

September 6, 2013

Via E-mail

Jeff Tannler
AMA Director
Arizona Department of Water Resources
3550 North Central Avenue
Phoenix, AZ 85012

Dear Mr. Tannler:

I am writing on behalf of Environmental Defense Fund (EDF) regarding the Department's Draft Fourth Management Plan for the Prescott Active Management Act (PRAMA). Our comments will focus on the overarching issues raised in our previous comments on the Fourth Management Plan process, which are attached for your convenience.

EDF's interest in Arizona's Fourth Management Plan process is grounded in our goals of promoting, on behalf of our membership, sound water management in Arizona and the Colorado River Basin. We believe that it is essential to these goals and to the state's future that Arizonans continue the work needed to achieve and build on the promise of the 1980 Groundwater Management Act.

(1) Scenario Planning for Safe Yield

EDF appreciates and supports the Department's considerable efforts to incorporate scenario planning into the Fourth Management Plan process. The future scenarios outlined in chapter 11 of the Draft Plan are very useful in portraying examples of water management decisions could be made in the PRAMA and the likely effect of these decisions on the ability of the AMA to meet safe yield goals over the long term. The 100-year time frame associated with these projections is also very informative and is appropriate given the forward look of the Assured Water Supply program and the serious consequence that decisions made now will have on the PRAMA communities in the future.

We also appreciate the graphs that visually display the annual magnitude of overdraft and surplus over time. (Could these also show the cumulative effect of the years of overdraft combined with the years of surplus?)

The three future scenarios included in chapter 11 vividly depict the very significant challenges that this region of Arizona faces. We are struck by the conclusion that even *with* importation of groundwater from the Big Chino Basin (which, as noted in the Plan, comes with its own very significant uncertainties and monetary and nonmonetary costs—and would likely require mitigation that itself will also affect the water balance in the area), and even *with* the other water management activities incorporated into the assumptions in these scenarios, the Prescott AMA will not be able to maintain safe yield indefinitely. We are also struck by the significant differences in the length of time for which the AMA *will* be in safe yield depending on choices made in the near term.

We are therefore very encouraged that ADWR plans to “construct and analyze... [further] scenarios throughout the fourth management period” and analyze them “to identify those factors which mostly strongly influence the ability of the PRAMA to achieve and maintain safe yield.” (Draft Plan, p. 11-3) The additional scenarios that the Department intends to create will be crucial to identifying the right solutions—and creating the awareness and will that will be needed to bring them to fruition. Resources for this endeavor will have to be made available to and by the Department at a scale that matches the importance and level of complexity of the challenge.

(2) Need for Broad Tool Set

EDF also appreciates the broad discussion in chapter 12 of the water management issues that the PRAMA faces, including categories of “allowable pumping” under the Groundwater Management Act and Assured Water Supply rules and the initial catalog of associated “possible solutions” for further exploration. Future scenarios explored by the Department and stakeholders will be useful for further evaluating which of these solutions has the most promise. We are encouraged that the community of the PRAMA has shown interest in the development of a regional water management strategy (Draft Plan p. 12-10) and agree that significant efforts will be required at many levels (local, regional, state) and across jurisdictions to address the challenges faced.

(3) Role of Conservation & Efficiency

As noted in our previous comments, while we understand that conservation, efficiency, and “curtailment” strategies will not by themselves result in safe yield, we do continue to believe that they can play an important role and would like to see development of further information that helps to clarify how various measures in new *and existing* development might play a further role in achieving safe yield in the PRAMA in the future. We appreciate that there are many variables that go into modeling such measures.

Finally, we reiterate our suggestion that as strategies for effluent use are explored in the future, environmental consequences are identified and thought through. The same consideration will apply to decisions about new uses of local surface water.

Thank you once again for the hard and thoughtful work that went into the development of this Plan. We continue to believe that a scenario-planning approach can help the AMAs take

significant steps toward reaching their safe yield goals. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Gibbon', with a long horizontal flourish extending to the right.

Jocelyn Gibbon
Attorney, Colorado River Program
Environmental Defense Fund