

September 14th, 2020 Municipal Subgroup Meeting Questionnaire Responses

These are responses collected from a questionnaire distributed during the September 14, 2020 Municipal Subgroup Meeting.

(*Note: Different colors are different responses)

Do you have any comments on the proposed Non-Per Capita Conservation Program (NPCCP) revisions presented in the September 14th Municipal Subgroup meeting?

I really like the direction that this is moving towards, specifically with the additional tier, diversification of BMP requirements by tier, and the increased required BMPs per tier. I think this helps meet the intention of the Management Plans to actually challenge water providers to conserve more over time. I think the idea of a Planning category for the BMPs is a good idea - however, I think each BMP there should be carefully vetted before adding them in. Some of the proposed planning BMPs appear that they could create some overlap with other BMPs and might need more stringent requirements to qualify for getting a BMP.

Scottsdale Water supports the proposed amendments to the NPCCP. However, we still suggest a fifth tier be added for utilities with 100,000 or more connections. In comparison to smaller utilities, a large provider at this size will have vastly different operating procedures, distribution network, customer variance, etc. which warrants more robust BMPs. This also allows for growth in the program and Scottsdale Water anticipates approaching or exceeding 100,000 connections. Scottsdale Water additionally supports AMWUA's comments.

The way the tier structure is broken out will automatically pull most cities/towns into tier 4. If the statutory limit is 250 acft/year, then just use that as the defining factor for inclusion into the NPCCP. As a side note, the title of this program could be misleading to outsiders. Is it possible to rename this program?

AMWUA supports: • The Department moving forward without different implementation requirements by tier within some BMPs • The Department moving forward with Tier Proposal 3A • The Department moving forward with increasing the required number of BMP points for each tier • The Department moving forward with requiring BMP points come from a minimum number of categories. AMWUA questions moving forward with weighted BMPs because there is no standard method or criteria for assigning points, nor any data available to determine criteria as weighting was only introduced in the 4MP.

The City of Tempe supports: • The Department moving forward without different implementation requirements by tier within some BMPs • The Department moving forward with Tier Proposal 3A • The Department moving forward with increasing the required number of BMP points for each tier • The Department moving forward with requiring BMP points come from a minimum number of categories. The City of Tempe questions moving forward with weighted BMPs because there is no standard method or criteria for assigning points, nor any data available to determine criteria as weighting was only introduced in the 4MP. More research is needed to identify the BMPs that are the most effective at saving water. BMPs that require more effort should not get more weight or consideration simply because they require more effort.

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Do you have any suggestions for BMPs to be potentially included in the proposed Planning Category and/or any questions about this proposed category?

In order to truly evaluate the potential of the proposed Planning BMPs, they will need to have more specific language. They are currently very generalized. We should be careful to make sure that they are as rigorous as we intend them to be. For example, under the "Staff Education and Training" would a one hour webinar for one staff member qualify the water

This information was gathered by the Arizona Department of Water Resources.

provider for getting a BMP point; I believe this should be more rigorous. The "Conservation Oriented Development" BMP may have some overlap with BMP 3.3 Water Budgeting Program and 5.1 Low Water Use Landscaping Requirements. We should be careful to structure the program so that one conservation program does not qualify a water provider to count it towards completion of multiple BMPs.

Scottsdale Water understands the theory behind this category and appreciates the Babbitt Center's presentation and knowledge on the topic. However, there are a few challenges within the proposed framework. 1. Providers not affiliated with municipal government cannot enact the proposed BMPs – those who are affiliated have likely already done so. Many utilities are not affiliated with local government and have no means in which to enact these BMPs, just as is the case with ordinances. For those utilities that are connected to local government, many of the proposed BMPs (drought plans, planning meetings, etc.) are already in effect and incorporated into current practices. This essentially makes these BMPs free points without accomplishing any progression in the land/water use arena. 2. Proactive BMPs make more sense for developing areas but come too late for areas approaching build out. Additionally, for a service area like Scottsdale Water, most of the area is developed. While there is in-fill and regrowth, the general matrix of the city has already been decided. Our focus is on sustainable transformation of spaces, which is not necessarily in the planning realm but rather an approach that focuses on how to make what is already built as water-efficient as possible. Some BMPs, such as water budgets or consultations, are part of this effort and highly effective. Scottsdale Water proposes creating more BMPs to expand these offerings. 3. To address what is already built we need a better understanding of the current water/land use nexus. The two biggest pieces needed for this analysis is water use information by sector and land classification. Together, they can quickly create targets for customers while also pinpointing customers who are inefficient. Not all utilities currently have these two vital data layers. Scottsdale Water proposes creating BMPs to encourage this data collection as gathering this data is expensive and time-consuming. BMPs for coding connections (such as the SIC) and completing a landscape analysis would provide a foundation for utilities to springboard into analyzing water use by land classification. Scottsdale Water is available to discuss this framework more and explain how it is being used within our service area, the benefits it is providing, and what we envision it can accomplish for water conservation. Scottsdale Water additionally supports AMWUA's comments.

I hope that more BMPs will be added

Sustainable Water Ordinances that limit a development's ability to exceed the planned water demands as determined in the General and Master Plans.

AMWUA appreciated the presentation from the Babbitt Center regarding the proposed Planning Category. The overview was helpful, but ultimately stakeholders will need to see draft language in order to fully evaluate the proposal. In general, AMWUA is interested to see how the proposed BMPs interface with other facets of Arizona water management framework. For example, the "Water Demand Adaptive Management and Shortage Response" BMP appears to significantly overlap with the requirements of A.R.S. § 45-341 - 43. Other proposed BMPs, such as "Water Supply Diversity" and "Integrated Long-Range Planning" appear to incorporate elements of water planning that are often conducted under the auspices of the Assured Water Supply Program requirements, particularly by Designated water providers. AMWUA supports encouragement of these water planning activities and is interested to see how the BMP language supports more sophisticated implementation of these actions. With regards to the "Land Use Planning and Water Utility Coordination and Communication" proposal, this BMP should be separate and should not replace the existing "Industry and/or Regional Partnerships for Water Conservation" BMP. The Alliance for Water Efficiency, American Water Works Association, AMWUA, and Water—Use It Wisely are all examples of vital water conservation partnerships that push the needle on demand management and efficiency, and should be encouraged and recognized as such in the Management Plans. Again, AMWUA appreciates the opportunity to hear a high-level overview of the Babbitt Center's suggestions and is looking forward to reviewing the proposal in more detail.

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Peoria appreciated the presentation from the Babbitt Center regarding the proposed Planning Category. The overview was helpful, but ultimately stakeholders will need to see draft language in order to fully evaluate the proposal. In general, Peoria is interested to see how the proposed BMPs interface with other facets of Arizona water management framework. For example, the "Water Demand Adaptive Management and Shortage Response" BMP appears to significantly overlap with the requirements of A.R.S. § 45-341 - 43. Other proposed BMPs, such as "Water Supply Diversity" and "Integrated Long-Range Planning" appear to incorporate elements of water planning that are often conducted under the auspices of the Assured Water Supply Program requirements, particularly by Designated water providers. Peoria supports encouragement of these water planning activities and is interested to see how the BMP language supports more sophisticated implementation of these actions. With regards to the "Land Use Planning and Water Utility Coordination and Communication" proposal, this BMP should be separate and should not replace the existing "Industry and/or Regional Partnerships for Water Conservation" BMP. The Alliance for Water Efficiency, American Water Works Association, AMWUA, and Water—Use It Wisely are all examples of vital water conservation partnerships that push the needle on demand management and efficiency, and should be encouraged and recognized as such in the Management Plans. Again, Peoria appreciates the opportunity to hear a high-level overview of the Babbitt Center's suggestions and is looking forward to reviewing the proposal in more detail.

Do you have examples of what works well and/or doesn't work well in the current Gallons Per Capita Per Day (GPCD) Program?

I believe that GPCD numbers are meaningful when broken down into more specific sectors (i.e., residential, non-residential).

It is disappointing to hear that ADWR is not considering a sector-based GPCD as this has a significant impact on overall GPCD targets. Large utilities with large non-residential customers are penalized under the current GPCD guidelines, even though the non-residential sectors may be using water more efficiently than the residential customers of other cities with the added benefit of economic growth. By leaving GPCD as one value we are creating a black hole. This hole will allow specific sectors to effectively hide within the aggregate water use. By pulling these sectors out and analyzing each sector against the whole we can gain a better understanding of where we have inefficiencies and can better target programs to address those inefficiencies. Scottsdale Water additionally supports AMWUA's comments.

As the valley builds out, we are beginning to see development (data centers) that uses more water than typical commercial and residential demands. This can hyper-inflate the total GPCD. It would be beneficial to target residential and commercial separately. This info would help focus conservation efforts.

Opportunity for improvement: The non-residential component of the GPCD target calculation penalizes utilities that serve water to large non-residential water users, despite the fact that many large non-residential water users bring significant economic benefits their communities. AMWUA understands that the non-residential component was based upon "conservation potential" from a time frame decades ago that saw large advances in water efficiency technology. This baseline should be reevaluated so that it encourages *efficient* water use, instead of discouraging high-value, managed water use that is beneficial for Arizona's communities. Additionally, based on our understanding, the methodology for calculating each of the GPCD component rates is excessively complex and resource consuming. AMWUA is interested in working with ADWR and stakeholders to develop a calculation that is more straightforward and effective as a measurement of water efficiency.

You briefly touched on it in the meeting, but I would appreciate a better understanding of how the non-residential component limit was calculated in the 3MP. There seems to be inconsistencies in what each city is required to meet. Inclusion of the non-residential component is problematic, as one large industrial user that provides many jobs and economic impact to the community and surrounding communities can throw off the GPCD calculation.

I would like to see more detailed components for types of non-residential categories. Currently, providers decide where to place various non-residential customers as far as categories (commercial, construction, etc.). Having specifics such as big box stores go under commercial and construction firms go under construction would be helpful. Also, businesses such as restaurants would have different water use than an antique shop, so should not be lumped as commercial. Other water uses such as stadiums, which some cities have and others do not, have different water uses, too. Just basing non-residential on population does not capture the whole picture.

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Do you have any suggestions on how the GPCD Program should be updated for the 5th Management Plans?

I think the GPCD calculations will require just as much attention and conversation as the BMP discussions have been getting.

If ADWR is truly wanting to push the needle on water conservation it is important that all users are held accountable for efficiency. Waste is waste, and not addressing any inefficiency could be detrimental to cultivating a culture of conservation. Providers in the NPCCP are in that program largely due to commercial and industrial uses, which is a condition of the nature of that customer class and not necessarily "wasteful", especially in juxtaposition with economic growth, for that City but also for the State as a whole. There are no requirements within the GPCD – however, that does not mean there isn't inefficient use. If conservation is truly supposed to encourage innovation that should be for all programs alike. This may be addressed in an alternative program, but it is important that it is addressed for the sake of conservation and moving the dial in the State, but also the narrative that being in or out of the GPCD program brings with it. At a minimum this management plan should require the data needed for sector based GPCD to address the inequality of the GPCD program and consider newer metrics such as consumption per connection. Multiple benchmarks will help identify where the most efficiency can be gained and explain why certain BMPs are important to different utilities. Scottsdale Water additionally supports AMWUA's comments.

Arizona's GPCD Program is outdated as a water conservation regulatory program. Unfortunately, despite the myriad of differences in calculations and circumstances, GPCD is more often utilized now as a public metric for measuring water efficiency but can lead to significantly misleading comparisons between Arizona water providers and others in the West.

Ultimately, AMWUA hopes that the GPCD Program can be reformed in the 5th Management Plan to more accurately convey Arizona's progress in water use efficiency, without setting unattainable targets based on old assumptions.

Going forward, I think it may be better to omit the non-residential component and look at residential GPCD only as that is a more "apples to apples" comparison. Alternatively, can we look at how GPCD is calculated from other basin states since we (Arizona) will be held compared to those GPCD during renegotiation discussions? Since GPCD seems to be calculated in many different ways, maybe there is a version that already exists that Arizona could adopt that makes sense.

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How can we improve these subgroup meetings?

It would be helpful if presentation slides could be posted to the 5MP Concepts page before or immediately following meetings. It would be helpful to allow two weeks for submitting responses to the feedback questionnaires. One week to submit suggestions on the GPCD program (or other elements of the 5MP) is not enough time for such an important question. We would appreciate a clearer direction for the timeline that proposals and feedback need to be made, especially on something as complicated as restructuring the GPCD program. It would be also be helpful to know upfront what ADWR is considering such as aspects with the GPCD program so we have some parameters to work within for making a proposal.

The polls & surveys are a fantastic improvement. Please continue.

It would greatly help discussion if the PowerPoint were provided three working days before the presentation. It is very difficult to interpret a slide, formulate responses, and reply in the chat before we move to the next slide. While the questionnaires create a great dialogue between the responder and ADWR, it does not bring other participants into the conversation. This is essential for collaboration as other participants may want to hear the logic behind our individual comments as it may spark a new idea or lead to a beneficial compromise for both parties. The virtual environment is what we have, however, it is not close to optimal for collaboration. If ADWR truly wants this to be a collaborative process, giving stakeholders time to digest the material before having open meetings where different ideas and concerns are meant to be brought up, then providing material ahead of time would help be that conduit for a more interactive virtual meeting environment.

The meetings are good and spaced out appropriately. Sometimes, I am not sure what is the goal of the meeting. What is the deliverable we are trying to complete. But overall, well done.

Nothing at the moment. Considering the circumstances of COVID-19, you guys are doing an amazing job with these online meetings.

I think you are doing a good job. They are better than in the beginning. We do need more discussion in the work phase of things like revisions to how GPCD is calculated.

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