February 28, 2022

Arizona Department of Water Resources
Natalie Mast, Director, Management Plans
Groundwater Management Section
1110 W. Washington St. Suite 310
Phoenix, AZ 85007
Via Email to: managementplans@azwater.gov

RE: Fifth Management Plan for Prescott AMA

Dear Ms. Mast,

I would like to congratulate the Arizona Department of Water Resources (ADWR) on completing draft Fifth Management Plans (5MPs) for all five of Arizona’s Active Management Areas (AMAs). These documents come on the heels of producing Fourth Management Plans (4MPs) for the AMAs besides Prescott AMA (PrAMA) and demonstrate a significant effort to catch up after years of budget and staffing shortages at ADWR.

The draft 5MP for PrAMA represents a notable shift away from the robust predictive analysis contained in the 4MP for PrAMA finalized in 2014. The supporting analysis of past withdrawals and recharge in the 5MP was not separately published for review and comment as ADWR had allowed during the development of the 4MP. The result is that the report and its supporting elements require more review and commentary than can reasonably be accomplished within the 28-day period that has initially been allowed by ADWR. Therefore, the Town of Prescott Valley (Prescott Valley) hereby requests additional time for a more thorough review.

Pending your response to this request, here is a very preliminary assessment of the draft PrAMA 5MP. This preliminary assessment is rooted in Prescott Valley’s commitment to work with ADWR and other stakeholders in PrAMA to reach the goal of safe yield. The Town has signed cooperative agreements with the City of Prescott (Prescott) and Salt River Project (SRP) and spent millions of dollars thereunder to reduce groundwater impacts. Based on these and other efforts, groundwater levels have increased by 180 feet in Prescott Valley’s main well field and by 110 feet at its recharge facility. Similarly, strong conservation efforts have allowed Prescott Valley to meet the water needs of a population that has increased by 22% with only a 6% increase in water demands over the past 15 years.

Our primary assessment is that the draft 5MP appears to lack the same guidance for reaching safe yield that has been included in past management plans. The draft 5MP includes some advice for PrAMA water users, but it is written in abstract language that does not identify specific actions, predict possible outcomes, or identify a clear role for ADWR. Indeed, the primary role ADWR
appears to set out for itself is simply that of a regulator. [see page 7-11 "...ADWR will be implementing a proactive compliance approach for the 5MP."]

Past guidance in the management plans has encouraged investment in significant safe-yield activities by PrAMA water users. It capitalized on decades of analysis by ADWR and various state and local study committees (including the Groundwater Users Advisory Committee, State-Wide Advisory Group, Water Resource Development Commission, Yavapai County Water Advisory Committee, Upper Verde River Watershed Protection Coalition (Coalition), and Governor’s Water Augmentation, Innovation and Conservation Council) to identify specific actions towards achieving safe yield in PrAMA. Those include -

1. **Importation of water from the Big Chino Sub-basin.** The Second Management Plan (2MP), the Third Management Plan (3MP), and the 4MP for PrAMA expressly identified this action as essential for achieving safe yield. The Groundwater Management Act was created to facilitate importation of water from the Colorado River to other AMAs (and forms the underpinning of the safe-yield goal for those AMAs). ADWR must continue to provide full support for the related program of water importation from the Big Chino Sub-Basin for PrAMA. Based on language in the 3MP, Prescott and Prescott Valley signed an agreement in 2004 to jointly import water from Big Chino Sub-basin. The two communities have since spent $23.5 million on a water property and millions more to design and defend the project. Since 2010, they have partnered with SRP (and worked with ADWR, the US Geological Service (USGS), Yavapai County Flood Control, and others) to develop an environmentally safe importation plan at a cost of well over $5 million. The Arizona Legislature has applauded this importation concept and has adopted legislation supporting ADWR’s most recent Determination on Prescott’s Designation of Assured Water Supply that incorporated the importation project.

2. **Regulation of “wild-cat” subdivisions that pump groundwater without 100-year assurances.** Ongoing proliferation of wild-cat subdivisions increases groundwater commitments beyond those made prior to the 1999 Declaration of Groundwater Mining in PrAMA (and pushes the safe-yield goal further into the future).

3. **Wastewater capture and effluent recharge in areas using septic systems.** In the PrAMA 4MP, ADWR projected future water supply and water demand under this and other management scenarios. That information should be updated to determine its relevance to current conditions.

4. **Stormwater management for increased recharge and capture.** The Coalition has in recent years identified and tested ways to manage stormwater for increased recharge (including, rooftop rainwater harvesting and recharge and other watershed restoration techniques). These have since been adopted as approved practices by the Natural Resources Conservation Service. Other proposed technologies such as Macro-rainwater harvesting should be tested to determine potential benefits.

During the additional review time requested above, Prescott Valley requests that ADWR provide missing data and update the analysis and conclusions in the draft 5MP. As an example, Figure 2-
8 portrays the PrAMA’s “Long-Term Overdraft” based on a single year of data. And that “long-term” overdraft for year 2019 purports to be calculated from the PrAMA Data Dashboard, which is missing all recharge data for that year.

We look forward to partnering with ADWR to make the final 5MP for PrAMA a document that will significantly move forward the goals of the Groundwater Management Act. Again, it is essential that the comment deadline be extended beyond February 28, 2022, to allow not only water providers but private citizens an opportunity to better digest the draft and provide needed input.

Please let me know if you have any questions.

Sincerely,

[Signature]

John Munderloh
Water Resources Manager
Town of Prescott Valley