

July 20, 2023

RE: Comments on the One Water 2100 Plan Draft

To whom it may concern,

The Tucson Metro Chamber recognizes and appreciates the vital importance of water conservation in the lower basin region, particularly in Southern Arizona. We commend Tucson Water for setting the national standard in these endeavors. These efforts extend beyond water conservation and significantly impact community resilience. However, it is crucial to recognize that water conservation initiatives can either impede or facilitate economic growth in our region.

As an organization, one of the Chamber's primary objectives is to foster economic development and ensure the continued prosperity of our region. We believe that achieving this goal requires active engagement with stakeholders, particularly the business community. It is imperative that the implementation of the One Water 2100 Plan reflects the best interests of all constituents within the Tucson Water service area, and this can only be accomplished through meaningful collaboration with stakeholders, including the business community.

In consideration of what has been discussed in the One Water 2100 Plan draft, the Chamber would like to offer several suggestions for your consideration. Being that the Plan seeks to guide Tucson Water's financial planning, conservation practices, and policy decision-making, we believe that several aspects of the plan necessitate additional review and/or further engagement from the business community.

- 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.
- 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.
- Improve page efficiency by avoiding repetition of sentiments and figures.
- 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.
- 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.
- Clarify certain phrasing and terms used in the document, such as "business connections" under Economic Variability on page 2-2, section 2.2.1.
- 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.

- Provide a clear rationale for focusing on Green Stormwater Infrastructure and expanding stormwater fees, considering the expected increase in precipitation intensities and the need to accommodate extreme events. Include a cost/benefit analysis of infrastructure expansions funded by increased utility fees.
- 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.
- 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.
- Provide clarity on how the thresholds for priority levels varied in each question administered in both the online and statistically valid survey.
- 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.
- Offer examples of "new programs targeting commercial customers" mentioned in 4.2.1 on page 4-6 to provide clarity and context.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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.



- 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.
- 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.

Again, we want to reiterate that we appreciate the time, effort, and energy that has gone into the creation of this plan and for all the efforts of Tucson Water to push initiatives and programs that best secure our region's water surety. CAVSARP is a great example of Tucson Water using innovative thinking to maximize our CAP allotment to safely deliver water to its customers. We appreciate your partnership and your careful consideration of these listed suggestions.

Sincerely,

A handwritten signature in black ink that reads "Michael Guymon". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Michael Guymon
President & CEO