


ARIZONA DEPARTMENT OF WATER RESOURCES
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MEMORANDUM

TO: Industrial Conservation Program
Planning and Compliance Staff

FROM: Herb Dishlip, Deputy Director Water Management 

DATE: January 23, 1995

SUBJECT: Policy regarding conservation plans for new industrial users and interpretation of new turf-related facility definition

The purpose of this memo is to inform you of two policies, recently adopted by Water Management Staff, regarding new industrial users and new turf-related facilities.

Expanded Industrial Users

The first policy is that an existing industrial user (and one that uses less than 100 AF of water annually), as it is defined in the SMP, will not be considered a new large industrial user if it expands after January 1, 1990 and begins using 100 AF or more. This means that § 6-103 of the SMP, regarding the submittal of a conservation plan, will not apply to those industries.

The Department will require conservation plans for new industrial users only, not industrial users which were in existence prior to January 1, 1990 and have subsequent to that date, expanded their water use to exceed 100 acre-feet per year. This policy will not release an expanded industrial user from other conservation requirements in the SMP, only the requirement to submit a conservation plan.

New Turf Related Facilities

The second policy more clearly defines "new" and "existing" turf-related facilities, especially with respect to expanded facilities. The new policy is: the date upon which a facility meets the definition of a turf-related facility (e.g. reaches 10 acres in size of water intensive landscape) determines if it is "existing" or "new". Two examples which clarify application of this policy are as follows:

- 1. A "new turf-related facility" is a school, park, golf course, etc. with 10 or more acres of water-intensive landscaping that did not exist prior to Dec. 26, 1984. Nothing existed at the site prior to that date. The facility began operation after December 26, 1984 and, as a result, is new.
- 2. A facility such as a park, school, cemetery, etc., existed prior to December 26, 1984 but did not meet the definition of turf related facility, because it had less than 10 acres of water intensive landscaping prior to that date. Subsequent to December 26, 1984, the facility expanded its water intensive landscape to 10 or more acres. Under this scenario, the facility was not a turf related facility prior to December 26, 1984 because it was less than 10 acres. It became a turf-related facility when the expansion caused it to be 10 or more acres after December 26, 1984 and is now considered a "new turf-related facility". (A cemetery which expands to meet the definition of a turf-related facility after December 26, 1984 must comply with the 75% landscape restriction of water intensive plants for the newly expanded acres. (§ 6-205.3. Phoenix AMA SMP))

Therefore, the determination of whether it is classified as an existing turf related facility or a new turf related facility is based on the date upon which the facility meets the definition of turf related facility (10 or more acres of water intensive landscape).