



Office of the City Manager
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Water Resources Section (928) 777-1144

September 6, 2013

Arizona Department of Water Resources
Jeff Tannler, AMA Director
3550 North Central Avenue, Suite 200
Phoenix, Arizona 85012

Re: Draft Working Copy, Prescott Active Management Area, Fourth Management Plan dated July 31, 2013

Dear Mr. Tannler:

The City appreciates the efforts made by ADWR to compile and analyze the Prescott AMA (PrAMA) data and use it for the development of safe-yield scenarios. That work is the basis for the Fourth Management Plan (4MP). By doing so, the area has opportunities to contemplate and consider implementation of additional strategies to address the on-going challenge of reaching safe-yield. The 4MP is concise in presentation and will serve as a useful reference tool.

During the timeframe when the Assessment section of the 4MP was under development, ADWR could not foresee the activity in 2010 among the City, Town of Prescott Valley, and Salt River Project. As you are aware, in 2010 the entities entered into what is known as the Agreement in Principle. Then in 2012 Comprehensive Agreement (CA1) was approved by the same three parties for increased and targeted monitoring in the Big Chino Sub-basin, and the completion of a refined, sub-basin specific, groundwater flow model. The actual timetable for the completion of these activities may span eight (8) to ten (10) years. We are aware that the 4MP is a tool and the scenarios, as projections of what may be possible, will not assure a certain outcome. The arrangement among the CA1 parties along with other future activities may show other future outcomes within the two sub-basins of PrAMA.

The City has the following basic comments:

- The local communities or even Yavapai County residents at-large often find it challenging to grasp the efforts that have occurred to date by both ADWR and local water providers to move toward a safe-yield situation. ADWR may want to attribute some space in the Introduction or other appropriate area to provide a concise history of efforts to date; this may also take the form of a bulleted timetable. What may the situation look like in the area if it wasn't subject to AMA rules in 1980 and subsequently, fully enacted AWS rules in 1998?

- **Chapter 3** It is understood that the municipal sector has traditionally included estimated private well use. Due to the number (and increasing number) of exempt wells in and around the AMA, it is important to make exempt well use a separate category in future management plans if this sector is intended to assist in solutions for safe-yield.
 - **Chapter 3.1** Water development and service by the City dates back to 1864 and in the years that followed supplies consisted of both surface water and groundwater switching back and forth and sometimes both concurrently. Starting the City's water provider history in 1948 with the initial wells in the Little Chino doesn't seem sufficient. The introduction may need to be briefly evaluated to determine the intent of the information. Is it solely to address municipal groundwater activity? If so, some information on the neighboring Towns is appropriate. What time period? Additionally, since the number of exempt wells is high in this small AMA, a table showing an estimated number per decade may be helpful to the reader.
 - **Figure 8-1** The City operates two (2) wastewater treatment/water reclamation plants. The map doesn't show the Airport Water Reclamation Facility (AWRF), and it may be difficult to show on the map as the USF is at the same location. The AWRF is currently being expanded.
 - **Chapter 8.3** The City has embarked on enhanced aquifer management and it is noted in the City's 2005 D&O. Two wells have been drilled within the area of impact surrounding the City's USF. One well is operational as documented in the City's 2012 annual report.
 - **Chapter 8.3.2** Groundwater overdraft has been stated in ADWR documents to be occurring in the AMA for decades. The volume of water in storage within the area aquifers have been shown to be decreasing since the 1940s. It is likely that the riparian system have already been comprised. In this section it will be more appropriate to use the terminology, "further compromised," instead of "destroyed." In Chapter 8.4.3 ADWR offers a potential, likely partial, safe-yield solution with the use of Del Rio Springs. This movement of water from one location to another has the potential to further compromise the riparian area.
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- **Chapter 8.4.1** The City's USF recharges the Little Chino sub-basin.
 - **Chapter 8.4.3** The considerable legal complexities of using Watson and Willow surface water supplies are not reflected in this chapter. The window for which the City can move water from the reservoirs is April 1 through November 30. Language here should be consistent with language in **Chapter 12.2.5**. The City's impression is that the pre-existing agreement (Stipulation and Judgment No. 22088) could require more than just changing language to allow for year-round transmission of water from the reservoirs to the USF. Additionally, the description for how water can be moved from Del Rio Springs doesn't appear to be needed text in the 4MP.
 - **Chapter 8.6.2** City Charter, Article I, Section 4 speaks to the permanent recharge of effluent generated by new development where future annexations are greater than or equal to 250 acres. The City maintains a non-recoverable water storage permit with the ADWR. This potential activity in non-recoverable recharge may be appropriate to note in the 4MP.

- **Chapter 12.2.1** Exempt wells continue to be challenging in this small AMA. Through Water Management Assistance Program (WMAP) it may be time to use funds to seek additional information and conservation opportunities for property owners using private wells. Additionally, the City continues to find challenge in A.R.S. §45-454 due to it not assisting with the connection of lots to City infrastructure for the benefit of the safe-yield opportunities outlined by ADWR.
- **Chapter 12.2.2** The statement that there are no storage projects along Granite Creek is not correct. Prescott's USF is adjacent to Granite Creek and has been in operation and permitted for several decades.
- **Chapter 12.2.2** Doug McMillan is referenced and his associated work. Please include appropriate documentation in the bibliography. His work is not clear as to what type of analysis was done and how it was documented.

The City would like to once again thank ADWR for the immense and dedicated effort to compile and analyze data for this draft management plan. We look forward to continued work with ADWR to attain additional supply improvements and the work with our neighbors to reach an on-going condition of safe-yield.

Sincerely,



Leslie Graser
Water Resource Specialist