



**Shaping a new  
tomorrow, today.**

November 12, 2021

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

**Re: 5th Management Plan for the Phoenix AMA, Proposed Recharge & Recovery Siting Criteria**

ADWR Management Plans Team,

The Town of Gilbert is submitting this letter to support comments submitted by the Arizona Municipal Water Users Association (AMWUA) regarding ADWR's proposal to implement the Section 8-801(B)(1)(a) Recharge and Recovery siting criteria in the Phoenix AMA 5<sup>th</sup> Management Plan.

Gilbert is concerned about the potential unintended consequences from implementing this policy given the lack of clarity regarding what constitutes an area "experiencing problems" with shallow groundwater, protections for riparian habitats, and the distinction between shallow groundwater and surface water yet to be adjudicated. Gilbert echoes AMWUA's recommendation to further refine and clarify this policy prior to its inclusion in the 5<sup>th</sup> Management Plan.

Gilbert greatly appreciates the efforts ADWR has made throughout the 5<sup>th</sup> Management Plan process to implement regulations that enhance groundwater management within the AMAs. We appreciate the opportunity to comment and remain willing to continue the discussion.

Respectfully,

A handwritten signature in black ink, appearing to read "Lauren Hixson". The signature is fluid and cursive.

Lauren Hixson  
Interim Water Resources Manager