February 28, 2022

Thomas Buschatzke, Director
Arizona Department of Water Resources
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via first-class mail and email: managementplans@azwater.gov

Re: Comments on ADWR’s Draft Fifth Management Plan for the Phoenix Active Management Area

Dear Director Buschatzke,

I appreciate the opportunity to provide comments on behalf of McCormick Ranch Golf Club (“MRGC”) regarding the conservation requirements for golf courses in the Draft Fifth Management Plan for the Phoenix Active Management Area, dated January 2022 (“Draft 5MP”). Although the Arizona Department of Water Resources (“ADWR”) has provided multiple opportunities for public comment in developing the Draft 5MP, MRGC’s concerns persist. The conservation requirements in the Draft 5MP for pre-1985 golf courses that were designed and constructed prior to the Groundwater Code and the First Management Plan are unattainable.

In the Draft 5MP, golf courses that were designed with conservation requirements in mind are receiving up to 16% increases in their water allotments, while golf courses that were designed prior to the Groundwater Code and First Management Plan are receiving decreases in their water allotments of up to 24%, nearly one quarter of the total allotment for some courses. Rather than the gradual and incremental reductions of previous management plans, the Draft 5MP will curtail MRGC’s current allotment by a staggering 15.9%.

MRGC is part of an iconic golf course community with 3,100 acres, 8,900 residences and 27,000 citizens, in the heart of Scottsdale, steeped in the history of Arizona since 1972, that provides recreational amenities, tourism benefits, as well as economic and ecological value to people and wildlife. Its property includes two golf courses, a restaurant, 288 acres of land and seven lakes with 88 acres of water surface area. It has remained a family owned and operated business since 1979 and is an essential feature of the McCormick Ranch community.

MRGC was originally designed to incorporate floodplains within the property and is an integral part of Scottsdale’s Green Belt, also known as the Indian Bend Wash Flood Control Project, an elaborately engineered drainage system with turf and lakes consisting of parks and golf courses. The Green Belt’s floodplains serve multiple purposes with benefits for recreation, wildlife, and property owners, while also serving to slow run-off, improve drainage, minimize erosion and
dust problems, and protect downstream communities such as Scottsdale and Tempe from damage during storm events. Over 70% of MRGC’s turfed acreage and lakes are located within designated floodplains.

Therefore, MRGC is requesting two changes to the Draft 5MP:

- **An Allotment Addition for Turf and Lakes in a Floodplain** to account for additional water needed for storm water drainage, flood control, and to prevent erosion.

Without an allotment addition for turf and lakes in the floodplain, MRGC will be required by state law to stop irrigating over one hundred acres of turf and stop filling eighty-eight acres of lakes, leaving large areas of dirt, weeds, and shallow lakes in the heart of Scottsdale next to prime real estate and commercial properties. Moreover, dirt in the floodplain will not provide erosion control and with every storm, sediment will be washed downstream into Scottsdale and Tempe. Acres of dirt and depleted lakes will reduce the value of surrounding communities and will be devastating to MRGC. As a result, MRGC is requesting that ADWR modify the Draft 5MP to include an Allotment Addition for Turf and Lakes in Floodplains.

- **An Allotment Addition and Additional Time to Comply for Low-Water Use Landscape on Pre-1985 Courses** that includes all turfed acres which are able to be removed and replaced with low-water use landscaping.

The Draft 5MP only allots enough water for a maximum of 18 acres of low-water use landscaping per course or one acre per hole. For courses that must remove more than 18 acres of turf, the Draft 5MP leaves them with no option but dirt or rocks for potentially large expanses of their golf courses. In addition, because of the large amount of acres that would have to be removed, many of these courses would need extra time to comply with their reduced allotments. Therefore, MRGC is requesting that ADWR modify the Draft 5MP to include a Low-Water Use Landscape Allotment Addition and Additional Time to Comply for Pre-1985 Courses to include all acres of turf that are able to be removed and replaced with low-water use landscaping.

*MRGC has already invested over $5 million to install a new irrigation system and operates its golf courses using best management practices and highly efficient technologies.* Additionally, MRGC recently hired a golf course architect to evaluate what additional actions it can take to conserve water and improve efficiencies. MRGC is committed to responsible water management and to reducing water use over time in a manner that is economically achievable and technically feasible.

However, ADWR’s Draft 5MP conservation requirements for golf courses could leave MRGC and many historic golf courses with no choice but to remove hundreds of acres of turf at great expense, leaving empty or depleted lakes, dirt in floodplains, bare granite in common areas within established communities, decreased home values, and competitive advantages for golf courses that were designed and built into the desert as opposed to traditional courses which will have to be “retrofitted.”
The Draft 5MP conservation requirements for golf courses are contrary to the Groundwater Code. Prior management plans recognized that it would be inequitable to require pre-1985 courses to significantly redesign their courses to comply with conservation requirements that were enacted after they were constructed. Curtailing MRGC’s water supply by nearly 16%, requiring it to remove over one hundred acres of recreational turf at an estimated cost of $5 million dollars, providing no water for any plants on more than one acre per hole whether or not it was historically irrigated, requiring it to deplete lake levels in the middle of established communities, and creating a potential hazard in the floodplain upstream of the cities of Scottsdale and Tempe and a potentially costly permitting process, is not “consistent with reasonable economic return.” A.R.S. § 45-566(A)(2).

Imposing such drastic reductions for recreational turf, which also provides economic value, wildlife value, and serves as a flood control project, while at the same time allowing water to be used for purely aesthetic and ornamental turf elsewhere, puts a greater burden of conservation on the golf industry, an economic engine for the State. In fact, the golf industry uses only 1.9% of Arizona’s total water use, and its economic return is about $4 billion each year. Therefore, ADWR should modify the Draft 5MP to include both allotment additions requested: 1) an Allotment Addition for Turf and Lakes in a Floodplain, and 2) an Allotment Addition and Additional Time to Comply for Low-Water Use Landscape on Pre-1985 Courses.

Thank you for considering my comments. Please don’t hesitate to contact me if you have any questions.

Sincerely,

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