



November 10, 2020

Tom Buschatzke, Director
Arizona Department of Water Resources
1110 W. Washington St., Suite 310
Phoenix, Arizona 85007

Re: 5th Management Plan - Reaching Safe-Yield in the Phoenix AMA

Dear Director Buschatzke:

The Arizona Municipal Water Users Association (AMWUA) wishes to formally convey its support for the Phoenix Active Management Area (AMA) management goal of safe-yield as an important driver of sustainable groundwater use through the fifth management period. Since 1980, water users in the AMA have made much progress reducing the use of groundwater, primarily through conservation efforts and the requirement that designated water providers and new municipal growth use renewable supplies to maintain consistency with the management goal. The AMWUA municipalities remain committed to reducing groundwater dependency in their service areas and have made significant investments in renewable water resources to provide secure, sustainable supplies to their customers. We, along with the rest of the water community, should be very proud of how far we have come since 1980 to decrease mined groundwater pumping.

Yet, it is all too clear that the Phoenix AMA will not reach safe-yield by the target date of 2025, setting a trajectory that could undermine the long-term hydrologic and economic health of the AMA. The AMWUA Board of Directors therefore urges the Arizona Department of Water Resources (ADWR) to lead the water community in the difficult but necessary discussion on how to further reduce the overdraft of groundwater in the AMA during the fifth management period and reach the goal of safe-yield.

Annual unreplenished groundwater demands across all sectors continue to exceed natural and artificial recharge in the Phoenix AMA. While we are far from the more dire groundwater situation of the 1960s and 1970s, we have no clear plan to eliminate this continual overdraft and we cannot overlook the negative impacts of cumulative depletion of our aquifers, which can lead to poor groundwater quality, diminished aquifer storage capacity, and localized land subsidence. The cumulative overdraft – over 1.6 million acre-feet since 1985 - has also meant a reduction in the physical availability of groundwater resources that would otherwise have served as a backup supply and supported new development. The State must recognize that population and economic growth, ongoing drought, a drier, warmer climate, and anticipated Colorado River shortages, among other factors, have the potential to drive further groundwater withdrawals and make maintaining a balanced AMA even more unlikely. Action must be taken today, by all sectors, to

Arizona Municipal Water Users Association

November 10, 2020

Re: 5th Management Plan – Reaching Safe-Yield in the Phoenix AMA

Page 2

reduce our reliance on finite groundwater supplies by achieving safe-yield and thus making our water resources more resilient in the face of uncertain future conditions. Failure to achieve a long-term safe-yield balance in groundwater use places all water users and our communities at risk. We must be forward-thinking, responsible stewards of our groundwater resources today, before we find ourselves facing a crisis.

There is also a critical perception factor for falling short of the statutory management objective that has implications for our State and its economy. Arizona has rightfully touted its Groundwater Code for 40 years with much emphasis about reaching safe-yield by 2025. Not meeting safe-yield can be downplayed with explanations about our progress or how the annual overdraft has been minimal. Yet, as 2025 approaches, decision makers, the public and media will question how and why Arizona failed to reach its goal and thus raise doubts about the effectiveness of our water management structure. This is why, within the current statutory framework for developing the 5th Management Plan (5MP), we need to demonstrate that we are willing to take decisive steps to reach safe-yield now rather than ignore it or deem it unimportant.

The statutory goal of reaching and sustaining safe-yield is meant to drive the regulatory water management framework of the AMA through *at least* 2025, because the 5MP may remain in effect for many years beyond 2025. As proposed to the 5MP Safe-Yield Technical Subgroup, ADWR should clearly establish its methodology for assessing progress toward safe-yield in the 5MP. Additionally, a detailed evaluation of groundwater overdraft by sector would best inform a comprehensive regulatory plan to further reduce groundwater reliance. All sectors must be held proportionately responsible for sustaining the health of our aquifers, which are the foundation of each sector's long-term economic viability.

We acknowledge that ADWR has limited regulatory authority for pressing the Phoenix AMA toward safe-yield and has already put many of its tools to use. ADWR and the water community should be proactive and develop additional tools and management strategies to address the groundwater withdrawals that prevent the AMA from reaching and maintaining its goal. Viewed as a percentage of either total water use or groundwater use in the AMA, the recent level of annual overdraft is not an insurmountable issue. For instance, if the State adopted measures to lower groundwater overdraft by even 100,000 acre-feet per year, less than 5% of overall water use, the Phoenix AMA would likely meet the long-term balance sought by safe-yield and be on a better course to sustain that balance far beyond the fifth management period.

AMWUA further acknowledges developing new tools to close the overdraft gap will be difficult especially considering ADWR's limited authority to further regulate groundwater withdrawals and that some strategies may require legislative support. AMWUA is fully committed to working with ADWR and the Phoenix AMA water community to develop the best approach necessary for the AMA to reach safe-yield during the fifth management period. The 5MP will set the course for years to come, and therefore ADWR must lead these discussions today to ensure the State has a clear roadmap that involves all water users to achieve the goal of safe-yield.

November 10, 2020

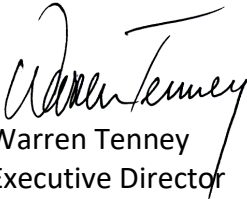
Re: 5th Management Plan – Reaching Safe-Yield in the Phoenix AMA

Page 3

Therefore, the AMWUA Board of Directors urges the State to identify, evaluate, and implement water management strategies, including those previously proposed in Management Plans or by past statewide water management initiatives, that could be incorporated into the Phoenix AMA's 5MP in order to seek a reduction in groundwater overdraft of up to 100,000 acre-feet per year to meet and maintain safe-yield in the near term. The 5MP Safe-Yield Technical Subgroup is a logical venue through which to initiate these discussions and generate ideas and feedback from representatives of all water-using sectors. The evaluation of strategies should also ensure that other instituted programs such as the Assured Water Supply Program and the Underground Water Storage and Recovery Program are well enough aligned with achieving the AMA's overall water management objective.

The residents, communities, businesses and industries in the Phoenix AMA are fortunate to have benefited from the foresight and leadership of the framers of the 1980 Groundwater Management Act. Our success heretofore should not prevent us from completing the policy declared in the Groundwater Management Act. The water community now must build upon the experience gained and lessons learned in the past 40 years to reach safe-yield and continue the stewardship for our water resources necessary to protect our communities now and into the future.

Respectfully,

A handwritten signature in black ink, appearing to read "Warren Tenney". The signature is written in a cursive style with a long horizontal stroke extending from the top of the "y".

Warren Tenney
Executive Director

Arizona Municipal Water Users Association