

Date	Name	Entity	Comment Summary	Method of Receipt
8/21/2013	John Zambrano	CWAG	<ul style="list-style-type: none"> <li>• Table 3-2 and 2-2 do not match in terms of net natural recharge;</li> <li>• Who would purchase LTS credits to offset a violation?</li> </ul>	Email
8/23/2013	Chris Marley	Town of Chino Valley	<ul style="list-style-type: none"> <li>• Opposed to exempt well regulations;</li> <li>• Proponent of storm water reclamation and injection wells</li> </ul>	Email
8/13/2013	Barbara Schroeder	private citizen	<ul style="list-style-type: none"> <li>• Why was limiting population growth not included as a potential water management strategy?</li> <li>• Requested clarification of "recharge" and "recovery"</li> </ul>	Email
8/6/2013	John Zambrano	CWAG	<ul style="list-style-type: none"> <li>• Cannot reproduce the projection scenarios with the information in the draft plan;</li> <li>• Figure 11-6 difficult to read;</li> <li>• What are the short-term water management issues that lead to using a 5-year moving average for net natural recharge?</li> <li>• Do GPCD figures in section 11.2 include reclaimed water?</li> <li>• Is there a typo in the growth rate percent?</li> <li>• Should CWA replace SDWA in section 7.4.3.7?</li> </ul>	Email
7/31/2013	Joanna Dodder	Prescott Courier	<ul style="list-style-type: none"> <li>• What is the annual population growth rate for projections?</li> <li>• What is the projected population in 2025?</li> <li>• What is the overall average GPCD today and what GPCD will the AMA need to achieve to reach safe-yield by 2025?</li> <li>• Is it accurate to say that OD will be 20-24K per year if the AMA does not implement water management strategies?</li> <li>• If those strategies are implemented when will OD of 20-24K be reached?</li> <li>• How much of the committed demand has not yet been built?</li> <li>• Is committed demand included in the water budget calculations?</li> <li>• How much water will the PRAMA need in 2025?</li> <li>• How much more groundwater is physically available in the LIC sub-basin?</li> </ul>	Email
8/30/2013	John Zambrano	CWAG	<ul style="list-style-type: none"> <li>• Section 2.6.2 page 2-10 - water level rise for the Agua Fria sub-basin is missing - what is that figure?</li> </ul>	Email
9/4/2013	Doug McMillan	private citizen	<ul style="list-style-type: none"> <li>• Clarify the definition of safe-yield relative to natural discharges;</li> <li>• Consider storm water harvesting and underground storage as an offset to overdraft rather than an accrual of LTS credits;</li> <li>• Clarify whether safe-yield is the same as creating zero net recharge;</li> <li>• Clarify the timeframe when COP can store - is it 90 days or 8 months? (April 1 through November 30th?);</li> <li>• The impact of Big Chino importation depends on whether the water comes from storage or natural discharges - request ADWR explore mitigation alternatives in the 4MP;</li> <li>• Propose macro-rainwater harvesting and storage along Granite Creek - could contribute to downstream surface flows.</li> </ul>	Email

Prescott AMA Draft Fourth Management Plan – Comments Received by ADWR as of 9/16/13.

Date	Name	Entity	Comment Summary	Method of Receipt
9/6/2013	John Munderloh	Town of Prescott Valley	<ul style="list-style-type: none"> <li>• Do not include exempt well pumping in the Municipal demand category;</li> <li>• Report should explain strides made toward reaching SY;</li> <li>• Does 4,530 AFY = the allowable SY pumping?</li> <li>• Do not infer that COP and PV will be paying for the most expensive water while others (exempt wells) use inexpensive local GW;</li> <li>• Limiting exempt wells is the State's responsibility - not local responsibility;</li> <li>• Include history of expenditures to date to achieve SY;</li> <li>• Add history on COP's water development;</li> <li>• Expand history of Bond Ranch surface water use;</li> <li>• Chapter 4, pg. 4-6 - add language clarifying water will be put to use within the Town of PV;</li> <li>• Chapter 5, Table 5-1 - units missing;</li> <li>• Chapter 5, pg. 5-10 - mention "Water Smart";</li> <li>• Chapter 6, pg. 6-5 - clarify that reclaimed water has been used by 4 out of 6 golf courses;</li> <li>• Chapter 7, pg. 7-13 - clarify PV has a constructed USF permit;</li> <li>• Chapter 8, pg. 8-3 - whether OD is increasing or decreasing depends on the period of record examined;</li> <li>• Chapter 8, pg. 8-4 - correction - COP has been recharging in the LIC not the UAF;</li> <li>• Chapter 8, Table 8-2 - "Year" column has description "Treatment Plant" in it;</li> <li>• Chapter 8, pg. 8-7, section 8.4.2 PV wastewater treatment plant capacity is 4,200 AFY (3.75 mgd);</li> <li>• Chapter 8, pg. 8-8 - correct statement about base flow at Del Rio Springs and its use.</li> </ul>	Email
9/5/2013	David Roberts	SRP	<ul style="list-style-type: none"> <li>• COP importation of BC GW not likely to occur by 2020;</li> <li>• Earliest date for having all components of the BC monitoring plan in place is 2017;</li> <li>• Not likely BC importation will occur until 2022;</li> <li>• Expand discussion of COP's limitations on using additional SW;</li> <li>• SRP supports enhanced aquifer management;</li> <li>• Chapter 2, section 2.3 - clarify uses of Watson/Willow;</li> <li>• Chapter 5, section 5.2 - correct 290 acres to 290 square miles;</li> <li>• Chapter 5, section 5.6 - add language clarifying the inclusion of the Basic Public Information Program in the NPCCP;</li> <li>• Chapter 8, section 8.4 typo - 859 should be 1,859; Chapter 8, section 8.4.1 - COP stores in the LIC not the UAF.</li> </ul>	Email

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9/5/2013	John Zambrano	CWAG	<ul style="list-style-type: none"> <li>• Add language specifying that cooperative management include an action plan to be evaluated by ADWR and the public;</li> <li>• ADWR should commit to educating the public on the need to reach SY;</li> <li>• Encourage publication of annual water budgets;</li> <li>• Adopt adaptive management strategy with triggers for increasingly aggressive regulation of timeframes are not met;</li> <li>• Enforcement provisions for exceeding conservation requirements should directly benefit the aquifer (as opposed to monetary penalties);</li> <li>• Increase/require reclaimed cuts to the aquifer for large annexed subdivisions;</li> <li>• 4MP should require greater conservation effort - increase the number of required BMPs;</li> <li>• Encourage additional conservation for new construction;</li> <li>• The projection of fluctuating net natural recharge is not helpful;</li> <li>• Quantify the groundwater withdrawal limit necessary to achieve SY;</li> <li>• Suggest natural recharge of 9,900 AFY and natural outflow as a decreasing trendline starting about 5,000 AFY;</li> <li>• Values for net natural recharge in Table 3-2 and 2-2 differ;</li> <li>• Figure 3-5 needs to be corrected;</li> <li>• Would like to see a budget showing overdraft if steps to achieve SY are not taken;</li> <li>• Budgets included are difficult to understand - include components and calculations in an appendix;</li> <li>• ADWR should prepare a list of the conservation and augmentation projects that could be considered to leave for providers to assemble into their own strategies;</li> <li>• Add detail on COP's other SW supplies and how COP could use them and if they did, the impact on discharge and water rights of others, and what would happen if these sources go dry;</li> <li>• Evaluate the impact of projected growth based on whether it is subject to AWS requirements or not;</li> <li>• Focus on projected growth from exempt wells and pre-AWS consistency with goal CAWS can help identify the volume of additional water needed to achieve SY;</li> <li>• Include discussion of mitigation of any potential impact on the Verde of BC GW importation;</li> <li>• Recognize the risk of recovering treated wastewater from within the AOI (WQ);</li> <li>• Expand definition of augmentation to include rainwater harvesting and work to resolve legal issues;</li> <li>• ADWR should incentivize and coordinate formation of a Replenishment District in PRAMA;</li> <li>• Include a list of the types of additional augmentation authorities ADWR might pursue</li> </ul>	Email
9/6/2013	Jocelyn Gibbon	Environmental Defense Fund	<ul style="list-style-type: none"> <li>• Supports efforts to incorporate scenario planning into the 4MP process;</li> <li>• Could ADWR show the cumulative effect of overdraft combined with the years of surplus graphically?</li> <li>• The additional scenarios ADWR intends to create will be crucial to identifying the right solutions and creating the awareness that will be needed to bring them to fruition;</li> <li>• Resources to develop additional scenarios will need to be made available to ADWR and by ADWR sufficient to complete the task</li> <li>• Significant efforts will be required at many levels, across jurisdictions to address SY;</li> <li>• Although conservation, efficiency and curtailment will not by themselves result in SY they are important – would like to see</li> </ul>	Email

Prescott AMA Draft Fourth Management Plan – Comments Received by ADWR as of 9/16/13.

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			development of how measures in new and existing development can assist in achieving SY <ul style="list-style-type: none"> <li>As strategies for reclaimed water are explored environmental consequences need to be identified and thought through (this also applies to surface water strategies)</li> </ul>	
9/9/2013	Linda Stitzer	Western Resource Advocates (Western Resources)	<ul style="list-style-type: none"> <li>Key issue of AWS allowable pumping that will continue to deplete the aquifer is not directly addressed in the draft plan;</li> <li>Encourage ADWR to be a catalyst and provide assistance for implementation of meaningful local actions to reduce AMA OD;</li> <li>Portraying annual OD as a 5-yr running average illustrates the variability of annual recharge and OD lagtime and is a useful tool to plan for variability and management to address local aquifer conditions affected by drought, however, the long-term net natural recharge is also value for planning and supply development purposes and should be reflected in the plan budgets;</li> <li>Support the suggestion of adopting WaterSense as a code for new subdivisions;</li> <li>Sewer flow and wastewater treatment system problem due to low interior demand do not appear to be a widespread problem (Alliance for Water Efficiency Fact sheet reference –online);</li> <li>Retrofitting existing home fixtures to achieve additional conservation is less expensive than supply augmentation;</li> <li>Encourage a scenario with reduction in existing demand due to increased conservation;</li> <li>Encourage ADWR to develop meaningful benchmarks of NPCCP effectiveness and periodically review the program;</li> <li>Encourage requiring additional mandatory BMPs tailored to individual providers that have measurable water savings rather than focusing on education and awareness;</li> <li>GPCD target methodology does not promote conservation and sends a message that conservation is not important;</li> <li>Encourage use of WMA funds for conservation assistance programs that measurably reduce GW pumping rather than for research;</li> <li>Support extension of conservation efforts to exempt well users targeting highest potential to conserve in hydrologically sensitive areas – WRA has a methodology to estimate water demand and conservation potential for exempt wells and is available to discuss this with ADWR and the PRAMA GUAC if interested;</li> <li>Agree to maximize benefit of recharge (along Granite Creek); ADWR should support a regional storage and recovery plan;</li> <li>Recommend plan address mitigation strategies (of BC pumping on the Verde), including options to reduce the volume of imported water needed;</li> <li>Low priority of CAP water that will become available for reallocation, its costs limit its viability as an augmentation strategy</li> <li>Lot-scale and neighborhood rainwater/storm water harvesting should be incentivized; larger scale capture must be carefully evaluated to environmental and resource implications;</li> <li>Augmentation actions should not lead to a GW pumping credit until, at a minimum, the aquifer is in long-term surplus.</li> </ul>	Email
8/1/2013	Thomas Atkins	private citizen	<ul style="list-style-type: none"> <li>Should express safe-yield goals in terms of GPCD, not acre-feet</li> <li>What is the GPCD rate for the LIC and UAF today?</li> <li>If we were at SY (with the current AMA population) what would be the GPCD value for the LIC and the UAF?</li> <li>What is the projected GPCD in 2025 that will lead to SY?</li> </ul>	Email
9/6/2013	Leslie Graser	City of Prescott	<ul style="list-style-type: none"> <li>In 2010 COP, PV and SRP entered into an Agreement in principle. In 2012 Comprehensive Agreement (CA1) was approved for increased and targeted monitoring in the BC. The timetable for completion of these activities may span 8-10 years. The arrangement</li> </ul>	Email

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			<p>among the CA1 parties and other future activities may show other future outcomes within the PRAMA than those shown in the draft plan;</p> <ul style="list-style-type: none"> <li>• Suggest providing a concise history of efforts of the local communities to move towards SY; What would the AMA’s OD be if there were no GW Code or AWS Rules?</li> <li>• Chapter 3 - make exempt well demand a separate category if this sector is intended to assist in solutions to SY;</li> <li>• Chapter 3, section 3.1 - COP water development and service dates back to 1864; starting the City’s water history with 1948 seems insufficient; Is the intent of the information to address municipal groundwater activity? If so, information on the neighboring towns is appropriate. What time period?</li> <li>• Chapter 3, section 3.1 - a table showing the estimated number of exempt wells per decade may be helpful;</li> <li>• Chapter 8, figure 8-1 – the map doesn’t show the Airport Water Reclamation Facility (which is being expanded), and it may be difficult to show the USF at the same location;</li> <li>• Chapter 8, section 8.3 – the COP has two wells within the AOI; one well is documented</li> <li>• Chapter 8, section 8.3.2 – use the term “further compromised” rather than “destroyed” when describing the AMA riparian habitat; movement of Del Rio Springs water has the potential to further compromise the riparian area</li> <li>• Chapter 8, section 8.4.1 – COP recharges in the LIC sub-basin</li> <li>• Chapter 8, section 8.4.3 – Legal complexities of using Watson and Willow lakes are not reflected; the window the COP can move water is April 1 through November 30; language here should be consistent with language in Chapter 12, section 12.2.5; changing the agreement would be very complicated; the description of how water can be moved from Del Rio Springs doesn’t seem to be needed</li> <li>• Chapter 8, section 8.6.2 – COP maintains a non-recoverable water storage permit and the COP charter speaks to permanent recharge of effluent generated by new developments greater or equal to 250 acres; may be appropriate to note this in the plan;</li> <li>• Chapter 12, section 12.2.1 – may be time to seek WMA funds to seek additional information and conservation opportunities for exempt wells; A.R.S. § 45-454 does not address exempt wells connecting to the COP for the benefit of SY opportunities outlined by ADWR</li> <li>• Chapter 12, section 12.2.2 – it is inaccurate to say there are no storage projects along Granite Creek; COP’s USF is adjacent to Granite Creek</li> <li>• Chapter 12, section 12.2.2 – include Doug McMillan in the bibliography</li> </ul>	