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February 8, 2010

Mayor Bob Walkup
Tucson City Hall
255 West Alameda Street
Tucson, Arizona 85701

Dear Mayor Walkup and Council members:

City-County Water and Wastewater Study Phase II Report

Tucson Audubon represents approximately 4000 member households, located primarily in Tucson and Pima County. We have a vision of communities in southeast Arizona connected to their natural world through birds, and who use our natural resources in a sustainable manner. Since 1949 we have been working with all in the community to conserve natural resources for use and enjoyment by all.

Tucson Audubon asks you to support the City-County Water and Wastewater Study Phase II Report and direct City staff to proceed, in cooperation with Pima County and other participants, to implement the recommendations of the report.

It is our view that the reporting of Phase II of the Water and Wastewater Infrastructure, Supply and Planning Study is a major contribution to water resource planning for the Tucson region.

We have a number of observations as you complete your deliberations and decide on approval of the final Phase II report. The report:

- acknowledges a balance is necessary as we address various needs for water
- includes "Respect for the Environment" as a key part of the report
- supports the need for a permanent water policy
- acknowledges the need for cooperation between City and County

Our comments related to each of these topics are provided below:

Balanced Requirements—Tucson Audubon congratulates the Committee on its recommended adoption of a new paradigm that provides a balance across all requirements for water—people, economics, and environment. This is especially important in light of the potential limited supply of water we will face in the future.

Recognizing these limitations, water conservation is consistent with a recent U.S. Geological Survey report that documents decreasing water use in the West (with the exception of four states), intense disputes, and ecosystem collapse tied to dwindling supplies. There are different techniques that will aid conservation measures, including rainwater harvesting focusing on roof and paved areas (both residential and commercial hardscapes), maximizing use of gray water for residential and commercial applications, and restoration of selective wetlands or washes with native plantings. Open space acquisition will further address the preservation of important conservation areas designated in the Sonoran Desert Conservation Plan.

Respect for the Environment. The citizens of our region have a long history of supporting the preservation of our natural environment, perhaps most strongly and recently exemplified by the values of the Sonoran Desert Conservation Plan. In particular, we support the recommendations made regarding riparian habitat, groundwater dependent ecosystems, and the perpetuation of the Conservation Effluent Pool (CEP). The goals and recommendations outlined on pages 29-36 of the report clearly outline a path forward to utilize prudently and thoughtfully our water supply to protect and encourage riparian habitat and groundwater dependent ecosystems.

The CEP is an essential tool needed to achieve these goals and we encourage the Mayor and Council to quickly finalize and approve the IGA between the City of Tucson and Pima County outlining how this CEP will be managed and utilized to benefit riparian habitat. These efforts could contribute to the recharge of our aquifer as they provide enhanced habitat for the pollinators and other species that comprise the ecosystem we depend on.

The American Bird Conservancy's Top 20 Most Threatened Bird Habitats in the U.S., 2007, (<http://www.abcbirds.org/newsandreports/habitatreport.pdf>) states that Southwest riparian habitats are the fifth most threatened habitat type in the nation. The Arizona Game and Fish Department (AGFD) stated that 90 percent of the Arizona's riparian habitat had been lost in their November 1988 issue of Wildlife Views (AGFD 1988). Habitats along watercourses are known for their high density and diversity of animal species. Some 80 percent of vertebrate species in the region are dependent on riparian areas for at least part of their life cycle; over half of these cannot survive without access to riparian areas (Noss and Peters 1995). Arizona and New Mexico have lost 90 percent of pre-settlement riparian ecosystems (Fig 3e) (Noss et al. 1995). In Arizona and New Mexico, more than 100 federally and state listed species are associated with cottonwood-willow bosques (Noss and Peters 1995). The regional decline of 36 of the 82 breeding bird species, which formerly used riparian woodlands, is a case in point (Nabhan and Holdsworth 1998, p. 2, State of the Desert Biome). Implementation of the recommendations of the Committee's report will provide opportunities for credit with the Habitat Conservation Plans (HCPs) being developed by both the City and County.

In March 2000, the City and County entered into a Supplemental IGA relating to effluent. Section V of this IGA described the CEP, with the City and County making up to 5,000 acre-feet of effluent available for riparian projects during the first five years and up to 10,000 acre-feet of effluent per year available thereafter. The City, Pima County, the Town of Oro Valley, and the Metropolitan Domestic Water Improvement District currently contribute to the CEP for the use of riparian projects. The new IGA currently being finalized is an important addendum to the 2000 IGA in that it more clearly outlines how the CEP will be managed and distributed to specific riparian projects. This increased specificity regarding implementation will lead to improved management of the CEP, benefiting both the owners of this resource and the riparian habitat on which it depends.

Permanent Water Policy—The City of Tucson has an interim water policy that was developed by Councilwoman Regina Romero and endorsed by the Council. Both the Council and Pima County need to adopt permanent water policies. We believe the Committee's Phase 2 Report, especially with regard to Goal 2 (Direct Growth to Suitable Areas) and Goal 3 (Integrate Land Use Planning and Water Resources Planning), provide a sound framework to consider the key elements for a water policy.

Cooperation—City of Tucson has invested considerable resources into projects such as the development of two Habitat Conservation Plans, El Rio Medio, Tres Rios del Norte, the restoration of Arroyo Chico and the Atterbury Wash, and policies and ordinances that protect riparian habitat. The Phase II Report serves as an important complement to these projects. As noted on page 64, one of the important successes to already surface as a result of this study is an increased level of cooperation between the City and the County. By supporting the Phase II Report and endorsing its implementation, all of these other projects will also benefit from the resultant shared expertise and increased cooperation.

At the public hearing on January 11, some expressed concern with the “broad philosophical statements” and potential cost implications of the Phase II Report. To Tucson Audubon, it is clear from a review of the Technical Papers that the Committee’s recommendations are supported by the scientific and technical data presented by staff. We commend the Oversight Committee and the City and County staff for their excellent professional work.

Thank you for your consideration of our suggestions as you shape the future of the Tucson area through water resources planning. We strongly recommend that Mayor and Council adopt a joint resolution with the Pima County Board of Supervisors approving the recommendations described in the Phase II Report, and direct city and county staff to report back to their respective governing body with a detailed action plan and schedules for translating the action plan into ordinances, resolutions, and intergovernmental agreements.

Sincerely,



Dr Paul Green
Executive Director
Tucson Audubon



Christina McVie
Conservation Chair
Tucson Audubon

cc: **Ward 1 Council Member Regina Romero**
Ward 2 Vice Mayor Rodney Glassman
Ward 3 Council Member Karin Uhlich
Ward 4 Council Member Shirley Scott
Ward 5 Council Member Richard Fimbres
Ward 6 Council Member Steve Kozachik

Ramón Valadez, Chairman, Pima County Board of Supervisors

