

**MARANA DMA 208 PLAN AMENDMENT  
COMMENT REVISIONS  
October 18, 2010**

SECTION/SUBSECTION	PAG COMMENT (JULY 2009 VERSION)	COMMENT RESPONSE/ PAGE LOCATION
<b>OVERALL COMMENTS</b>		
	Figures do not have page numbers, but are referenced by page number in the ADEQ check list.	Numbers have been added to figures and Check List.
	This 208 amendment does not have specific information about sewer conveyance system layout, treatment processes, exact locations, etc. These elements can easily be addressed in subsequent 208 amendments or consistency reports for individual facilities. Based on discussions at the Task Force meetings, the Town does intend to submit consistence reports for each of the facilities. Therefore, we recommend that this intent is noted in the DMA 208 amendment, because mention of the Town’s intent creates support for subsequent 208 submittals.	Specific treatment system information will be provided in subsequent consistency reports if required. This intent is noted in this 208 Amendment: Pg 1 ¶5 L6 Pg 2 ¶6 L6 Pg 4 ¶2 L4 Pg6 ¶1 L4 Pg46 ¶1 L5 Pg 50 ¶2 L4 Pg 51 ¶2 L3 Pg 51 ¶5 L1
	Likewise, because the Town has stated that it will be relying on interim treatment agreements with Pima County until Town facilities are built, please add text indicating the Town’s intent to have the planning area served by Pima County until such time as it can provide service independently.	Due to the results of the litigation, this discussion is no longer relevant.
<b>EXECUTIVE SUMMARY</b>		
	Acknowledge here, or elsewhere in the report, that, as necessary, the Town expects to submit consistency reports to gain 208 consistency for specific facilities described in this amendment.	Acknowledged: Pg 1 ¶5 L6 Pg 2 ¶6 L6 Pg 4 ¶2 L4 Pg6 ¶1 L4 Pg46 ¶1 L5 Pg 50 ¶2 L4 Pg 51 ¶2 L3 Pg 51 ¶5 L1
<b>BACKGROUND</b>		
	Demonstration of financial feasibility will depend on text later in the report that, among other items, describes solids handling costs, the fact that the reclaimed system will be part of a different utility, and that costs for pretreatment of wastewater are part of a subcontracted to Pima County.	Financial Section of the document has been revised to include only those elements relevant to the PAG 208 Plan Amendment: Pg 49, Financing
	Suggest changing “or establish” to “and establish”	Pg 4 ¶2 L6

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<b>INTRODUCTION</b>		
	Suggest spelling out DMA the first time the acronym is used.	Pg 1 ¶1 L2 Pg 5 ¶2 L5
	This statement is unclear... implies that existing effluent intergovernmental agreements, but this is not explicitly stated.	Pg 9 ¶2 L1
<b>NATURAL SETTING</b>		
	Suggest addition that the depths to groundwater are specific to the Town's planning area.	Pg 12 ¶6 L1
	Suggest removing the mention of sulfates because this is specific to mining contamination, and there are no such mines in the Town's planning area.	Removed from: Pg 13 ¶3 L1
	Since Cottonwood WRF is shown to be within the 100 year flood plain, suggest adding text to explain how it will be protected from flooding, or move the facility out of the flood plain on the map.	Flood plain issues for all WRFs will be addressed in the consistency report when final site location is made: Pg 14 ¶2 L3
<b>PROJECT DESCRIPTION</b>		
	Since this is a wastewater plan and the Town cannot currently manage all water resources, suggest stating that the Town state it will manage "wastewater resources", not water resources in the first line of this paragraph.	Pg 18 ¶2 L1
	Make sure that population numbers match those sited in the Executive Summary	Pg 19 ¶5 L5
	The reference to Figure 7 seems to be out of place, because figures 5 and 6 have not been referenced yet. Consider re-ordering the figures to remedy this problem.	New Figure (Figure 5) has been added to show residential septic areas: Pg 22 ¶1 L3
	Suggest providing the source of the protocol for determining how many EDUs would be assigned to each land use type.	Pg 24 ¶2 L1
	Recommend adding an asterisk indicating that the northern portions of basins 3 and 6, located in Pinal County, are within the CAAG planning area.	Pg 27, Table 2
<b>EXISTING CONDITIONS</b>		
	Recommend that a description of the ownership of the conveyance system and a brief write up on the transfer of that ownership from PC to the Town, based on the outcome of the litigation, be added here. Either a note that this text will be added or a mock paragraph could be added in order to fix this discontinuity. Upon resolution of the litigation this paragraph could be updated as part of the final amendment.	Outcome of litigation and discussion of existing system is provided: Pg 3 ¶3 L3 Pg 5 ¶4 L3

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	I could not identify the three high volume interceptors on a map. Having them on a map would make it easier to understand the geography of the system. It is unclear from this paragraph, why you might redirect the flows, because the concept of the transfer of conveyance from PC to the Town has not been introduced. (See last note to correct this discontinuity)	Due to the results of the litigation, these high flow interceptors located to the south portion of the planning area are no longer discussed: Pg 31 ¶1 L1
	Recommend adding the following text onto the first sentence “and is owned and operated by Pima County.”	Sentence revised: Pg 34 ¶5 L2
	Recommend adding the following text onto the first sentence “and is owned and operated by Pima County.”	Sentence revised: Pg 34 ¶6 L2
	Recommend that text be added to clearly state the Town’s perspective on the existing Marana facility and the choice not to incorporate it into any of the alternatives. Based on our discussions in Task Force meetings, the Town is concerned about the cost of upgrades to this facility in order to meet A+ reuse standards. In addition, discussions indicate that the outcome of the litigation between the Town and Pima County will affect whether the Marana facility is ultimately integrated into the operations of the Town.	Discussion regarding incorporation of the Marana WRF has been added to the text: Pg 7 ¶6 L5 Pg 35 ¶1 L2 Pg 37 ¶2 L3 Pg 49 ¶3 L1
<b>WATER RECLAMATION FACILITIES ALTERNATIVES</b>		
	Explanation about the Town’s plans for the existing Marana facility would clarify why it is not mentioned in any of the alternatives presented. Please see comment above. Language could also reflect that if future agreements between the Town and Pima County allow integration of the facility into the operations of the Town, a subsequent 208 amendment or consistency report will be prepared to reflect this adjustment.	Discussion regarding incorporation of the Marana WRF has been added to this 208 amendment: Pg 7 ¶6 L5 Pg 35 ¶1 L2
	Recommend noting that these costs do not cover recharge facilities or solids handling and which Town departments will be paying for these services. This was brought up at our July 6 <sup>th</sup> Scope of Work Task Force meeting.	Reuse components will be managed and financed by the Town water utility: Pg 48 ¶2 L2 CIP costs include solids handling: Pg 41, Table 7
	The detailed conveyance system is described but not shown in the amendment. Since sewer system maps are generally included in 208 amendments, we suggest adding a sentence saying that these will be shown in subsequent amendments or consistency reports for these facilities.	Pg 37 ¶2 L1
	Recommend clarifying some of the financial information here so that Table 7 can be better understood. (see note below)	Both Table 7 and the Financial Section of the document have been revised to include only those

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		elements relevant to the PAG 208 Plan Amendment: Pg 41, Table 7 Pg 49, Financing
	The following questions might be addressed by a few sentences, so that the reader better understands the Town’s plans and can better interpret Table 7. At the July 6th Task Force meeting, an Economist.com representative estimated that the latest capital plan assumes that the Town will issue over \$100 M in bonds to finance the wastewater collection and treatment system. Table 7 shows that \$43,500,000 will be “allocated to existing.” Does that mean that this will be paid with bond debt that will be folded into existing sewer rates? The table also indicates that \$44,920,000 will be “allocated to growth.” At the Task Force meeting, Town staff indicated that this cost will be paid by new connection fees, but is there also some payment of debt service by future customers? Based on a discussion at the July 6 Task Force meeting it would be useful to clarify if connections taken over from Pima County would be considered new connections and if they would pay any connection fees to cover the cost of Phase I improvements.	Both Table 7 and the Financial Section of the document have been revised to include only those elements relevant to the PAG 208 Plan Amendment: Pg 41, Table 7 Pg 49, Financing
	In the first bullet: Tucson Water currently supplies reclaimed water to Dove Mountain. It is unclear if you are suggesting that the Town would be taking over serving reclaimed water to this area.	Bullet Deleted
	It is currently unclear, if the amendment is citing SROG because the Town proposes it as model for regional wastewater management in the Tucson region.	Section Deleted
<b>WATER RECLAMATION FACILITY PROCESS ALTERNATIVES</b>		
	It is unclear if all of these process alternatives are still being considered for the various facilities, or if the Town has a preferred process. Suggest adding text to explain that the particular process, and associated process diagrams, will be included in subsequent 208 amendments or consistency reports for each of the planned facilities.	Pg 46 ¶1 L5
<b>RECLAIMED WATER</b>		
	In Task Force meetings, the Town expressed intent to work with Tucson Water to establish similar reclaimed water provision agreements upon transfer of sewer service from Pima County to the Town. If this is still the Town’s intent, we suggest that a discussion be added to the document and that existing effluent agreements between Pima County and Tucson Water also be described.	Pg 1 ¶4 L4 Pg 3 ¶2 L1 Pg 6 ¶2 L3 Pg 9 ¶1 L2 Pg 35 ¶3 L2 Pg 48 ¶4 L1

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<b>IMPACTS OF PROPOSED FACILITIES</b>		
	Suggest adding the potential impact if the Town decides to not use the existing Marana facility.	Pg 49 ¶3 L1
	Effluent treated at the County line facility will have been generated in Pima County but discharged in Pima County, though still within the Tucson Active Management Area. We suggest that the Town's perspective that there is no impact because the water will not be transferred out of the Tucson AMA be discussed.	Pg 49 ¶1 L3
	The Town has also reassured Tucson Water and Metro Water that treatment of water at the County line facility will not affect delivery of effluent to their reclaimed water systems.	Pg 48 ¶4 L1
<b>FINANCING</b>		
	As discussed several time in the Task Force meeting, there is no concern that the Town is a viable municipality with bonding authority. However, the amendment is still fairly unclear about what costs would be paid for by bonding versus sewer fees versus connection fees and also if certain parts of the system (recharge, reclaimed, solids treatment, pretreatment) would be paid for by this utility or by another Town utility. Addition of a table clarifying this type of information is recommended.	The financial section of the document has been revised to include only those elements relevant to the PAG 208 Plan Amendment: Pg 49, Financing
<b>CONSTRUCTION</b>		
	Suggest updating to 2009/2010 budget numbers. Also, it is unclear what the Sewer "Fund" is. The \$40,000,000 identified as the Sewer Fund does not seem to correspond with other numbers as shown on Table 7 on page 39. Suggest clarifying if the Sewer Fund would pay for phase I construction costs, new hook ups, solids handling, pretreatment contract, or other costs and how it corresponds to other cost numbers in the document.	The financial section of the document has been revised to include only those elements relevant to the PAG 208 Plan Amendment: Pg 49, Financing
	Suggest adding a caveat that future consistency reports for individual facilities will include site maps that show set backs.	Pg 51 ¶2 L3
<b>INDUSTRIAL PRETREATMENT</b>		
	Post comment provided by PAG - Clarification	Section Revised Pg 50 ¶4