

<u>Question/Comment</u>	<u>Response</u>
Conservation	
<p>Landscape Policy: CWAG supports the requirement to use drought-tolerant plants. We suggest that this policy be modified to include:</p> <p>A) the provisions in the CWAG Landscape Policy (attached)</p> <p>B) No new golf courses are permitted. Existing golf courses will be restructured to minimize water use by reducing irrigated areas or using artificial turf.</p> <p>C) Homeowner Associations are prohibited from banning, limiting or increasing the cost of rainwater harvesting or requiring water-intensive landscaping.</p>	<p>A) Thank you for your suggestion of implementing the CWAG Landscape Plan. At this time the City practices and has plans to further implement many items from the CWAG plan. The City will continue to limit outdoor watering, provide education, promote rainwater harvesting, and promote minimal outdoor water use on new developments. The City also promotes water conservation through the removal of turf, smart irrigation timers, and rainwater harvesting.</p> <p>B) No new golf courses have been permitted in over twenty years. However, golf courses are large water users and do not support water conservation, this item will be forwarded to Council as part of proposed code changes. Conservation efforts at the City have worked and will continue to work to remove unused turf with golf courses, large businesses, and HOA's.</p> <p>C) Covenants, Conditions, and Restrictions (CC&Rs) are private agreements between property owners and are not enforceable by the City. However, the City makes efforts to educate HOAs about the benefits of water conservation.</p>
<p>Conservation Incentives: CWAG supports the proposed improvements to the water conservation incentive program.</p> <p>A) We suggest that hot-water recirculation be added as a requirement for all new construction and as an incentive for existing customers.</p> <p>B) We also suggest that the City prohibit gray water use for all homes receiving municipal water.</p>	<p>A) Hot water recirculation systems are currently not a part of the rebate program. The City has invested extensive research into the systems, where the findings show that the systems ultimately create more water usage through increased energy usage. Energy production and transmission uses water, hot water recirculation systems have not been proven to have a net positive impact. The City will continue to monitor technologies into the future, and this conservation code may be subject to change.</p> <p>B) The City will be addressing gray water as part of the anticipated code changes.</p>

Public Outreach

<p>Is this going to be posted online? At what point are the comments going to be addressed?</p>	<p>Information regarding the proposed policy changes, including videos of Work Study Sessions to Council are on the City website. Please visit http://www.prescott-az.gov/water-sewer/water-management/water-policy/</p>
<p>Would you update the website, financial costs, implications for the developers, affect to the aquifer, so the general public can better understand these proposed policies</p>	<p>The website has been updated with each Study Session as this process has progressed. As additional information is brought forward by staff, consultants and Council, the website will continue to be updated.</p>
<p>Would you please hold public discussion in venues other than Council Study Sessions?</p>	<p>A series of public meetings will be held on September 4th, September 9th, September 11th and September 17th. Please visit http://www.prescott-az.gov/water-sewer/water-management/water-policy/ for locations and times.</p>
<p>Shouldn't the City have neighborhood meetings on this, the affected areas?</p>	<p>A series of public meetings will be held on September 4th, September 9th, September 11th and September 17th. Please visit http://www.prescott-az.gov/water-sewer/water-management/water-policy/ for locations and times. As sewer policy continues to be developed, additional public meetings will be scheduled.</p>
<p>Can we have copies of the Study Session slides?</p>	<p>All information presented to Council, including power point presentations are viewable on the City website at http://www.prescott-az.gov/water-sewer/water-management/water-policy/</p>
<p>Will there be a place we can look at all the information? Not just the council memos?</p>	<p>The City website contains a schedule of Public Meetings in September, Council Agenda's, Council Minutes, Videos of Council presentations, videos of presentations by consultants, Herb Dishlip and Gary Woodard, the draft Water Management Policy and proposed code changes. Please visit http://www.prescott-az.gov/water-sewer/water-management/water-policy/</p>
<p>Questions are asked at Council Study Session, but generally answers are not available.</p>	<p>All public comments are being collected and are listed here along with responses, in this document. In addition, a frequently asked questions (FAQ) sheet will be available in the Public Meeting series scheduled throughout the month of September. The FAQ sheet will be also be posted on the Cities website on the Water Policy Page under "documents". Please visit http://www.prescott-az.gov/water-sewer/water-management/water-policy/</p>

<p>The schedule to study and vote on the policies is far too aggressive. CWAG requests that you slow down the schedule to permit logical planning and better public understanding and comment. City leaders too need more time to digest and consider the proposed policies.</p>	<p>The City has scheduled 4 Public Meetings throughout the month of September to gather additional comment and questions from the public. Council's consideration of any proposed changes will not occur until additional public input is received.</p>
<p>Regional Cooperation</p>	
<p>What about regional cooperation?</p>	<p>City Management has committed to organize meetings with regional stakeholders to discuss this topic.</p>
<p>Are we including the Big Chino in these estimates?</p>	<p>The estimates are based upon the City's current Assured Water Supply, and does not include the Big Chino water source.</p>
<p>Do you have a plan to work with the other jurisdictions on safe yield?</p>	<p>The City will continue to work with the Arizona Department of Water Resources and other regional stakeholders to work toward safe yield.</p>
<p>Safe-yield and Overdraft</p>	
<p>We are not recharging what we are pumping out. In only 2 out of 14 years we recharged more. Does this policy really address safe yield if we do this in a piecemeal fashion.</p>	<p>While it is true that only 2 of 14 years the City recharged more that was pumped, it is also true that the City continues to increase in population and remain constant and/or decrease water use due to trends and conservation efforts. The City has been a leader in water conservation for over a decade in working toward safe yield for the Prescott AMA, however, the City cannot be responsible for safe yield for the entire AMA.</p>
<p>What about the overdraft and meeting safe yield?</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 Groundwater Users Advisory Council (GUAC) to work toward the goal of safe yield.</p>
<p>When you pump the 10,000 additional AF that you are legally entitled to, how is that going to impact overdraft?</p>	<p>When the City received its Assured Water Supply, it was required to prove that the water was legally, physically, and continuously available for the next 100 years. The 2009 Decision and Order, issued by the Court sets forth the legal and physical availability to water for the City based on these findings.</p>

<p>We should use this excess 10,000 water or less as a bargaining chip with other communities and develop a safe yield plan.</p>	<p>The City will continue to work with the Arizona Department of Water Resources and other regional stakeholders to work toward safe yield.</p>
<p>Sewer</p>	
<p>How are return flows going to be monitored and controlled?</p>	<p>The WRMM tracks actual individual water use through utility billing records. The City also tracks all wastewater flows coming into the Water Reclamation Facility. Prop 400 requires that the wastewater flows be measured and recorded for non-recoverable storage and will support the comparison of water use vs. returned flows in the wastewater stream. Commercial and Industrial development have a requirement through the pre-treatment code for a measuring and sampling location be installed on the sewer service from the building. Through the data collected by these methods, the City is able to determine the rate of return.</p>
<p>Have you considered any other alternatives to requiring connection to sewer? (Alternative to septic systems?)</p>	<p>One of the primary goals of converting septic users to sewer is the return of wastewater flows to the recharge facility to aid in reaching safe yield. Alternative systems will not increase the effluent recharged into the aquifer nor do they improve the water quality of the creeks and streams, therefore they are not being considered as part of the new policy or code changes.</p>
<p>When we are asking for return flows of 50% how will that those be monitored and enforced?</p>	<p>The WRMM tracks actual individual water use through utility billing records. The City also tracks all wastewater flows coming into the Water Reclamation Facility. Prop 400 requires that the wastewater flows be measured and recorded for non-recoverable storage and will support the comparison of water use vs. returned flows in the wastewater stream. Commercial and Industrial development have a requirement through the pre-treatment code for a measuring and sampling location be installed on the sewer service from the building. Through the data collected by these methods, the City is able to determine the rate of return.</p>
<p>Is the 50% requirement for all new development or only for new development outside of City limits?</p>	<p>This requirement will be for development inside and outside of the City.</p>
<p>City should consider that the return flow to a WWTP should be 70% not the proposed 50%</p>	<p>Return flows to the Water Reclamation Facility varies depending on the type of use. The 50% return rate is a minimum standard, representing all utility billing customers including septic users.</p>

<p>The City should consider setting up a plan to have property owners in some neighborhoods pay off the infrastructure bills over time</p>	<p>The City will be embarking on the development of a long-range plan to potentially convert existing septic users to sewer, to assist with the overall goal of safe yield. One of the largest questions to be answered is how new sewer connections will be funded and associated cost. This topic will be studied and recommendations made as part of the long-range plan.</p>
<p>Financing mechanisms might work better if the Water Enterprise Fund and the Sewer Enterprise Fund were joined</p>	<p>This is something the City will consider as part of the long-range planning process.</p>
<p>There are a lot of properties that cannot connect to sewer. This will reduce property value.</p>	<p>The City will be embarking on the development of a long-range plan to potentially convert existing septic users to sewer, to assist with the overall goal of safe yield. The plan will include both positives and negatives of new sewer connections, focus on areas that can improve water quality in the creeks and focus on funding sources as well as grant assistance opportunities. It may not be feasible for all septic users to convert to sewer, however, the development of a long-range plan will give the City and property owners information to make these decisions on where conversion to sewer is possible and/or feasible.</p>
<p>Can you tell me when I will know how the policy will affect my pending purchase of property on Gurley? It appears we cannot connect to sewer and in that case we cannot have water. This would result in a worthless property.</p>	<p>It is not the City's intention to create unbuildable lots or hardships for vacant lots within the City. Under the current water policy, this property can build a single-family residential unit with a septic system. The proposed sewer requirements may require new construction to connect to the City sewer when it is available or to extend sewer at the time of construction. This decision has not been decided by Council as the new policy is still being discussed.</p>
<p>How much of property sewer connection will the City be willing to pay?</p>	<p>The City will be embarking on the development of a long-range plan to potentially convert existing septic users to sewer, to assist with the overall goal of safe yield. One of the largest questions to be answered is how new sewer connections will be funded and how much it will cost. This topic will be studied and recommendations made as part of a long-range plan.</p>

<p>CWAG supports the proposed prohibition on new septic systems. CWAG supports the general goal of connecting existing septic systems to the sewer system. However, we are concerned that the proposed policy is incomplete. There is no analysis of the impacts on citizens, and we are concerned that the policy creates an unacceptable financial burden for citizens and/or the City. Much work needs to be done here. CWAG requests that the City leaders withdraw this policy until they develop sensible Financial assistance programs for affected property owners that are justified by a cost/benefit analysis.</p>	<p>The City will be embarking on the development of a long-range plan to potentially convert existing septic users to sewer, to assist with the overall goal of safe yield. The plan will include both positives and negatives of new sewer connections, focus on areas that can improve water quality in the creeks and focus on funding sources as well as grant assistance opportunities. It may not be feasible for all septic users to convert to sewer, however, the development of a long-range plan will give the City information to make these decisions on where conversion to sewer is possible and/or feasible.</p>
<p>The proposed requirement that new water customers return at least 50% of potable water deliveries as wastewater is unenforceable does the city propose to meter the wastewater from each connection? Also, the 50% figure is too low. City water reports routinely show wastewater recovery over 60%. Landscape water use is the major loss point because water applied outdoors to plants evaporates and cannot be recovered. If the City adopted a policy that new connections cannot use municipal water outside after a reasonable plant establishment period, the wastewater recovery ratio would increase substantially. This would complement the proposed requirement for only drought-tolerant plants. CWAG requests that the City leaders revise the draft sewer policy and resolve the above issues.</p>	<p>There is no anticipated metering being considered for each sewer connection. Anticipated wastewater return flows are determined at the time a project is proposed. The project is then either approved or not based upon that projection. The City is educating the public, and promoting limited outdoor water use through the Conservation Program.</p>
<p>Water Connection Policy</p>	
<p>There is no “market cost” for water, how is the City going to determine this?</p>	<p>The price of water is one that will be determined by the market. The City will employ a consultant to assist with determination of a marketable price, when needed.</p>
<p>How are we going to give water for commercial uses?</p>	<p>Water use for commercial projects will initially be estimated based upon water used by other comparable business within the City. After five years of actual water use data being entered into the Water Resource Management Model (WRMM), an actual water use can be determined for long-use planning of the water resource need.</p>

<p>Where is the support services getting water from (compared to the previous .1 markup)</p>	<p>Water use for commercial projects will initially be estimated based upon water used by other comparable business within the City. After five years of actual water use data being entered into the Water Resource Management Model (WRMM), an actual water use can be determined for long-use planning of the water resource need.</p>
<p>What are we allowing as "headroom" or space?</p>	<p>Based on current land use, zoning, and build out population the WRMM has estimated approximately 2,000 acre-feet will still remain within the City's Assured Water Supply. The Model will continually monitor and estimate water usage and population growth, which will identify potential "headroom" into the future.</p>
<p>What is our overall vision? The general plan is not adequate.</p>	<p>The General Plan is the long-range plan for the City of Prescott, as approved in the general election by a supermajority of the voting residents of this community. It addresses land use, open space, growth area, environmental planning, cost of development, and water resources. The General Plan is required by law and is an expression of the community's preferred future.</p>
<p>The City has proposed a "Cost/Benefit Analysis" be required. It seems like a cost/benefit analysis may be a big waste of time and money. Is the cost/benefit analysis aimed only to look at the costs and benefits of the City? What about the costs and benefits of the property owners?</p>	<p>A cost/benefit analysis is only used to determine the costs and benefits to the City for a proposed project.</p>
<p>I suggest there be variable pricing depending on the neighborhood. If a neighborhood is hauling water or has failing wells, then a higher price for City water may be justified as compared to areas that have good wells.</p>	<p>A variable pricing system would be overly complicated and increase the cost of rate studies in the future for minimum benefit to the City.</p>
<p>The cost of building water and/or sewer infrastructure for certain neighborhoods would not be a reasonable expenditure unless a large portion of the property owners agree to hook up to City sewer or water/sewer. The City should consider having one price for property owners to hook up when the project is proposed, and a higher price if an owner opts to hook up later</p>	<p>The property owners would be required to connect to City water and/or sewer according to the rules outlined in City code. Funding options will be considered as part of a long-range plan, to be developed.</p>

<p>The proposed policy seems fragmented. It is recommended that a set of documents that describe the problems the City leadership hopes to solve, then present draft solutions, rationales, and analyses of impacts on various stakeholder groups.</p>	<p>The proposed Water Management Policy and accompanying City Code changes were developed comprehensively, with the goal of reaching safe yield, improving surface water quality and simplifying internal processes and procedures. More information can be found in the study session presentations at http://www.prescott-az.gov/water-sewer/water-management/water-policy/</p>
<p>Draft policies do not include any justification or evidence of how the proposed approach would solve the (unstated) problems.</p>	<p>The previous policy created by the City to allocate a specific amount of water each year to new development created the perception, each year that the City was running out of water. The allocation process was over allocating, and tying up or committing the water supply at an overly conservative amount. This new policy will eliminate the annual allocation of water, and track actual and project future water usage.</p>
<p>The policy doesn't appear to be a "long-term plan" but a list of procedures and rules. Albuquerque has an example of a functioning, successful water management plan and planning process which is recommended.</p>	<p>The Water Management Policy has not been a long-term water plan, it was updated on a 1-5 year basis. The City's proposed policies can remain in place long-term rather than being manipulated on a yearly basis.</p>
<p>Groundwater Allowance as defined by ADWR and this proposed policy City believes that the unused portion of the Groundwater Allowance can be allocated to new construction, yielding a total of 16,507.44 afy (the sum of the Groundwater Allowance and the Alternative Water in the 2009 D&O) to existing and new subdivisions. Since Prescott pumped approximately 6,700 af in 2018, COP leadership now apparently believes they have approximately 9,800 afy of remaining groundwater to allocate to new water-service connections. CWAG is concerned that COP's attempt to allocate the groundwater Allowance for new water connections will increase the overdraft by nearly 10,000 afy.</p>	<p>The City manages the water portfolio according to the 2009 Decision & Order, State Law, and the rules and regulations of the Arizona Department of Water Resources.</p>
<p>CWAG requests that the City leaders defer any further action on the draft water policies until the they provide legal justification permitting the allocation of unused Groundwater Allowance to new water customers.</p>	<p>The City manages the water portfolio according to the 2009 Decision & Order, State Law, and the rules and regulations of the Arizona Department of Water Resources.</p>

<p>Administration of Water: CWAG supports the administrative approval of small amounts of water to new development, but the 5 af limit is too high. We suggest a 1 af limit for clerical approval. We are concerned the proposal to discontinue water contracts is an invitation for abuse and favoritism, plus it will make it difficult to track the amount of water awarded by the City. Additionally, this policy will remove a useful control on the rate of growth by making water available at any time.</p>	<p>The City Council will determine the amount of water that can be administratively approved when the Water Policy is adopted.</p>
<p>Water Outside City Limits</p>	
<p>If we are serving water outside of city limits is that water going to be used for additional growth?</p>	<p>The primary reason to serve water outside of City limits is to decrease the use of exempt wells and septic systems. New developments would also be required to extend water and sewer infrastructure into areas that do not have it, thus making additional connections possible. While additional recharge may result from connections outside of the City limits, this is not the primary goal.</p>
<p>Why would we serve water outside of City Limits instead of Annexing? Is that bypassing the Prop 400?</p>	<p>City services for annexed properties include more than water and sewer service. It also includes fire protection, police services and street maintenance, most of which comes from the General Fund. It is not bypassing Prop 400, which includes annexations of 250 or more or multiple annexations totaling 250 acres or more over 10-years.</p>
<p>The City has proposed a "Water Acquisition Cost" be paid for those outside of the City seeking water. There is no market price for water, how will this be determined?</p>	<p>The price of water is one that will be determined by the market. The City will employ a consultant to assist with determination of a marketable price, if needed.</p>
<p>Water users outside the City limits will be paying 30% more than the water rate paid by users inside the City limits, and will be paying the monthly sewer fee. How could a project not pay off for the City – especially when we understand that the City will be getting free recharge water in addition to all the payments received?</p>	<p>It is true that water rates outside the City limits are 30% higher than for those inside the City limits. It would be up to the Council to set terms for service to outside City limits customers.</p>

<p>Providing Water Outside City Limits This is an extremely controversial proposal. The draft policy provides no explanation of the need, the rationale, or an analysis of the impacts. The map in the draft policy is unreadable. Why is this proposed? What is the need? What are the impacts to stakeholders?</p>	<p>The proposed Water Management Policy and accompanying City Code changes were developed comprehensively with the goal of reaching safe yield, improving surface water quality and simplifying internal processes and procedures. An updated map is available on the City website: http://www.prescott-az.gov/water-sewer/water-management/water-policy/. Regional cooperation is a main priority for reaching safe yield within the Prescott AMA. Offering municipal water service and sewer in place of wells and septic tanks is the start of regional cooperation. The service of water outside of City limits will decrease the use of exempt wells and require new developments to extend much needed infrastructure into areas that currently do not have it.</p>
<p>Providing Water Outside City Limits New developments require infrastructure, and ultimately the consumer pays for it through county taxes if in the county, or through city taxes and impact fees if in the City. Every subdivision will need to comply with state and county or city subdivision rules. How does this help home buyers and homeowners? How does this impact developers? How does it impact the County? Has the City received approval from Yavapai County for this idea?</p>	<p>Approval from Yavapai County is not required. The developer will be required to install the needed infrastructure for a project. The sewer and water revenues from utility bills will be used to maintain the infrastructure after completion. Having a long term stable water supply increases property values. The City also treats water to EPA standards, and wells are privately maintained.</p>
<p>Residents of these out-of-city service areas now pay a 30% surcharge for water. Is the City attempting to increase its water enterprise revenue by overcharging homeowners?</p>	<p>In 2018, the City adopted a new rate and fee schedule for all water and sewer users. This rate study included an analysis of the cost to provide service, which includes service to areas outside of the City limits. In addition to the analysis, the City has an agreement with the Town of Chino Valley to not increase water service to City customers inside of the Town of Chino Valley more than 30% of the cost to customers inside of the City limits. The rate and fee study can be found at http://prescott-az.gov/wp-content/uploads/2018/12/Schedule-of-the-Proposed-Increase-of-Water-and-Wastewater-Rates.pdf</p>
<p>Is this an attempt to get around Prop 400 public notice and effluent requirements by avoiding annexation so the City can receive recharge credits?</p>	<p>City services for annexed properties include more than water and sewer service. It also includes fire protection, police services and street maintenance, most of which comes from the General Fund. It is not bypassing Prop 400, which includes annexations of 250 or more or multiple annexations totaling 250 acres or more over 10-years.</p>

Is this part of a negotiated solution to the AZ Eco South Annexation that would protect the Granite Dells?	No
Is this a pro-growth policy designed to support development and line the pockets of developers with city resources?	No
What is wrong with annexation? The City is providing water & sewer, so what is the problem with simply annexing the area?	City services for annexed properties include more than water and sewer service. It also includes fire protection, police services and street maintenance, most of which comes from the General Fund.
Providing water outside of City limits proposal CWAG requests that the proposals be updated to include impacts on the aquifer, on safe yield, and on other groundwater users.	The City will be using water from its Assured Water Supply (AWS) to serve any property outside of the City limits. The impacts to the aquifer and safe yield was evaluated by ADWR in the 4th Management Plan and under the 2009 Decision & Order.
General	
Doesn't this policy remove or weaken controls on development and increase the growth rate?	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.
Why should I conserve water if it will be used to promote growth?	Water conservation is one of the primary reasons the City has made progress toward reaching safe yield. While the City cannot be responsible for safe yield over the entire AMA, education and conservation have played a key role in the progress that has been made. The Water Resource Management Model (WRMM) will allow the City to continue to track water usage and project water needs into the future. The City has a long standing growth rate of 1% -2% for the last decade.