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Arizona Department of Water Resources  
1110 W Washington St #310  
Phoenix, AZ 85007

Dear ADWR Staff and Leadership,

Scottsdale Water thanks the Department of Water Resources (“Department”) for leading the stakeholder process and soliciting feedback on the Non-Per Capita Conservation Program (NPCCP) concept and GPCD Proposal. The stakeholder process produced innovative new approaches and improvements to the existing programs to help enhance water conservation for future generations and we look forward to entering the 4<sup>th</sup> Management Plan and the 5<sup>th</sup> Management Plan (5MP).

The improvements in the NPCCP are numerous, including an emphasis on creating measurable, targeted reporting requirements from industry standard metrics. The program is not only equal in conservation requirements to the GPCD, in many ways it is more rigorous. When properly utilized, it creates water savings from programs designed for precise and accurate tools that target known inefficiencies in a customer base rather than a blanket metric reduction. This type of precision conservation targets that excess, and not only reduces the reliance on groundwater, but also helps customers mitigate waste and maximize performance. However, this system relies on targeting the correct customers for various Best Management Practices (BMPs).

The Department’s previously maintained a matrix that guided water providers in selecting BMPs that will be the most effective for their customer classes. This is a guiding principle in all good conservation programs. Without an updated matrix, providers in the NPCCP are at risk of putting energy into executing comprehensive programs that will be ineffective due to misguided BMP selection. For instance, a provider that is nearing build out may not receive the same results of enacting an ordinance as a provider that is at the beginning of growth. Without an updated matrix the NPCCP will not be as strong as providers need it to be when moving into the 5<sup>th</sup> Management period. Scottsdale Water urges the matrix be updated and included in the 5<sup>th</sup> Management Plan, not maintained as a separate document, and is willing to create a draft for stakeholder review.

Scottsdale Water also believes that the NPCCP should also have the same responsiveness that is proposed in the GPCD Program. Additional new BMPs can be added through the existing procedure outlined in Section III, however we propose that all BMPs can also be modified or deleted each year under the same Section III.

Finally, the new Category 7: Planning, is a welcome addition and brings some innovative ideas to the table. Since the new category was added to the 5MP in the last six months, the text has not had the opportunity to undergo the same stakeholder review as other categories. One notable difference in relation to other categories is the amount of text in each BMP as well as some crossover between BMP requirements and existing Management Plan requirements. This may result in duplicitous points or the suggestion that providers are not already obligated to meet those requirements. Suggested edits for this



category are included in a separate document along with other edits to the entirety of the NPCCP program.

The standardized reporting requirement built into the NPCCP, ideally with measurable water savings or informative findings, helps create a suite of vetted measures to utilize to achieving water conservation in Arizona. This recorded, public knowledge will prove invaluable as the Colorado River System moves deeper into drought and faces the potential of shortages. The integrity of the BMPs is reliant on selecting the right program for the right customer; remaining flexible to changing conservation goals; and collecting meaningful reporting requirements. Scottsdale Water urges the integration of the provider matrix, addition of modifications and deletions to the established Section III for adding BMPs, and the attached edits to maintain that integrity.

Again, we want to thank the Department for this conversation and elevating the conversation around water conservation to improve the NPCCP. Please contact us with any additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gretchen', with a long horizontal line extending to the right.

Gretchen A. Baumgardner

Water Policy Manager, City of Scottsdale