



**PIMA COUNTY  
REGIONAL WASTEWATER RECLAMATION DEPARTMENT**  
201 NORTH STONE AVENUE  
TUCSON, ARIZONA 85701-1207

PH: (520) 740-6500  
FAX: (520) 620-0135

March 30, 2011

Ms. Claire Zucker  
Watershed Planning Manager  
Pima Association of Governments  
177 N. Church Avenue, Suite 405  
Tucson, Arizona 85701

Dear Ms. Zucker:

The Pima County Regional Wastewater Reclamation Department appreciates the opportunity to participate in the March 30, 2011 Public Hearing for the proposed Marana 208 Plan Amendment for Designated Management Agency (DMA) status. As you are aware, Pima County has significant concerns about this proposed change to the Pima County DMA.

Pima County has a long standing record of providing quality service to the entire region for over thirty years. With eleven treatment facilities and over 700 square miles of service area, Pima County has maintained and operated the second largest wastewater system in Arizona with efficiency and cost effectiveness while remaining committed to system compliance and expansion in order to assure the best possible service and safety for all county residents. While all rate payers of the county benefit from the outstanding service provided by the Pima County Regional Wastewater Reclamation Department, the Town of Marana has been one of the focal points of much of the future planning. Pima County maintains that its role as steward to the region for wastewater service, established by the Clean Water Act, is a factor in its continued support of a regional system.

Pima County has been serving the Town of Marana since 1973. Pima County wastewater facilities serving the Town include the Marana Wastewater Reclamation Facility (WRF), the Ina Road Wastewater Reclamation Facility and the six major Pumping Stations which convey the Continental Ranch and Dove Mountain flows to the Ina Road WRF. The Department has invested significant staff time and expertise and millions of dollars in planning and operating these Marana area facilities in coordination and cooperation with the Town of Marana.

In fact, most recently, Pima County has negotiated with ADEQ on Marana's behalf to assure that capacity can be allocated for future developments in the northern area of Marana. RWRD has capacity agreements in the North Marana service basin totaling 1,368,000 gallons per day. (The current capacity of the Marana WRF is 700,000 gallons per day (gpd) and current flows are 230,000 gpd.) The "over-commitment" of capacity initially prompted ADEQ to insist that no more capacity assurances be provided to prospective new Town applicants for sewer service. However, Pima County's agreement with ADEQ will allow for such assurances to be issued.

Due to good management and the regional economies of scale, Pima County's sewer rates are below the average for cities across the United States and at the average for Arizona cities. The Pima County Regional Wastewater Reclamation Department is the recipient of numerous awards for quality business practices and high standards of regulatory compliance. These include the International Standards Organization certification for the Conveyance Division (ISO 9001:2008 which specifies requirements for a quality management system, ISO 14001:2004 which addresses various aspects of environmental management, and OHSAS 18001:2007 which addresses health and safety standards and requirements). In addition, the Department has received over 34 National Association of Clean Water Agencies (NACWA) water quality awards including 10 Silver, 20 Gold and 4 Platinum Awards since 2004 and was most recently recognized for creative planning and management with the 2010 NACWA National Environmental Award.

There are numerous risks and uncertainties that would be faced by the Town of Marana and its citizens if there were a change in the current wastewater structure. If Marana were to become the DMA for their proposed area, it would assume all responsibility for:

- Staffing wastewater facilities
- Regulatory compliance including:
  - Acquisition of permits
  - Laboratory testing and analysis
  - Regulatory reporting and records retention
  - Compliance with future regulatory changes
    - Stricter limits on existing standards
    - Cost of treatment for emerging contaminants
- Compliance with BADCT for any new and/or upgraded facilities

In addition, Marana wastewater staff would be directly responsible for:

- Maintenance and repair of all pump stations and pipelines in compliance with CMOM
- Maintenance and repair of all wastewater reclamation facility infrastructure
- Biosolids operations
- Recharge and reuse facilities
- Odor control management
- Energy for treatment and conveyance
- Industrial pretreatment program

Does the Town have the expertise to step into managing and operating a comprehensive wastewater treatment structure for the proposed area? Does it make sense to change the existing DMA structure that has been in place and effectively operating for over 35 years?

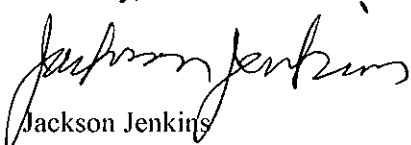
Another risk and uncertainty for the Marana residents is the unknown impact this change could have on their monthly wastewater rates. The proposed 208 Plan Amendment is based on aggressive growth and development within the proposed plan boundaries. Projected revenues may be heavily impacted by fluctuations in the housing cycle. If the growth projections prove to be too ambitious for the current economic climate, this could cause sustained high monthly rates for the existing Marana customers.

Comprehensive and detailed financial data is missing from the proposed 208 Plan Amendment. Requested rate and financial information provided by the Town during the review of the proposed 208 Plan Amendment was incomplete. Therefore, it is hard to predict what the Marana residents can truly expect to pay for their sewer service if the proposal takes effect. But using the actual costs incurred by the County to operate the wastewater infrastructure in Marana, our analysis shows that the Marana residents would pay approximately 21% more on their monthly sewer bill since they would be losing the advantage of economies of scale in spreading the costs over all wastewater customers in the County and not just the 12,000 in the Town. Further, due to the Town residents assuming all Marana WRF debt, the debt service cost to Town residents will increase significantly. Currently Pima County spreads these risks and costs over 262,000 customers, can the Town of Marana ratepayers afford to have the costs spread over only 12,000 customers?

The main objective for the Town of Marana requesting DMA status is to obtain a 100-year assured water supply and to control the effluent produced by the users of the Town's water utility company. Acquiring existing wastewater infrastructure and/or constructing redundant facilities is a very expensive and risky undertaking for the Town residents. Pima County has made an offer to the Town to provide the effluent from the Marana WRF to the Town as well as any other effluent where the water source is the Marana Water Utility. This effluent would be free of cost for the Town. To alleviate the Town's concern on future development and growth, Pima County has offered to involve the Town in all sewer service and capacity assurance processes to help insure all future development proceeds unimpeded. This offer does allow the Town to meet its objectives without placing a significant economic burden on its residents and undertaking more risks and uncertainties.

The responsibilities assumed by Pima County are no less critical now, in times of regional economic hardship, than in the past when growth and development were on the rise. Efforts are consistently being made to upgrade and improve system performance as well as reduce environmental impacts by making the best use of renewable resources. Pima County is prepared to continue the efforts already in place to protect public health and safety while providing quality service. The regional system, as it stands today, demonstrates industry experience, effective management and environmental accountability giving the entire community the assurance of an above standard wastewater treatment system.

Sincerely,



Jackson Jenkins  
Director, Pima County Regional Wastewater Reclamation Department

cc: C.H. Huckelberry, County Administrator  
John Bernal, Deputy County Administrator for Public Works