March 18, 2022

Thomas Buschatzke, Director
Arizona Department of Water Resources
1110 West Washington Street, Suite 310
Phoenix, AZ 85007

RE: Draft 5MP Revisions to Recharge “Storage & Recovery Siting Criteria”

Dear Director Buschatzke:

The City of Chandler appreciates the opportunity to comment on version 3 of the draft revisions for the Fifth Management Plan (5MP) Storage & Recovery Siting Criteria, published on March 8, 2022. We appreciate the addition of possible criteria to analyze which facilities are contributing to shallow water areas. Unfortunately, the revised language does not address or alleviate any of our primary concerns.

Chandler remains concerned that the Department is proceeding with a policy which negatively impacts water management in the AMA and will likely have unintended consequences for the recharge and recovery program. Multiple stakeholders have repeatedly requested the Department conduct an analysis of the impacts and identify the specific geographic areas affected by this policy. We request the Department remove this 5MP language in the absence of an analysis to propose a methodology.

While we appreciate the Department’s attempt to provide additional details in the revised draft language, the most concerning aspects of the 5MP language still have not been addressed. Shallow water is still defined as “50 feet below land surface” and the language still includes unreasonable recovery restrictions for facilities where shallow water is not a problem. The language still does not include a methodology for implementation and we respectfully request the Director remove the new definition for shallow water until an analysis and methodology have been published.

Chandler has made significant investments in our six recharge facilities, four of which are operated by Chandler within our service area, plus two regional facilities operated by SRP. This new policy
could jeopardize our future ability to deliver water to our Wetlands USF and our twenty ASR wells, for recovery from our thirty potable distribution wells. This operational flexibility is essential to how our distribution system operates and how we meet our annual demands.

The proposed 5MP language ignores the operational realities of municipal distribution systems and potentially restricts the use of our existing infrastructure to recover water from our Wetlands and ASR wells. This negatively impacts Chandler during a time of uncertainty on the Colorado River, when the ability to utilize our distribution wells for annual storage and recovery is more important than ever.

We appreciate your consideration of how these proposed changes could negatively impact the operations of water providers in all AMAs.

If you have any questions, please contact me at 480-782-3663.

Sincerely,

[Signature]

Simone Kjolsrud
Water Resource Advisor
Public Works & Utilities Department
City of Chandler

cc: John Knudson, Public Works & Utilities Director, City of Chandler
    Gregg Capps, Utility Resource Manager, City of Chandler