

Fools Hollow & Park Valley Water Companies



April 28, 2010

Douglas W. Dunham, Deputy Assistant Director
Water Management Division
Arizona Department of Water Resources
3550 N. Central Avenue
Phoenix, AZ 85012

Fax # (602) 771-8689

RE: Proposed Changes to Substantive Policy Statement for Assured and Adequate Water Supply Applications

To Whom It May Concern:

We appreciate the opportunity to contribute the comments below concerning proposed changes to the Substantive Policy Statement.

1. Information required, or that may be required, would result in added expenses and/or waste for small water companies. *Examples:*
 - a. Map showing bedrock depths below land surface with a contour interval of 100 feet or less
 - b. Thorough description of the extent and degree of faulting and fracturing within the study area. What about systems, such as Fools Hollow-Park Valley, which rely on an aquifer that flows through fractured rock?
 - c. Additional aquifer testing to determine site-specific parameters
 - d. Longer duration aquifer tests (added costs and water waste)
 - e. Drilling and testing of wells if existing wells are deemed insufficient and/or unsatisfactory for use in performing aquifer tests (added costs and waste)
 - f. Additional methods other than slug tests, specific capacity well data and driller's log program to support the data from the aquifer test
 - g. New wells drilled if no water level data is available for study area
 - h. Advanced geophysical methods to estimate water levels
 - i. Additional supporting documentation if the Department's demand calculator is not utilized to estimate water demand. The demand calculator does not accurately account for certain circumstances such as a golf course in the study area served by a developer drilled well.
 - j. New ACC AAWS rule xxxx. What is the relationship of this rule to ADWR Assured and Adequate Water Supply applications? Could this potentially mean added costs to comply with this new ACC requirement?
2. Using previous studies to meet the requirements of a new application is discouraged. However, it is our position that such studies are baselines for predicting future trends.

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3. Some information simply cannot be adequately substantiated. *Examples:*
 - a. Description of natural recharge and discharge must include "mountain front recharge and precipitation sources"
 - b. Conclusions concerning the physical availability of a 100-year assured or adequate water supply based on results of the 100-year drawdown analysis
4. 100-Year Drawdown Analysis. It is noted, as required by new ACC AAWS rule xxxx, that the "deepest well in the project area must be used as the depth to bedrock." In the example of Fools Hollow-Park Valley, wells are not drilled to bedrock.
5. Accounting for no-flow boundaries within 10 miles of any pumping well is an unrealistic expectation for a system that relies on an aquifer that flows through rock fractures, such as the Fools Hollow-Park Valley system. For example, all wells associated with this system include no-flow boundaries located within 10 miles, but where those boundaries exist is anyone's guess short of drilling. A well drilled in one area could be productive; another well 100 feet away could result in nothing more than a pool of water. The onerous of providing such evidence should not be on the water company.
6. Selecting a Model Method to Support Groundwater Supply Estimates. In the case of the application submitted for Fools Hollow-Park Valley, the Department calculated total groundwater in storage through a tank analogy and results were incorrect.

In addition to the above, we recommend that there be a deadline associated with approving or rejecting applications. We waited approximately 1 1/2 years for approval after submitting our application. This lengthy time frame was particularly perplexing in view of the fact that the system is located within the City of Show Low study area and the City of Show Low had previously received their designation.

Looking towards the future, it would be helpful if the Department were to compile data for areas in such a way that the data could be a useful resource to small water systems. For example, if the Department already has on record an active designation for the City of Show Low, which qualifies certain information that would be directly applicable to the Fools Hollow-Park Valley study area, perhaps there would be less information needed from Fools Hollow-Park Valley, which could potentially be a time saver for all involved.

Also, since the Department has experts that review applications, consider dropping the requirement that small water companies also have an expert to prepare their applications. Oftentimes, small water companies have resources at their disposal that can successfully fulfill the requirements associated with preparing an application without having to incur added expenses to hire a qualified expert.

Sincerely,

Michael W. Mack
For Fools Hollow & Park Valley Water Companies
System # 09-011

MM/hj

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