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Ms. Nicole Ewing-Gavin and Ms. Melaney Seacat
City/County Water Study
Tucson, AZ

Dear Ms. Ewing-Gavin and Ms. Seacat:

The Tucson Mountains Association provides the following comments on the draft Action Plan for Water Sustainability:

We congratulate the Action Plan Team Members for the comprehensive and coordinated approach to water sustainability. Key components of a successful plan are addressed, including: 1) integration of land use, infrastructure and water resources planning, 2) effluent, 3) gray water, 4) water harvesting, 5) environmental needs, 6) sensitive riparian ecosystems, and 7) may other important elements for a sound effort. The plan does not rely on additional resources to move forward, but recognizes the need for additional partnerships and outside funding when feasible. We commend the group on the thoughtful integration across the various segments of the plan. Suggested modifications are noted below:

❖ Comprehensive Integrated Planning (page 11): Regarding the indicators of future success, it might be better to have the first indicator read as follows: Percent change in residential unites/acre. There may be instances where increased density is not the best outcome.

❖ Effluent Management (pp. 19-21, and 23--indicator number 2): We are concerned that the previous earmark of effluent for the environment should be maintained into the future as our population expands. According to the Phase 1 Report, water resources currently available total 217,444 acre feet. Only 10,000 acre feet have been reserved for the Conservation Effluent Pool, or 4.6 percent. We believe this CEP allocation, which is being revisited again in this draft report, should be the minimum amount earmarked for the environment. It should not be redirected to aquifer augmentation. This is true especially with regard to the contaminants (e.g., pharmaceuticals) that may remain in the effluent in the long run if it were placed in retention pools used to augment the aquifer. If more effluent is produced due to growth in the four designated areas, the additional resource logically could go to irrigation or additional environmental needs as development occurs.

Again, thanks for the opportunity to review and comment on the draft action plan.

Sincerely,
Dr. Edwin A. Verburg
President