

J. Scott Miller

From: Linda Stitzer [linda.stitzer@westernresources.org]
Sent: Monday, April 09, 2012 12:24 PM
To: J. Scott Miller
Cc: Thomas Buschatzke
Subject: Prescott AMA 4MP Comments
Attachments: 4MP_Comments_04_09_12ltr.doc

Hello Scott,

Attached are initial comments from Western Resource Advocates on the Prescott 4MP. We look forward to continuing to participate in this process.

Please contact me if you have any questions.

Thank you,
Linda

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WESTERN RESOURCE ADVOCATES

April 9, 2012

Dear Scott,

Western Resource Advocates submits the following preliminary comments on the Fourth Management Plan for the Prescott AMA. We are concerned about the increasing overdraft under all planning scenarios and limited current management tools to address it. Our comments are based on the limited information available to date, primarily the PrAMA Assessment and your presentation to the Prescott GUAC in January, 2012. Therefore, they are general in nature and we look forward to the opportunity to develop and discuss these and other strategies further as the management plan progresses. Please contact me if you have any questions.

Management Plan Process

We are concerned about the level of public engagement and limited publicity about the 4MP since it directly or indirectly affects most of the water users in the PrAMA and is intended to be more of “a plan” to reach the management goal than previous management plans. This requires a public dialogue involving the Department, the regulated community and the public that would likely not occur in a standard GUAC meeting as proposed. Further, meaningful engagement of stakeholders at the onset is more likely to ensure plan support.

Conservation

It is unclear how the Department concluded that additional conservation requirements are unnecessary. The contribution of water conservation to reduce overdraft should not be underestimated, particularly for the PrAMA where renewable supplies are limited. While the conservation requirements in prior management plans as well as self-initiated efforts have resulted in substantial reductions in use, we disagree that additional conservation requirements would not yield much savings. Recent municipal demand studies show annual GPCD reductions of 1% are common due to both passive and active conservation efforts and suggest that this be at least a minimum expectation.

Since both large providers in the PrAMA are regulated under the Modified Non-Per Capita Conservation Program, the lack of readily measureable standards associated with the program and the ability of the Department to monitor, evaluate and enforce the program given its staffing reductions is a concern. We understand that an advisory

committee has met and development of an evaluation plan for the Modified NPCC Program was underway. We strongly encourage the Department to continue to develop meaningful indicators of program effectiveness that could include requiring additional BMPs, enhanced reporting and a mid-planning period program effectiveness evaluation.

While the component GPCD method of the Total GPCD Program is somewhat complex, we believe that the underlying methodology, that new users should be expected to have stricter conservation standards based on higher efficiency fixtures and an exterior water use budget, is sound. We encourage the Department to retain an effective GPCD program that requires continuing GPCD reductions. ✓

In addition, the lost and unaccounted for water requirements have remained constant through multiple management periods and deserve another look; in particular we recommend considering whether 10% for large providers and 15% for small providers is still an appropriate standard. Both Prescott and Prescott Valley annually report losses of about 8.5% - over 1,000 acre-feet in 2008. While there are many components of lost and unaccounted for water (including underreporting meters that result in lost revenue), reducing actual physical losses results in reduction in pumping.

Planning for Safe-yield, Cooperative Water Management and Development of New Programs

✓ The consequences of continuing to overdraft the aquifer are serious. If the 4MP is envisioned to be more “a plan” to achieve the safe-yield goal, we support inclusion of a planning chapter that includes evaluation and recommendations of what potential actions are needed. Ideally, this would be the starting point for a local/regional cooperative water resource planning process to develop implementable safe-yield strategies. We encourage the Department to initiate this effort and provide support to PrAMA communities. In addition, considering the lack of renewable supplies available to the AMA, cooperation will likely be necessary for water supply development projects.

We support regional development of meaningful new approaches to address overdraft that could include legislation, strategic groundwater recharge, dedication of a portion of recharge to the aquifer and a sub-area management program to address environmentally sensitive areas, areas of rapid groundwater decline and other management objectives.

Contribution to Safe-Yield; Exempt Wells and New Users

As the largest water use sector in the PrAMA and the only sector subject to replenishment requirements, municipal water providers carry most of the responsibility to meet safe-yield. We encourage development of incentives and requirements to address groundwater pumping by domestic wells and new industrial users. Though any programs aimed at domestic wells will be met with opposition, the continuing “hands off” approach is inequitable and unsustainable. Potential approaches could range from legislation to education and could include aggressive conservation outreach, limits on new wells in “critical areas” or assessment of fees to be used for conservation and augmentation

programs. In addition, unused industrial groundwater rights and issuance of new permits represent potential new groundwater pumping. Conservation requirements and replenishment should be considered for these new users.

Augmentation and Reuse

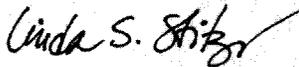
As stated in the PrAMA Assessment regarding renewable water supplies under the Assured Water Supply Rules: *“In essence, because of the limited access to alternative supplies, the Municipal sector in the Prescott AMA has a disproportionately large groundwater allowance when compared to the other safe-yield AMAs. In 2006, the groundwater allowance use for the Prescott AMA was approximately 42 percent of the total Municipal sector demand.”* This large groundwater allowance perpetuates overdraft, creating an additional challenge for the AMA and the potential for physical availability problems in the future.

For this reason, additional effluent reuse, condensate capture and creative augmentation and replenishment strategies need to be seriously explored. One viable approach is implementation of Low Impact Development (LID) practices that promote stormwater infiltration. These practices include passive and active rainwater harvesting, decentralizing stormwater management and slowing runoff flows. These practices could be incentivized or included as a regulatory option and we encourage ADWR to actively support adoption of these types of requirements at the local level in the management plan. Augmentation actions should not lead to a groundwater pumping credit program until, at a minimum, the aquifer is in “surplus” for a sufficiently long period of time.

Monitoring Progress

To monitor progress toward reaching the safe-yield goal and the contribution of conservation and augmentation programs, the Department should annually update and report water demand by all sectors, calculate the GPCD for all municipal providers and regularly update the PrAMA water budget. If sufficient progress is not being achieved, modification of the 4MP to incorporate necessary changes should be considered. With only thirteen years left to meet the management goal, regular monitoring and responsive actions are obviously needed.

Sincerely,



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cc: Tom Buschatzke
Prescott GUAC