Hello Sharon,

Below are my comments that I read at the public hearing, and you requested that I send. Please let me know if you have any questions or wish to discuss further.

1. (Suggestions) On Page 2-5 Section 2.4.2 the water use figure for large water providers should be broken out into each of the large providers and what would be very interesting to see is that exempt wells are the third largest water user in aggregate. This is interesting as exempt wells were created in the GMA as a way for those too far from water providers an access to water via a well and with 35 GPM or less considered too small a quantity of water to amount to a significant demand. However, within the Prescott AMA, dry lot subdivisions and wildcat lot splits are proliferating. It could be predicted that when the large water providers have built out, and/or exhausted their assured water supplies, exempt wells will continue and could become the largest water demand sector in the AMA and exempt from safe-yield or other requirements.

2. (Suggestions) Page 3.8, Section 3.3.2 it states “The use of CAP water is not economically feasible in the PrAMA due to the distance of the AMA’s water users from the CAP aqueduct. Recognizing this, the City of Prescott and the Yavapai-Prescott Indian Tribe sold their CAP allocations. Could this be reworded to say “In the late 1990s, direct deliveries of Colorado River water were determined to not be economically feasible due to their distance from the CAP canal or the Colorado River. Recognizing this, the City of Prescott and the Yavapai-Prescott Indian Tribe sold their CAP allocations. However, future water settlement agreements with Northern Arizona Native American communities and/or Non-Indian Agricultural (NIA) water allocations may provide Northern Arizona with future opportunities for Colorado River water”.

3. (New Goal added) Page 3-9, Section 3.4 – There is no mention of ADWR’s comingling and volumetric accounting prohibitions, which is not an official policy, guideline, or rule, whereby a non-designated municipal water provider cannot recharge, store, and recover reclaimed water for certificates of assured water supplies and thus providing renewable water supplies for new growth versus the use of groundwater. This is specifically not called out. Could this be included in this plan.

4. (New goal added) Communities and organizations within PrAMA have been developing pilot projects, and examining larger development, regional, or community-wide storm water management projects that utilize non-appropriated urban or development sheet flow, directing it, quantifying it, for recharge via constructed recharge facilities. However, under State laws, there are only three water supplies that can be recharged for credits that include, CAP, surface water, or reclaimed water. Should ADWR include a goal to examine stormwater sheet flow that could gain credits, a cut to the aquifer, and statute modifications as a goal or objective in the 5MP.

Cheers,

Mark

Mark Holmes, P.G.