

TOWN OF MARANA

**CENTRAL ARIZONA
ASSOCIATION OF GOVERNMENTS**

**DESIGNATED MANAGEMENT AGENCY
SUBMITTAL PACKET**

Prepared for:

TOWN OF MARANA

AND

CENTRAL ARIZONA ASSOCIATION OF GOVERNMENTS
1075 S. Idaho Road, Suite 300
Apache Junction, Arizona 85219

Prepared by:



WestLand Resources, Inc.
Engineering and Environmental Consultants
4001 East Paradise Falls Drive
Tucson, Arizona 85712
(520) 206-9585

DECEMBER 2011
Project No. 527.31 A 8005

DESIGNATED MANAGEMENT AGENCY SUBMITTAL PACKET

The Town of Marana (Town) is providing the following information as directed by the Arizona Department of Environmental Quality (ADEQ) and the Central Arizona Association of Governments (CAAG) to obtain Designated Management Agency (DMA) status for the Town's projected planning area boundaries within Pinal County. As a CAAG DMA, the Town will provide sewage collection and wastewater treatment services for residential, commercial, and industrial uses within the Town's planning area. As a DMA, the Town will own and control the effluent produced at its WRFs, providing an opportunity to maximize the beneficial use of effluent.

A CAAG 208 Plan Amendment has been developed for the Pinal County portion of the Town's planning area. The Town is submitting this DMA packet and the 208 Plan Amendment to CAAG to be processed and approved on parallel tracks.

The following information was requested by CAAG and ADEQ in order to process the Town's request to be established as the DMA for its planning area in Pinal County.

1. Legal Description and map of the requested DMA/Planning area.
2. Self-Certification letter from the Marana Town Attorney
3. Letters of Support

General Description of Proposed
CAAG 208 Planning Area

Those portions of Township 10 South, Range 9 East; Township 10 South, Range 10 East; and Township 10 South, Range 11 East, Gila and Salt River Meridian, Pinal County, Arizona, described as follows:

All of Sections 01, 02, 03, 04, 11, 12, 13, 24; the Northeast 1/4 and the North half of the Northwest 1/4 of Section 09; the North half of Section 10 and the East half of the Southeast 1/4 of Section 10; the North half of the Northwest 1/4, the Northeast 1/4, the Southeast 1/4 - EXCEPT any portion lying Northwest of the Southeast right of way of Sasco Road in said Southeast 1/4, and the South half of the Southwest 1/4 of Section 14; that portion of the Northeast 1/4 of Section 22 lying Northeast of a diagonal line connecting the Northwest corner to the Southeast corner thereof; the North half and the Southeast 1/4 of Section 23 - EXCEPT the Southwest 1/4 of said Southeast 1/4 thereof; and the Northeast 1/4 of Section 25 all in said Township 10 South, Range 9 East;

TOGETHER WITH

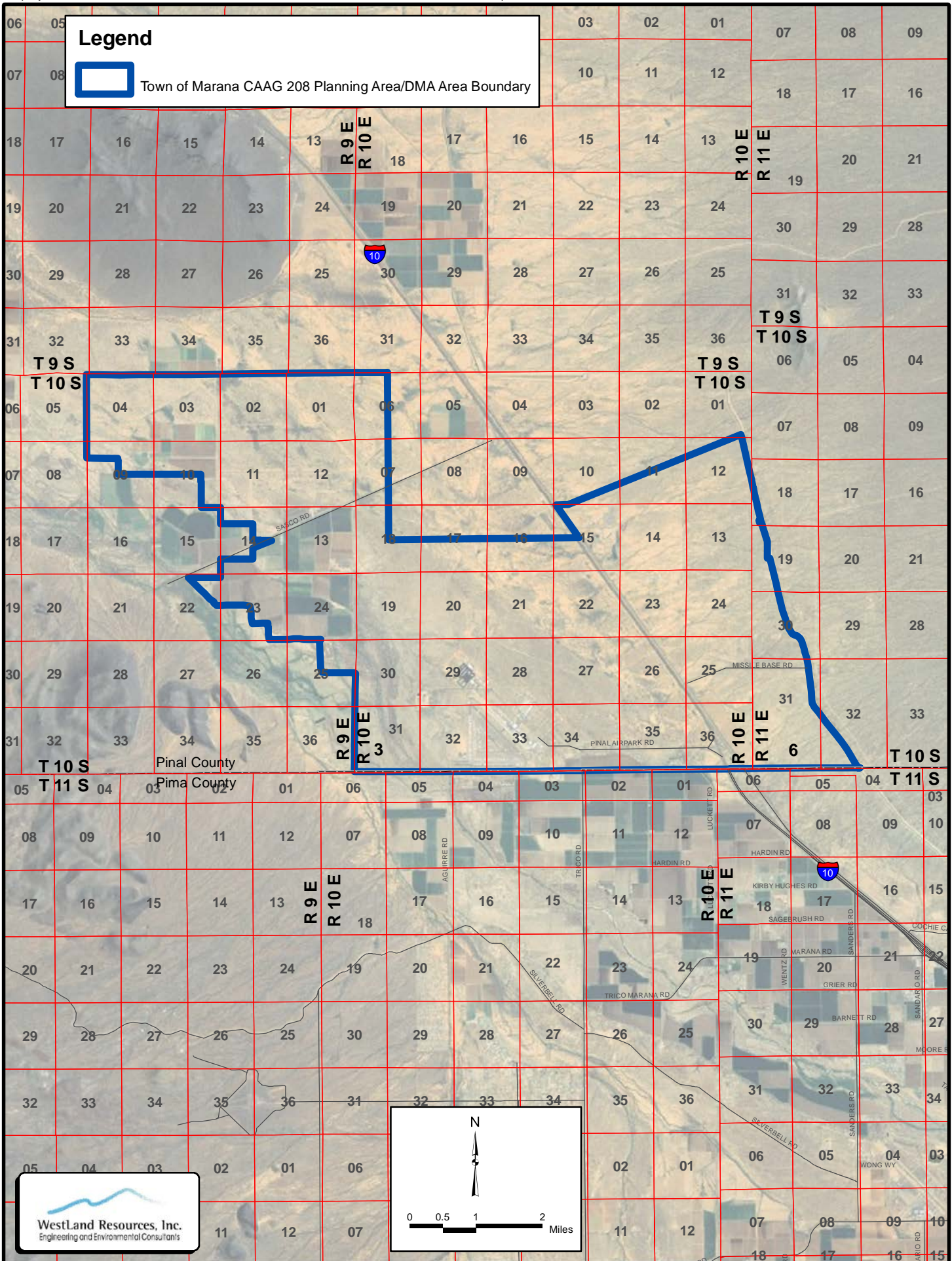
All of Sections 10, 11, 12, 13, 14, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36; the West half of Section 6; the West half of Section 7; Section 15 - EXCEPT that portion of the Northwest 1/4 thereof lying Southwest of the Southwest right of way of Interstate 10; the South half of Section 16; the South half of Section 17; the South half and the Northwest 1/4 of Section 18 all in said Township 10 South, Range 10 East, EXCEPT any portions thereof lying east of the west right of way of the Central Arizona Project canal, and FURTHER EXCEPTING any portions of said Sections 10, 11, and 12 in said Township 10 South, Range 10 East, lying northwest of the following described line:

Beginning at a point on the North line of said Section 12, 3000 feet (more or less) West of the Northeast corner thereof and at the intersection with the northwest right of way of existing powerline; thence South 64 degrees West, 12500 feet (more or less) along said northwest right of way and extension thereof to the intersection with the south line of said Section 10.

TOGETHER WITH

All of Sections 18, 19, 30, 31, and 32 lying west of the west right of way of the Central Arizona Project canal, all in said Township 10 South, Range 11 East.

All lands above comprise an area of 24,800 acres, more or less.





TOWN OF MARANA
LEGAL DEPARTMENT

June 22, 2011

Brian Tapp, Executive Director
CENTRAL ARIZONA ASSOCIATION OF GOVERNMENTS
1075 South Idaho Road, Suite #300
Apache Junction, Arizona 85219

Re: Town of Marana 208 Plan Amendment—Self Certification

Dear Mr. Tapp:

As legal counsel for the Town of Marana, Arizona, I hereby certify, in connection with wastewater collection and treatment facilities that serve homes, businesses, industries and other users within the jurisdictional limits of the Town of Marana (which wastewater facilities are referred to in this letter as the “Subject Facilities”) and pursuant to Clean Water Act section 208(c)(2) [33 U.S.C. § 1288(c)(2)], that Marana is authorized by law:

- (A) to carry out appropriate portions of Central Arizona Association of Governments’ Areawide Water Quality Management Plan (the “208 Plan”) developed under Clean Water Act section 208, subsection (b);
- (B) to manage effectively the Subject Facilities and any other waste treatment works and related facilities serving such area in conformance with the 208 Plan;
- (C) directly or by contract, to design and construct the Subject Facilities and any other new works, and to operate and maintain new and existing works as required by the 208 Plan;
- (D) to accept and utilize grants, or other funds from any source, for waste treatment management purposes;
- (E) to raise revenues, including the assessment of waste treatment charges;
- (F) to incur short- and long-term indebtedness;
- (G) to assure in implementation of the 208 Plan that each participating community pays its proportionate share of treatment costs;

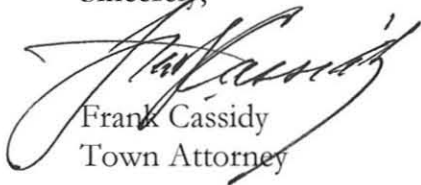
Brian Tapp, Executive Director
CENTRAL ARIZONA ASSOCIATION OF GOVERNMENTS
June 22, 2011
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(H) to refuse to receive any wastes from any municipality or subdivision thereof, which does not comply with any provisions of the 208 Plan applicable to such area; and

(I) to accept for treatment industrial wastes.

Please let me know if you need any additional information in connection with this self-certification.

Sincerely,



Frank Cassidy
Town Attorney





September 21, 2011

Brian Tapp, Executive Director
Central Arizona Association of Governments
1075 S. Idaho Road, Suite 300
Apache Junction, Arizona 85219

Re: Marana Proposed Amendment to the CAAG 208 Areawide Water Quality Management Plan/Designated Management Agency

Dear Mr. Tapp:

This constitutes Pinal County's comment/response with respect to this application by the Town of Marana. The application constitutes a proposed CWA §208 plan amendment involving the portion of Pinal County north of the Pima County line lying within the Town of Marana Planning boundaries. The following are Pinal County's comments.

We wish to compliment the Town of Marana and their consultant on a clear, concise and thorough application.

In the recent past CAAG has desired that the 208 Amendment and the Designated Management Agency (DMA) be separate amendment proposals. Pinal County continues to be in agreement with this position.

Pinal County has generally raised concern over proposals to discharge reclaimed wastewater into natural watercourses. Pinal County's concerns rested on the prospect that allowing such off-site discharges will result at some point in the future in discharges that would inflict nuisance impacts on down-stream property owners.

Specifically, to the extent that Town of Marana has committed to maintaining a A+ Reclaimed Water Quality standard and put its highest beneficial use which includes, but are not limited to, the irrigation of parks, road medians, school yards, agriculture and turf facilities. Additionally, excess reclaimed water that is available may be recharged under an Arizona Department of Water Resources (ADWR) Underground Storage Facility (USF) permit and/or Groundwater Savings Facility (IGSF) permit. Pinal County has concurred in allowing for an off-site discharge under an AZPDES or NPDES permit that would only occur "as a last resort" due to "infrequent heavy storm events."

Although this 208 plan is within planning two regions, Pinal County has long maintained that 208 applications should clearly affirm whether adjoining political subdivisions and wastewater providers within the CAAG Region support the application. In this case, there are no objections within the CAAG Region and therefore support the Marana 208 Plan.

The Town of Marana has included appropriate "no objection" letters in Appendix B from subdivisions and wastewater providers within the CAAG Regional boundaries.

Marana 208 Plan

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Pinal County submitted a letter dated August 2, 2010 (attached) to the Town of Marana stating it continued support of wastewater planning to serve the Marana/Red Rock/I-10 corridor. Siting for any wastewater treatment facilities should adhere to the Federal Aviation Administration Advisory Circular 150/5200-33B to limit any externalities caused to the Pinal Air Park.

Again, given the comments stated above, Pinal County gives support for the Town of Marana's 208 Plan Amendment and Designated Management Agency designation. Should you have any further questions or concerns, do not hesitate to discuss the matter with me at your convenience.

Sincerely,



Ken Buchanan
Assistant County Manager
Pinal County Development Services

cc: Mr. Pete Rios, Supervisor, District #1
Gilbert Davidson, Marana Town Manager
Mark Weinberg, Red Rock Utilities
Don Gabrielson, Pinal County Air Quality
Reg Glos, Pinal Environmental Health Services
Fritz Behring, Pinal County Manager
Manny Gonzalez, Pinal County ACM/AS

Development Services



September 2, 2011

Brian Tapp
Executive Director
Central Arizona Association of Governments
1075 S. Idaho Road, Suite 300
Apache Junction, AZ 85273

RE: Town of Marana CAAG 208 Plan Amendment

Dear Mr. Tapp,

Evergreen Maintenance Center, Inc. supports the Town of Marana (Town) to continue the 208 Plan Amendment process through the Central Arizona Association of Governments (CAAG) and concurs with the Town's effort to become the Designated Management Agency for its proposed planning area in Pinal County.

Sincerely,

Michael Michels
Director QA/QC
Evergreen Maintenance Center
24645 Pinal Air Park Road
Marana, AZ 85653

cc: Barbara Johnson, Town of Marana



red rock utilities

WATER • WASTEWATER • RECLAIMED WATER

October 12, 2011

Attn: Travis Ashbaugh

Mr. Travis Ashbaugh
Central Arizona Association of Governments
1075 W. Idaho Road
Apache Junction, AZ 85119

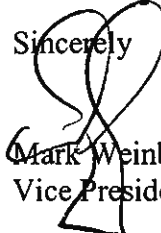
Re: Town of Marana CAAG 208 Plan Amendment

Dear Mr. Ashbaugh:

Red Rock Utilities, LLC owns and operates a water and wastewater utility company in southern Pinal County contiguous to the area that the Town of Marana wants to include in its long range utility service area. Over the past few years we have met numerous times with Town of Marana staff and attended several stakeholder meetings to review the town's planning effort to obtain a CAAG 208 Amendment. Red Rock and the Town of Marana have always had a cooperative relationship, and have agreed on a shared boundary for our respective utility company service areas. In addition, Red Rock has reviewed the town's application for a CAAG 208 Amendment and has found it to be thorough and complete.

Therefore, Red Rock Utilities, LLC supports the Town of Marana's efforts to obtain a CAAG 208 Amendment and recommends approval of their application.

Sincerely



Mark Weinberg
Vice President, General Manager

MW:lf