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David Godlewski
SAHBA, President & CEO

Shawn Cote
Tucson Association of Realtors, Government Affairs Director

Courtney LeVinus
Arizona Multihousing Association, President & CEO

Dear Mr. Godlewski, Mr. Cote, and Ms. LeVinus,

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 25, 2023. Your original comments are listed in bullet points below and the responses are italicized.

➤ **Use of Data to Support Fact-Based Decisions** – We request the incorporation of additional data to support and prioritize the recommendations in the Plan. It is through the use of detailed information and data that decisions can be made to properly manage our water resources.

➤ **Use Cost-Benefit Analysis to Guide Decisions** – The recommendations in the Plan and/or the resulting implementation strategies, should be supported by a cost-benefit analysis whenever possible. While properly managing our water is the top priority, the specific actions necessary to do so should bear a close relationship to the cost or impact.

One of the next steps for the One Water 2100 will be a more thorough implementation plan that builds on Chapter 6. We will take the above two comments into account as we implement the strategies. The following technical memos in the appendix include cost benefit analyses:

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

➤ **Increased Emphasis on Water for the Economy** – Ensuring there is enough water for the economy and conserving our resources is not, in our opinion, mutually exclusive. The Plan’s Vision Statement properly acknowledges “quality of life” as a foundational element of One

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Water. This cannot be achieved if our residents do not have high-quality and high-paying jobs. As technology improves, especially in water recycling for industrial uses, our water resources can be maximized while ensuring that Tucson also maintains a thriving economy.

➤ **Partner with the Private Sector** – Several of the recommendations (i.e., new policies and regulations referenced in the Plan) will affect private sector businesses especially those in the real estate, development and construction industries. It is highly probable that the recommendations in the Plan will increase the cost of doing business for most businesses in these areas. We are happy to facilitate meetings with our members and other professionals in order to help achieve the goals of the Plan while mitigating its impacts on their businesses, consumers and other stakeholders.

We genuinely appreciate your offer to help discuss specific impacts to your members as we implement the plan. We will definitely keep you in the loop as we develop more specific implementation projects and actions that support the One Water 2100 goals and strategies.

- **Regional Collaboration & Community Engagement** – Southern Arizona’s water future and success is linked through the coordinated efforts of multiple local governments, tribal partners, municipal and private water providers, private sector businesses, stakeholder groups and the public. As noted in the Plan, a substantial portion of Tucson Water customers are located outside of the City limits. Tucson Water’s infrastructure crosses multiple jurisdictional boundaries and relies upon agreements with other water providers. In particular, the nature of the bifurcation of water and wastewater between the City and County, and the effort to secure the Tucson Water CAP allocation were predicated on regional collaboration and benefits to the community as a whole. As noted in section 1.1, engagement of stakeholders and partners is a distinguishing feature of the One Water approach. We agree and recommend the Plan and its implementation steps emphasize the importance of regional collaboration and community engagement.
- **Optimizing Water Re-Use is Key for Our Future** – The City of Tucson and Tucson Water are pioneers in community wide conservation efforts. We recognize these efforts, along with Tucson’s commitment to protecting Lake Mead and advocating for Arizona’s share of Colorado River Water, have put us in a strong position for a secure water future. This position would be enhanced with increased efforts to recycle water including utility scale direct potable reuse. These strategies are the next frontier in water management. They require careful study and evaluation before implementation, however, we urge Tucson to expedite this effort in light of significant benefits.

Thank you for supporting this strategy.

- **Celebrate and Acknowledge Increased Water Efficiency/Conservation in New Construction** –

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Increased efficiency in development and construction has helped Tucson “decouple” demand from population growth. Homes and apartments built today use much less water than the majority of existing Tucson Water customers. Yet, there will still be continued improvements to conserve even more water like the use of Water Sense plumbing fixtures. Yet there are several references in the Plan – primarily attributed to responses from survey respondents – that frame new development as a burden to our water supplies. We encourage Tucson to embrace the efficiencies of new construction and minimize such references. We also seek to work proactively with Tucson to identify strategies where we can work together.

More context about the efficiency of new homes was added to the One Water 2100 draft plan.

Specific Comments

ES.2, 1.3.3 Guiding Principles – We request a stand-alone guiding principle in support of Economic Growth as it is as important as the other guiding principles outlined in the Plan.

More context about how our water resilience supports a strong economy and our overall quality of life will be added to the One Water 2100 draft plan.

ES. 4 – Community Engagement – Our organizations understand the challenge of trying to balance the appropriate level of community and stakeholder engagement with having a process that is so cumbersome it makes completing the Plan impossible. Now that the draft has been completed, we offer our assistance in coordinating meetings with leading business organizations to discuss and consider how the planned activities will affect the professional sectors. This type of coordination would help develop lasting partnerships needed over the life of the Plan.

Your assistance with coordination and outreach is greatly appreciated and we will reach out once the implementation process begins.

ES.7 Vulnerabilities and Opportunities – We ask Tucson Water to reconsider references that imply Population growth, land use changes and economic factors are vulnerabilities. The Plan accurately notes that total water use in the region has declined despite a growing population (and by inference land use changes and a growing economy). With respect to population growth, we suggest it would be more appropriate to say modify the language to something like, “unforeseen population growth that exceeds historic norms and future projections.” Similarly with land use changes which require approval by governmental bodies. It seems very unlikely that there would be a future scenario where land use changes that adversely impact water are approved. It might be more appropriate to say, “a breakdown in the current process for approving land use changes that results in less efficient use of water.” It is also unlikely that future economic factors or commercial uses of water are less efficient than present use. It might be more appropriate to say, “failing to consider water management as part of our economic development strategy.”



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We will provide more context in the plan about demands that exceed historic norms and future projections.

ES.9 – Prioritization of Strategies, RW-1 – New Policies for Water Reuse – We request Tucson Water work with private sector representatives, including real estate developers, on the evaluation and development of policies for water reuse in buildings. Additional data, such as quantification of water savings, should be incorporated into this process along with use of a cost-benefit analysis.

Your feedback will be incorporated into the forthcoming implementation plan, and we welcome the opportunity to explore onsite reuse. Support from your members will help us determine best practices for this strategy.

ES.9 – Prioritization of Strategies, RW-2 Purifying Recycled Water – As referenced in our ‘General Comments,’ strategies like purifying recycled water for custom uses appear to have great potential. We appreciate the inclusion of this strategy and encourage the evaluation of such being one of the highest priorities.

Thank you for supporting this strategy.

ES.9 Prioritization of Strategies, S-2, S-3 Stormwater – We request Tucson Water work with private sector representatives to include those regulated and impacted by the Plan on evaluation and development when seeking to integrate or expand stormwater standards, policies, and practices. For example, Pima County is currently updating their landscaping code. This creates an opportunity to standardize storm water design requirements across all jurisdictions.

Tucson Water and Planning and Development Services recently began working on a Low Impact Development code review process. We will reach out to your members to get your feedback once the project is underway.

ES.9 – Prioritization of Strategies, S-4 Stormwater – Please provide details of proposed increases to the storm water fees.

This strategy was included in the initial list but was not prioritized through the survey and community engagement process.

ES.9 – Prioritization of Strategies, I-2 Demand Incentives - We request Tucson Water work with private sector representatives regulated and impacted by the Plan on evaluation and development of incentive programs for residential and commercial customers.

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Your offer to engage with us on the evaluation and development of incentive programs is greatly appreciated. Tucson Water staff will reach out during the implementation phase next year.

1.2.1 Role of the Plan – In addition to the items listed, partners should use the Plan to guide economic development strategies and facilitate job growth, which we recommend be included as another bullet point.

The third guiding principle of the Plan cites the importance of economic growth in our overall quality of life. This section refers to how the Plan could support a regional partnership.

1.3.2 Water Management Key Partners – Tucson Water may want to consider including other partners such as the University of Arizona, Central Arizona Water Conservation District, PAG and the City of Tucson PDS department.

These organizations will be identified in the draft that Mayor and Council will discuss on October 17, 2023.

1.3.3 Water Service Area Policy – The practical effects of the Water Service Area Policy are not as straightforward as implied in the Plan. For many landowners, it has been challenging and time consuming to navigate the policy and has left them uncertain about the ability to secure water service and move forward with their projects. We request an opportunity to discuss this matter with Tucson Water and work collaboratively to find mutually beneficial solutions to these challenges.

Tucson Water staff implements this policy as it has been laid out by Mayor and Council.

1.4 Tucson Water Management History – Has the City explored constructing additional recharge areas so that excess CAP can be “banked” into the aquifer immediately? Has Tucson Water considered a recharge location in the Southeast? If so, we would like to better understand the pros and cons identified in this analysis.

The Central Arizona Project does not convey water to the southeast side of the Tucson Water service area. The recharge basins in Avra Valley have already been expanded to accommodate our full allocation of Colorado River water delivered through the Central Arizona Project.

There are Capital Improvement Program projects underway to design and construct pipelines that can convey renewable Colorado River water to the southeast side and reduce reliance on



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groundwater in that area. Tucson Water is also looking at funding options to increase storage of reclaimed water at the Southeast Houghton Area Recharge Project.

1.4.2 Drought Preparedness and Response Plan – We agree the Drought Plan will need to be updated once Post 2026 Operational Guidelines are developed. Further, we encourage the Plan strategies be based on actual impacts to Tucson Water’s resources, not solely on shortage conditions of the River. Stakeholders, including those in the development and business communities, should be engaged as the Plan is implemented and updated. As previously mentioned, not issuing PADA’s in a Tier 2 Shortage may result in development projects being stalled and impeding housing supply and job creation.

Tucson Water staff will reach out when the Drought Plan is updated.

Plan Tucson – While it is clear throughout the document, in this section it may make sense to clarify “the Plan” referenced at the start of the third sentence is referring to the One Water Plan and not Tucson’s general plan.

The next version of the draft One Water 2100 Plan will make a clearer distinction about the Plan Tucson update.

Collaborative Plan Development, Phase 4 Plan Implementation – What, if any, is the CIP in the 2024 Fiscal year? Has Tucson Water anticipated the amount needed annually for the next 5, 10, 25 years? Are there opportunities for stakeholders to support these planning efforts and corresponding investments?

The CIP is updated every year during the Tucson Water’s annual budget process. 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.

Chapter 2 Collaborative Plan Development, Phase 3 – Community Engagement & Adoption – We agree presentations were made upon request, a Townhall was conducted, and workshops were hosted. This effort solicited broad community input. Similarly, the final Plan will benefit from targeted stakeholder meetings, especially with the development community, to solicit specific input and feedback on Plan concepts and recommendations.



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The community engagement campaign, including a public comment period on the draft plan and targeted stakeholder workshops, was reviewed with Mayor and Council in July 2022 and January 2023.

2.2.1 Economic Variability - Please clarify definitions of “business connections.”

The description of economic variability was clarified in the draft that Mayor and Council will discuss on September 6, 2023.

2.3.6 Public Surveys – We appreciate the efforts to survey residents to garner insight on their perceptions and priorities. This information is beneficial to the planning process. References to the statistically valid survey appear multiple times. Who was the national research firm that did the survey and are the cross-tabs publicly available? Will Tucson Water continue to do this type of research over the life of the plan to continue to gain insight from the public?

The Statistically Significant Survey Results Appendix contains more details about how Probolsky Research conducted the survey. There will be an annual progress report for One Water 2100.

3.1.1 Tucson One Water Cycle – In this chapter, or another appropriate place in the Plan, there should be a chart that notes the volume of water, in acre feet, of Tucson Water Supplies for type of water. For example, the pie chart in Section 3.1 includes percentages for Colorado River, Remediated Groundwater, Recycled Water and Stormwater Harvesting but it does not specify a volume of water in acre feet.

The totals in acre feet will be specified in the draft plan that Mayor and Council will discuss on October 17, 2023.

3.2 Surface Water – We recommend including language that reflects a commitment to working collaboratively with ADWR, CAP, water providers and other stakeholders on a unified approach for the State’s position with respect to negotiations with other basin states and the Bureau of Reclamation.

This language will be clarified in the draft plan that Mayor and Council will discuss on October 17, 2023.

3.2.1 Central Arizona Project – We recommend including language that emphasizes



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the City's support for the CAP and preserving as much of the Colorado River allocation to the CAP as possible during negotiations with other basin states and the Bureau of Reclamation.

Strategy SW-3 addresses this comment.

3.2.2 Recharge and Recovery – Are there potential issues or impacts to our aquifer (i.e., a hydrological disconnect) with the Tucson Water locations for recharge and recovery?

No, the majority of our recharge and recovery sites are not hydrologically disconnected.

3.3 Groundwater – Does the Plan quantify the total amount of allowable groundwater to be pumped (separate from LTSCs)? If not, please include. Please clarify water level declines due to groundwater pumping by others.

This is specified in the assured water supply section of Chapter 3. Water level changes are specified in the map in the groundwater section of Chapter 3.

3.3.2 Assured Water Supply – Please provide links/documentation for the 2023 application to modify Designation of Assured Water Supply (DAWS).

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

3.3.3 Central Arizona Groundwater Replenishment District – Is there an amount of groundwater that could be pumped associated with Tucson's membership in the CAGR? If so, how much annually?

If necessary, Tucson has a membership allowance of 12,500 acre-feet per year.

3.3.4 Arizona Water Banking Authority – Please describe if any of the 847k+ acre-feet of LTSC's will be available to augment or enhance Tucson's water resources in the time of shortage conditions. Who has priority for accessing AWBA credits?

Based on our population, we anticipate that a substantial portion of the water stored in the water bank will be available to the City of Tucson if it is needed to meet demand.

3.3.5 Remediated Groundwater – Please specify the amount of water currently and

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potentially available through TARP and all other groundwater resources.

Tucson Water can remediate over 10 million gallons per day. Total groundwater remediation volume is undefined.

Water Quality – There is no question that water quality is of utmost importance, but it should also be recognized that there are costs for achieving quality, especially when Tucson Water’s operational targets exceed Federal requirements. Tucson Water should provide detailed information about the cost differential between meeting and exceeding Federal requirements for treatment. How many of the 230 drinking water wells are located within the Tucson City limits?

85 of those wells are within the City limits.

Reclaimed System – What is the total amount of reclaimed water available to the City of Tucson/Tucson Water? We request to be part of the process that contemplates expanded use of reclaimed water. What are the costs and benefits of expanding the reclaimed water system?

The amount of reclaimed water delivered to Tucson Water customers varies from year to year. The range is typically between 10,000 acre feet and 18,000 acre feet depending on demand. More details on the costs and benefits can be found in the “Benefits and Costs of the Reclaimed System” Appendix.

3.4.1 Groundwater Recharge – How much of the City’s wastewater entitlement is discharged into the Santa Cruz without earning LTSCs? We request the City of Tucson/Tucson Water prioritize seeking ways to earn LTSCs from this water source. What is the cause of the groundwater pumping that has resulted in a decline in groundwater levels to a point that necessitated SHARP?

About 16,000 acre feet of Tucson Water’s treated wastewater entitlement is not earning storage credits because it is flowing past the Trico Stream gage each year. SHARP allows Tucson Water to recharge more reclaimed water. This facility was not built because of declining groundwater levels.

3.4.2 Greywater – The cost for homebuilders to comply with this requirement is approximately \$1,000 per home, but past City research findings have shown that very few homeowners use grey water even when they are aware their home is plumbed for this

purpose. This appears to be an example of where the concept sounds better than the resulting water savings.

3.4.5 Direct and Indirect Potable Reuse – How much water are we talking about that could be reused? What would the effect of this use be on our system? How would it alleviate strain on other supplies? What are the costs to do this? We see this as an important strategy and request the City of Tucson/Tucson Water expedite the planning and potential implementation of DPR/IPR.

The unused treated wastewater noted above could be used for this purpose. The biggest benefit is increasing available renewable supplies. The price for each acre foot of water purchased from the Central Arizona Project provides a reference point for the value of this potential water supply. The costs will be evaluated through the implementation plan.

Stormwater – How much water are we talking about? What is the cost of realizing this type of water use? A cost-benefit analysis should be completed when looking to develop new policies and regulations. We request to be part of any policy/regulatory development in this area. There appears to be no reference to the commercial rainwater harvesting ordinance which could be acknowledged as an accomplishment in this area.

3.5.1 Residential Rainwater Harvesting Rebate Program – What is the amount of potable water that has been conserved through this program? What is the cost of the program?

The rainwater harvesting program has saved 126 million gallons since 2011. The current savings cost per acre foot for this program is \$4,000. More information about historic savings and costs for this program can be found in the 2022 Conservation Program Report (<https://www.tucsonaz.gov/Departments/Water/Conservation>). More information about projected savings from this program can be found in the Conservation Projections Appendix of the One Water 2100 draft plan.

3.5.2 Storm to Shade Program – What is the cost-benefit analysis related to this program?

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

3.7 Future Water Supply Opportunities – Please clarify whether “recycled water” referenced here includes IPR/DPR. If it does not, IPR/DPR should be identified specifically.



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The One Water 2100 draft plan that Mayor and Council will discuss on September 6, 2023, includes this clarification.

4.1 Today's Water Uses – As the plan notes, while 93% of Tucson Water customers are residential, they consume only 70% of the water. New policies, regulations and conservation strategies should be geared toward non-residential customers. Additionally, we request a detailed analysis of single-family usage compared to multi-family usage.

Please see the Conservation Projections Appendix for further details about single family and multifamily usage.

4.1.1 Per Capital Water Use Trends – We applaud Tucson Water for acknowledging that water demand has been “decoupled” from population growth and the extent which residential demand has declined. We ask that the City of Tucson/Tucson Water further consider the decline in water usage for new homes compared to existing homes in future policy development and conservation strategies.

We appreciate your support for this part of the plan and will take this trend into account during the implementation phase.

4.2 Water Conservation – We request the use of a cost-benefit analysis when developing new conservation strategies and/or evaluating existing strategies and programs.

The Conservation Projections Appendix includes some preliminary information about the costs and benefits of these strategies. The implementation phase will consider this information as well.

Rebates and Incentives – What are the amounts of each rebate and the total amount available? What would be the budget for new rebate programs? Do those monies need to be allocated by Mayor & Council from the General Fund?

The conservation program is funded by the conservation fee on the utility services statement. Rebates are not allocated through the General Fund. More information about the conservation program budget and individual rebates can be found in the 2022 Conservation Program Report (<https://www.tucsonaz.gov/Departments/Water/Conservation>)



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4.2.5 Advanced Metering Infrastructure – The analysis that is referenced in the Plan should be shared publicly. It appears the concept of “Smart Metering” is highly cost effective, but we’d like to see if the analysis supports that assertion. We would also like to know how this program is to be funded. This is likely a conservation strategy that could become a top priority. For the near term, has Tucson Water considered offering smart meters to customers who would like to purchase them for their homes?

Tucson Water was recently awarded a Water Infrastructure Finance Authority grant to expand our smart metering pilot project for select commercial customers. The Smart Metering Technical Memorandum was added as an appendix to the draft One Water 2100 plan that Mayor and Council will discuss on September 6, 2023.

Non-Revenue Water Management Program – Please provide estimates of what amount of water is being lost through non-revenue or unaccounted for water.

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.

4.2.6 Drought Preparedness and Drought Plan – We applaud Tucson Water for acknowledging that shortages on the River do not immediately translate to shortages for Tucson’s water supply. This point is critical and should be continually emphasized with policymakers and the public.

Please note that shortages that affect our contract with the Central Arizona Project will affect our supply of Colorado River water.

4.2.7 Drought Policy Responses – To our knowledge, the amount of water savings associated with these tactics and the cost of implementation have not been quantified. If this has been done, we request that this information be shared. It is essential to have direct and proactive collaboration with the development community when developing the Low Impact Development ordinance and Net Zero Water policy.

Tucson Water and Planning and Development Services will host stakeholder discussions to inform the Low Impact Development code consolidation project. Tucson Water staff has only been directed to research Net Zero Water policies.

4.3 Future Water Demand Vulnerabilities – How is acquiring other service areas a vulnerability? Is there an increase in supplies if Tucson Water acquires water companies?



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If so, has that increase been projected and how much water does that potentially represent?

Any acquisition of new service areas will create new demands particularly if they are not associated with renewable water supplies.

4.5.3 Supply and Demand Comparison – We appreciate the efforts Tucson Water has undertaken to analyze different future scenarios. This will help us make thoughtful and sound management decisions. Does Tucson Water or the Plan contemplate potential change in classifications or categories of water rights, particularly agricultural rights (conversion to residential)? If so, how would this impact water supplies?

Tucson Water is not contemplating any changes to classifications of water rights.

5.3 Water Supply Strategies – Please provide examples of opportunities for increasing the amount of locally developed and controlled water supplies.

Expanding our use of treated wastewater for Advanced Water Treatment and/or IPR and stormwater are two opportunities for increasing the amount of locally developed and controlled water supplies.

5.3.2 Groundwater Strategies – New homes and residential communities have significantly improved water efficiencies. This has allowed our population to increase without straining our water resources. This is not reflected in references from survey respondents who feel new development is a “threat” or usage needs to be “curbed.” We ask Tucson water to consider removing these references if they represent a small segment of respondents and are not actual recommendations or strategies.

5.3.4 Stormwater – We recommend the references to written comments to expand stormwater capture to existing homes and businesses and mandating onsite capture and storage be removed or clearly identified as not being actual recommendations or strategies as part of the Plan.

These two comments refer to responses received through the survey. They are included in the plan to provide a summary of how people responded to the survey questions.

5.4.2 Monitoring and Mandates - We prefer the “carrot” approach to the “stick” approach. Any mandates should include a cost-benefit analysis and quantify the amount of water



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saved. The city is already mandating water efficient fixtures. We also ask to be included in the development of water use guidelines that are referenced as a medium priority.

Your offer to participate in the stakeholder engagement for the implementation phase is genuinely appreciated.

I-1 Low Income Support – What is the funding source for low-income assistance programs? Are there opportunities to work collaboratively on improving outreach?

These programs are funded through Tucson Water's annual budget process. We genuinely appreciate your offer to collaborate with outreach.

I-3 Modifying the Tiered Rate Structure. Should be approached cautiously with sensitivity to potential unintended consequences on those with the least ability to pay.

Affordability and equity are one of the plan's guiding principles.

Chapter 6 – Implementation – Please provide a dollar amount range for the low to high relative expenses.

Tucson Water will conduct cost-benefit analyses in a timely manner as future projects are identified and moved forward in the implementation phase. Construction prices vary widely depending on when projects take place.

6.1 Implementation Actions – Cost-Benefit and feasibility analysis for these proposals is critical and must be undertaken immediately.

Table 6.3, RW-1 C – We asked parties that would benefit from incentives for on-site reuse be included in the development of these actions.

Stakeholders will be included as specific projects are developed during the implementation phase.

Table 6.4, S-2 B – We encourage Tucson to include representatives from the private sector in the Regional Taskforce.

Tucson Water and Planning and Development Services will host stakeholder discussions to inform the Low Impact Development code consolidation project.

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Cordially,

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

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