February 28, 2022

Delivered via E-mail correspondence

Thomas Buschatzke, Director
Arizona Department of Water Resources
1110 W. Washington St., Suite 310
Phoenix, AZ 85007

Re: Comments Concerning the Pinal Active Management Area Draft 5th Management Plan

Dear Director Buschatzke:

Thank you for the opportunity to review and provide comments on the Pinal Active Management Area Draft Fifth Management Plan (5MP) prepared by the Arizona Department of Water Resources (ADWR). Global Water Resources, Inc. ("Global Water") appreciates the considerable effort and thought ADWR employed in developing the 5MP. Global Water respectfully requests ADWR consider the incorporation of the comments provided below in preparing the final draft of the 5MP for promulgation.

General comments:

- We request Pinal AMA’s 5MP be promulgated last of the five AMAs, to provide Global Water and all Pinal stakeholders additional time to review the numerous program provisions of the 5MP.

- The GPCD program and the Non-Per Capita Conservation Program (NPCCP) has well served the water conservation goals of Arizona for many years. However, water conservation philosophies, technologies, and practices continue to evolve as programs are tested and measured. It is time to evaluate whether Arizona can improve upon these programs so that we can continue to be thought leaders in the field of water management. We would like to encourage the exploration of additional non-GPCD alternative programs that could better capture and incentivize water reuse as well as reduction in water consumption.

Chapter 5, Municipal:

- At the onset of the 5MP development there was discussion about the number of utility tiers to offer for the NPCCP. It is unfortunate that we landed on only 4 tiers for all Arizona utilities. Additional tiers would better serve small utilities as they transition to medium or large utilities. As it is now, this tiered structure would require a massive step change in the resources needed to adapt to a minor change in service connections (from 30,000 to 30,001). A relatively small utility (say 35k connections) will be required to have the same size conservation program as a huge water utility
like the City of Phoenix. This will be challenging for small and medium utilities to accomplish successfully. An additional tier or two between the third and fourth tiers is warranted.

- Section 5-1104. A.2.a of the 5MP states “non-potable direct use effluent” and “non-potable effluent recovered within the area of impact” are not included in the calculation of a municipal provider’s compliance with its GPCD requirement. There does not appear to be a definition of “non-potable” in the management plan or in Title 45. How will ADWR determine what is potable and what is non-potable? Including potable direct use effluent and potable effluent recovered within the area of impact in the GPCD rate is a disincentive for a provider to pursue direct potable reuse of recycled water.

Should you have any questions or wish to discuss any of the comments in this letter further, please feel free to contact me by mail, email at jake.lenderking@gwresources.com or by phone at 480-719-6977.

Sincerely,

Jake Lenderking
Senior Vice President, Water Resources and Legislative Affairs

CC: Shaina Shay, Global Water Resources
    Pam Muse, Global Water Resources