



April 23, 2021

Arizona Department of Water Resources
1110 W Washington St., Suite 310
Phoenix, Arizona 85007

Re: 5th Management Plan for the Phoenix AMA, Recharge Program Evaluation

ADWR Management Plans Team,

We would like to note our appreciation for the effort that has gone into development of the 5th Management Plans (5MP) to date. AMWUA and its members have been actively engaged in development of the Municipal Conservation Programs and Safe-yield Technical Subgroup, which have proved to be highly informative and helpful in soliciting stakeholder feedback. One area that has received less attention is the Management Plan chapter on the Recharge Program. The 3rd and 4th Management Plans each contained a robust section describing the current state of Arizona's Recharge Program, its role in furthering water management objectives, and suggestions for policy change. Development of the 5MP presents a similar opportunity for ADWR to reflect on the Recharge Program and identify areas for improvement.

AMWUA believes that the Recharge Program is such a crucial element within the 5MP that ADWR should seek input and feedback from stakeholders to better inform the relevant chapter(s) pertaining to the Recharge Program in the 5MP. We suggest that this could be best accomplished through a stakeholder meeting, similar to those held on other 5MP topics.

As the impacts from climate change intensify, the Phoenix AMA may experience increased variability in its water resources. When we enter a period of strained renewable water resources the AMA will most likely see increased recovery activity and groundwater withdrawals, making recharge all the more important for managing our aquifers sustainably. Conversely, when renewable water supplies may be more plentiful, it is important to have capacity available for recharge in the areas where it benefits the aquifer most. Both realities are already evident as we enter a Tier 1 Shortage in 2022, just a year after Tonopah Desert Recharge Project was reopened due to a lack of recharge capacity elsewhere in the AMA. The 5MP presents an opportunity for ADWR to leverage its expertise and experience to evaluate how the Recharge Program could be improved in the face of these ongoing challenges.

Issues that ADWR could explore in the 5MP include whether the Phoenix AMA currently has sufficient recharge capacity in the areas where water users would benefit most, and if there are opportunities and need for increased targeted recharge.

The 5MP also offers a timely venue for ADWR to solicit and address stakeholder feedback on the Recharge Program, as the Department has done with other elements of the 5MP. There have been growing concerns throughout the water community about policies and procedures related to the issuance of Recharge and Recovery permits. The time is ripe to evaluate if recharge and recovery

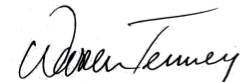
Arizona Municipal Water Users Association

policies – cornerstones of Arizona groundwater management – can be improved beyond the current regulatory framework. The Department should work with stakeholders to identify if there are policies or procedures that may be impeding the issuance of new recharge and recovery permits.

AMWUA understands that ADWR is seeking to complete a draft of the 5MP by the end of 2021. This timeline may not be conducive to implementing significant policy changes to the Recharge Program through the 5MP itself. Nevertheless, the 5MP is still an important planning document that should be utilized to identify issues, conduct programmatic evaluation, and set the stage for future policy discussions. Engaging with stakeholders as ADWR has done on other 5MP topics to identify and understand any challenges facing the Recharge Program is the first step that should be taken.

Again, we appreciate the opportunities that we have had thus far to submit input on the Phoenix AMA 5MP, and look forward to continued engagement throughout the rest of the process.

Sincerely,



Warren Tenney
Executive Director