5th Management Plans
Agricultural Subgroup Meeting
December 8, 2020
• Additional opportunity to provide input and feedback on items discussed in the meeting
• Questions are optional so you can choose what you’d like to provide input on
• Responses will be posted anonymously on our 5MP Concepts Webpage
• Please respond by 12/22/2020

Link to Google Form Questionnaire: https://forms.gle/2Ekz1Sod5UHpRJbM9
I. Introduction
II. Process – Presentation by Ag Stakeholders
III. Status and Timeline of 4\textsuperscript{th} and 5\textsuperscript{th} Management Plans
IV. Review of Previous Agricultural Subgroup Meetings
V. Additional BMP Analyses
VI. Current and Potential Regulatory Agricultural Conservation Programs
VII. Closing Remarks
Agricultural Collaborators

Explanation of Purpose, Process, and Progress
Who We Are

- Producers and independent well owners from Pinal and Phoenix AMAs
- Irrigation District Representatives
- Agricultural Organization Staff and Leadership
- Elected Officials
Stakeholder Concerns

- Proposed revisions in the 4th Management Plan posed serious barriers to the continued efficiency and effectiveness of Central Arizona Ag Producers
- Past meeting formats did not lend themselves well to in-depth discussion of complex issues
- Stakeholders did not feel their concerns were being adequately addressed and filed motions for rehearing or review for the Pinal 4MP
Process

- September 2: Collaborators draft a letter to ADWR, outlining concerns and requesting a meeting
- September 15: ADWR sends a response to the September 2 letter
- September 17: Speaker Bowers, Senator Kerr, and Representative Griffin send ADWR a letter requesting that the Department delay issuing findings on the hearing for the Pinal 4MP
- September 18: ADWR sends a response to September 17 letter, indicating that the statutes provide no discretion to approve that request and suggesting a potential alternate path forward to provide additional time
- September 29: Collaborators and ADWR meet to discuss a path forward
  - Meetings every two weeks since 9/29
  - Also organized a tour of Pinal County BMP farms
## Issues and Progress

<table>
<thead>
<tr>
<th>Issue</th>
<th>Progress</th>
</tr>
</thead>
<tbody>
<tr>
<td>BMP Program History &amp; Objectives</td>
<td>Historical overview of BMP program (why it was adopted, intended purpose, etc.)</td>
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<td>Tour of BMP Farms to see practices in action</td>
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<tr>
<td>BMP Advisory Committee: why not consulted in 4MP drafting process?</td>
<td>Governor’s Executive Order extended and clarified authorization of BMP Advisory Committee</td>
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<td>Committee meets this week; new appointments to fill vacated positions in progress at Boards &amp; Commission</td>
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<tr>
<td>BMP Points Structure</td>
<td>ADWR explained rationale behind increasing points requirement and changes to point allocation</td>
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</table>
## Issues and Progress

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Reduction of Top 25% of Water Duties</td>
<td>Reviewed statutory language and Department authority; discussed administrative review options</td>
</tr>
<tr>
<td>Table 4-1 and Supplement 1</td>
<td>ADWR clarified purpose and nature of data (static or not) in each document to explain apparent inconsistencies</td>
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<td></td>
<td>ADWR presented draft of new table structure with explanatory footnotes</td>
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<tr>
<td>Annual Reporting Audit Data</td>
<td>Discussed how requests for cropping acreage on annual reports can lead to data without context.</td>
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<td>Expressed concerns about ramifications on future regulatory structures.</td>
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## Issues and Progress

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<tr>
<td>Interpretation of Conservation &amp; Efficiency</td>
<td>Discussed disparate interpretations of conservation as application efficiency vs. conservation as an overall decrease in water use</td>
</tr>
<tr>
<td>Statutory requirement to achieve reductions in withdrawals of groundwater</td>
<td>Discussed ADWR interpretation of the requirement in light of the individual management goals in each AMA</td>
</tr>
</tbody>
</table>
Meanwhile…

- Multiple members of the Collaborators group filed petitions for review of the Pinal 4MP
  - ADWR review process for Pinal 4MP is ongoing
- The group will continue to meet going forward, and will coordinate meetings in conjunction with the 5MP Agricultural Stakeholders Subgroup
Status and Timeline of 4th and 5th Management Plans
Estimated 5MP Timeline

2020
MPWG
Program Analysis
Program Development

2021
Drafting
Document Structure & Content
Implementation & Strategy

2022
Promulgation
Present to GUACs and stakeholders
Conservation Programs become effective 1/1/2025
MPWG Subgroups

{All meeting info is available at new.azwater.gov/5MP}

Work Group

Subgroup

Breakout

MPWG
12/16/2020

Ag
1/27/2021

Muni
2/10/2021

Industrial
TBD

Safe-Yield
Technical
3/10/2021

Turf
2/24/2021
Questions & Comments:

Time’s up!
Review of Issues from Previous Meetings
## Review of Issues from Previous Meetings

<table>
<thead>
<tr>
<th>Topic</th>
<th>Discussion</th>
<th>Action</th>
<th>Status</th>
</tr>
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<tbody>
<tr>
<td>BMP History and Objectives</td>
<td>Perspectives from both the chair of the BMP Advisory Committee, Agricultural Collaborators Group, and ADWR were shared.</td>
<td>Recommendation: Include on early BMP Committee Agenda</td>
<td></td>
</tr>
<tr>
<td>Reduction of Top 25% of Water Duties by up to 10%</td>
<td>Reviewed statutory language</td>
<td>TBD: GIS map of reductions in Phoenix and Pinal AMAs</td>
<td>Administrative Review adjustments</td>
</tr>
<tr>
<td>Table 4-1 &amp; Supplement 1</td>
<td>Clarified purpose and nature (static or not) of each document and why there were differences in data</td>
<td>Split part of Table 4-1 into two tables Added a table footnote</td>
<td>Consensus based on mockups to edit the tables in the final 4MP</td>
</tr>
<tr>
<td>Annual Reports and Audit Data</td>
<td>Discussed rationale for data requests on annual reports</td>
<td>Removed request for crop data, maintained requirement for actively irrigated acres</td>
<td>Completed</td>
</tr>
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<tr>
<td>4MP: BMP and Base Program Analysis</td>
<td>Discussed statutory requirement for achieving reductions in withdrawals of groundwater</td>
<td></td>
<td>ADWR: Changes to BMP points &amp; structures supported by requirement to reduce withdrawals of groundwater</td>
</tr>
<tr>
<td>5MP: BMP and Base Program Analysis</td>
<td>Discussed options for comparing BMP and Base Program water use</td>
<td>BMP Lineage Analysis subgroup created with members of the collaborators group</td>
<td>Ongoing</td>
</tr>
<tr>
<td>4MP: Modification of BMP Points Structure</td>
<td>Discussed Ag &amp; ADWR’s view of statutory requirements</td>
<td>Maintain ADWR Approach</td>
<td>Completed</td>
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<td>5MP: Modification of BMP Points Structure</td>
<td>Discussed Ag &amp; ADWR’s view of statutory requirements</td>
<td>Refer to BMP Advisory Committee for input to ADWR</td>
<td>Ongoing</td>
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<tr>
<td>4MP: Individual BMPs &amp; Points Accumulation</td>
<td>Discussed technical accuracy of the BMP Action</td>
<td>Maintain ADWR Approach</td>
<td>Completed</td>
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<tr>
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<td>5MP: Tiered System for BMPs</td>
<td>Refer to BMP Advisory Committee for input to ADWR</td>
<td>Ongoing</td>
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<tr>
<td>Definitions of Conservation &amp; Efficiency</td>
<td>Needs further discussion</td>
<td>TBD</td>
<td>Ongoing</td>
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<td>Statutory requirement to achieve reductions in withdrawals of groundwater</td>
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| Timeline                                                             | 4MP: Completing adoptions by the end of 2020  
5MP: Completing adoptions by the end of 2022 | Ongoing |
Questions & Comments:

* Issues discussed previously
* Any additional issues needing discussion
* Process for moving forward
Additional BMP Analyses
Additional BMP Analysis: BMP Lineage

* Another method of looking at data of the BMP and Base Program
* Data showing water use of BMP farms before and after joining the program
  * Tracking IGFR water use over time is complex
  * Conveyances trigger the creation of a new right/conveyance number
* ADWR has developed a methodology and is actively working on this analysis
Meeting: 10am-12pm on Wednesday, December 9, 2020 (webinar)

* Co-chairs: ADWR Director Tom Buschatzke & Pinal AMA farmer Scott Riggins

* This meeting will cover the purpose and scope of the Agricultural Water Conservation BMP Advisory Committee, the history of the Agricultural BMP Conservation Program, and next steps for the committee.

* ADWR Public Meetings Calendar for future meetings: https://new.azwater.gov/meetings
Questions & Comments:

Time’s up!
Current & Potential Agricultural Conservation Programs
A.R.S. § 45-563 (A)

“The director shall develop a management plan for each initial active management area for each of five management periods... and shall adopt the plans only after public hearings... The plans shall include a continuing mandatory conservation program... designed to achieve reductions in withdrawals of groundwater.”
# Current Regulatory Agricultural Conservation Programs

<table>
<thead>
<tr>
<th>Base Program</th>
<th>Historic Cropping</th>
<th>Best Management Practices</th>
</tr>
</thead>
</table>
| • Required by statute  
  • A.R.S. § 45-568  
  • “…shall include in each plan an irrigation water duty…”  
  • Allotment Based Program  
  • Water duties based on crops historically grown and water duty acres | • Required by statute  
  • A.R.S. § 45-568.02(A)  
  • “…as an alternative conservation program that achieves conservation equivalent to that required by [the Base Program]…”  
  ➢ No farms are currently enrolled in this program | • Required by statute  
  • A.R.S. § 45-568.02(G)  
  • Requires participant “...to implement specific agricultural conservation practices for water use…”  
  • Right holder must achieve a specified number of points by completing BMPs, in lieu of complying with maximum allotment |
### Base Program

<table>
<thead>
<tr>
<th>4MP</th>
<th>Potential 5MP</th>
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</thead>
</table>
| • Irrigation Water Duty is calculated for each IGR  
  • Phoenix & Pinal – implemented 10% reduction of top 25% of water duties in an ASFC | • Irrigation Water Duty is calculated for each IGR  
  • “may” implement 5% reduction of top 25% of water duties in an ASFC  
  • Prior admin reviews |
### BMP Program

#### 4MP

- **3MP:**
  - Target: 10 Points
- Phoenix, Pinal, & Santa Cruz 4MPs
  - Update from 10 to 12 Points
  - Update of points distribution within each BMP category

#### Potential 5MP

- Introduce Tiers for BMP Points Targets
  - Additional discussion in BMP Advisory Committee
A.R.S. § 45-568.02(F)

“The director may include in the adoption of, or a modification to, the management plan for the fifth management period additional alternative agricultural conservation programs that the director determines achieve conservation that is at least equivalent to that required under [the Base Program]...”
Potential 5MP: Integrated Farm Program

Concept

* Allow multiple IGFRs under the same owner/operator to combine reporting/allotments, with a “cut to the aquifer” percentage reduction of the total combined allotment.
  * Similar to provision allowing contiguous turf facilities to combine allotments

To Be Determined

* Geographic limitations
  * Contiguous
  * Irrigation District
  * Sub-Basin
* “Cut to the Aquifer” Percentage
* Process for joining/leaving
* Management of flex credits
5MP Agricultural Conservation Programs

**Base Program**
- Allocation based, default Program

**Proposed Integrated Farm Program**
- Removes Administrative Burden of Base Program

**BMP Program**
- Most Efficient, Highest Conservation Farms
Questions & Comments:

* Questions/Discussion:
  * Base Program
  * BMP Program
  * Integrated Farm Program
Closing Remarks
5MP Agricultural Subgroup – Next Steps

Additional Discussions in BMP Advisory Committee:

* 5MP BMP Program:
  * Individual BMPs
  * Tiers
  * Point target(s)

➢ These discussions will be referred to the BMP Advisory Committee for recommendations

Next Steps for Future Meetings:

* Continued development of Integrated Farm Program
* Discussion of 5% reduction of top 25% of water duties in each ASFC

Next Meeting (tentative):

1/27: Integrated Farm Program
Questions?

managementplans@azwater.gov

Management Plans Work Group:
new.azwater.gov/5MP

Full Text of Management Plans:
new.azwater.gov/ama/management-plans