

Stakeholder Ad Hoc Committee Suggested Revisions

Revisions in green were brought forward by Lisa Shipek, Co-Executive Director at Watershed Management Group. For each revision, Lisa outlines which revisions she does or does not support and the reasons why.

Potential Revision 1.A.1: Change the large quantity water user threshold from 10,000 ccf/month annual average.

- Strongly Support
- A decrease in the large water user threshold is important to regulate more large water users. There are just a few users at 10,000 ccf/month already in Tucson. We should not encourage any new ones of that size, with Colorado River cuts and drought.

Potential Revision 1.A.2: Use a tiered system to define large quantity water users and apply different levels of review and approval requirements for the various tiers.

- Strongly Do Not Support
- All applicants should follow the same intentional review, ensuring review by Mayor and Council, opportunity for public comment, and no reduction of the City's groundwater aquifers or surface waters of our rivers.

Potential Revision 2.A.1: Add an explicit requirement that proposed water use does not reduce City's groundwater aquifers or the surface waters of the Santa Cruz, Rillito, Tanque Verde Creek or Sabino Creek

- Strongly Support
- Policies that prevent our aquifer from being mined and our rivers from being dewatered are long overdue. Our waters are sacred, and Tucson's recent gains in restoring aquifer levels and river flows must be protected from corporations.

Potential Revision 2.A.2: Add a requirement that all potable and reclaimed water use should be offset with wet-water strategies located within the Tucson Basin, including offsite water conservation and savings such as in-channel recycled water recharge projects to support river health and green stormwater infrastructure for enhanced infiltration. The Ordinance should also include an exemption for this requirement for the following categories of users that provide a public benefit to the Tucson community: hospitals, public health facilities, and educational institutions.

- Strongly Support

- A net zero or net positive water policy for development is a policy direction that will ensure a sustainable water future, especially in the face of Colorado River cuts and drought. The exemption for hospitals etc. should meet at least a 50% offset.

Potential Revision 2.A.3: Revise section 27-20 C2d as follows: "That the applicant has agreed to use reclaimed water to offset at least 30 percent of its water use or at such other percentage as the Director determines is the maximum use of reclaimed water that is warranted for the applicant's facility, given the facility's proximity to the reclaimed water system."

- Strongly do NOT support
- I support a 100% or more offset of potable and reclaimed water (net zero / net positive water policy). This policy should ensure reclaimed water is valued the same as groundwater, surface water, stormwater, and potable water - a One Water framework.

Potential Revision 2.B.1: It should be stated that the use of reclaimed water should not occur at the detriment to environmental flows, including the Santa Cruz River.

- Strongly Support
- Reclaimed water should be prioritized and protected for release into our rivers, to restore flows, recharge our aquifer, and restore cooling riparian forests.

Potential Revision 2.B.2: Increase the current proximity requirement for using reclaimed water from one mile of the Tucson Water Reclaimed Water Distribution System.

- Somewhat do NOT support
- Reclaimed water's highest use is for groundwater recharge and river flow. This can best be done by releasing into Tucson's rivers. We should minimize the amount of infrastructure that is using reclaimed water for consumptive use by corporations.

Potential Revision 2.C.1: Users should be required to conduct onsite treatment of reclaimed water.

- No need to include my name/affiliation for this item

- Is this meant to say, "Users should be required to conduct onsite treatment of wastewater."? If so, then that is a good requirement for on site water efficiency.

Potential Revision 2.C.2: Onsite treatment of effluent generated by the customer to recycle for onsite use should be included as an option to offset water use.

- Strongly Do Not Support
- This is an efficiency measure, but does not offset their consumptive water use.

Potential Revision 2.D.1: The application requirements should identify acceptable techniques and technologies (e.g. Best Management Practices) for inclusion in the Conservation Plan.

- Strongly Support
- We should define the strategies that will help build a sustainable water future for our community, including green infrastructure, water harvesting, native landscapes, river floodplain acquisition and restoration, restoration of river flows.

Potential Revision 2.E.1: The applicant's Conservation Plan should include a cost-benefit analysis combined with an environmental benefit analysis in order to better assess and articulate the economic benefits.

- Somewhat support
- The applicant's Conservation Plan should articulate the benefits to the environment, the Tucson Basin watershed, and public well-being, as well as economic benefits.

Potential Revision 3.A.1: Add language to indicate that the Tucson Water Director should have the ability to administratively approve any water conservation plan that meets all of the requirements of the Ordinance.

- Strongly Do Not Support
- All applicants should have the same intentional review with opportunity for public comment, review by CWAC, and review and approval by Mayor and Council.

Potential Revision 3.A.2: Include a requirement that the Tucson Water Director must reply to an application within 90 days.

- Strongly do Not support
- The intentional review of future Large Water Users should not be rushed or timebound.

Potential Revision 3.A.3: Include a requirement that CWAC (Citizens' Water Advisory Committee) is a water conservation plan reviewer.

- Strongly support

Potential Revision 3.A.4: Include a requirement that the Tohono O'odham Nation is a water conservation plan reviewer.

- Strongly Support
- The Tohono O'odham Nation and the Pasqua Yaqui are from a long-line of indigenous communities that have stewarded the Santa Cruz watershed since time immemorial. We must respect their sovereignty and their review and guidance should be mandated.

Potential Revision 3.A.5: Include extensive public engagement as part of the water conservation plan review process (in addition to the opportunity for public comment on applications during M&C meetings).

- Strongly Support
- Collectively, the community has worked tirelessly for decades to conserve water. The community should have opportunity to give input on a water user that will diminish water needed for the health of the local people, animals, forests, and rivers.

Potential Revision 3.A.6: Include a flow chart or process diagram of the Ordinance application submittal, review, and approval process.

- No need to include my name/affiliation for this item

Potential Revision 3.B.1: Add a requirement for third party annual review of large quantity water user's annual use and water offsets.

- Strongly Support

Potential Revision 3.B.2: Add a requirement that third party annual review is presented to CWAC.

- Strongly Support
- A presentation to CWAC would increase transparency and accountability to the community.

Potential Revision 4.A.1: Customer annual water use should be publicly available

- Strongly Support

Potential Revision 4.B.1: The penalties should be simplified, with fewer steps and levels of sanction.

- Strongly support

Potential Revision 4.B.2: There should be fewer violation levels, with the non-compliant customer proceeding to water restriction before four violations.

- Strongly support

Potential Revision 4.B.3: Suspension of service is too severe, and should be changed to some type of service restriction, rather than cut-off.

- Strongly do not support

Potential Revision 4.B.4: The language should be strengthened from the Director *may* suspend service, to something stronger such as "shall" suspend service, when users are in violation

- Strongly Support

Potential Revision 5.A.1: Include a requirement that applications should include projections of regional aquifer impacts via the water and energy nexus.

- Strongly Support
- All policy should protect our local aquifer as well as regional aquifers.

Potential Revision 5.A.2: Specify that the application must be inclusive of all water uses, including cooling and ancillary water uses.

- Strongly Support
- This provision ensures there are no hidden water uses that are detrimental to nearby watersheds.