February 28, 2022

Ms. Natalie Mast,
AMA Director- Management Plans
Arizona Department of Water Resources
1110 West Washington St., Suite 310
Phoenix, Arizona 85007

Re: Draft 5th Management Plan for the Phoenix AMA

Ms. Mast and Management Plans Team,

The City of Glendale (Glendale) would like to formally submit comments on the 5th Management Plan’s Proposed Storage and Recovery Siting Criteria Implementation, Section 3-801(B)(1)(a).

Glendale recharges at four USFs in the West SRV – the CAP Agua Fria (Constructed and Managed) USF, the CAP Hieroglyphic USF, the SRP New River Agua Fria Underground Storage Project (NAUSP USF), and our own West Area Recharge Facility USF. Glendale recharges effluent at the NAUSP and West Area Recharge Facility, CAP and NCS water at NAUSP, and CAP water at the CAP facilities. We have stored a total of just under 200,000 AF at all facilities.

ADWR is now proposing to enforce Storage and Siting Criteria in 3-801(B)(1)(a) that originated in the 3rd Management Plan but has never been enforced. Most of the storage facilities at which Glendale recharges have a Maximum AOI that extends near the boundaries of the Buckeye Water Logged Area. Enforcement of this Storage and Recovery Siting Criteria will greatly affect the City’s ability to recover water stored in the future.

The uncertainty of being able to recover water outside of the AOI as defined in Substantive Policy Statement – RW1 along with the potential enforcement of the Storage and Recovery Siting Criteria, have the potential to restrict the way Glendale manages LTSC recovery and our water portfolio / water delivery system.

Lack of a thorough analysis from ADWR on the facilities that will be affected by this proposed Storage and Recovery Siting Criteria leaves a great uncertainty about future recharge operations. The chosen shallow water level limit of 50 feet bsl is not well conceived in the proposal. With the current Colorado River shortage upon us, and with the understanding that more groundwater and recovered water will have to replace our CAP supplies, groundwater levels throughout the Phoenix AMA will be in decline.

When the Maximum AOI is used to analyze the intersection of “shallow” groundwater and recharged water, the future withdrawal of groundwater and LTSC’s between the USF and the “shallow” groundwater is not considered. The maximum AOI is not a good realistic indicator of the impact of recharged water upon water levels as the recharged water does not typically “in reality” intersect the
area of “shallow” groundwater. While it is a great tool for public noticing, it is a flawed analysis for the impact of water that is recharged at a great distance from an area experiencing “shallow” groundwater levels.

Glendale believes that this criteria will impact our ability to recover our LTSC’s in the future. If the Department does enforce this Storage and Recovery Siting Criteria, Glendale would suggest grandfathering in current LTSC’s or just imposing the criteria on new recharge facilities permitted after 2025. Glendale requests that more discussion and stakeholder input be vetted before this Storage and Recovery Siting Criteria be implemented in the 5th Management Plan.

Please contact Drew Swieczkowski (Water Resource Manager) at (623) 930-4113 or at dswieczkowski@glendaleaz.com.

Sincerely,

Drew Swieczkowski
Water Resource Manager
Glendale Water Services