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WATER RESOURCE MANAGEMENT
DAVID C. ROBERTS
Senior Director

September 5, 2013

Sandra Fabritz-Whitney
Director
Arizona Department of Water Resources
3550 N Central Avenue
Phoenix Arizona 85012

VIA Email and US Mail

RE: Prescott AMA Draft 4th Management Plan

Dear Sandy,

Thank you for the opportunity to provide comments on the Department's Draft 4th Management Plan (Plan) for the Prescott Active Management Area (AMA). SRP appreciates the Department's extensive effort in analyzing and compiling the area hydrology, historical and future demand projections, water budget data, and planning scenarios. This Plan will provide guidance for water users within the Prescott AMA towards reaching the safe yield goal by 2025.

As you know, SRP and its shareholders have extensive surface water rights to the Salt and Verde Rivers, and other watercourses within the State. Consequently, we are very interested in the various management plans for all of the AMAs. The Plan for the Prescott AMA is the first to be issued for public comment. Described below are SRP's comments and suggestions on the Plan.

The Plan certainly recognizes the challenges facing the Prescott area in achieving safe-yield, as well as the benefits of maintaining safe-yield to the region's water users and general economy. The Department has done a good job of describing several important water management options for reducing groundwater overdraft and managing the region's limited water supplies. We commend the Department for their innovative thinking in this regard.

As noted in the Plan, importing water from the Big Chino sub-basin (Big Chino) to the Prescott AMA is recognized as perhaps the most significant management option for

reducing overdraft and achieving and maintaining safe-yield. On page 11-3 and again on page 11-5, as part of its water supply scenario analysis, the Department notes that importation of water from the Big Chino could be initiated as early as 2020. While we are not aware of the current plans for the Town of Chino Valley, SRP believes that Prescott's importation plan is likely not going to occur by that date. As you know, in recognition of the importance of the Big Chino to the region and the need to better understand the basin's hydrology, last year Prescott, Prescott Valley and SRP entered into an agreement to fund the development of a long-term water monitoring program, and to develop a regional groundwater model.

A key component of the agreement is the collection of baseline data from the monitoring program prior to implementation of Prescott's plan to import water from the Big Chino to the Prescott AMA. There are numerous components to the monitoring plan that are likely to take several years to complete. As of today, Prescott, Prescott Valley and SRP estimate that the earliest date for all of the components of the monitoring plan to be put in place is around 2017. Consequently, it is likely that importation of water from the Big Chino to Prescott and Prescott Valley will not commence until about 2022 or later. SRP understands that there are many assumptions that play into the scenario projections but thought this was important to point out for consistency.

On page 8-7 the Department raises the idea of Prescott potentially amending its agreement with SRP as a means to allow Prescott to make greater water management flexibility (use) of its surface water supplies from Watson and Willow Lakes. SRP agrees that an amendment to the agreement is necessary to accomplish this goal; however, we believe there are additional conditions or limitations that affect Prescott's ability to make greater use of its Watson and Willow Lake supplies. For example, the water rights transfer order (ST98-001) contains language that limits Prescott's ability to divert water during certain times of the year. Accordingly, we believe this paragraph should be clarified or expanded to include any other conditions or limitations that apply to the Watson and Willow Lake supplies so that a complete picture is presented of what Prescott would need to do to put these supplies to greater use.

Lastly, there are various references to enhanced aquifer management throughout the Plan. As you know, SRP is very interested in continued work toward developing programs for enhanced aquifer management in all AMAs. Locating recharge in areas closest to recovery is one very important tool to promote the health of the aquifer across an AMA. We would like to express our support for your work in this area and offer any assistance you might need in developing, refining and implementing this concept.

Other Suggested Edits/Comments:

- 2.3: The CVID water rights were severed and transferred to Prescott for municipal use within their water service area, and non-consumptive (in situ) use for recreation, and wildlife, including fish for water held in storage.
- 5.2: "...290 aeres square miles of undeveloped land within the AMA."
- 5.6: The General requirements section (5.6.1.3) makes no reference to the required Basic Public Information Program. We suggest that you add the following sentence at the end of this section, after the bulleted items noting BMP requirements for each Tier:

Regardless of the number of BMPs required, all municipal providers regulated under the NPCCP must implement a basic public Information program described in detail in section 5.6.1.5 of this plan.

Adding this sentence will establish the public education program as a general requirement, along with the other general requirements, and also will help readers understand why Item 4 in Section 5.6.1.4 must be included in the Provider Profile.

- 8.4: Table -8-1. Typographical error in the far right column. 859 should be 1,859.
- 8.4.1: "...City of Prescott's Sundog and Airport wastewater treatment plants have been treating wastewater...recharging the reclaimed water into the ~~Upper~~ ~~Agua Fria~~ Little Chino subbasin..."

We appreciate the opportunity to comment on the Prescott AMA Plan and look forward to working with you on all of the Plans developed for the Fourth Management Period. I would be happy to discuss any of our comments with you at your convenience.

Sincerely,



David C. Roberts
Senior Director
Water Resource Management

cc: Jeff Tannler, ADWR