

# The Daily Courier

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## Talk of the Town: ADWR's 4MP should ask more of communities

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The Arizona Groundwater Management Code, established in 1980, requires the Department of Water Resources (ADWR) to issue decadal management plans for each of the state's five groundwater Active Management Areas. On July 31, ADWR unveiled a draft of the Fourth Management Plan (4MP) for the Prescott Active Management Area (PrAMA), which is the aquifer system for our water supply.

The 4MP was expected to cover the period 2010-2020, but the plan is late. ADWR is seeking comments on the draft. The Citizens Water Advocacy Group (CWAG) has participated from the beginning of public involvement in the 4MP and has submitted comments on this and related documents (see [cwagaz.org](http://cwagaz.org)).

Our region's groundwater supply is being overdrafted, and the goal of PrAMA is to come into balance and achieve safe yield by 2025. AMA management plans, however, are not blueprints or pathways to safe yield. The only regulatory element of the 4MP specifies conservation requirements for the municipal, industrial and agricultural sectors.

The draft 4MP states, "Although conservation is an effective means of managing available supplies, it is insufficient by itself to bring the PrAMA to safe yield." Further, "Individual water user choices, city and county ordinances, and regional cooperative water management efforts may result in additional progress toward safe yield but are outside ADWR's authority to require or enforce ..." Clearly, the onus is on our communities to take action to achieve safe yield.

Beyond their critical limitations, PrAMA management plans provide useful information, including a general overview, physical information, historical supply and demand and the resulting overdraft. The plans also provide a description of the many complex rules and terminology that apply to water providers. As such, a management plan is an important read for those with a serious interest in understanding our water world.

Conservation programs are the heart of the management plans, and the main focus is compliance with a menu of Best Management Practices (BMPs). The agricultural and industrial sectors require compliance with BMPs, but today these sectors are small relative to municipal and private (exempt) wells, which constitute about 90 percent of the demand.

The PrAMA's 21 small municipal providers are required to minimize waste, maximize efficiency of outdoor watering and encourage reuse of water supplies, all without specific criteria. Exempt wells have no requirements.

The two large providers must conduct a Basic Public Information Program and can select five BMPs from a menu of about 50. The BMP categories include: public information, education and training; outreach services to the public; physical system evaluations and improvements; ordinances; rebates and incentives; and research. The [City of Prescott](#) has been performing some of these BMPs, and they have proved successful. CWAG believes, however, that complying with only five BMPs can be easily achieved and that the 4MP should require much more than five. Conservation is probably the least expensive way to reduce our overdraft.

The draft 4MP presents scenarios by which the PrAMA might achieve safe yield. The scenarios include population projections, statistical projections of natural recharge and discharge events, more stringent conservation assumptions and a number of water augmentation projects.

The augmentation projects include importation of water from the Big Chino aquifer by Prescott, Prescott Valley and Chino Valley and use of the City of Prescott's water rights from Banning Creek, Hassayampa Creek and Del Rio Springs. The scenarios also include extensive sewerage of the county with central treatment and use of reclaimed water.

The draft 4MP doesn't discuss the practicality, economic feasibility, environmental issues or political acceptability of the scenarios. It doesn't provide sufficient detail for these projects to be evaluated by the reader. It doesn't mention the need to mitigate the effects of importing Big Chino groundwater on the Verde River. This omission occurs despite the stated intention of the municipalities to mitigate any reduction in flow and despite ADWR statements that flow reduction in the Verde River will result from groundwater pumping in the Big Chino.

The draft 4MP refers to a need for cooperative water management. CWAG would like the 4MP to specifically call for a PrAMA-wide plan to achieve safe yield. ADWR could assist in the timing and structure of the discussions and provide technical assistance in the formation of a plan. Ultimately, however, it is the communities that must implement programs to achieve safe yield. We can do it - if we summon the political will.

Please submit questions and comments to [info@cwagaz.org](mailto:info@cwagaz.org).

Environmental Defense Fund Attorney Jocelyn Gibbon presents "Water Law 101" on Saturday, Nov. 9. Details are at [cwagaz.org](http://cwagaz.org).

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