



9379 E San Salvador Drive  
Scottsdale, AZ 85258

Phone: 480-312-5685  
ScottsdaleAZ.gov/Water

August 6, 2020  
Arizona Department of Water Resources  
1110 W Washington St #310,  
Phoenix, AZ 85007

Dear ADWR Staff and Leadership,

As members of the Non-Per Capita Conservation Program (NPCCP), Scottsdale Water has a vested interest in seeing the NPCCP elevate the conversation around water conservation. Scottsdale Water thanks the Department of Water Resources for soliciting collaborative feedback through the municipal subgroup questionnaire to further these efforts. There are aspects of our response that we feel warrant additional explanation.

When it comes to Best Management Practices (BMPs), programs can be well-designed and executed, but if they are targeting the wrong customers, they will be ineffective. The Department of Water Resources previously maintained a chart that guided water providers in selecting appropriate BMPs that will be the most effective for their customer classes. Scottsdale Water urges revisiting this matrix during the 5<sup>th</sup> Management Plan (5MP) process. Scottsdale Water supports requiring a specific number of points from *each* category for the purposes of moving "Beyond Compliance", however, this should not overshadow or be a replacement for the demographics matrix. Versatility and flexibility in programs are important, however, providing the right program to the right customer is also necessary to consider.

Additionally, Scottsdale Water feels strongly that BMPs be worth one point apiece. Awarding additional points based on effort or time-spent may lead conservation efforts down an erroneous path. Effort or time does not always yield water savings. Management practices selected through data-driven decisions will provide the best quantitative measurements for managing water supply and thereby groundwater withdrawal goals. This is not to say that programs that provide quality services, such as adult education, are not valued. Those programs are emphasized and required in AMWUA's proposed Public Engagement Program (PEP) but should only be one element of an effective conservation program.

Finally, Scottsdale Water supports the normal distribution proposal, but the tier levels should be set at each Active Management Area (AMA). Due to the size variation, creating a normal distribution with all providers in all AMAs may lead to smaller AMAs receiving a tier structure, and therefore BMP requirements, that are unachievable or even undesirable. Meanwhile, larger AMAs would receive a structure that does not scale appropriately for their size or provide enough rigor to elevate effective conservation practices. In that vein, Scottsdale Water also proposes a Tier 5 be added to the 3A/AMWUA Proposal for the Phoenix AMA. This suggested tier is 100,000+ service connections.



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The structure of the NPCCP lays the groundwork and provides context for the selection of BMPs. It is the most important step of the process as all decisions build on this framework. Scottsdale Water appreciates the questionnaire but also requests that additional time be allocated to building this integral piece of the program, specifically in regard to the demographics matrix. Please contact us with any additional questions.

Again, we want to thank the Department for this conversation and giving all stakeholders the option to give input. Scottsdale believes the 5MP is an opportunity to hone and elevate the BMPs, and it will assist all organizations in highlighting and, when necessary, expanding their conservation programs.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gretchen", written over a horizontal line.

Gretchen A. Baumgardner

Water Policy Manager | City of Scottsdale