



August 23, 2023

**Lisa Shipek**

Watershed Management Group, Executive Director  
1137 N. Dodge Blvd.  
Tucson, AZ 85716

Dear Ms. Shipek,

Thank you for your thoughtful feedback on the draft One Water 2100 plan. Tucson Water staff has responded to the comments you detailed in a letter submitted on July 21, 2023. Your original questions are listed below, and the responses are italicized.

**Pg 13**

-It's great to see the #3 guiding principle, specifically preserving and restoring riparian areas. While this is emphasized as a guiding principle here in the plan, it is not backed up with actions later in the plan. In order to move beyond lip service on this guiding principle, actions need to be outlined.

-It's good to see over-reliance on supplies of Colorado River pointed as one of the biggest vulnerabilities. More emphasis should be placed on local water solutions in the action plan.

*The strategies and implementation actions are based on the feedback Tucson Water staff received from the comprehensive community engagement campaign. Mayor and Council reviewed this campaign and the initial outcomes. One of the key outcomes was a focus on water supply and demand management strategies that support guiding principle #1. There are several strategies in Tucson Resilient Together that support the One Water 2100 guiding principle #3. Strategies and actions from both plans will inform the development of Plan Tucson, the City's general plan update.*

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-The plan, informed by Tucson Water's scenarios & the community survey, leaves out essential aspects of One Water, leaving out riparian and groundwater restoration actions. "The survey focused on supply and demand management strategies as they were the areas identified as the most important and most uncertain in the scenario planning processes."

-Under Surface Water Strategies: I wonder how these strategies align with leaving water in the Colorado River for the health of the Colorado River and a more balanced system? Instead of maximizing benefits to the Colorado River, how about balancing benefits with the health of the Colorado River ecosystem.

-Under Groundwater Strategies: Suggest partnering with SCWC. How can SCWC's watershed plan help inform this plan?

*The One Water 2100 draft plan was developed for Tucson Water's service area. Tucson Water's partnership with SCWC was added to the draft that Mayor and Council will discuss on September 9, 2023.*

**Pg 18**

-It says" Several metrics were developed to evaluate progress on Plan implementation and are shown in the table below." I'm wondering where is the table?

*The Mayor and Council draft includes an edit that makes the location of the metrics table easier to find.*

-“The gpcd metric will also be a key indicator of whether demand is being reduced.” Why not set a target for GPCD, to motivate the community to conserve water? WMG has set a target of 40 GPCD for residential to significantly reduce or eliminate our need for Colorado River Water.

*The scenario projections in Chapter 4 show a GPCD reduction from 119.5 in 2024 down to 99.5 in 2100.*

**Pg 19**

-This is a great explanation of why One Water. I'd like to see this plan address ecosystem needs. This does not currently show up in the action steps.

*Please see the response above about why the strategies and actions focus on water supply and demand management approaches.*

-The plan calls out the importance of collaboration between organizations and the community, but there are no specific strategies or actions to back this up. For example, there is no reference and/or support of the Santa Cruz Watershed Collaborative's Watershed Restoration Plan (adopted 2022) which includes goals and specific strategies; Tucson Water is a partner of the Collaborative.

*Please see the response above about calling out Tucson Water's partnership with SCWC in the Mayor and Council draft.*

**Pg 21**

In the Section, About Tucson Water: The Plan should acknowledge that the City of Tucson derives its land and groundwater from the dispossession of ancestral lands and waters of the Tohono O'odham. This in turn led to the Southern Arizona Water Rights Settlement Act (SAWRSA) and spurred an extension of the Central Arizona Project to San Xavier District. Prior to the construction of the Central Arizona Project, groundwater diversions by City of Tucson non-Indian water users drastically undermined the Nation's federal reserved rights in Avra and Santa Cruz valleys, and damaged or destroyed related cultural, environmental, and agricultural uses of this water especially at San Xavier District. SAWRSA settled the Tohono O'odham Nation's water rights claims to a little over 100,000 acres - less than 1/20th of the reservation lands, but it did not address all of the inequities caused by prior pumping. The Nation is currently in negotiations with the United States and others to settle the rest of the Nation's water rights.

*A land acknowledgment was added to the Mayor and Council draft.*

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The plan does not recognize there are seasonal and perennial flowing rivers in the Tucson basin. This recognition is essential, to recognize there are surface waters in the Tucson basin, and therefore the Surface Waters section of the plan should address the health and sustainability of local surface waters.

“The Tucson region is located along the Santa Cruz River and its tributaries. Prior to 1880, this was the primary water source for Tucson. With increasing development, groundwater use increased leading to declining groundwater levels, resulting in the disappearance of natural perennial surface-water flows.”

*Surface water in the context of the draft One Water 2100 plan refers to our water supply. Colorado River water is the only surface water supply source. It is delivered through the Central Arizona Project, recharged into the aquifer, and recovered to meet the demands of Tucson Water's customers.*

**Pg 53**

The plan pays lip service to the ecosystem benefits of their projects, like the Santa Cruz Heritage project, without any actions in the plan to enhance riparian ecosystem health.

“The Santa Cruz River Heritage Project is an excellent example of how Tucson Water is committed to provide “fit-for-purpose” water resources for community and ecosystem benefits. The project, which launched in 2019, adds approximately 3,150 AFY of treated recycled water to the Santa Cruz River at a point south of downtown near the heart of the City. The added water brings perennial flow to this portion of the river after 80 years of no surface flow and fosters abundant native vegetation and wildlife along with recreational and economic opportunities.”

*Please see the response above about why the strategies and actions focus on water supply and demand management approaches.*

**Pg 70**

The Drought Preparedness and Response plan should consider local drought factors, not just levels in Lake Mead. Here is an opportunity to address that through the One Water Framework. Local groundwater levels, local surface flows, and local rainfall should all influence our drought response.

*The Drought Preparedness and Response Plan is updated every five years. The outcomes of the Arizona Reconsultation Committee will be included in the next drought plan update.*

**Pg 83**

- Why doesn't the plan consider local surface water flows? Like Sabino, Tanque Verde, Rillito, Santa Cruz, Cienega?

*Please see the response about surface water above.*

**Pg 93**

-Under Affordability, Accessibility, and Social Justice Strategies: The significant reductions in water deliveries from Lake Mead contemplated under some Plan scenarios and the Proposed SEIS action alternatives may lead Tucson, Sahuarita, and Avra Valley farmers to a return to the previous status quo, with impacts to federal reserved rights that meet or exceed the historic damage suffered by the Nation. The Plan should commit to minimize any further impacts to the Tohono O’odham Nation’s federal reserved rights.

*Thank you for this comment on the draft plan.*

**Pg 98**

Here are specific strategies we recommend to be added to the Surface Water Implementation Actions. In parenthesis are references to the Santa Cruz Watershed plan where these strategies are mentioned.

-Help protect and restore shallow groundwater areas and their corresponding historic and current surface flows (e.g. Sabino, Tanque Verde, Cienega, Rincon)

-Enhance stormwater infiltration in arroyos and shallow groundwater areas (pg 54 and 61 of SCWC Plan)

-Review and update floodplain preservation policy to enhance floodplain infiltration for groundwater recharge opportunities (pg 55 and 62 of SCWC Plan)

-Balance (not maximize) the benefits of our Colorado River allocation for Tucson with the health of the Colorado River itself

-Support environmental flow local policy development (pg 66 of SCWC Plan)

-Increase allocation of water to the Conservation Effluent Pool to support surface flow restoration opportunities. The Conservation Effluent Pool is currently 10,000 acre feet and could be doubled to 20,000 acre feet.

**Pg 99**

Here are specific strategies we recommend to be added to the Groundwater Implementation Actions. In parenthesis are references to the Santa Cruz Watershed plan where these strategies are mentioned.

-Enhanced stormwater recharge near shallow groundwater areas

-Create targeted conservation programs for people living in shallow groundwater areas (pg 56 SCWC plan)

-Work with water providers and other water utilities using groundwater to develop “shortage sharing agreements” during periods of local drought (pg 56 SCWC Plan)

-Partner with Santa Cruz Watershed Collaborative to implement Watershed Restoration Plan

*Tucson Water is a partner in the SCWC*

**Pg 100**

Here is a specific strategy we recommend to add to the Recycled Water Implementation Actions. In parenthesis are references to the Santa Cruz Watershed plan where these strategies are mentioned.

-Treat and manage recycled waters to support riparian systems and shallow groundwater recharge (SCWC Plan pg 57)

- For RW-2-G “Beneficially use all recycled water within the Tucson AMA.” What is considered beneficial use? Are surface flows and groundwater recharge considered beneficial use?

*As a water utility, Tucson Water considers several beneficial uses of recycled water for our customers. In stream recharge like the Santa Cruz River Heritage project, constructed recharge like the South Houghton Area Recharge Project, and treating recycled water to drinking water standards are all beneficial uses.*

Cordially,



John Kmiec  
Director  
Tucson Water