



December 30, 2015

VIA EMAIL & U.S. Postal Service

**CITY OF
TUCSON**
TUCSON WATER
DEPARTMENT

Jeff Tannler (jmtannler@azwater.gov)
Arizona Department of Water Resources
3550 N Central Avenue
Phoenix, AZ 85012

Re: Review Comments Regarding the Tucson AMA Draft 4th Management Plan

Dear Mr. Tannler:

Tucson Water would like to thank ADWR for the opportunity to provide comments on the Draft 4th Management Plan for the Tucson AMA. We understand and encourage the purpose and goals that Management Plans represent for sound stewardship of water resources in Southern Arizona. Please consider the specific comments below as you collect and address the many comments you will most likely be receiving from others in the Tucson AMA.

Table 2-8

Under Ground Storage Facilities: We suggest removing Clearwater from CAVSARP line. Perhaps the text could spell out CAVSARP and SAVSARP with the acronyms, then use the acronyms in all other references (see Table 8-5).

Section 5.2

History: There should be mention of the decline in demand from 2007 through 2013. The demand in 2013 is roughly equal to 1996 (TAMA Total); however, there were 230,476 more people in the TAMA as of 2013.

Section 8.4.2

Fourth Paragraph: It should be noted that of the 90% of effluent that belongs to the City of Tucson, there are currently five other providers that have signed IGAs with Tucson and are entitled to effluent generated from their service areas: Town of Oro Valley, Metro Water, Town of Marana, Flowing Wells, and Spanish Trails.

Section 8.7

Renewable Water Supply: Effluent long-term storage credit does not have a 5% cut to the aquifer requirement. This is an incentive to encourage storage of effluent in USFs or GSFs.

Section 12.2.4

Injection Recharge: The WCPA discourages the injection of raw CAP water in the City of Tucson, but not injection of recovered CAP delivered through the drinking water





distribution system. However, at this time it is cost prohibitive to use injection technologies on a large scale.

Again, we appreciate the opportunity to provide comments to this Draft of a highly anticipated 4th Management Plan. Tucson Water looks forward to continued collaboration with ADWR on this and on the many other important issues facing both the Tucson AMA and Arizona as a whole.

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Respectfully,

Sandy Elder
Deputy Director
Tucson Water Department

cc:

Albert Elias, Acting Director, Tucson Water
Scott Clark, Deputy Director, Tucson Water
Jeff Biggs, Water Administrator, Tucson Water
Andrew Greenhill, Intergovernmental Affairs Manager, Tucson Water
Wally Wilson, Chief Hydrologist, Tucson Water

