

Citizens Water Advocacy Group (CWAG)
Suggestions in Anticipation of a Draft of the Fourth Management Plan
For the Prescott Active Management Area
March 28, 2012

1. CWAG appreciates the opportunity to provide comments in advance of a draft Fourth Management Plan (4MP). We also appreciate the presentations by the Department at recent GUAC meetings. We believe, however, that the meetings were not sufficiently publicized. With the exception of the CWAG organization, attendance by the general public was virtually nonexistent. We recommend that the Department make a greater effort to involve the public. Because ADWR plans to use the GUAC as the primary conduit for public input on the 4MP, and because the GUAC currently has only two attendees because of expired positions, ADWR should urge the Governor's office to fully staff this advisory board.
2. The 4MP should commit ADWR to a program to educate the public regarding the need for the Prescott Active Management Area to reach safe yield, and explain the problems that could occur if safe yield is not reached. We encourage the publication of annual water budgets to the greatest extent possible. Water budgets are valuable in making people aware of our consistent and increasing overdraft.
3. The 4MP should recognize the poor results of the 3MP in moving the PrAMA towards Safe Yield. Based on the limited data in the Assessment, under the 3MP the PrAMA overdraft has increased. We conclude, therefore, that a more aggressive approach is needed. Under the 4MP, ADWR should monitor and report the overdraft annually, using this data to drive an adaptive management strategy. The 4MP should include internal time goals for progress in reducing the overdraft and triggers for enhanced regulatory requirements if the timeframes are not met.

Enhanced requirements can include significantly greater conservation and cuts to the aquifer for recharged effluent. The ADWR should seek authority for the latter as needed. We note that the citizens of Prescott voted to change its charter to require 100% cut to the aquifer for all effluent generated from large annexed subdivisions. It seems reasonable and fair to increase effluent cuts to the aquifer for all communities if progress towards safe yield is not made.

4. The 4MP should include much stronger conservation requirements than those proposed in the Modified Third Management Plan. The switch by providers to the Municipal Modified Non-Per Capita Conservation Program appears less rigorous and is likely to be less effective than the gpcd programs previously used. BMPs need to be well defined and criteria established such that compliance can be more readily determined. GPCD reporting should be required to help evaluate the effectiveness of the Municipal Modified Non-Per Capita Conservation Program.

The 4MP should consider even stronger conservation requirements applying to new construction including residential, commercial and industrial.

5. CWAG believes that the local jurisdictions must work together to develop a plan to achieve safe yield. Two previous attempts to work collaboratively developed important information and concepts, but the recommendations were not carried out. We believe leadership on the part of ADWR might have made a difference. As part of the 4MP, ADWR should call for the local user entities to commence discussions to develop a safe yield plan. ADWR can assist in the timing and structure of the discussions and provide technical assistance.
6. Previous management plans attempted to balance future supply and demand by estimating overall population growth for the PrAMA. These estimates use highly speculative and often inaccurate techniques. Alternatively, PrAMA population growth can be viewed in two components; growth that can use PrAMA groundwater and growth from new subdivisions that must use alternative water. The first component consists mainly of previously approved, but un-built lots (grandfathered) and growth from exempt wells. The first component, which can use PrAMA groundwater, will take us further from safe yield. The second component must use alternative water and, therefore, does not take us further from safe yield.

In addition to providing remedies for the current overdraft, the PrAMA must provide remedies for the additional overdraft that would result from the first growth component. The 4MP should focus on estimating the additional water needed to satisfy this projected overdraft.

If growth in new subdivisions is to occur, it would require alternative water. We suggest that the municipalities may be interested in this growth and may seek water to meet its demand. It doesn't appear necessary for the 4MP to attempt to project this demand or speculate on how much water the municipalities wish to direct to new subdivisions.

By focusing on the first growth component, the 4MP can more accurately estimate how much water will be needed for safe yield. Projections of growth of exempt wells can consider historical rates tempered by information on land availability and other growth considerations. Growth from previously approved, but un-built, lots can be estimated by evaluations of municipal records and suitability of lots for home construction.

By determining the projected overdraft resulting from the growth of exempt wells and grandfathered lots, the safe yield scenarios in 4MP can determine, for example, explicitly how much recharged effluent or Big Chino water or any other water is necessary to achieve safe yield and what water might be available as alternative water for subdivision growth.

7. Declines in groundwater levels vary considerably throughout the PrAMA. Some residents in Chino Valley and Williamson Valley are now suffering dry wells. Because effluent recharge and reuse is increasingly important, the 4MP should seek to locate recharge facilities to mitigate localized areas of groundwater table depression. Groundwater flow modeling may help develop localized criteria for management of effluent and stormwater recharge. Additionally, ADWR should monitor and evaluate the extent of land

subsidence in areas where groundwater levels are now significantly lower than historical levels.

8. The Draft Assessment report includes tables and graphs that show a reduced overdraft by subtracting the AWS Groundwater Allowance. This presentation is not a real world overdraft and therefore is confusing and unnecessary, particularly in the absence of any legal sanctions for an overdraft. For clarity, we recommend that the AWS Groundwater Allowance not be included in key tables and graphs.
9. In its evaluation of PrAMA's future supply and demand, the 4MP is expected to include imported groundwater from the Big Chino. At the AWS hearings on April 15, 2009, ADWR Chief Hydrologist, Frank Corkhill, testified that water taken out of Big Chino would have to result in a reduction in flows to the headwaters of the Verde River. Although ADWR apparently does not have the regulatory authority to prevent this importation or its adverse effects, the 4MP should describe the considerable controversy surrounding the importation including the department's assessment of the hydrology and the possible plans and need for mitigation that may result from ongoing discussions. The controversy has the potential to delay or prevent the importation, and this potential should be recognized and understood by the public in this document.
10. The 4MP should enhance and implement the augmentation programs described in the 3MP. The definition of augmentation should be expanded to include rainwater harvesting both on a personal and landscape scale. ADWR should work to resolve legal barriers to landscape scale rainwater harvesting and should increase funding for the Augmentation and Conservation fund in order to support and incentivize use of harvested rainwater. ADWR should incentivize and coordinate the formation of a Replenishment District within the AMA.
11. Growth in exempt wells will increase the difficulty of achieving and maintaining safe yield. The 4MP should evaluate the growth of exempt wells and determine ways exempt well owners might be able to contribute to achieving safe yield. The 4MP should initiate actions to minimize their adverse effects on the aquifer by using existing authorities and requesting new authorities as needed.
12. The 4MP should include a discussion of additional authorities needed by the Department to accomplish the safe yield goal by 2025.