February 22, 2022

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

RE: 5th Management Plan for Tucson AMA, Proposed Recharge and Recovery Siting Criteria

ADWR Management Plans Team

The Metropolitan Domestic Water Improvement District would like to take the opportunity to provide comments to the implementation of the Tucson AMA 5th Management Plan.

Metro Water District appreciates ADWR efforts to address the hydrologic disconnect conditions that exist between recharge and recovery in the three AMAs; however, in the document posted for the implementation of the proposed 5th Management Plans there is a case for unintended consequences in the Tucson AMA. In the document “Proposed 5MP Recharge & Recovery Regulatory Language Modifications (Version 3 – updated January 6, 2022),” the following is stated as the metric to be used for siting of recovery wells:

Once the 5MP requirements go into effect, any applicant who applies for a new USF permit, to modify an existing USF permit or to renew an existing permit would be subject to Management Plan Siting Criteria 8-801(B)(1)(a)). If the maximum area of impact of a USF, calculated as part of that permitting process, overlaps an area determined by the Director to have shallow groundwater conditions, then that facility would be considered to be contributing water to an area determined by the Director to have shallow groundwater conditions. Those USF applications could be approved without additional demonstrations, but the USF permit and all associated WSP(s) would be conditioned to indicate that water stored at that facility must be recovered within the area of impact of that USF only. Water stored pursuant to permits issued prior to January 1, 2025 would not be subject to this requirement.

If these conditions were used for repermitting Metro Water District’s Avra Valley Recharge Project (AVRP), an area of naturally occurring shallow groundwater (as defined by 50 feet or less below land surface) would be overlapped by the modeled maximum area of impact. This would restrict Metro Water District’s current ability to recover CAP credits in its Metro Main service area. Water recharged at AVRP and recovered in the Metro Main service area do not currently, or would in any future activity, affect the area of shallow groundwater. The ability to recharge CAP water at AVRP is not jeopardized by the existence of the shallow groundwater, and therefore should not restrict either recharge or recovery operations by Metro Water District.
If there is any real need for an impact area overlay, Metro Water District suggests that the Area of Hydrologic Impact be substituted in place of the Maximum Area of Impact. In the Tucson AMA, we feel there isn’t a real need for any such restrictions on recharge and recovery activities.

Please feel free to contact me or Wally Wilson at (520) 575-8100 or wwilson@metrowater.com to discuss our comments further as needed.

Best Regards,

Joseph Olsen, P.E.
General Manager
Metropolitan Domestic Water Improvement District