

ROOSEVELT WATER CONSERVATION DISTRICT

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September 16, 2019

Thomas Buschatzke
Director, Arizona Department of Water Resources
1110 West Washington Street, Suite 310
Phoenix, Arizona 85007



RE: Development of the Fourth and Fifth AMA Management Plans

Director Buschatzke:

I would like to submit the following comments regarding the Arizona Department of Water Resources' proposed Fourth Management Plan for the Phoenix Active Management Area ("Fourth Plan") and the process for developing the Fifth Management Plan ("Fifth Plan").

I believe the process that ADWR has used to develop the proposed Fourth Plan is critically different from the process used to develop previous management plans. Previous plans used an arduous, difficult, and sometimes confrontational stakeholder-driven process, which resulted in well-vetted, thoughtful, and rigorous plans. That process was built around the principle that the affected water users would work together to develop a reasoned, scientifically based approach to meeting AMA management goals. These collaborative efforts between the regulated community and ADWR resulted in successful previous plans.

Unfortunately, development of the proposed Fourth Plan has not involved a similar process. At a July 9, 2019 initial work group meeting, ADWR staff announced that a draft Fourth Plan had been completed and would be posted that day for review and comment. Prior to that meeting the draft plan had not been vetted or discussed with stakeholders in any substantive manner. One cannot help but see this as a roll-out of a minimum-effort draft plan with a pre-determined outcome, allowing ADWR to quickly move on to the Fifth Plan.

The abbreviated process used to develop the Fourth Plan creates concern for development of an appropriate Fifth Plan. ADWR staff at work group meetings have described using a development process similar to the process used for the proposed Fourth Plan, where ADWR staff will propose ideas and then the public provides comment. These descriptions suggest that rather than utilizing a process with stakeholder input and buy-in, ADWR is attempting to reach a pre-determined outcome. I believe that this will result in a structurally weakened management plan that will not best serve the State of Arizona's interests.

The Roosevelt Water Conservation District is interested in actively working to build meaningful and thoroughly vetted Fourth and Fifth Plans. Toward that end, I encourage ADWR to consider implementing the following steps:

1. Retract the current proposed Fourth Plan.
2. Take necessary steps to develop a new plan that combines the Fourth and Fifth Plans (“Combined Plan”).
3. Utilize a public process involving appropriate stakeholders and rigorous debate about how best to achieve AMA management goals.
4. Invite appropriate stakeholders and industry leaders to participate in public meetings about the Combined Plan.
5. Schedule reasonable deadlines for completing the Combined Plan.

Thank you for your consideration of these suggestions. I will look forward to continuing to work with you, ADWR staff, and the various stakeholders and other interested parties to develop meaningful and effective Management Plans.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Shane M. Leonard', with a long horizontal flourish extending to the right.

Shane M. Leonard
General Manager