



managementplans - AZWATER <managementplans@azwater.gov>

City of Chandler 4MP comments

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To: managementplans@azwater.gov

Cc: Gregg.Capps@chandleraz.gov, Deina.Burns@chandleraz.gov

To Whom it May Concern,

Thank you for having this open process of development of the Fourth Management Plan for the Phoenix AMA. We in the City of Chandler have attached our comments of the draft plan for your review.

As you will see by our comments, the main concern the city has is with the use of GPCD as a conservation metric. Though we are home to over 260,000 residents, our city has not followed the typical buildout strategy of cities our size. Today, we have reached over 94% of residential buildout but only 62% of commercial/industrial buildout. This means that in future years Chandler's growth will be predominantly from the commercial / industrial sector as we fill in our large employment corridors along Price Road and near the Chandler Airport. Currently, Chandler is home to a large employment base of high tech jobs that help to support the economic vitality of, not just Chandler, but of the surrounding cities and towns.

As you know, GPCD can be an adequate conservation metric when used in residential applications. However, due to the large employment we support, Chandler's committed water usage today is nearly a 60/40 split, residential to non-residential, and is projected to be a 50/50 split at buildout. These conditions are not conducive to using GPCD as an accurate measurement of conservation. Further, we'd like to understand the calculation behind the new GPCD requirements and how it would impact us.

We understand that you will be busy reviewing not only our comments, but the comments from all the other entities regarding the plan. When your time allows, we'd like to discuss our water system and the GPCD requirement with you in person prior to finalizing the Fourth Management Plan.

Thank you,

Chris Connor

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**Chandler comments on 4MP.xlsx**

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| Section: | Comment: |
|---|--|
| 5.3.1.3, page 5-9 General Requirements | Chandler does not agree with the how BMP's were weighted. Weighting should be based on effectiveness versus cost. |
| 5.3.2.2, page 5-13 Total GPCD Program Development | Chandler has not followed the typical buildout strategy of cities our size. As of January of this year, we have reached over 93% of residential buildout but just 62% of non-residential buildout. This means that in future years Chandler's growth will be predominantly from the commercial / industrial sector as we fill in our large employment corridors along Price Road and near the Chandler Airport. Currently, Chandler is home to a large employment base of high tech jobs that help to support the economic vitality of, not just Chandler, but of the surrounding cities and towns. GPCD can be an adequate conservation metric when used in residential applications. However, due to the large employment we support, Chandler's committed water usage today is nearly a 60/40 split, residential to non-residential, and is projected to be a 50/50 split at buildout. These conditions are not conducive to using GPCD as an accurate measurement or projection of conservation. Further, we'd like to understand the calculation behind the new GPCD requirements and how it would impact us. Chandler supports the use of the Non-Per Capita Program as an alternative to GPCD, however attaching a GPCD goal that is not attainable is not a fair evaluation of our Communities conservation ethic. |
| 5.2.2, page 5-3 | The statement that "continued implementation of conservation measures...will result in reduction in per capita use rates and increased water efficiency in the municipal sector." is only true if you assume that new growth is from new homes replacing agriculture and that water savings from conservation measures will continue to improve at the same historical rate. For cities like Chandler, who's residential is largely built out, the growth will come from new industry developing in the City which will increase GPCD even when becoming more efficient on both the residential and industrial sectors. |
| 5.2.2, page 5-4 | Increased water conservation, full utilization of CAP, and maximized treated effluent are called out as efforts to achieve safe yield. Chandler agrees and has already done all 3. However, because of the increase in industrial use within the city, the GPCD will still increase. |
| 5.3.1.4, page 5-9, 5-10 | Under <i>Profiles submitted by providers with a DAWS</i> , states that if the Director does not approve the Provider Profile then municipal provider has to revise, appeal, or be regulated under GPCD. But in paragraph above under <i>Provider Profile</i> it says the Director doesn't approve or disapprove in 90 days the Profile is deemed approved. Can this be clarified? Does "does not approve" = disapprove? |

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| Appendix 5A, page 5-43 | It's unclear how this calculation relates to the Assigned GPCD on the table on the following page. Because of this, it's difficult to determine if the median GPCD from 2000-2009 minus one standard deviation is a good measuring stick. We have concerns that the variability of population, economic growth, and recession during that time period would inflate the standard deviation and effect the GPCD calculation going forward. A more detailed explanation of the calculation and the Assigned GPCD would help us. Providing the raw data would also be useful. |
| Appendix 5A, page 5-44 | It's not clear how the Assigned Total GPCD Requirement is calculated. There are large discrepancies for each city that aren't clearly explained. Some similar sized cities have a much larger assigned GPCD than Chandler. |