

TUCSON GUAC FOURTH MANAGEMENT PLAN RECOMMENDATIONS

The recommendations herein apply only to the Tucson Active Management Area, and are not intended for other AMA's.

SAFE YIELD

Problem:

The TAMA is not forecast to meet its statutory mandated goal of Safe Yield by the established time line – 2025 under the three scenarios outlined in the recent ADWR Assessment.

Summary:

Municipalities have been effective in reducing their groundwater consumption through use of conservation measures, available CAP allocations and effluent. Other sectors still face challenges in reducing groundwater dependency. A combination of limited delivery infrastructure, supply availability and insufficient legal/contractual access to renewable water supplies make it difficult for agricultural and industrial water users to be able to positively contribute to achievement of the Tucson AMA management goal.

Maximizing the utilization of effluent, a significant resource, also remains elusive.

Infrastructure required to extend delivery of CAP allocations to other portions of the AMA are non-existent-

The 4th Management Plan provides the AMA with an opportunity to meet our goal by 2025, but presentations to date lack guidance to effective options to reduce reliance on groundwater consumption and increase use of potentially available renewable water supplies-

#1 Recommendation:

The 4th Management Plan, and ultimately the 5th and final plan, should provide clear guidance and direction to the AMA and GW users toward achieving and then maintaining Safe Yield. Statutory, regulatory, alternative supply issues and other impediments that prevent all sectors from reducing reliance on groundwater must be identified and overcome.

#2 Recommendation:

ADWR has stated that, for the 4th Management Plan, no changes to the Agriculture or Industrial programs will occur. Rather than leave the Agricultural and Industrial sectors unassisted by the

Department, ADWR should work with all sectors to identify and develop programs that facilitate use of alternative water sources that can assist in the achievement of Safe Yield. These efforts will address not only the infrastructure needs but the supply needs as well. Incentives need to be more fully explored.

DELIVERY INFRASTRUCTURE

Problem:

The lack of infrastructure prevents some groundwater users in the AMA, including TAMA CAP subcontractors from accessing alternate supplies, adding to the continuing overdraft of groundwater.

Summary:

Portions of the AMA have no delivery system to receive alternate supplies water. For example, Green Valley and Sahuarita have struggled for years with concerns over a declining aquifer but there has been no means to transport water from the CAP terminus to places where it could be used directly or recharged.

Some Agricultural operators could use effluent instead of groundwater but lack a delivery system or the financial resources to do so.

While not in the Water Delivery or Construction business, the Department of Water Resources has an interest in replacing groundwater use with an alternate supply that this additional infrastructure could achieve. Any extension of the delivery system would also greatly enhance recharge and recovery activities.

#3 Recommendation:

The Department of Water Resources, in conjunction, with the CAWCD should assist the local parties to initiate the delivery of alternate supplies to groundwater users.

EFFLUENT

Problem:

Considerable effluent is lost or underutilized annually in the TAMA.

Summary:

Effluent is an important ingredient in the AMA's Alternate Water supply inventory but much is still unused. A Blue Ribbon Panel, appointed by the Governor completed a

detailed study of Alternative supplies including effluent. It outlines the problems and opportunities associated with this resource and proposes a number of recommendations that need implementation.

In our AMA, for example, a large amount of effluent is currently discharged into the Santa Cruz River bed north of the Ina Road Facility. This prevents its use as an alternate to groundwater pumping. While having little jurisdiction over the effluent issue, DWR has an interest in reducing unnecessary groundwater pumping which this effluent could supplant.

#4 Recommendation:

The Department of Water Resources should actively support coordination between the parties and provide a forum for evaluating and resolving any outstanding issues preventing maximizing effluent use within the AMA.

#5 Recommendation:

ADWR should revisit and implement the recommendations made by the Governor's Blue Ribbon Panel.

(http://www.azwater.gov/AzDWR/waterManagement/documents/BRP_Final_Report-12-1-10.pdf)

SAFE YIELD PROGRESS REPORT

#6 Recommendation:

ADWR should use the most recent supply and demand data (2012 or even 2013) to develop the path(s) to Safe Yield in the 4th Management Plan.

#7 Recommendation:

ADWR should devise a program that will encourage all new industrial development to utilize renewable supplies.

#8 Recommendation:

Prior to finalizing the 4th management Plan for the Tucson AMA, and annually thereafter, ADWR should provide an annual overdraft accounting and also provide, retroactively, overdraft numbers for the past decade. We need to know clearly what each sector's contribution to the Safe Yield goal is year-to-year.

ADWR PROPOSALS

Problem:

ADWR has presented the GUAC with two proposals for consideration, but has not replied to questions and concerns regarding both.

Summary:

ADWR has proposed two “white papers” for consideration, the first dealing with the Municipalities GPCD, and second with the “Cut to the Aquifer”.

Regarding the GPCD paper, our most successful conservation efforts in the AMA have occurred through this program. The paper suggests imposing a standardized GPCD across the AMA for those Municipalities using the GPCD program that would significantly simplify ADWR’s accounting problems associated with this program but at the price of any future individual provider conservation efforts.

The “Cut to the Aquifer” program raised a number of unanswered questions and comments suggesting the program could have serious negative effects on recharge of CAP water deliveries or effluent in the AMA.

#9 Recommendation:

ADWR must clearly define the problem, the situation, and the economic impacts that each of its draft proposals is designed to solve or improve, as well as its role in advancing the AMA’s Safe Yield Management Goal. Only then can the TAMA water community evaluate the proposals and provide meaningful suggestions for inclusion in the 4th Management Plan.

#10 Recommendation:

Until the Department addresses the previous recommendation, the Tucson GUAC does not recommend inclusion of either the changes to the GPCD program or the Cut to the Aquifer program in the 4th Management Plan as other than issues for further study.