

City of Avondale Response to [5th Management Plans - Municipal Subgroup Meeting Questionnaire](#)

All questions are optional. Please complete by 8/11/2021

**1. Please provide your name, email address, and/or phone number:**

*Jennifer Davidson, [JDavidson@avondaleaz.gov](mailto:JDavidson@avondaleaz.gov) City of Avondale Water Resource Manager*

**2. Do you have any suggested edits for the draft 5MP municipal regulatory language?**

- No, I think the draft looks good

**3. If you answered yes above, please upload the Word document with your tracked changes and/or comments here. \*If you're unable to upload the document here, please email it to [managementplans@azwater.gov](mailto:managementplans@azwater.gov).\***

**4. Do you have any other questions and/or comments?**

The general structure of the proposed 5MP GPCD requirement calculation method is a positive step towards addressing issues with the Total GPCD Program that have been recognized in past Management Plans. The 5MP direction to remove the outdated calculation assumptions and to be more responsive to water use fluctuations is an improvement.

We appreciate the Department's assistance in describing the Total GPCD program as a regulatory tool for individual provider improvement rather than a comparison metric because there is neither an industry standard for calculating GPCD, nor is GPCD indicative of what a typical resident uses per day.

We appreciate ADWR's diligent efforts to facilitate public stakeholder forums throughout the expedited 4<sup>th</sup> and 5<sup>th</sup> Management Plans processes and to make great strides in increasing opportunities to collect quantitative data to measure the effectiveness of municipal conservation practices.

AMWUA recommends taking advantage of the opportunity to analyze and review findings from the first five management periods, especially the new data that will be collected in the 5MP. We believe such data along with the collective lessons learned should be used to continue to improve how post-2025 municipal conservation programs reduce groundwater use in the AMA.