



November 5, 2021

Natalie Mast, AMA Director - Management Plans
Arizona Department of Water Resources
1110 W. Washington St, Suite 310
Phoenix, Arizona, 85007

Re: 5th Management Plan for the Phoenix AMA, Non-Golf Turf Facilities Conservation Program

Ms. Mast:

The Arizona Municipal Water Users Association (AMWUA) appreciates the Arizona Department of Water Resources' (ADWR) approach to developing the 5th Management Plan through a public stakeholder forum and applauds ADWR's efforts to reduce withdrawals of groundwater through an assessment and update of our conservation programs.

AMWUA's members provide water service to over 3.5 million people in the Phoenix Active Management Area (AMA). Leveraging expertise of the staff who administer the water conservation programs of these municipal utilities, AMWUA respectfully submits the following comments on the draft regulatory language for the 5th Management Plan Non-Golf Turf Facilities Conservation Program for the Phoenix Active Management Area (AMA).

Definition of a Non-Golf Turf Facility

The definition of a large, non-golf turf facility has consistently stayed at ten (10) acres or more of water intensive landscaping. Throughout the Phoenix AMA there are a tremendous amount of landscape areas that are still large but fall below the ten (10) acre limit. Data shows that large water intensive landscapes over ten (10) acres tend to be more efficiently irrigated and managed than these middle ground facilities and can achieve a higher water savings potential. AMWUA recommends reducing the ten (10) acres or more of water intensive landscaping to capture these sites with high water savings potentials. Alternatively, the threshold of ten (10) acres or more of water intensive landscaping could be streamlined to capture any site with XX acres or more of total landscape area.

AMWUA recognizes that identifying these large, non-golf turf facilities is an administrative burden on ADWR staff who already have limited capacity. Some AMWUA municipalities have the resources to identify these facilities and would be interested in collaborating with ADWR to provide assistance.

Update to the Proposed Method of Calculating the Non-Golf Turf Facilities' Conservation Allotment

The October 21, 2021, update to the proposed method of calculating the non-golf turf facilities' conservation allotment divided facilities into two categories based on the facilities' percentage of water-intensive landscaped area. While we recognize the initiative to incentive turf conversions into

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low-water-use landscapes by allowing a higher turf application rate for “low facilities,” the updated turf application rate for “high facilities” is unrealistic and unsustainable because a 4.43 acre-foot (AF)/acre application rate is only appropriate for ornamental turf, not active turf areas.

Large, non-golf turf facilities capture municipal parks which are public amenities that have seen an increase in use since the beginning of the COVID-19 pandemic. These parks need to be watered at an application rate of at least 4.75 AF/acre to maintain healthy turf areas that can withstand high traffic amounts. Additionally, watering the turf areas at these parks at an application rate lower than 4.75 AF/acre creates safety hazards for the public. For example, turf areas in a public park with programmed recreation activities, like soccer, need to maintain a certain level of soil moisture—even in the winter—to ensure proper dust control and air quality and to prevent more serious injuries if a child was to fall on the Phoenix AMA’s already hard clay soil.

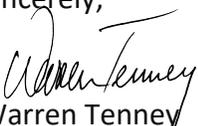
AMWUA recommends that the “high facility” category be subdivided into “parks” and “non-parks” categories in order to allocate park facilities the 4.75 AF/acre application rate necessary for healthy turf areas and for preventing safety hazards.

Table 1: AMWUA Proposed Application Rates and Categories for Non-Golf Turf Facilities in the Phoenix AMA

Facility Category	Category	Application Rate (AF/acre)
High – Parks (>30% water intensive landscape)	Turf	4.75
	Low Water Use Landscape Area	0.85
	Total Water Surface Area	6.2
High – Non-Parks (>30% water intensive landscape)	Turf	4.43
	Low Water Use Landscape Area	0.85
	Total Water Surface Area	6.2
Low (≤30% water intensive landscape)	Turf	4.75
	Low Water Use Landscape Area	1.08
	Total Water Surface Area	6.2

AMWUA appreciates the extensive effort ADWR has put forth to work with stakeholders through the 5th Management Plan process and trusts that the Department will ultimately move forward in a way that advances our shared goal of increasing water conservation and efficiency within Arizona. AMWUA looks forward to continuing to partner with the Department throughout the remainder of the stakeholder process. Please contact Sam Draper, AMWUA’s Conservation and Efficiency Program Manager, at sdraper@amwua.org with any questions you may have on the comments included herein.

Sincerely,



Warren Tenney
Executive Director