

<u>Question/Comment</u>	<u>Response</u>
<b>Aquifer/Safe Yield/Overdraft</b>	
<b>Does the City Council factually know if the recharge water replenishes the aquifer that is used by the City?</b>	The City does not calculate recharge or groundwater flow. Water experts and technical agencies (ADWR) do this work, and set the guidelines/requirements for the City, who maintains the data and daily operations of the Recharge Facility near the Airport. Please see the 4th Management Plan, Water Atlas, or contact ADWR for further information.
<b>Does the City Council factually know how long it takes the recharge water to enter the aquifer used by the City?</b>	ADWR maintains the Prescott AMA Groundwater Flow Model, which determines recharge travel time estimates.
<b>Does the City Council factually know what percent of recharge water actually enters the aquifer used by the City?</b>	ADWR maintains the Prescott AMA Groundwater Flow Model, which determines recharge percentage estimates.
<b>What is the total amount of water that is presently stored in the aquifer that the City uses?</b>	ADWR states that 3.1 million acre-feet is in storage within the AMA aquifers (as stated in ADWR Report on the Final Decision and Order That the Prescott AMA is No Longer at Safe-Yield, January 1999)
<b>What is the annual consumption of all users of this aquifer; Prescott, Chino Valley, Prescott Valley, Private Wells and other users?</b>	See 4th Management Plan for ADWR estimates.
<b>The estimated number of years of "life" our aquifer has left given ongoing development/new subdivisions that are being built or will be built in the future across all municipalities that use this aquifer?</b>	There are many variables that impact the life of an aquifer. Please contact ADWR for additional questions related to aquifer lifespan.
<b>The City Council appears to be bound by "water agreements/water rights" that were established years ago in a time when populations across Prescott, Prescott Valley and Chino Valley were much less, and drought conditions/climate changes were not a factor in the development of these agreements. Given the reality of today, how can these "agreements" even be considered reasonable to adhere to and execute? Or no matter what the state of our aquifer is in, these agreements are legally binding to be adhered to, i.e. the state of the aquifer, the amount of water in the aquifer, an increasing drought due to climate changes, have absolutely no bearing on the water rights these agreements have entitled to them?</b>	The City holds a Decision and Order of an Assured Water Supply, confirmed by the State of Arizona. The City maintains water contracts under its' Assured Water Supply designation at the discretion of Council.

<p><b>It appears that, in its deliberations, the City focused only on the question of whether the City might have the legal right to pump groundwater to support a doubling of the City's population. There is no indication that the City considered the question of the negative impact on the City's contribution to safe yield and the aquifer. Clearly, no matter what the percentage of increased pumping that will be recharged, the remainder will increase the overdraft on the aquifer.</b></p>	<p>The overdraft is an issue that the City takes seriously and as a result have implemented an aggressive water billing rate structure and committed funding toward a comprehensive conservation program for over a decade with positive results. The issue of the entire Prescott AMA as a whole however, is the responsibility of the Arizona Department of Water Resources, because the AMA is a significantly larger land use area than just the City of Prescott. The City actively participates on the Governor's Users Advisory Council (GUAC) to work toward the goal of safe yield.</p>
<p><b>Even simple back-of-the-envelope calculations would have demonstrated that the more it pumps, the more the City will be adding to the AMA's overdraft. Increased conservation among current water users might moderate the overdraft but will not eliminate it. And natural recharge cannot be expected to increase.</b></p>	<p>The overdraft is an issue that the City takes seriously and as a result have implemented an aggressive water billing rate structure and committed funding toward a comprehensive conservation program for over a decade with positive results. The issue of the entire Prescott AMA as a whole however, is the responsibility of the Arizona Department of Water Resources, because the AMA is a significantly larger land use area than just the City of Prescott. The City actively participates on the Governor's Users Advisory Council (GUAC) to work toward the goal of safe yield.</p>
<p><b>Although the details have not been shared, it appears that the Dishlip model was utilized in support of certain projections of future COP water supply and demand scenarios. However, it is apparent that the model was not sufficiently robust to accommodate the implications of these projections on overdrafting and the aquifer.</b></p>	<p>ADWR has the Prescott AMA Groundwater Model. The WRMM was not intended to be an additional groundwater model, but to measure consumption and future projections for the City of Prescott water service area.</p>

**Climate Change**

<p><b>If this year's monsoon season is the new "normal" given climate changes, does that reality have any impact on the City Council's longer term development goals for the City, or does the City Council have facts that such a limited resupply of water through future ongoing "dry" monsoon seasons will have little if any impact on the amount of water in the aquifer and therefore has no direct impact on future residential development plans for the City of Prescott?</b></p>	<p>As required by State Statute the City must file the Drought Contingency Plan as a supplement to the annual water report to the State. This plan is updated every five years.</p>
<p><b>Contingency Plan</b></p>	
<p><b>Does the City Council have any water contingency plans if an unexpected long term or short term event would impact our aquifer like an increased prolonged dry spell (the near elimination of any monsoon season), significant development in Prescott Valley that begins to negatively impact our aquifer quantitatively, a serious pipeline break serving the aquifer that dramatically reduces the amount of water available to Prescott?</b></p>	<p>As required by State Statute the City must file a Drought Preparedness Plan which is updated every five years. The Prescott City Code 3-10-11 includes provisions for restrictions during water shortages, resources levels indicate procedures for reduced usage under any significant decrease in water supply.</p>
<p><b>General</b></p>	
<p><b>Please identify through a presentation of the "case for each change (including the hugely significant change in interpretation of the groundwater allocation.) 1. What the change is from what to what. 2. The reason for the change. 3. What the change means for important stakeholders. 4. What any issues are with respect to the change.</b></p>	<p>Please see the Study Sessions and all information on <a href="http://www.prescott-az.gov/water-policy">www.prescott-az.gov/water-policy</a></p>
<p><b>Please identify the specific areas of the proposed water policies, in addition to the question of mandatory sewer hook-ups, that you and the Council will be open to modifying based on public input.</b></p>	<p>Please provide the areas which you would like to see modified if the City is currently not addressing areas in which you have concerns. To see the modifications currently proposed please see <a href="http://www.prescott-az.gov/wp-content/uploads/2019/07/Code-Changes-Other.pdf">http://www.prescott-az.gov/wp-content/uploads/2019/07/Code-Changes-Other.pdf</a>.</p>
<p><b>Will you recommend to Council that they give explicit approval to the 180 degree change in interpretation of the groundwater allocation rather than simply proceeding to act on this new interpretation?</b></p>	<p>While this is a change in how the City manages its' water policy, all changes will be made in accordance with State Law.</p>

<p><b>Will you recommend to Council that they create a new policy that, like the current procedures, provides for the pacing of development to meet the stated objective of achieving moderate growth in the range of 1.5% to 2% annually?</b></p>	<p>Through the use of the Water Resource Management Model (WRMM), the City will be able to determine how much and where water is being used in one tool. The City has a long standing growth rate of 1% -2% for the last decade.</p>
<p><b>Great opportunity to learn about City water plans. Thanks! (Submitted with Public Meeting Card and first public meeting)</b></p>	<p>Thank you for the input.</p>
<p><b>I think the City has done a remarkable job via public education, rebates, tiered water rates for conservation, coupled with excellent data tools to know exactly how much water the City is using and how much water is being returned to the aquifer via re-charge. The concerning issue for me, however, regarding the new draft water policy is that while ADWR's allocation of 16,500af and the City's consumption of 6,700af is touted the flip side of ADWR's formula is the mandate that the City reach safe yield by 2025 which has not been addressed by the new water policy. Was not the allocation of 16,500af based in part by the assumption that we would be recharging at least 50% of the ground water pumped?</b></p>	<p>The overdraft is an issue that the City takes seriously and as a result has implemented an aggressive water billing rate structure and committed funding toward a comprehensive conservation program for over a decade with positive results. The issue of the entire Prescott AMA as a whole however, is the responsibility of the Arizona Department of Water Resources, because the AMA is a significantly larger land use area than just the City of Prescott. The City actively participates on the Governor's Users Advisory Council (GUAC) to work toward the goal of safe yield. The assumption within the Decision and Order does not include a 50% recharge rate. For further information please see the 2009 Decision and Order at <a href="http://www.prescott-az.gov/wp-content/uploads/2016/03/decision_order_aws_text.pdf">http://www.prescott-az.gov/wp-content/uploads/2016/03/decision_order_aws_text.pdf</a>.</p>
<p><b>The other topic you could throw in there is ADWR is "paper water" while we are drawing "wet water." Given that ADWR's allocation was calculated 25 years ago, perhaps it is time to request a new study and a new allocation number. The citizens do not feel that we have "plenty of water" and a new calculation just might settle the science.</b></p>	<p>The City's allocation was last updated in 2009, and finalized in 2011. Under the rules, the next application to update the City's Decision and Order will be submitted to ADWR in December 2021.</p>
<p><b>Public Outreach</b></p>	
<p><b>Do you and the current Mayor and Council believe that sufficient transparency will be achieved when policies are publicly justified <u>after</u> they have decided?</b></p>	<p>No new codes have been adopted at this time. Please see proposed changes on the City website at <a href="http://www.prescott-az.gov/water-policy">www.prescott-az.gov/water-policy</a></p>

## Regional Cooperation

**Is there a reason when the City Council hired consultants to study the water situation, that the consultants did not take into account the residential development plans of other municipalities like Prescott Valley and Chino Valley and the impact their long term future usage would have on the aquifer? Or is the water consumed from our aquifer by the other municipalities not that significant and the impact of their long term residential development plans on the aquifer is trivial?**

Prescott Valley and Chino Valley are not within the City of Prescott's water jurisdictional area. City Management has committed to organize meetings with regional stakeholders to discuss this topic.

## Water Connection Policy

**I have not read or heard anything about how the rate of commitments for supplying water to new developments, large and small, would be paced or controlled. Hopefully, there will be a new policy in this area and it will be evaluated in a quantitative rather than merely qualitative basis.**

Through the use of the Water Resource Management Model (WRMM), the City will be able to determine how much and where water is being used in one tool. The City has a long standing growth rate of 1% -2% for the last decade.

**Policy changes represent changes in strategy. To fully understand the short and long run implications of the changes, the range of potential impacts on important stakeholders needs to be evaluated.**

This public comment period has been to gain stakeholder input.

**Page 2 B&C "return of water and outside city limits" Does this mean the city will obtain recharge credits allowing water to be withdrawn from the aquifer?**

No.

## Wells

**How many private wells are in Prescott?**

There are approximately 1300 wells within the City limits. This includes monitoring wells, exempt wells, and all other wells within the ADWR database.

**Can the City require them to be monitored and reported?**

No, they are permitted through ADWR.