

CAP STAFF PRELIMINARY COMMENTS/QUESTIONS REGARDING PROPOSAL FOR  
"ENHANCED AQUIFER MANAGEMENT: ALTERNATIVE CUT TO THE AQUIFER"

CAP staff supports ADWR's goal of developing a comprehensive groundwater management program that will help avoid negative impacts to water users and to the environment from localized groundwater level imbalances within the AMAs. The Department's proposed cut to the aquifer concept (Proposal) represents a substantial change to Arizona's underground water storage program that could have significant impacts on CAWCD operations. CAWCD seeks to better understand the elements of the Proposal, and its potential implications, in order to analyze and provide meaningful input on the Proposal. To that end, CAWCD submits the following comments and questions:

1. The Proposal notes that the Department has been analyzing how changes in the cut to the aquifer provision could support comprehensive aquifer management in the AMAs and that the Proposal is one possible approach. Could the Department provide a more comprehensive description of the specific problem(s) that the Proposal seeks to address and where might the problem(s) be expected to occur and in what timeframe?
  - a. What type and level of analysis has the Department undertaken to evaluate the impact of the Proposal on the problem(s)?
  - b. Has the Department evaluated the potential costs of the Proposal?
  - c. When will the results of those analyses be available to the public?
  - d. What other alternatives might be available to address the problem and to what extent have those alternatives been explored?
  - e. When will the results of the analysis of other alternatives be available to the public?
  
2. Unlike recovery wells, excess groundwater pumping by CAGR members currently is not attributable to individual wells. How would the cut to the aquifer be established for excess groundwater pumping and would the CAGR be required to somehow attribute all excess groundwater pumping to individual wells?
  - a. The additional administrative burden of tracking and attributing excess groundwater pumping to individual wells could be substantial (perhaps overwhelming) and costly to the CAGR, its member service areas and water providers serving member lands. ADWR, most likely, also would experience significant additional administrative burdens and costs under such a scenario.
  
3. Does the Department anticipate that the Proposal would create additional physically available groundwater to support new growth on groundwater supplies and replenishment?
  - a. If so, how would the current state of physically available groundwater, as established in existing groundwater models, be modified?
  - b. What data would be required to successfully demonstrate a "positive" impact? Would the Department make different modeling assumptions or would actual augmentation have to be demonstrated?
  - c. How long would it take to see "positive" changes to the physically available groundwater supply?