



# MAYOR & COUNCIL MEMORANDUM

November 14, 2023

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Subject: Commercial Rainwater Harvesting Ordinance: Update on Hiring and Enforcement (City Wide)

Issue – At the request of Councilmember Dahl, City Staff has prepared information regarding the status of hiring additional staff and enforcement of the City’s Commercial Rainwater Harvesting Ordinance. This item is scheduled for discussion by the Mayor and City Council.

City Manager's Office Recommendation – The City Manager recommends that the Mayor and City Council provide staff direction on next steps, if any, related to the Commercial Rainwater Harvesting Ordinance (CRWHO).

Background – On January 25, 2022 the Mayor and Council discussed deficiencies related to implementation of the City’s Commercial Rainwater Harvesting Ordinance. At that time, three new positions were allocated to Planning and Development Services, including a Landscape Architect and two Construction Inspectors. On June 7, 2023 an update memo was provided to the Mayor and Council to apprise them of progress to date, including the successful hiring of three new staff members into the allocated positions.

Present Consideration(s) – Since the last update to the Mayor and Council, the Planning and Development Services Department (PDS) has been diligent in the necessary training to advance both the review goals of the CRWHO and help enable Tucson Water to have better enforcement tools to manage the CRWHO Program.

As mentioned in the previous update, the positions authorized by Mayor and Council to manage the CRWHO compliance have been filled. Since the Landscape Architect’s hiring, 137 Commercial Rainwater Harvesting Plans have gone through the review process and have been approved. Additionally, 137 CRWHO inspections have been performed.

While there will always be pushback to new regulations, the compliance and the submitted plans have improved considerably, with most projects complying with the Ordinance from the onset rather than requiring multiple iterations to meet the requirements of the Ordinance itself. Often, the projects exceed the ordinance’s requirements by 20-30%. That translates to upwards of 75-80% of the required water usage of the plant materials being met by rainwater harvesting.

The Landscape and Engineering Section of the Current Planning Division has been evaluating all the legacy development packages, which existed before the initialization of TDC Online, finding the existing Commercial Rainwater Harvesting Plans, uploading them to TDC Online, and GIS mapping them in Tucson Maps. This exercise has allowed the department to see where deficiencies in plan review exist, where strategic goals are not being met, and how to institute/implement better enforcement tools. This will allow PDS to further support the implementation of the City of Tucson’s proposed One Water 2100 and guide our water resources for the next 80 years. To date, 525 legacy cases have been added to the TDC Online system.

In addition to the aforementioned work, both the Landscape Architect and the Site Engineer are working with the Long-Range Planning Team of PDS and Tucson Water on the development of new Low Impact Development Standards (LID), which will strengthen the existing Commercial Rainwater Harvesting Ordinance, while at the same time providing new cutting-edge standards for all forms of development in the City of Tucson.

SS/NOV14-23-219

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Financial Considerations – Ongoing funding for the allocated staff positions will be necessary to ensure continued improvement in review, enforcement, and inspections related to Commercial Rainwater Harvesting.

Operating Costs and Maintenance Inputs – None.

Legal Considerations – None.

Respectfully submitted,



Elizabeth Morales  
Assistant City Manager

KS/KM/EH  
PDSD

Attachment(s): Memorandum from Council Member Dahl dated October 5, 2023