cwac

Citizens' Water Advisory Committee
City of Tucson
P.O.Box 27210
Tucson, AZ 85726-7210

DATE: May 1, 2013

TO: CWAC

FROM: Urban Agriculture Sub-Committee
Chair: Chuck Freitas
Members: Christopher J. Brooks,
Jean McLain
Catlow Shipek
Brian Wong

SUBJECT: Tucson City Council Member Karin Uhlich's request that CWAC consider the feasibility of an Urban Agriculture water rate, or using an existing rate category for this water use.

CONCLUSION: Urban Agriculture as defined by the City's Planning and Development Services Department, as well as Pima County Wastewater's option for secondary metering to ensure accurate/minimum wastewater fees, provides for the lowest possible water rates for Urban Agricultural use. There is little that the Water Department can provide in way of discounts or additional benefits for Urban Agriculture. No action is recommended.

BACKGROUND: The Urban Agriculture Sub-Committee was formed at the November 2012 CWAC meeting, and has met several times to discuss various options for water rate and fee relief for Urban Agriculture users. The Sub-Committee considered a range of options to provide possible relief for Urban Agriculture including the potential to waive specific meter installation fees as well as an investigation of rates.

The Sub-Committee received a number of presentations from, and/or discussions with various entities, including:

- Merrill Eisenberg, Ph.D., University of Arizona
- Community Gardens of Tucson
- City of Tucson Conservation and Sustainable Development Department
- City of Tucson Planning and Development Services Department
- Pima County Regional Wastewater Reclamation Department
- Pima County Finance and Risk Management Department
- City of Tucson Water Department

The City's Planning and Development Services Department will likely be defining Urban Agriculture as:

A) Non-Profit Community Gardens
AND
B) For-Profit Urban Gardens

Residential properties will likely be excluded from Urban Agriculture definition, since gardening is a traditional use of residential properties but residential customers should be encouraged to take advantage of Tucson Water's existing rebate programs for rainwater harvesting and gray water reuse in order to reduce the cost of irrigating a garden when use of potable water is the only other option.

The above definition applies to areas within the City of Tucson. More than 35 percent of Tucson Water customers are outside the City limits. It is not clear how other jurisdictions will define Urban Agriculture, or how customers outside the City limits would show that their property qualifies as Urban Agriculture.

The above definition for Urban Agriculture means that all certified Urban Agriculture users will be commercial water accounts, and would pay for their water at the current flat rate of 2.25$/ccf. Also, any Urban Agriculture user who is able to connect to the Reclaimed system will receive the current flat rate of 1.83$/ccf. Please note that we expect the reclaimed system to be subsidized by potable water customers in upcoming years by about 20 percent. This means that the true rate for reclaimed water will be approaching 2.20$/ccf, which is close to the commercial rate for potable water. Given the already low rates that will be available for Urban Agricultural users, the sub-committee did not feel that lower rates were feasible.

In an effort to define other opportunities for minimizing cost impacts for Urban Agriculture, the sub-committee decided to investigate the possibility of waiving some types of meter installation fees. Two major fees, the System Equity Fee and the CAP Fee, which are related to meter installation, were identified as possible candidates. In order to eliminate these fees installation of a second meter (for Urban Agricultural irrigation purposes) would be installed immediately downstream of the main water meter. Under present conditions Tucson Water is set up to only install and administer either:

Meter Installation Type	**Remarks**
Single Meter	This is a single meter installation that monitors water flow to all of a customers uses, including irrigation. Wastewater usage is determined based on water use during December, January and February, as it is assumed that minimal irrigation is occurring during this time frame.
Or	
Parallel Meters	More than one meter is installed at most commercial customers to provide for a separate measurement of irrigation water (with no sewer component), and internal water use which includes a discharge to the wastewater collection system. The irrigation meter is not charged for sewer use. Both meters are tapped off of the same water main, and operate in parallel to each other.

If Tucson Water were to add the additional meter installation type of allowing a second meter installed immediately downstream of the main billing meter (a dual meter) for Urban Agriculture, this could eliminate the System Equity Fee and CAP fee for the dual meter, but it would introduce an additional monthly meter fee for the dual meter. Only those Urban Agriculture customers who do not already have a parallel meter, and who are using larger amounts of irrigation water during the winter could benefit from installation of the dual meter. Customers who are using irrigation water during the months of December, January and February are likely paying for extra sewer use than they are actually using. Installation of either a parallel or dual meter would allow those customers to realize savings in wastewater fees, but would add some water meter fees. Larger Urban Agriculture users might benefit if the wastewater fees were offset by the water fees.

Please note that whether or not parallel or dual meters are installed for Urban Agriculture irrigation, backflow prevention is always required for this type of water use, and must be installed by the customer. Also note that reclaimed customers would not benefit from dual metering since there is no wastewater component needed for billing purposes.

As an alternative to the cost for Urban Agriculture customers of installation of parallel or dual water meters, Pima County allows non-residential customers to install what they term 'secondary' meters. These secondary meters are located anywhere downstream of the main water billing meter. They are not installed by Tucson Water, but are installed by a qualified plumber. They are not maintained nor read by Tucson Water. Those customers call Pima County to report their secondary meter use. Pima County then makes adjustments to their wastewater bill so that the customer is not charged wastewater fees for the irrigation use. This service is provided to customers at no charge.

Given that Urban Agricultural uses will be defined as non-residential, then all Urban Agricultural customers would qualify for the Pima County secondary meter option regardless of whether or not they are inside or outside the City limits. Since the secondary meter will not result in monthly fees from the Water department (like a dual meter will), customers will likely choose to utilize the County Secondary Metering Option, in lieu of dual metering from the water department.

Utilizing the County's Secondary Meter Option for Urban Agriculture in lieu of parallel or dual metering from Tucson Water, will provide the following benefits:

- Differences in land use designation between the City and the County will not be an issue. Urban Agriculture users regardless of their location are able to utilize the secondary meter option.
- Customers not charged any dual or parallel metering fees from the Water Department
- Customers can install the County's 'secondary' meters anywhere on property. They will not be required to have the meter installed close to the main water billing meter. This will minimize customer irrigation piping system costs.
- Tucson Water (and its customers) do not have the added costs associated with: 1) Preparing dual meter standards documents; 2) Modifications to the billing system to accommodate the dual meter, or hiring of additional personnel to manually input data gathered from the dual meter; 3) Maintenance of additional Tucson Water meters.

cc: Alan Forrest, Tucson Water
Sandy Elder, Tucson Water
Melodee Loyer, Tucson Water
Mark Titus, Tucson Water
Belinda Oden, Tucson Water
Nancy Gradillas, Tucson Water
Scott Schladweiler, Tucson Water
Jackson Jenkins, Pima County Regional Wastewater Reclamation Department
Melody Burton, Pima County Finance and Risk Management Department
Charles Matt Matthewson, Pima County Regional Wastewater Reclamation Department
Manabendra Changkakoti, Pima County Regional Wastewater Reclamation Department