



COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER
130 W. CONGRESS, TUCSON, AZ 85701-1317
(520) 740-8661 FAX (520) 740-8171

C. H. HUCKELBERRY
County Administrator

April 23, 2009

Sandra Eto
PXAO-1500
Bureau of Reclamation
Phoenix Area Office
6150 West Thunderbird Road
Phoenix, Arizona 85306

Re: Draft Environmental Assessment on the Proposed Community Water Company Central Arizona Project Water Distribution System and Recharge Facility

Dear Ms. Eto:

I would like to acknowledge my appreciation for the work the Bureau of Reclamation (Bureau) has put forth to date helping Pima County address this region's water supply needs, and to thank you for the opportunity to comment on this draft Environmental Assessment. The primary source of water for Green Valley is from groundwater within the Santa Cruz Valley; this is supplemented with two sources of renewable supply. One source, effluent water, is fully committed to golf course irrigation. The other renewable water source is Central Arizona Project (CAP) water. The CAP delivery system currently terminates at Pima Mine Road, ten miles north of Green Valley. Due to the ever increasing water demand in this area it is vital that sound, cooperative, cost effective measures are implemented to ensure that CAP water is delivered to and for the benefit of the Green Valley area. We found this draft Environmental Assessment to be deficient in evaluating the viable options available for CAP delivery and providing meaningful analysis of the environmental and social economic impacts. Instead, this document presented a cursory environmental assessment of one option that is financially supported by a private mining company while discarding all other options that could be more beneficial to the Green Valley area.

Numerous studies have established that the Green Valley area does not have a sustainable water supply given current groundwater pumping rates in the Upper Santa Cruz River Basin. The water table in Green Valley and the Upper Santa Cruz Basin has been declining, and is expected to continue at faster rates as water demand increases. As a region we look to the

Sandra Eto

Draft Environmental Assessment on the Proposed Community Water Company Central Arizona Project Water Distribution System and Recharge Facility

April 23, 2009

Page 2

Bureau for the leadership and foresight to help the Green Valley area meet its water supply needs now and in the future. Bureau support of a draft Environmental Assessment that overlooks viable alternatives for CAP delivery and augmentation while promoting delivery and recharge of CAP water which benefits a private mining company that would use it outside the area of hydrologic impact is not appropriate.

To help clarify our position the following comments are offered:

1. There may be a legally established disconnect between the proposed delivery of CAP water to the identified recharged site and Rosemont Mine.
 - a. The proposed 20-acre recharge site provides no hydrologic benefit to the Community Water Company (CWC). It is 2.5 miles away from CWC's service area and down-gradient of their wells. The proposed recharge site is, however, located immediately up-gradient from the planned Rosemont well field.
 - b. The report documents the beneficial rise in groundwater levels in the area resulting from the proposed recharge, however, it fails to acknowledge this recharged CAP water will be utilized and that there will be no long-term beneficial increase in groundwater depth. It is likely the recharged CAP water will commingle with local groundwater and be used by Rosemont Mine in the Santa Rita Mountains and Sonoita Valley watershed. Thus, CAP water will be exported to another unconnected watershed and will not benefit the declining water table in Green Valley.
 - c. As presented there is no guarantee that CWC's CAP allocation will enter the CWC Service Area unless "CWC needs to recover recharged water which will be affected by future water demands and water quality considerations" (p.10, lines 33-35). This means there is an uncertainty whether the 20" pipeline from the recharge site to the CWC service area, 2.5 miles to the east, will ever be built.
 - d. The report did not address the environmental impact for the recovery component. Presumably, CWC will need wells to recover their CAP allocation in addition to the 2.5 mile 20" pipe line.
2. The Environmental Assessment did not provide a rigorous evaluation of the alternative CAP recharge locations.
 - a. The descriptions and evaluation discussions of alternative recharge sites in the Green Valley area are cursory and dismissive without adequate evaluation. It appears that the proposed CAP recharge site was primarily chosen because Rosemont Mine has down-gradient supply wells that would benefit from a raised water table to export comingled CAP water and groundwater to their proposed mine in the Santa Rita Mountains and Sonoita Watershed.

Sandra Eto

Draft Environmental Assessment on the Proposed Community Water Company Central Arizona Project Water Distribution System and Recharge Facility

April 23, 2009

Page 3

- b. Discounting recharge on Arizona State Trust Land in close proximity to both the CWC service area and their recovery wells with a statement that it is too close to the Green Valley Wastewater Treatment Facility is short sighted. An evaluation of mounding from CAP recharge and well recovery is needed to determine the impacts to the Facility. Additionally, recharge in this area may have environmental benefits by reducing movement of the sulfate and TDS plume currently contaminating CWC wells.
- c. Potential recharge to the Santa Cruz River and its tributaries was eliminated based on one statement made by a Pima County employee related to problems associated with the introduction of non-native fish. No discussion was provided substantiating the claim or discussing options that would mitigate introduction of non-natives or the environmental benefits for undertaking this alternative. In a recent biological opinion regarding delivery of CAP water to the Gila River Basin, the U.S. Fish and Wildlife Service concluded that several conservation measures should and can be effectively used to control non-indigenous fish. In addition, the Bureau has successfully sponsored recharge of CAP at the Arroyos Project on the San Xavier District of the Tohono O'odham Nation that is tributary to the Santa Cruz River. To rule out riverbed recharge sites with a unsubstantiated single-source statement is short sighted and not in keeping with Environmental Assessment standards, especially when the U.S. Fish and Wildlife Service has indicated that riverbed recharge of CAP water can be viable if precautions are taken.
- d. In August 2008, Pima County, in cooperation with the Upper Santa Cruz Providers and Users Group, developed a scope of work to select and evaluate feasible CAP recharge sites for the Green Valley area. Technical site selection criteria including estimated infiltration rates, mounding potential, available storage capacity, groundwater quality, perched water table conditions and subsurface impeding layers, proximity to landfills and waste disposal sites, environmentally sensitive areas (cultural resources and biological sensitivity), potential to enhance riparian habitat, and land ownership. Conceptual layouts are to be developed for each facility selected. The layouts will provide plan views, sketches and profiles where needed. The acreage, period of recharge and estimated annual recharge volume are to be developed. Cost evaluations are also included.

A similar rigorous site selection process is what should be undertaken by the Bureau. Instead, this Environmental Assessment consists of carefully crafted word-smithing that highlights one alternative which has financial support. This document falls short of the comprehensive site evaluation, as described on pp.17-19, Section 2.6.3.

- 3. The location and construction of the proposed pipeline and CAP recharge site have problems that were not discussed in the draft Environmental Assessment including:

Sandra Eto

Draft Environmental Assessment on the Proposed Community Water Company Central Arizona Project Water Distribution System and Recharge Facility

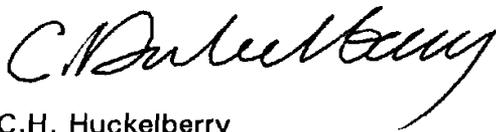
April 23, 2009

Page 4

- a. The proposed recharge facility is a 20-acre, 60-foot deep hole that is to remain in perpetuity. The carbon footprint required excavating such a hole, and disposing of the material was never discussed or compared to other alternatives.
- b. Impacts to Priority Vulnerable Species recognized by Pima County in its Sonoran Desert Conservation Planning effort were not mentioned for either the pipeline or the recharge site.
- c. Impacts of CAP recharge to adjacent domestic water users. The TDS content and higher corrosivity of CAP water will cause home plumbing to corrode and break faster.

We look forward to working cooperatively with your office to resolve the above issues and to successfully address the water supply needs of the Green Valley area. Should you have questions, please feel free to contact myself or Suzanne Shields.

Sincerely,



C.H. Huckelberry
County Administrator

CHH/jj

- c: John Bernal, Deputy County Administrator - Public Works
Nanette Slusser, Assistant County Administrator for Policy - Public Works
Suzanne Shields, Regional Flood Control District Director
Ursula Kramer, Environmental Quality Director
Linda Mayro, Cultural Resources Manager
Richard Grimaldi, Deputy Director, Environmental Quality
Tom Helfrich, Division Manager, Regional Flood Control District
Frank Postillion, Chief Hydrologist, Regional Flood Control District
Nicole Fyffe, Executive Assistant to the County Administrator