

DRAFT

Evaluation of the Third Management Plan  
Program for Large Municipal Water Providers in  
Active Management Areas

# Summary of Interviews and Framework for the Stakeholder Process



Arizona Department of Water Resources  
3550 North Central Avenue  
Phoenix, Arizona 85012

December 29, 2005 - Robin Stinnett



## Introduction

Work is ongoing to identify and evaluate possible alternatives to the existing regulatory program for large municipal providers: cities, towns and private water companies in Active Management Areas (AMAs). An alternative may be employed during the remainder of the Third Management Period in one of three ways: (1) it may be incorporated into the Third Management Plan (TMP) as an additional alternative, (2) it may be used as a compliance option for municipal providers who cannot meet their assigned per capita use targets, or (3) it may be incorporated into the Third Management Plan as a replacement for the base program (total GPCD), the Alternative Conservation Program and/or the Non-Per Capita Conservation Program.

A set of goals and objectives has been developed for this process, along with a work plan and approach to stakeholder engagement. At the beginning of the current evaluation process, early in 2005, informal meetings were held with AMA Directors and other ADWR staff members who have had direct experience with development and/or implementation of the municipal program.

Additionally, informal meetings were held with water providers in the Phoenix, Tucson, Pinal and Prescott AMAs to introduce the evaluation process, to request feedback on the existing regulatory program, and to ask for ideas regarding additional options that may be considered during the evaluation process. Most of these meetings were held with individual providers, but a few included small groups of providers. The meetings were held between March and August 2005. All large municipal providers in the Prescott and Pinal AMAs were interviewed. Nine Phoenix AMA providers and six Tucson AMA providers were interviewed, along with one private water company representative with service areas in three AMAs: Pinal, Tucson and Phoenix. A list of municipal providers interviewed for the initial evaluation of the TMP conservation requirements is provided below:

Arizona American Water Company	City of Mesa
Arizona Water Company	Metropolitan Domestic Water Improvement District
City of Chandler	Town of Oro Valley
Chino Meadows Water Company	City of Peoria
Community Water Company of Green Valley	City of Phoenix
City of Eloy	City of Prescott
Town of Florence	Town of Prescott Valley
Flowing Wells Irrigation District	Queen Creek Water Company
Town of Gilbert	City of Scottsdale
City of Glendale	City of Tempe
Town of Marana	Tucson Water

•  
•  
•  
•  
•  
•  
•

---

Comments made by ADWR staff, private water company representatives, and staff from municipal utilities (cities and towns) are summarized in separate sections of this report. These are followed by a section containing a composite listing of comments made by the water providers. Since several provider representatives made similar comments, the frequency of each comment is noted. This section was included in an effort to illustrate the breadth of comments offered during the interviews and to document trends, minority views, and unique observances and suggestions. Consensus opinions and trends discussed in the earlier section summarizing municipal provider comments are not necessarily repeated in the composite listing. The final section of this report briefly outlines a framework for the stakeholder process, which is based primarily on comments and suggestions offered during the initial interviews.

During the informal meetings, written information was requested on water conservation activities implemented by the various water providers. A separate report titled, *A Summary of Water Conservation Programs in Active Management Areas*, has been prepared that summarizes the water conservation activities of the fifteen cities, towns and private water companies submitting information in response to that request. In addition, an Internet search has been conducted to identify water conservation activities implemented by municipal water providers in western states. The report, *A Web-Based Summary of Water Conservation in Arizona, California, Colorado, Nevada, New Mexico, and Utah*, is the result of this Internet search and includes a listing of conservation activities and websites for water providers in those six western states. Information contained in these reports will help to define the norm with respect to water conservation activities in the AMAs, as well as what might be considered as state of the art in our region. Both reports will be made available to anyone who requests a copy.

The information gathered from ADWR staff and municipal providers has helped to shape internal discussions related to development of a TMP alternative program and also will serve as the beginning point for the stakeholder process designed to continue progress toward selecting and refining an alternative to the existing regulatory program for cities, towns and private water companies in AMAs.

### **Summary of Comments by ADWR Staff**

Eight ADWR staff members were interviewed between February and May 2005. There was general consensus on the following issues:

- The administrative burden associated with our current program is disproportional to its value. Activities such as developing municipal models, administering alternative programs, reviewing and re-estimating service area populations where there are disagreements between the provider and ADWR,

and reviewing and monitoring compliance activities (stipulations) require an intensive amount of staffing.

- Although some like the notion of using GPCD (Gallons Per Capita Per Day) as a compliance measure more than others, all agree that fluctuations in GPCD are influenced by other circumstances besides a provider's water conservation effort. In some instances, there does seem to be a corresponding relationship between GPCD reductions and water conservation activities. But other factors such as weather and continued residential development with little or no new non-residential development also can contribute substantially to GPCD reductions. Conversely, there seems to be a direct relationship between increases in non-residential users and increases in GPCD rates, regardless of conservation efforts.
- A Best Management Practices approach should be given thorough consideration. In addition, the current Reasonable Conservation Measures (RCMs) contained in the Non-Per Capita Conservation Program should be reviewed and re-evaluated.
- Information on water conservation programs should be collected from municipal providers to serve as a gauge for the number and scope of water conservation activities currently practiced by providers in each of the Active Management Areas.
- ADWR should proceed with evaluating the program as quickly as possible to indicate to the public that this is a high priority issue for the Department and that we are serious about our commitment to look for alternatives to the existing program.
- The stakeholder process should be kept practical and fair. Participation should be invited and should influence the development of alternatives to the existing program.

Additional comments include the following:

- Groundwater limits would help to increase progress made toward development of renewable supplies. Having a program that requires some type of water conservation activity but is not tied to the management goals for the AMAs could inhibit and possibly reverse progress toward development of renewable supplies. The counter argument to this is that the Assured Water Supply Program will address the issues of groundwater dependence and ADWR's groundwater management goals.
- The GPCD program has some benefits. It is easy to administer as long as the provider agrees with its service area population estimate.

The following suggestions were offered:

- Use a GPHUD (Gallons Per Housing Unit Per Day) based program with RCMs for non-residential uses.

•  
•  
•  
•  
•  
•  
•

- 
- Allow for reasonable growth in the non-residential area as long as conservation activities are implemented for this use sector.
  - Include activities geared toward mature residential development.
  - Meaningful evaluation of water conservation activities should be required of and expected by providers.
  - Give providers a base program with a set of minimum conservation activities (e.g., reducing lost and unaccounted for water (if applicable); conservation literature given to all new customers; conservation literature made available to all existing customers; monitor high water users; offer audit programs for turf facilities, schools, apartment complexes, and/or other higher water users; require all providers to have designated water conservation staff, FTE to be determined by size).
  - Look into the possibility of creating a separate program for private water companies.
  - The stakeholders process should be well defined and effectively managed.

#### **Summary of Comments by Private Water Company, Water Improvement District and Irrigation District Representatives**

Representatives from seven private water companies, water improvement districts and irrigation districts were interviewed during the spring and summer of 2005: Arizona-American Water Company, Arizona Water Company, Chino Meadows Water Company, Queen Creek Water Company, Community Water Company of Green Valley, Flowing Wells Irrigation District and the Metropolitan Domestic Water Improvement District.

There was general agreement among providers on the following issues:

- Private water company staff expressed interest in working with ADWR not only to develop an alternative approach to the TMP municipal program but also to strengthen their relationship with the Department. They shared ideas on how private water companies might develop stronger partnerships with ADWR and with each other. They expressed interest in finding ways to build conservation efforts among private water companies.
- ADWR and the private water companies should go together to the ACC to present a standard, mutually acceptable, mandatory program to incorporate water conservation into a water company's activities.

Additional ideas and suggestions included the following:

- The idea of a conservation tariff should be explored. A conservation tariff could be built into each rate case to finance water conservation activities.
- ADWR should be the leader in conservation messaging. This way all water providers can take advantage of a statewide or regional message.
- ADWR should focus less on regulation and more on providing technical assistance. ADWR should be doing research on the effectiveness of water conservation techniques and should be looking for innovations in conservation techniques and technologies (“the next best thing in conservation”).
- ADWR should adopt a program whereby the municipal provider can choose from a selection of conservation activities. The program should be kept fairly simple. The listing of conservation activities should be based on the compilation of water conservation activities collected during the TMP evaluation effort.
- If ADWR proceeds with the kind of program noted above, the possibility of sharing conservation programs and staff should be considered and discussed.
- There should be some requirement to replenish the amount of groundwater used.
- Those municipal providers whose water use is already extremely efficient, should not be expected to cut water use back any more.

One interview participant suggested that the following set of conservation activities be considered as an alternative conservation program:

1. Free showerheads/aerators. Rebates on low flow toilets and hot water recirculating pumps.
2. Landscape rebates (although these need to be researched for cost effectiveness – look at cost and dollar amount and potential amounts saved per rebate).
3. Public information and education. This needs to be a bona fide program. Needs to be defined (“not just on paper”).
4. Audits – residential and commercial users using a professional auditor. Look at three options: (1) upon request by user, (2) mandatory audits of a percentage of customers each year (could be a wasted effort if you happened to audit very efficient users), (3) audit high water users (maybe voluntary, maybe mandatory).
5. School programs.
6. Conservation oriented rate structure, possibly tiered rates if water bills can be kept simple enough.

---

## Summary of Comments by Municipal Utility Staff (Cities and Towns)

Representatives from fifteen cities and towns were interviewed for the initial phase of the TMP evaluation. They include Chandler, Eloy, Florence, Gilbert, Glendale, Marana, Mesa, Oro Valley, Peoria, Phoenix, Prescott, Prescott Valley, Scottsdale, Tempe, and Tucson. Some of the most commonly offered comments and suggestions are noted below. Also a few detailed suggestions offered by provider representatives are included. Many other comments are listed in the following section containing the composite listing of comments and issues.

- Although some providers are happy with the total GPCD program, several indicated that a Best Management Practices approach should be considered and discussed.
- Holding the non-residential GPCD constant is still a concern among some providers.
- Some target or measurement should accompany any alternative selected. Even those providers who are not partial to the total GPCD program feel as though some monitoring technique is necessary. Tracking residential GPCD or GPHUD was a popular suggestion, although often it was offered as a monitoring tool rather than a measure of compliance.
- The municipal providers that currently participate in the non per capita program like it. Although it took a long time to negotiate a mutually acceptable program, providers feel as though their program suits their water service areas. Reporting and evaluation measures are quite cumbersome, however, and should be streamlined. Some noted the importance of streamlining the negotiation process: reducing the time it takes to develop a mutually acceptable program and making changes easier to accomplish. It is interesting to note that all of the providers participating in the non per capita program implement more conservation activities than they are required to do pursuant to their stipulations.
- Several providers suggested that ADWR should not only be the regulator, it also should help in partnership development and information dissemination. ADWR should support and/or fund evaluations of certain water conservation activities and techniques and should be a leader in disseminating water conservation information.
- Several providers noted that flexibility is very important. They want enough flexibility in the regulatory program to implement a conservation effort that meets their needs, addresses their service area characteristics, and allows for

easy modification when they want to add, delete or modify one or more elements.

- Providers seem to be very interested in ADWR collecting and compiling information on water conservation measures to discuss during the evaluation process and to use eventually as resource material.
- Providers want a fair and open stakeholders process. They want to be kept informed and they want to know that we will use their input productively. Some suggested that we make sure our objectives are well defined. One provider also suggested that we talk about possible options (rather than presenting just one) and explain that we are trying to figure out what works and what doesn't (rather than imposing something arbitrary).

One representative suggested this alternative program:

All water providers should be required to implement certain water conservation activities. Additional measures should be adopted that are pertinent to each provider's water service area (BMP based approach). Providers also should be able to document their programs by preparing a plan that answers the following questions: What are you going to do? How are you going to do it? How do you know how well you did it? ADWR should review and assess each plan every two to three years. Providers should revise their plan every five years.

### **Comments Offered by Municipal Providers in Active Management Areas**

The listing below includes a composite set of comments made by municipal providers, as well as the frequency of those comments. Comments have been paraphrased and simplified to provide readers with the main ideas and suggestions offered by providers. Comments are grouped into several categories.

#### **GPCD Rates/Population**

<b>Comment</b>	<b>Frequency</b>
The effectiveness of GPCD as a measure of conservation is debatable/outdated. Non-residential use, weather fluctuations and problems with population estimates confound the reliability of this measurement.	6
Don't just continue to crank down GPCD rates.	5
The total GPCD program provides flexibility for providers. They can design their programs to meet their needs without burdensome reporting constraints.	2
The GPCD program is easy. You know if you're over or not.	1

•  
•  
•  
•  
•  
•  
•

---

Trust providers to give the Department their own service area population estimates.	1
A seasonal population adjustment should be considered.	1
Providers serving primarily new developments with little non-residential use already have very low GPCD rates. They are very efficient but are expected to be even more efficient (stated by three providers). One of these providers stated that they already have a conservation based rate structure. Why shouldn't they be allowed to increase non-residential water use rates and use as much as providers serving more mature communities with a more balanced residential to non-residential use ratio? Equity issue.	3
Large untreated water deliveries should be included in a provider's GPCD rate.	1
Go back to using MAG population estimates for providers in the GPCD program. They are calculated consistently. Using MAG estimates would be very time efficient for ADWR. To improve timeliness, have MAG work on population numbers during the year instead of waiting until the annual reports are turned in.	1

#### Non Per Capita Program

<b>Comment</b>	<b>Frequency</b>
Some of the performance measures required in the non per capita program have nothing to do with saving water.	6
Providers on the non per capita program like it. They can design around their own needs. Reporting is too cumbersome. Requirements related to water savings estimates should be revised. RCMs could use some revision.	4
Two providers left the non per capita program due to reporting requirements, problems with water savings measurements, problems with RCMs, too much administrative burden.	2
Can't participate in the non per capita program because they are groundwater dependent.	2
One provider is afraid of participating in the non-per capita program because of the reporting requirements. Right now, they can implement the same components under the total GPCD program but are not subject to the reporting requirements.	1

## Best Management Practices (BMP) Approach

<b>Comment</b>	<b>Frequency</b>
A BMP approach should be considered.	4

## Private Water Companies

<b>Comment</b>	<b>Frequency</b>
ADWR and private water companies should go to the ACC together with a set of requirements generated by the Department and supported by the water companies.	3
Private water companies need to coordinate water conservation efforts with the local community and the education system. They need the support of these institutions to be successful in their conservation efforts. They also need ADWR's help with this.	2
A tiered water rate can be set for private water companies. The top tier can go to fund membership in the GRD. If there is money left over, it can be used to finance water conservation programs.	2
All private water companies should identify at least one staff person as the designated water conservation contact.	1
A water conservation tariff should be considered for private water companies to raise funds for conservation activities.	1

## Other Alternatives/Options

<b>Comment</b>	<b>Frequency</b>
Consider separate conservation activities for mature development (e.g., cost share/rebates for low flow plumbing fixtures). Show residents that there is a payback for them too.	2
Everyone should do something. Meaningful conservation activities should be required. (Some providers meet their GPCD requirements without an earnest conservation program.)	2
All providers should have to implement a specific set of basic conservation measures (e.g., a base program), with additional measures appropriate for their service area characteristics. Conservation plans should be required.	1
The utility should be given the opportunity to demonstrate their needs. They are in a better position than ADWR to analyze their service area and determine what kinds of conservation measures should work for them and to evaluate their effectiveness after they are implemented.	1

•  
•  
•  
•  
•  
•  
•



Require ordinances and other conservation activities but also require an explanation of how they are to be implemented.	1
Development of a drought plan is a realistic requirement.	1
ADWR should give providers a per acre allotment for each new development. The allotment should assume “good conservation,” for example, 1.5 AFA. It is much easier to affect the water use in a development before it happens.	1
A strong meter replacement program would help to reduce lost and unaccounted for water.	1
Use water management assistance grant funds to support leak detection equipment and trained staff (mobile lab concept) to be shared by municipal providers.	1
Require, or consider in developing requirements, dollars spent on conservation per capita.	1
Consider supporting legislation that allows people in Homeowners Associations (HOAs) to choose whether or not to overseed turf with ryegrass during the winter. Some HOAs require winter overseeding.	1
Consider limiting or discouraging non-beneficial uses.	1

Water Sources

<b>Comment</b>	<b>Frequency</b>
Some providers advocate a focus on renewable supply (increasing use and/or taking it into account). Focus on all supplies, all aspects of water management including effluent use. Look at a provider’s total water management effort.	3
Groundwater use reductions ARE an appropriate element of a regulatory program.	1
Groundwater use reductions are NOT an appropriate element of a regulatory program.	1

Reuse/Recharge

<b>Comment</b>	<b>Frequency</b>
Some providers made a stronger statement about renewable supplies noting that there should be some requirement to replenish the amount of groundwater withdrawn by municipal providers.	2

ADWR does not focus enough on recharge. Recharge should be required. 1

Compliance

<b>Comment</b>	<b>Frequency</b>
It is a good idea to have some kind of overall measurement to serve as an indicator of trends over time: GPCD, GPHUD, residential GPCD, benchmark, track by number of connections in each user class.	8
Need a more timely way to track GPCD or other target. DWR could identify a provider as out of compliance as long as one year after they miss their target.	3
Don't penalize providers if they change water sources.	1
Go easy on compliance efforts during the TMP evaluation. Concentrate on working with providers to develop a better program, especially since we're halfway through the management period.	1
Need regulation, partnership, <b>and</b> targets to track progress, rather than just compliance numbers.	1
Hold an annual performance review with providers who don't meet their target OR do this with all providers every year.	1

Reporting

<b>Comment</b>	<b>Frequency</b>
Streamline annual reporting process. Changing the forms every year is difficult. Make forms available to download electronically. Set up electronic reporting capability. Perhaps set up a spreadsheet for providers to use.	5
Consider putting the reporting burden on the owner of the turf facility.	1
ADWR should keep track of turf facility completion and let the provider know when it is operational.	1
One provider would like ADWR to develop a quarterly recharge report form for providers to complete and submit electronically.	1
On annual report, clarify that two checks are necessary: one for groundwater withdrawals and another for recharge/recovery.	1

•  
•  
•  
•  
•  
•  
•

---

#### Water Accounting/ Fees

<b>Comment</b>	<b>Frequency</b>
Drought exemption issue needs definition/clarification. Providers would like to know if they received the drought exemption.	2
One provider would like ADWR to deduct the amount of water recharged each year from its total withdrawals, while at the same time accumulating recharge credits for the same water.	1
Perhaps exempt well owners should pay a withdrawal fee to help with conservation and water supply augmentation programs. Perhaps there should be a property assessment for this purpose.	1
Increase the fee for recovery water. This would offset revenue deficits associated with decreases in groundwater withdrawals. ADWR needs more funding to operate properly. Providers can afford this.	1
ADWR should increase withdrawal and recharge fees for providers that are out of compliance.	1

#### Information Management

<b>Comment</b>	<b>Frequency</b>
To improve the management plan, present a matrix summarizing all requirements. This way a provider can look at one or two pages and know what they are supposed to do. Make language clear and concise.	2
One provider wants to know how ADWR's numbers are and will be used in compliance and planning activities.	1

#### Stakeholder Process

<b>Comment</b>	<b>Frequency</b>
Providers want an open and meaningful stakeholder process. Not just a formality with a predetermined outcome.	3
During the stakeholder process, create a task force comprised of representatives from the various user groups to help identify appropriate conservation measures.	1

#### Perceptions/ADWR-Provider Relationship

<b>Comment</b>	<b>Frequency</b>
Providers want more of a partnership with ADWR. Providers	5

want more support: technical assistance; research on next best conservation technologies and practices; help with evaluations; support messaging efforts; publicize local conservation efforts; advocate on behalf of private water companies with the ACC, governing boards, and cities and towns served by private water companies; show providers HOW to implement conservation measures; help educate the public about the cost of future water supplies.

Conservation didn't stop when DWR's regulatory program went on hiatus. Internal commitment to their conservation programs should be recognized. 4

Look at how the management plan can benefit other processes such as the Colorado River issues and drought planning. The more mutual support between water providers and the State, the better. 1

Other Suggestions

<b>Comment</b>	<b>Frequency</b>
Keep the program as simple as possible (reporting, measurement) while maintaining flexibility.	6
ADWR should have a stronger presence in the community. ADWR should retain, but temper regulatory activities. Help providers be more successful.	3
Don't penalize providers for expanding their non-residential development.	2
End users should be more involved in conservation. They should be held more accountable and should be engaged more in the process.	2
ADWR shouldn't give its authority away. They should take the lead and do what they were intended to do. This includes implementing regulatory programs and undertaking compliance activities. It is important for the State to continue to publicize the successes of the Groundwater Management Program.	1
There should be a functional, well-developed regional water conservation organization in each AMA.	1
Make sure that whatever work is done to evaluate the TMP is also used to prepare for the Fourth Management Plan.	1
Don't forget that providers need to meet their fixed costs.	1
One size fits all approach doesn't work for all AMAs since water sources differ.	1



## Framework for the Stakeholder Process

The stakeholder process for identifying and evaluating alternatives to the current conservation program for municipal water providers in Active Management Areas will begin in late January 2006. During the stakeholder process, proposals submitted to the Department will be reviewed and discussed by the stakeholder group and considered by the Department. In addition, issues associated with possible alternatives also will be identified, discussed and evaluated by the stakeholder group. Any proposals received prior to the first stakeholder meeting will be presented for discussion during the meeting. In addition, any issues associated with each proposal will be identified and discussed, either during the first meeting or during subsequent meetings. Please contact Robin Stinnett at 602-771-8602 or [rsstinnett@azwater.gov](mailto:rsstinnett@azwater.gov) to submit proposals or issues for review and discussion during the stakeholder process.

In an effort to focus the discussion during the first few stakeholder meetings, a few preliminary concepts are presented below. These concepts are based on suggestions made by municipal water providers during the initial interviews held during the spring and summer of 2005 and on subsequent internal discussions by Department staff. These concepts, along with any other proposals submitted to the Department, will serve as a starting point for the stakeholder process and will be presented and discussed during the first stakeholder meeting to assess interest among municipal providers and to help establish direction for the stakeholder process. It must be noted that these concepts are offered for discussion and evaluation purposes only and are not necessarily advocated by the Department at this time. Also note that maintaining the current municipal program as it appears in the Third Management Plan is another possible alternative.

### Preliminary Concepts

#### **Water Conservation Plan**

Each large municipal water provider would submit a plan annually that describes its current water conservation program and addresses additions and/or modifications for the coming year. Justification for programs would be included which would include a description of the character of the municipal water service area and plans for targeting each provider's unique characteristics to maximize conservation potential. Program staffing and budget would be included in the plan as well as an evaluation of the previous year's water conservation activities. Plans would be reviewed annually by Department staff to determine adequacy and completeness. A review meeting would be held each year between Department staff and staff representing the municipal provider.

**Prescribed Conservation Program** (municipal Best Management Practices approach)

All large municipal providers would be assigned a specific set of water conservation activities to implement within their water service areas. These activities would be appropriate for all municipal providers regardless of size or type (municipal public utility or private water company). An additional set of conservation requirements would be offered to the provider. The provider would choose to implement a subset of these that are most appropriate for its size, type, and service areas characteristics. The number of additional conservation requirements might be established in accordance with size and service area characteristics (i.e., amount and type of non-residential water uses). A report would be required annually from all providers containing a description of how each of the required measures was implemented, along with a description of program staffing and budget.

**Modified Alternative Conservation Program** (per current TMP program)

A residential water use requirement such as residential GPCD or GPHUD would be assigned to each large municipal provider. Rather than adding non-residential uses to the GPCD or GPHUD requirement, non-residential water conservation measures would be assigned to each provider or would be selected by the provider from a listing of acceptable measures. Another option would be for the Department to require that the provider adopt an ordinance or issue a condition of service requiring new non-residential users to employ state of the art water conservation technologies and practices applicable to each type of non-residential use. Rather than requiring groundwater use reductions, as required in the current Alternative Conservation Program, the Department could require that a provider obtain a Designation of Assured Water Supply for its service area.

**Associated Issues**

The issues listed below are offered for discussion during the stakeholder process. Undoubtedly, additional issues will be identified and discussed as the stakeholder process progresses.

1. If, after completion of the stakeholder process, an alternative program is adopted by the Department, should the alternative replace the GPCD program or should it be offered in addition to the GPCD program? Should the current Alternative Conservation Program and Non-Per Capita Conservation Programs be retained?
2. Should a groundwater reduction component be included in any alternative program?
3. Should any other type of increased reliance on renewable water supplies be required (e.g., recharge, direct use of treated effluent)?

•  
•  
•  
•  
•  
•  
•



4. What other types of water management strategies should be considered for inclusion in an alternative program?
5. Would it be possible and appropriate to have a separate regulatory program for private water companies?
6. What would be the most appropriate reporting procedures for the new program?
7. What would be the compliance framework associated with the new program: How would compliance be monitored and enforced?
8. Will a legislative change be necessary to accommodate adoption of a new program for the remainder of the Third Management Period? If so, how should that legislation be advanced and supported?
9. What kinds of outreach efforts should the Department initiate to support municipal water providers in achieving their requirements pursuant to any revisions made to the municipal program for the TMP?