May 31, 2022

Sharon Scantlebury  
Docket Supervisor  
Arizona Department of Water Resources  
1110 W. Washington, Suite 310  
Phoenix, AZ 85007

RE: Prescott AMA Fifth Management Plan - Final Comments

Dear ADWR:

As the hearing closes on the management plan for Prescott Active Management Area Fifth Management Period, 2020-2025, the city would like to thank you for all the efforts made to prepare for and make notable updates to this regulatory document. As we know, nothing is perfect, but given the parameters that are currently available in Arizona Revised Statutes (A.R.S.) for the development of such plans, this is prepared thoughtfully.

Looking forward and as stated, “...requirements will remain in effect “until the legislature determines otherwise” (A.R.S. § 45-568 (C)).” It is going to take considerable effort and strong leadership to set a course like the structures provided in the 1980 Groundwater Management Act, and decadal plans to continue progress toward supply management. It may not always be clear, but ADWR administers the requirements enacted by statute and administrative code; however, in your work you gain value insights for how overarching needs may be met when multiple sectors exist which have unique conditions. It is evident in section 8.5 Next Steps that ADWR determined, “…bigger, bolder water management moves will be required, and additional tools will need to be developed.” It is understandable that these were not included in this document for reasons stated above.

As one of the municipalities within the Prescott AMA, exploring those bigger, bolder moves and implementing the next generation of tools is something to look toward. We look forward to working with you.

Sincerely,

Leslie Graser  
Water Resource Project Manager