



October 17, 2016

Dear Pima County Board of Supervisors,

The Community Water Coalition writes on behalf of concerned Tucson community members to ask that you vote “no” on the IGA approving a proposed project to divert up to 7,000 acre feet annually (AFA) of effluent from Pima County’s Tres Rios Water Reclamation Facility (WRF) to a Groundwater Savings Facility (GSF). This proposed diversion would cause a significant loss of riparian habitat along the Santa Cruz River,¹ resulting in an economic loss to the County and undermining the County’s goal of protecting critical riparian habitat.²

We understand and acknowledge the Bureau of Reclamation’s (BOR) obligations to the Tohono O’odham Nation under the Southern Arizona Water Rights Settlement Act (SAWRSA) and its goal of securing 100% credit for effluent recharge. However, we assert that this goal can best be achieved through current, ongoing efforts – in coordination with BOR, Pima County Flood Control District, the Community Water Coalition, and other partners – to develop a system for allowing 100% recharge credits while maintaining surface flow in the Santa Cruz. Stakeholders are evaluating the possibility of a pilot constructed recharge project in the Santa Cruz that would allow for both maintenance of surface flows and 100% credits. Such a project would render the need for the proposed diversion obsolete, because BOR would achieve its goal of receiving 100% credit for effluent through the constructed facility.

The costs of the proposed diversion project outweigh the benefits to Pima County. BOR predicts that the proposed diversion will “cause the loss of 78.8 acres of riparian habitat along a distance of 5.04 miles.”³ Of the 14.65-mile effluent-dominated portion of the Santa Cruz, this 5-mile stretch contains 57% of the riparian habitat.⁴ Pima County’s in-lieu fee cost per acre for Regulated Riparian Habitat disturbance ranges from

Coalition Members

- ACE Charter High School
- Center for Biological Diversity
- Cienega Watershed Partnership
- Coalition for Sonoran Desert Protection
- Community Food Bank of Southern Arizona
- Desert Watch
- Native Seeds/SEARCH
- Physicians for Social Responsibility
- Primavera Foundation
- Save the Scenic Santa Ritas
- Sierra Club - Rincon Group
- Sky Island Alliance
- Tucson Audubon Society
- Tucson Mountains Association
- Watershed Management Group

Business Affiliates

- Borderlands Brewing Company
- Crow Communications Group, Inc.
- Ethos Rainwater Harvesting
- La Cocina
- Wells Fargo Advisors – Jennifer Mills
- Technicians for Sustainability

¹ Bureau of Reclamation Draft Environmental Assessment for the Construction of a Temporary Project to Reuse up to 7,000 Acre Feet Annually of Effluent at a Groundwater Savings Facility in Pima County, <file:///Users/kat/Downloads/trsgsfdea.pdf> p. 36

² “The District seeks to protect riparian habitat for future generations and to maintain the area’s quality of life for residents of Pima County... Riparian areas provide many community benefits, including reduced risk of flooding and erosion, higher biological diversity, recreational opportunities, increased groundwater recharge...” See <https://webcms.pima.gov/cms/One.aspx?portalId=169&pageId=64197>

³ See Final Environmental Assessment, p. 17 <https://pima.legistar.com/View.ashx?M=F&ID=4723148&GUID=923A6916-0835-4BC2-A968-67B9DFDD5BAE>

⁴ See Final Environmental Assessment, p. 17 <https://pima.legistar.com/View.ashx?M=F&ID=4723148&GUID=923A6916-0835-4BC2-A968-67B9DFDD5BAE>

\$22,000 to \$40,000.⁵ This amounts to a \$1.7 million estimated impact on the low end, or \$3.1 million on the high end. This estimate does not account for the intangible loss to the community – for example, BOR’s Final Assessment acknowledges that “the quality of recreation, such as wildlife and bird watching activities” will be adversely affected.⁶ Meanwhile, BOR stands to gain \$1.2 million in credits from diversion to a GSF.⁷

We urge the Board of Supervisors to deny a project with this level of impact on critical riparian habitat, especially without evaluating and approving a mitigation plan first. We would echo comments of Pima County Flood Control Director and Chief Engineer Suzanne Shields⁸ from February 2016, citing concerns about the substantial impacts on riparian habitats and the lack of a plan for mitigating those impacts. According to the Pima County Mitigation Standards and Implementation Guidelines, if a disturbance lies within an Important Riparian Area (IRA) then the Board of Supervisors is required to approve a mitigation plan.⁹

Finally, this purportedly temporary project poses the risk of becoming permanent once BOR begins using the credits it seeks to obtain here to meet its SAWRSA obligations. The infrastructure investment to build and maintain the diversion is not insignificant, and the chance that BOR will abandon the diversion and return the effluent to the Santa Cruz after five years is small. We urge the County to consider the long-term impact of diverting flow that sustains rare and valuable riparian habitat. Diverting any amount of surface flow from the Santa Cruz for any period of time will adversely impact native vegetation and species. The proposed diversion is a shortsighted project that will harm Pima County, its riparian habitats, and its people. A viable alternative will be for BOR to receive 100% credits for constructed recharge, so as to disincentivize removing water from the Santa Cruz.

The Community Water Coalition welcomes the opportunity to work with BOR, Pima County, and other entities on developing alternative solutions that will not adversely impact the Santa Cruz River and the communities that depend on it.

Sincerely,



Randy Serraglio
Chair



Louise Misztal
Secretary



Lisa Shipek
Treasurer

⁵ Regulated Riparian Habitat Offsite Mitigation Guidelines for Pima County, November, 2011

https://webcms.pima.gov/UserFiles/Servers/Server_6/File/Government/Flood%20Control/Rules%20and%20Procedures/Riparian%20Habitat%20Mitigation%20Plan%20Guidelines/offsite-guidelines.pdf p. 4

⁶ See Final Environmental Assessment, p. 30 <https://pima.legistar.com/View.ashx?M=F&ID=4723148&GUID=923A6916-0835-4BC2-A968-67B9DFDD5BAE>

⁷ “At the going rate for selling credits, the feds could earn about \$1.2 million a year by diverting 7,000 acre feet.” http://tucson.com/news/science/environment/santa-cruz-stretch-pitted-against-competing-water-needs/article_b0af7cfd-a3d4-5d1a-ac93-9c9081006d8d.html

⁸ See Appendix D, Comments Received, p. C-12 <https://pima.legistar.com/View.ashx?M=F&ID=4723148&GUID=923A6916-0835-4BC2-A968-67B9DFDD5BAE>

⁹ See Appendix A, Mitigation Process Summary and Riparian Habitat Mitigation Plan Submittal Checklist, https://webcms.pima.gov/UserFiles/Servers/Server_6/File/Government/Flood%20Control/Rules%20and%20Procedures/Riparian%20Habitat%20Mitigation%20Plan%20Guidelines/onsite-guidelines.pdf