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WATER RESOURCE MANAGEMENT
DAVID C. ROBERTS
Senior Director

January 15, 2013

Mr. Scott Miller
Statewide Active Management Area Director
Arizona Department of Water Resources
3550 N. Central Avenue
Phoenix, AZ 85012

RE: Comments on "Enhanced Aquifer Management: Alternative Cut to the Aquifer" Concept Paper

Dear Mr. Miller:

Thank you for the opportunity to provide comments on the "Enhanced Aquifer Management" concept paper presented and discussed at the Phoenix Active Management Area (AMA) Groundwater Users' Advisory Council Meeting on November 8, 2012. The concept represents an important "future direction" for the Fourth Management Plan by modifying cut to the aquifer provisions of Arizona's underground water storage program. These changes would address projected groundwater level imbalances across the AMA identified by ADWR and advance progress toward the management goal of achieving safe-yield by 2025. The benefits of such a groundwater management approach are not only positive for the continued health of the aquifer, but also for Arizona's future economic vitality.

SRP fully supports the ADWR's decision to address long-term comprehensive management of the aquifer and the concept paper provides a solid foundation from which to build. Given the changes to the underground water storage program contemplated in the concept, and the financial and operational challenges it raises, SRP suggests ADWR convene a stakeholder process to discuss and develop the concept further. That process would provide an opportunity for stakeholders to understand the reasoning behind ADWR's decision to pursue a new groundwater management approach—including discussion about analysis of long-term imbalances conducted by ADWR—address any reservations or misconceptions, and build consensus necessary to pass required legislation.

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Arizona's water interests have a long history of working collaboratively to develop innovative water management approaches and programs. Modifying ADWR's current policies to further encourage recharge, recovery, and replenishment in critical areas of the aquifer is the next step in fine-tuning groundwater management. SRP looks forward to working with ADWR and other stakeholders to move the enhanced aquifer management program from concept to practice.

Sincerely,

A handwritten signature in black ink that reads "David C. Roberts". The signature is written in a cursive style with a prominent initial "D".

David C. Roberts
Senior Director
SRP Water Resource Management