Re: BWCDD Comments on Draft 5MP Storage & Recovery Siting Criteria

Dear Ms. Mast and Management Plan Teams:

On behalf of Buckeye Water Conservation & Drainage District (BWCDD), we have reviewed the updated (March 8, 2022) draft 5MP Storage & Recovery Siting Criteria. Although we appreciate the work that has gone into considering the issues by the Department and the many opportunities to comment, we still believe that the inclusion of these criteria in the Fifth Management Plan at this time is premature.

The criteria, as currently drafted, are difficult to understand, both in terms of the actual textual language and in terms of the goal that is sought to be accomplished. Much of the criteria seem to be focused on defining what is “shallow depth to water” but with little indication of why the restrictions on recovery are based on the location of storage, rather than confronting proper storage siting at the time of storage.

As you know, BWCDD is in an area that is almost certain to qualify for the definition of “shallow depth to water” but the water present in the area is not to be targeted for recovery. It remains unclear whether recovery is being incentivized for this area, but the limitation on recovery in areas experiencing less than 4 feet of annual decline certainly seems to place a premium on areas where groundwater levels are stable. We firmly believe that disrupting stable water levels by making those areas attractive for recovery is doing a disservice not only to that local area, but to the AMA as a whole.

We understand that the Department has struggled with this issue and has gone through several iterations of the draft criteria attempting to address comments and concerns. We also understand that the Department is creating the Recharge & Recovery Workgroup to further analyze the many complex issues facing the Recharge & Recovery Program. We believe that the Workgroup is a better forum to address these issues and therefore suggest that these criteria be removed from the 5MP forum and deliberated more fully, and wholistically in the Workgroup.

Sincerely,

Noel Carter
Noel Carter, General Manager BWCDD