

May 20, 2021



Arizona Department of Water Resources
Management Plans Group
1110 W Washington St., Ste #310
Phoenix, AZ 85007

Re: Comments to ADWR on Total GPCD recommendations

Q1. Please provide any feedback and/or questions you have regarding the 5MP GPCD Proposal: Tucson Water has reviewed the proposed methodology calculations for the 5MP and supports the proposed changes. Specifically, we support adjusting and aligning the flex balance range for all AMAs to +45 GPCD and -15 GPCD, and adopting the proposed 5MP GPCD Requirement Calculations.

The adjusted flexibility provisions provide consistency throughout the AMAs and provide a greater buffer before non-compliance for providers that experience increases in GPCD. This is important given that the default calculation is a 3-year rolling average minus 1% that will adjust the GPCD requirement more quickly than the current calculation. With a starting flex balance of 30 GPCD, Tucson Water would stay in compliance based on future demand projections. Tucson Water would be more concerned about meeting compliance with this methodology if we did not currently have a positive flex balance.

Historically, Tucson Water experiences about a 4% increase in calculated GPCD because end-of-decade numbers are an over-estimate once new census data is incorporated into calculations. The 3-year rolling average mitigates some of the impact of decadal, post-census population adjustments. We encourage ADWR to consider how population numbers are adjusted by different water providers and consider whether additional short-term adjustments need to be made to avoid non-compliance or unattainable GPCD requirements.

Q2. Please provide any feedback and/or questions you have regarding the 5MP NPCCP Proposal: As Tucson Water is not currently in NPCCP program, we did not review.

Q3. Do you have any other questions/comments not addressed above?

We recognize that the 5MP focus is on groundwater conservation, but given current usage trends and demand projections in the TAMA, we would like ADWR to consider what GPCD values are needed to achieve safe yield throughout the TAMA. Tucson Water has already achieved a lower GPCD relative to other large municipal providers. Is it possible to establish a GPCD set point that aligns with reasonable future demand projections and would keep the TAMA in safe yield?

While we acknowledge there is still additional groundwater savings to achieve through water conservation, it is unlikely that GPCD will continue to decline at the rate we have experienced over the last two decades. A recent analysis of current water use trends and future demand estimates that we may only be able to achieve an additional 10 GPCD of savings over the next two decades, and that it may be variable based on weather patterns and climate trends. While a 3-year moving average does help





A proud part of the City of Tucson



adjust for short-term weather impacts (particularly, low rainfall years), there is still a concern that climate impacts may override conservation efforts in the future. During this next planning period, GPCD may begin to flatten and likely reach a bottom based on current plumbing technology and an uncertain climate future.

