

**Attachment D**

Petition to Phoenix Mayor and City Council  
For Comprehensive Water Supply Evaluation; December 18, 2019

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2019 DEC 18 PM 6:39  
CITY CLERK DEPT.

**Subject: Petition to the Mayor and City Council of the City of Phoenix  
for Comprehensive Water Supply Evaluation Prior to Proceeding with  
City of Phoenix (COP) Drought Pipeline Project**

Honorable Mayor Gallego and City Council Members:

Pursuant to Chapter 4, Section 22 of the Phoenix City Charter, this petition is submitted by the undersigned, in our individual capacities as citizens of Phoenix. We also submit this petition on behalf of residents and homeowners in the Biltmore Highlands, Madison Heights, and Granada Park Neighborhoods, regarding the COP plan to install a 66-inch transmission main and a 48-inch transmission main through the Phoenix Mountain Preserve and nearby neighborhoods, starting at the 24<sup>th</sup> Street Water Treatment Plant (WTP) and continuing to 32<sup>nd</sup> Street and Bell Road. This plan has also, at times, been referred to as the “Drought Pipeline Project.”

The COP Water Services Department (WSD) Drought Pipeline Project will cause major traffic disruptions and health and safety risks to neighborhoods and schools, potentially damage home structures, reduce home values, and forever scar the Phoenix Mountain Preserve, all at an enormous and possibly unnecessary expense to City taxpayers.

In order to gain council support for the project, the WSD has marketed the pipeline as an emergency, necessary to address near-term drought impacts to Phoenix water supplies, particularly in the north Phoenix area. However, as discussed below in more detail, the City is well-positioned to withstand reductions in its water supply resulting from drought. The pipeline is unnecessary to address near-term potential drought impacts to the north Phoenix area and is certainly not an emergency. It is a costly project, rushed to eliminate community input and an evaluation of risks to community health and safety, and is likely underestimated at a cost of \$300 million to the public.

**Our Petition.** We respectfully request that the City Council fulfill its duty to protect the voters, taxpayers, and residents of this City from unnecessary costs, from the rushed and possibly ill-planned and unnecessary “Drought Pipeline Project.” We request that the City Council:

1. Direct the WSD to halt work on the planning, design, and construction of the 66-inch and 48-inch diameter pipelines. Require the WSD to engage in a public study of the water needs of the north Phoenix area during drought.
2. Require the WSD to further develop water conservation within the City and estimate the amount of water use that can be reduced via existing and/or additional water conservation programs.
3. Direct the WSD to evaluate all reasonable options for the safest, most cost-effective method, that meets city engineering standards, to deliver water to North Phoenix if additional water is needed there. Some of the options that should be evaluated are:
  - drilling of water production wells within or closer to North Phoenix;
  - construction of a water treatment plant in North Phoenix or expansion of the Union Hills or Deer Valley water treatment plants (WTPs);
  - water exchanges with other cities; and
  - construction of a water transmission line from the 24<sup>th</sup> Street WTP, Union Hills WTP, and/or Deer Valley WTP.
4. If water supply needs justify a transmission pipeline project, we request the City Council direct the WSD to engage in a thorough study of alternative alignments that are consistent with engineering design standards for water supply systems (COP, 2017).
  - Alignment alternatives for a pipeline project of this size should necessarily be evaluated for criteria such as: worker and community health and safety; structural impacts to nearby buildings and infrastructure; realistic excavation costs including excavation of bedrock; historical, cultural, architectural, and archeological impacts; and environmental protection.
  - Alignment alternatives should utilize major collector streets or arterial streets with a minimum easement width of 80 feet (and not local or minor residential collector streets with widths less than 80 feet) as outlined in the City Design Standards for Water and Wastewater Systems. (COP, 2017)

**Construction of the Water Pipeline Is Not an Emergency or Necessary to Address Near-term Drought Conditions or Central Arizona Project (CAP) Water Restrictions**

The WSD has marketed the proposed pipeline project as being an emergency and necessary to address drought and potential water restrictions. This is not true. With the exception of a need to construct additional wells in the north Phoenix area to facilitate recovery of stored CAP water, the COP is well-positioned to address any shortages to City water supplies that might result from future drought and reduced water supplies on the Colorado River or the Salt River system.

Currently, the primary water supply for the north Phoenix area is CAP water delivered from water treatment facilities in that region of the City. As a renewable water supply delivered from the Colorado River, CAP water supplies are subject to potential reductions if shortages are declared on the Colorado River. Fortunately, by virtue of the high priority of its CAP water, the availability of water from the Arizona Water Banking Authority during drought, and proactive

drought planning already put in place by the City to bolster CAP, the north Phoenix area is unlikely to be significantly impacted by drought.

First, the City's CAP water supplies are unlikely to experience significant reductions except in the case of severe water shortages on the Colorado River. Priority to water within the CAP system is based on the purpose of use. CAP allocations for "Municipal" purposes, such as the City's allocation, share the highest priority to water in the system with "Indian" priority CAP water. In the event of shortages in CAP water supplies, water supplies for lower priority CAP allocations for "Excess CAP Water" and "Non-Indian Agricultural" priority CAP water will be reduced before Municipal and Indian priority CAP allocations. As a result, the City's CAP water supplies are some of the last to be reduced in times of shortage (AWBA, 2019a).

Second, in the event that the City's CAP water supplies are reduced, the City is entitled to have those water supplies replaced with CAP water previously stored underground by the Arizona Water Banking Authority (AWBA). This replacement of water supplies during a shortage is called "firming." While the mechanics of the recovery and delivery of those firmed water supplies must still be worked out among the AWBA, the CAP and the COP, the AWBA water supplies will help to fill any gap in CAP water supplies resulting from Colorado River shortages (AWBA, 2019b).

Third, the City has successfully planned for drought through the storage of available CAP water not needed for delivery to customers and through innovative agreements with other water interests. For example, the City has entered into an agreement with the City of Tucson to store the City's CAP water supplies. In times of shortage, the City's agreement allows it to request Tucson to recover the stored water in exchange for the City taking delivery of Tucson's CAP water. Furthermore, the City has stored over 290,000 acre-feet of its CAP water underground in the Phoenix area and an additional 43,000 acre-feet stored in the Tucson area. If the City installed adequate well infrastructure in the north Phoenix area and/or it partnered with other entities to accept stored water credits in exchange for "wet" CAP water (similar to the Tucson deal), it could utilize those stored water supplies to provide water to the north Phoenix area without the expense and destruction of the proposed pipeline project. Moreover, if the City were to construct storage and recovery injection wells in the north Phoenix area, it could minimize potential impacts from stored water recovery in that region (LBDCP, 2019).

Fourth, the City is not yet fully utilizing its CAP water supplies. In 2018, the City stored "about 58,000 acre-feet, or just under one-third of its annual CAP allocation, underground." This water banking is "done by actively injecting water through wells and into aquifers underground. Phoenix owns several such wells in the northern part of the city." (Whitman, 2018) Although the City's storage activities are important for future planning, these 58,000 acre-feet represent reductions in City water supplies (by approximately 33%) that could occur without any impact to City water customers or imposition of water use restrictions.

Lastly, the WSD has failed to study what water savings and drought protection could be provided through imposition of stronger water conservation and water use restrictions in times of shortage. It is shameful that the City Council would impose a \$300 million infrastructure project on City

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taxpayers and allow destruction of the Phoenix Mountain Preserve before requiring the WSD to study what water savings could be gained through water conservation efforts.

In summary, there are clearly alternatives to the proposed pipeline available to address water supply and drought concerns in the north Phoenix area. Before allowing further taxpayer dollars to be wasted on the proposed pipeline project, the City Council should require the WSD to prepare a study explaining why the above measures would be inadequate to address drought impacts. Without that study and explanation, the City Council cannot justify the proposed pipeline projected as being a necessary and appropriate expense to taxpayers or to negatively impacting existing neighborhoods and the Phoenix Mountain Preserve.

Sincerely,



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cc: Arizona Republic  
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### References

AWBA, 2019a, Policy Regarding the Distribution of Long-term storage credits for firming CAP Municipal and Industrial Subcontractors. March 4.

<https://waterbank.az.gov/sites/default/files/Adopted%20AWBA%20Policy%20-%20M%26I%20Firming.pdf>

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COP, 2017, WSD Design Standards Manual for Water and Wastewater Systems.

Lower Basin Drought Contingency Plan (LBDCP), 2019, Implementation Plan, Agreement to Exchange Long-Term Storage Credits Between Arizona Water Banking Authority and City of Avondale, City of Chandler, City of Goodyear, City of Peoria, City of Phoenix, City of Scottsdale, City of Tucson, Freeport Minerals Corporation, and EPCOR Water Arizona, Inc., July 3. <https://waterbank.az.gov/sites/default/files/AWBA%20Agreement%20to%20Exchange%20Long%20Term%20Storage%20Credits%202019.pdf>

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