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Scottsdale, AZ 85258

Phone: 480-312-5685
ScottsdaleAZ.gov/Water

November 5, 2021

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

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

Dear ADWR Staff and Leadership,

Scottsdale would like to thank the department for the opportunity to comment on the Phoenix AMA Draft 5th Management (5MP) Plan Non-Golf Turf Facilities Conservation Program. We believe in forward thinking and an innovated construct of regulations to manage our groundwater and other water resources far into the future. We applaud ADWR for their hard work in all aspects of the 5MP development, including conservation at turf facilities.

Scottsdale assisted in the development of the remarks made by AMWUA and fully supports that comment letter. Several expert Scottsdale staff added input to AMWUA's recommendations, including our former Parks Irrigation Supervisor, who has helped manage Scottsdale parks for nearly two decades and implemented the Parks water budgeting program. The level of expertise on how to appropriately manage these vital community amenities is invaluable – it is only by actively managing do we learn what is, and is not, attainable. There are significant implications to our community and parks system with the proposed application rates for the category of the more than 30% high-water-use non-golf facilities. As a municipal provider, we work for our citizens, and we approach our challenges with equity at the forefront of our minds. The proposed application rates are not equitable between the subcategories of non-golf turf.

With the reduced application rates of both the low-water-use plantings and the turf, it reduces the ability for all community members to access quality open space. While we understand that mathematically an acre of turf or low-water-use plantings only requires a specific amount of water, in practice, especially at parks, there are a number of additional circumstances that affect water use. Scottsdale parks largely do not overseed as an example to its citizens and to preserve precious water resources, but that also means that in the high-traffic winter season additional water must be used to control dust. We must abide by air quality standards. Additionally, while the grass is dormant, the parks experience high citizen use. Parks have seen an increase in usage during the pandemic as they are a free outdoor resource to all citizens. The citizens are active in the parks and this means some water must be applied to the dormant grass to keep the soil pliable. This softer soil is needed to help prevent injuries that may occur during games such as pick-up soccer or frisbee. These activities happen throughout the park and are not limited to designated active areas. A third reason for increased water usage may occur throughout the year and has to do with grass recovery, when high traffic events or activities stress grass, more water is needed for grass recovery. These lessons in park management



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have been learned over the last two decades. We are proud of being able to provide this great community resource while also decreasing operating costs and conserving water.

As this chapter is written, many of our parks would not be able to maintain the current level of operations. Parks are a corner stone of what make a community great for all its residents, separate from their economic position. While we understand that the position of the 5MP is to tighten the regulatory obligation to further conserve groundwater, we argue more meaningful savings can be gleaned from other turf facilities without sacrificing public amenities. We respect that it may be difficult to bring new turf facilities under management, however, Scottsdale and other municipalities are willing to help communicate the message and educate our end users. In the end, water allotments not only conserve water, but they can also reduce costs, which is why many of our end users are organically requesting a water budget which is akin to a water allotment. We support AMWUA's proposal to reduce the size of the facility from 10 acres to 8 acres. If that is not possible, we support regulating any facility with 10 acres or more of landscape, regardless of type. Finally, we strongly recommend that the non-golf facilities be separated into subcategories and managed with appropriate application rates.

Scottsdale has made water conservation a priority in our parks system for over two decades and have gone above what the regulatory structure requires. As the 5MP is written, we believe the calculations are well-intentioned but misguided. The minimal savings from reducing park allotments will not be worth the cost to our communities. There is a much higher potential for conservation at medium-sized facilities, as supported by research across the AMA. Our parks are the backbone of our community, and for many of our lower income population it is the only access to open, green spaces. We ask that the department review the draft language and equitably approach the standards for all turf facilities.

Sincerely,

A handwritten signature in black ink, appearing to read "Gretchen A. Baumgardner", written over a horizontal line.

Gretchen A. Baumgardner

Water Policy Manager | City of Scottsdale