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August 23, 2023

Michael Guymon

Tucson Metro Chamber, President & CEO
212 E. Broadway
Tucson, AZ 85701

Dear Mr. Guymon,

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 20, 2023. Your original questions are listed in bullet points below and the responses are italicized.

- Provide an overview of Tucson's current water situation, including the entities involved (Pima County Wastewater, Tucson AMA, Private Water Companies, Irrigation Districts, TO and PY nation water settlements, and state land), in the Executive Summary.

Tucson Water has more than enough water to meet projected demands in all four future scenarios detailed in Chapter 4. The scenario projections are summarized in the draft One Water 2100 plan that Mayor and Council will discuss on September 6, 2023. The entities involved in regional water management are listed on p. 11.

- Utilize the data presented within the document to visually represent the four future scenarios of water diversification and supply, along with the correlation between water use and population growth up until 2100.

The scenario projection graphs are in Chapter 4.

- Improve page efficiency by avoiding repetition of sentiments and figures.

The draft One Water 2100 plan that Mayor and Council will discuss on September 6, 2023, has been edited with this in mind.

- Enhance community engagement by involving the business community in the stakeholder process and representing a wider range of sectors throughout the document, including those listed in Table 1-2, or page 124 of the Plan's Appendices.

Table 1-2 in the Scenario Planning Technical Memo Appendix is a list of stakeholders invited to the series of scenario planning workshops held in 2021. A wider range of stakeholders that represented numerous sectors were also invited to participate in a conservation workshop held in 2019 and the series of strategy workshops held in 2022. These organizations will be listed in the acknowledgements for the Mayor and Council draft.

The Town Hall and three surveys were open to everyone in the community.

- Consider old and inefficient infrastructure, such as underground piping, as water supply vulnerabilities, considering the impact of "smart meters" in identifying weaknesses in existing infrastructure on page ES-4, section ES.7.

A more detailed list of vulnerabilities, like infrastructure, is listed in the scenario planning section of Chapter 2. Smart Meters will give customers more timely alerts about leaks on their side of the meter, but they cannot identify infrastructure vulnerabilities like leaks in larger pipes on the utility side of the meter. An ongoing utility project has been identifying aging infrastructure and potential leaks for a few years now.

- Clarify certain phrasing and terms used in the document, such as "business connections" under Economic Variability on page 2-2, section 2.2.1.

This language is clarified in the Mayor and Council draft.

- Include stakeholder input and revision processes from entities like CWAC, SAHBA, etc., to demonstrate transparency and reflect the feedback provided by these entities. This information may be relevant on page 2-6.

This suggestion is incorporated into the Mayor and Council draft.

- Provide a clear rationale for focusing on Green Stormwater Infrastructure and expanding stormwater fees, considering the expected increase in precipitation



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intensities and the need to accommodate extreme events. Include a cost/benefit analysis of infrastructure expansions funded by increased utility fees.

American Rivers and ECONorthwest provided a green infrastructure cost benefit analysis for Tucson Water in 2018. Please see the attached report.

- Highlight the relevance of economic development in the region, as it can drive advancements in technology, innovation, and entrepreneurship, especially considering the statistically valid survey's emphasis on researching modern technologies and approaches.

The importance of economic development is a key aspect of the Quality of Life guiding principle.

- Address unintended consequences mentioned of changes to water rates for certain water users mentioned in section 5.4.1 on page 5-9, ensuring equity in participation.

Affordability and equity are called out in another guiding principle of the plan. These concerns are always centered in any discussions about rate changes.

- Provide clarity on how the thresholds for priority levels varied in each question administered in both the online and statistically valid survey.

Priority levels were determined by the number of survey respondents that prioritized each strategy.

- Include a visual representation of current losses within Tucson Water's distribution system due to leaks and other inefficiencies, in line with the mention of Non-Revenue Water management and increased audits in section 4.2.6, page 4-8.

This information was added to the draft One Water 2100 plan that Mayor and Council will discuss on September 6, 2023. Non-revenue water losses are typically 6% to 9% per year.



- Offer examples of "new programs targeting commercial customers" mentioned in 4.2.1 on page 4-6 to provide clarity and context.

Tucson Water staff is developing an ornamental or non-functional turf rebate program and other landscaping incentives for commercial customers.

- Explain the impact of new developments and updated requirements when referencing the "decoupling" of Tucson and average gallons per capita per day (gpcd) in 4.1.1 on page 4-2.

This information was added to the draft One Water 2100 plan that Mayor and Council will discuss on September 6, 2023.

- Clarify the intentions of the Plan regarding stormwater infrastructure and its quantification to determine its benefits and contribution to delivering reliability, reinforcing resiliency, enhancing the community's quality of life, achieving affordability, accessibility, and social justice, and ensuring public confidence with safe, high-quality water supplies.

Green stormwater infrastructure and the Storm 2 Shade program reduces our community's reliance on Colorado River water and improves our climate resilience through shade canopy.

- Evaluate the effectiveness of mandates on the business/development community for conservation, considering low participation in the gray water system rebate incentive program, and other mandates and incentive programs to follow because of this Plan's implementation.

One of the next steps for One Water 2100 will be a more thorough implementation plan that builds on Chapter 6. We will take this comment into account as we develop implementation projects. In the meantime, the following technical memos in the Mayor and Council draft appendix include cost benefit analyses:

- *Benefits and costs of the reclaimed system*
- *Conservation projections*
- *Smart metering*

- Clarify if groundwater from TARP and the Advanced Oxidation Process Facility has started supplementing the reclaimed water system, given that it is now 2023 as mentioned in 3.3.5 on page 3-9.

This clarification will be included in the Mayor and Council draft.

- Provide further details about Tucson Water's 2023 application to modify its Designation of Assured Water Supply (DAWS), as it serves as a baseline for future efforts, as mentioned in 3.3.2 on page 3-8.

The application process with ADWR is iterative and has not been finalized yet.

- Specify the relative expenses, levels of effort, implementation timelines, and costs for potential capital, O&M, and cost-to-service associated with each implementation strategy listed in Chapter 6, using more specific indicators like approximate dollar amounts, months to complete, etc.

One of the next steps for One Water 2100 will be a more thorough implementation plan that builds on Chapter 6.

- Page 5-5, Section 5.3.2 states that Agriculture, mining, and new development were of greatest concern regarding conservation among statistically valid survey respondents. It would be beneficial to include the breakdown of these uses in Tucson.

Language will be added to the Mayor and Council draft that addresses this comment.

Population growth is part of the scenario projections in Chapter 4.

- Page 4-11, Section 4.5.1 mentions the current zoning and planned and potential annexations of the Tucson Water Obligated Service Area, however, it would be helpful to demonstrate the infrastructure needs within these areas and how adequate infrastructure will be accomplished in the implementation of this plan along with the accomplishments of various conservation goals included within the plan.



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The Water Use Projections Appendix details anticipated infrastructure needs. Tucson Water's Capital Improvement Program is updated every year during the department's annual budget update for Mayor and Council. The capital budget also has forecasts in five year increments. The CIP for fiscal year 2024 and the following years include a wide variety of projects that replace aging infrastructure, ensure continued protection of water quality, and the design and construction of new infrastructure that will convey renewable resources to support anticipated growth.

- Good water governance and effective stakeholder engagement are inextricable. There should be a separate discussion on amending the governance model for a regional water authority that considers various stakeholders in the region.

Tucson Water appreciates your thorough and thoughtful feedback on the draft plan.

Cordially,

A handwritten signature in black ink that reads 'John Kmiec'.

John Kmiec
Director
Tucson Water