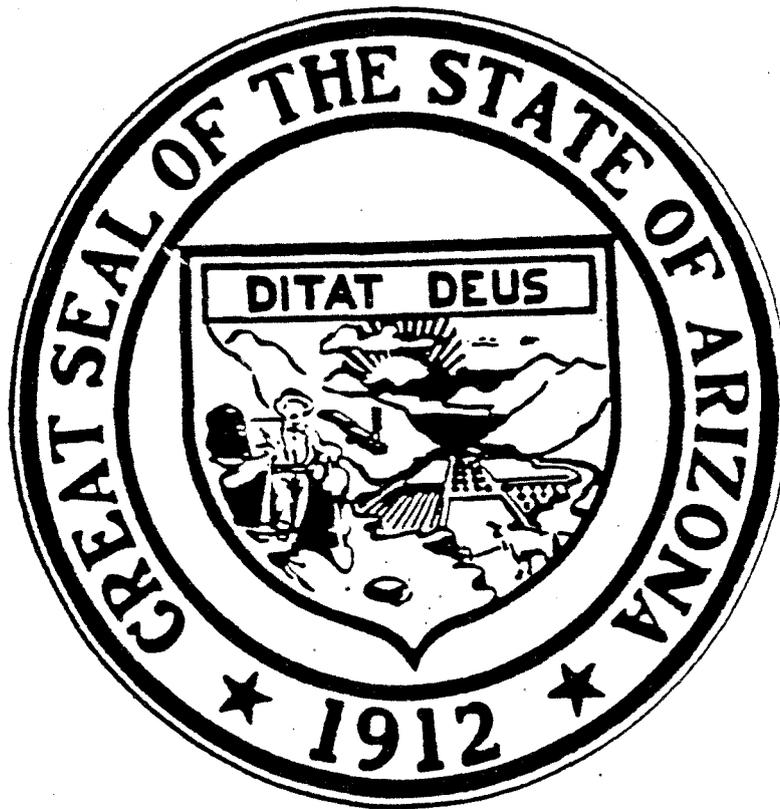


STATE OF ARIZONA  
PROJECT S.L.I.M. REPORT ON THE  
DEPARTMENT OF WATER RESOURCES



DEPARTMENT OF WATER RESOURCES

PROJECT SLIM

TABLE OF CONTENTS

	<u>PAGE</u>
EXECUTIVE SUMMARY .....	1
RECOMMENDATIONS	
<u>Office of Engineering</u>	
Safety of Dams Inspections .....	15
Modeling Section .....	17
DWR – DEQ Coordination of Groundwater Quality Work .....	22
<u>Office of Water Management</u>	
Regulating Fewer Water Rights (AMA) .....	28
Planning and Compliance Management .....	37
Water Management Support Division .....	48
<u>Office of Administrative Services</u>	
Management Information System .....	56
<u>Legal Division</u> .....	60
EXHIBITS	
1. SLIM Interview List – DWR .....	9
2. Current Organization Chart .....	10
3. Summary of Titles & Savings (DWR) .....	11
4. Summary of Positions Savings (DWR) .....	12
5. Proposed Organization Chart .....	13
6. DWR Implementation Schedule .....	14

July 2, 1992

Ms. Elizabeth Rieke  
Director  
Department Of Water Resources  
15 South 15th. Avenue  
Phoenix, Arizona 85007

Dear Ms. Rieke:

The Governor's Project SLIM review of your agency has been completed, and the project team is pleased to present you with this summary of our findings and recommendations. The study was initiated on Feb. 12, 1992 and the field work was completed approximately March 27, 1992.

The summary restates the objectives of the review, the approach which was used, and highlights the major changes recommended as a result of the study. It quantifies the potential benefits for your agency and the public at large and summarizes the key implementation actions and legislative support needed to convert the potential into actual benefits. The summary is followed by the detailed findings and recommendations.

In total, the recommendations identify approximately \$801,664 in benefits for your agency.

#### OBJECTIVES & GOALS

The overall objective of this study was to find ways to improve the delivery of services in the Arizona Department of Water Resources (DWR). The goals were to improve the process of delivering public services and reduce the cost of government whenever and wherever possible. Impediments to prompt and effective services were to be identified and removed where possible, and structures established which support the long term goal of continuous improvement using total quality management concepts throughout the agency.

## APPROACH

We reviewed the shelf data from the Department to understand the mission, responsibilities, and workloads. Interviews were conducted with all levels of supervision and selected technical and clerical positions. We observed work activities, computer system use and obtained either actual or estimated work measurement standards for the processes which were reviewed. We discussed procedural findings with work center managers and supervisors.

Exhibit 1, SLIM Interview List – DWR, lists the 37 individuals we contacted during the review. Many of these individuals were contacted more than once to confirm our understanding of their areas of responsibility and to discuss the feasibility of proposed process changes and structures. Because of their cooperation and participation, the study team and your managers have been involved together interacting and interfacing on the information that has led to these recommendations.

Exhibit 2, Current Organization Chart, shows the structure of each division as it was presented to us at the time of the review. Though changes have occurred during and since Project SLIM, this chart is included to provide the reader a frame of reference and a benchmark against which all changes can be measured.

## SUMMARY FINDINGS & RECOMMENDATIONS

Part of the savings come from eliminating duplication of the same or similar activities between agencies and within the agency. Other savings come from eliminating some regulation as well as the development and implementation of standards.

Analyses of the organizational structure indicates over-organization with extremely limited spans of control for managers and supervisors. This span of control ranges from 1:1 to 1:6. Managers and supervisors make up 34.3% of DWR's staff.

The majority of units are staffed with seven or less persons. Personal interviews related that a possible reason for the current organization structure is for the purpose of employee pay. Under the present personnel classification system an employee is designated a supervisor in order to justify a higher grade and resulting pay. This is not based on sound business principles.

Office of Engineering

In the Office of Engineering, we recommend that standard operating procedures currently in draft, in the Dam Safety Section, be finalized and implemented as early as possible. Other standards for functions in Dam Safety need to be developed. Based on estimates of time required for work activity, authorized positions in this section can be reduced from five to four.

Standardizing the process of design review and other guidelines will provide a training tool for new employees and improve performance of all personnel.

In the Hydrology Division, we recommend that a cooperative agreement be established between DWR and DEQ allowing DEQ the mandate on water quality issues but DWR supplying the manpower through their network of indexed wells in the 50 water basins of the state. This will prevent DEQ from having to develop a duplicate program to expand their "Ambient" water monitoring program that is presently in its infancy.

In the Modeling Section of Hydrology, we recommend transferring two FTEs to Planning Support for Active Management Area (AMA) activities while eliminating all modeling that is EPA and DEQ oriented. This action supports DWR in its need to continue modeling work within the four AMAs but discontinues activity that should be handled by an emerging DEQ with their own mandates on water, air and soil contamination sites. This recommendation results in a reduction of five FTEs. This will benefit the State of Arizona by eliminating duplication of similar functions crossing over agency lines.

Office of Water Management and Planning

In the Water Management Support Division of the Office of Water Management and Planning, we recommend transferring two FTEs in the Conservation Section to the Planning Support Division, two FTEs in the Water Quality Section to the Operations Division, and reducing the staff by five FTEs. This will result in the elimination of the entire Water Management Support Division. The Planning Support Division and the four AMAs will benefit from consolidating central planning issues. Work activity is insufficient to maintain the Water Quality Section when the recommended options in the report are implemented. The Operations Division will benefit from the addition of the two FTEs being transferred into their Division for open well work activity or handling surface water diversion protests which are activities not receiving enough attention.

In the AMAs, we recommend that the number of water rights regulated be reduced by approximately 50%. This will benefit all of the AMAs by reducing administration of rights and compliance issues. The four AMAs can still control 95% of groundwater use. Based on reduced activity as stated, two FTEs in the Tucson AMA and one FTE in the Pinal AMA will be reduced.

We recommend transferring the Phoenix and Tucson AMA Planning Supervisors to the Planning Support Division in Phoenix and eliminating the three WR Manager I positions in the AMA Area Director offices. This will result in the following:

- Maximize the Area Directors span of control in the AMA
- Allow special assignments to be transferred to the Planning Support Division, and
- Provide staff to allow planning and compliance issues to be developed in the Planning Support Division with input from the local AMA areas.

Office of Administrative Services

In the Management Information Systems Division of the Office of Administrative Services, we recommend that DWR review its MIS strategic plan and reach agreement on priorities and performance

requirements for each user group. We also recommend that this review be conducted with the users' input as well as the input of MIS. In addition, the proposal submitted by the Adjudications staff to the Deputy Director of Engineering should be a part of the review.

Legal Division

Based on the workload calculations and considering that most other agencies operate without services of its own legal staff, we recommend eliminating the currently vacant Attorney III positions.

The Team's recommendations, and the accompanying exhibits which describe them, are based on the situation as it existed at the time of the interviews and analyses.

SUMMARY OF SAVINGS

The improved services and benefits outlined above are achieved through the eight Recommendations discussed in this report. The recommendations apply to several areas such as organization restructuring, management controls, functional realignment, work measurement, and staffing requirements.

Exhibit 3, DWR Summary of Titles and Savings, shows the impact of each of the Recommendations, and includes avoidance of future costs and reduction of present costs. The magnitude of each is:

Cost Avoidance	\$ 282,289
Cost Reduction	<u>\$ 519,375</u>
Total:	<u>\$ 801,664</u>

Exhibit 4, Summary of Position Savings, shows how the recommendations would impact the various divisions and major sections of DWR. As indicated in the Exhibits, the staffing recommended for the DWR totals 214.7 against the current 232.7 in DWR for a savings and cost avoidance of 18 positions. At the time of our review, seven of these positions were vacant.

Exhibit 5, Proposed Organization Chart, shows the proposed structure of DWR following the implementation of these recommendations. These structures are consistent with the recommendations, but are not the only possible structures which can achieve the improved service and benefits. Actual structures will be finalized as the recommendations are implemented.

#### **IMPLEMENTATION**

Implementation is the critical step in the process of achieving savings. Potential savings are often identified but not achieved when the implementation process is distracted by day to day activities and managers shy away from the necessary reduction in staff. Successful implementations are marked by two things: a strong commitment from senior management to achieve as much of the savings as proves possible; and designation of implementation team leaders with the requisite mental toughness to see the task through to completion. Implementation leadership will determine if the maximum savings are achieved by putting in place the concepts proposed in this document, and resolving any differences which exist due to interim changes in the organization.

The implementation process is best carried on soon after the review process. This maintains momentum while the topics are fresh in people's minds.

We estimate that most of the recommendations contained in the report can be implemented within a period of six months. Some of the recommendations will require legislative action and therefore may require 18 months to implement. Reducing the number of regulated water rights is an example.

Ms. Elizabeth Rieke, Director  
Department of Water Resources  
Page 7

Our recommended Implementation Plan in Exhibit 6 shows an implementation sequence and approximate duration for each recommendation. Individual recommendation implementation requirements are shown with the recommendation in the detail section of this report.

There are three major components of cost associated with implementation. These are typically one-time costs and represent a reduction in first year benefits. They include the costs of current employee time during implementation, outside assistance, and employee redeployment. Outside implementation assistance can significantly improve the total value of benefits achieved, and can reduce the total time necessary to achieve implementation through the use of focused, dedicated resources. These costs depend on the total scope of the assistance requested, and are not included in this individual report.

\* \* \* \* \*

Ms. Elizabeth Rieke, Director  
Department of Water Resources  
Page 8

We wish to thank you as the Director of DWR and your entire staff for their complete cooperation, participation, suggestions and comments, and support of our efforts during this study.

We appreciate the opportunity to be of service to the Governor and the SLIM Steering Committee in this endeavor. Should you have any questions regarding this report please feel free to contact the Project Executive or any member of your Project SLIM Team.

- Ken Boyd, Department of Agriculture
- Amjad Huda, Coopers & Lybrand

The Agency Director's comments follow this signature page.

Very truly yours,



David St. John  
Executive Director  
Project SLIM

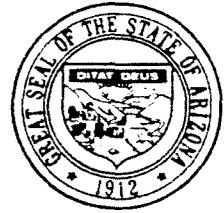
# ARIZONA DEPARTMENT OF WATER RESOURCES

15 South 15th Avenue, Phoenix, Arizona 85007

Telephone (602) 542-1553

Fax (602) 256-0506

June 10, 1992



David R. St. John  
Project Executive  
for Project SLIM  
Third Floor  
1700 West Washington  
Phoenix, AZ 85007

FIFE SYMINGTON  
Governor

ELIZABETH ANN RIEKE  
Director

Dear Mr. St. John:

The Department of Water Resources (Department or DWR) appreciates the opportunity to respond to the recommendations of Project SLIM. We have prepared two longer response documents that identify those areas where we agree with the SLIM recommendations and those areas where we disagree. It is critical to note that the Department believes the FTE reductions proposed by SLIM go beyond elimination of waste and duplication, and instead cut into programs and reverse major policy decisions in existing law. Since the Department reduced its FTEs by approximately 10% in early summer 1991 and still has significant backlogs in various permitting and regulatory programs, there simply is not much fat left to cut.

The Department has prepared a detailed counterproposal indicating where we believe savings can be achieved. Even that counterproposal is betting on the come -- assuming savings can be achieved in areas where we are not sure it is possible. However, the counterproposal has been developed in the spirit of constructive participation in the SLIM process. We support the objective of Project SLIM which is to achieve savings without reducing service levels.

Highlights of the Department's counterproposal are as follows:

- \* DWR's Modeling Section should be retained as a separate section within the Hydrology Division. The Modeling Section plays a critical role 1) in developing models to test water management "what ifs" in the Active Management Areas; 2) in providing technical support for the Gila River and Little Colorado River general stream adjudications; and 3) in preparing hydrologic data in a useful form for other users within and outside the Department. Staffing for that unit could be reduced from nine to five but no further. With five staff members, some of the section's activities that support mandatory statutory functions of the Department would be significantly delayed. SLIM proposes elimination of the section, reduction of the staff from nine to two and transfer of the two remaining positions outside the Hydrology Division.

- \* The Active Management Area (AMA) staffs should continue to play a significant role in conservation planning, and staffing levels should remain adequate to eliminate the significant backlogs in AMA work. The AMA offices were established in order to recognize the major differences among the AMAs and to give the water users and communities affected by the Groundwater Code a vital role in water conservation planning for their area. The Project SLIM recommendations to move the Tucson and Phoenix AMA Planning Supervisors to the central office and to reduce the AMA staffs by a total of eight additional positions would significantly weaken the AMAs and centralize the conservation planning activities of DWR.
- \* A proposal developed by DWR and endorsed by SLIM to deregulate small water rights -- through statutory changes -- should be implemented. However, SLIM has overestimated the level of savings that can be achieved through statutory deregulation because DWR has already administratively deregulated the small rights. Any savings from the small rights proposal should be devoted to elimination of the existing backlogs in water management work, such as open well enforcement, surface water applications and applications for administrative review of conservation requirements.
- \* As SLIM recommends, the Department's Planning Support Division should become a more vital unit. Two of the AMA Deputy Director positions should be downgraded and moved to the Planning Support Division. The remaining AMA Deputy Director position should be eliminated. This would eliminate three middle level managers and strengthen the planning support unit.
- \* DWR should retain adequate staff to fulfill its independent statutory responsibilities in the water quality area. Those responsibilities include: preparation, in cooperation with DEQ, of a water quality assessment in each Active Management Area for each Management Plan; assurance that the water supplies used to demonstrate an adequate or assured water supply are of suitable quality; issuance of poor quality withdrawal permits, which are a type of groundwater right; assessment of water quality impacts for other DWR groundwater permitting programs; and assurance that the large quantities of contaminated groundwater that must be withdrawn and treated are put to use whenever possible. DWR should retain that independent role but should not perform functions also assigned to DEQ.

David St. John  
June 11, 1992  
Page -3-

Accordingly, DWR's Water Management Support Division and four of the seven positions in the division should be eliminated. The remaining three positions should be transferred to the Planning Support Division. The SLIM recommendations would leave DWR with no personnel to fulfill its independent statutory water quality responsibilities.

- \* In implementation of SLIM, an attempt should be made to eliminate one position in the Dam Safety Section and one position in the Legal Division, as proposed by SLIM. However, those positions should not be eliminated if it would compromise service levels.
- \* All the SLIM recommendations that do not involve FTE reductions should be implemented. DWR has already initiated implementation of most of the recommendations.

DWR's counterproposal would result in the elimination of up to eleven positions and a projected savings of approximately \$500,000.

Let me thank you again for the opportunity to have the Department's views included in the Project SLIM report on DWR.

Sincerely,



Elizabeth Ann Rieke  
Director

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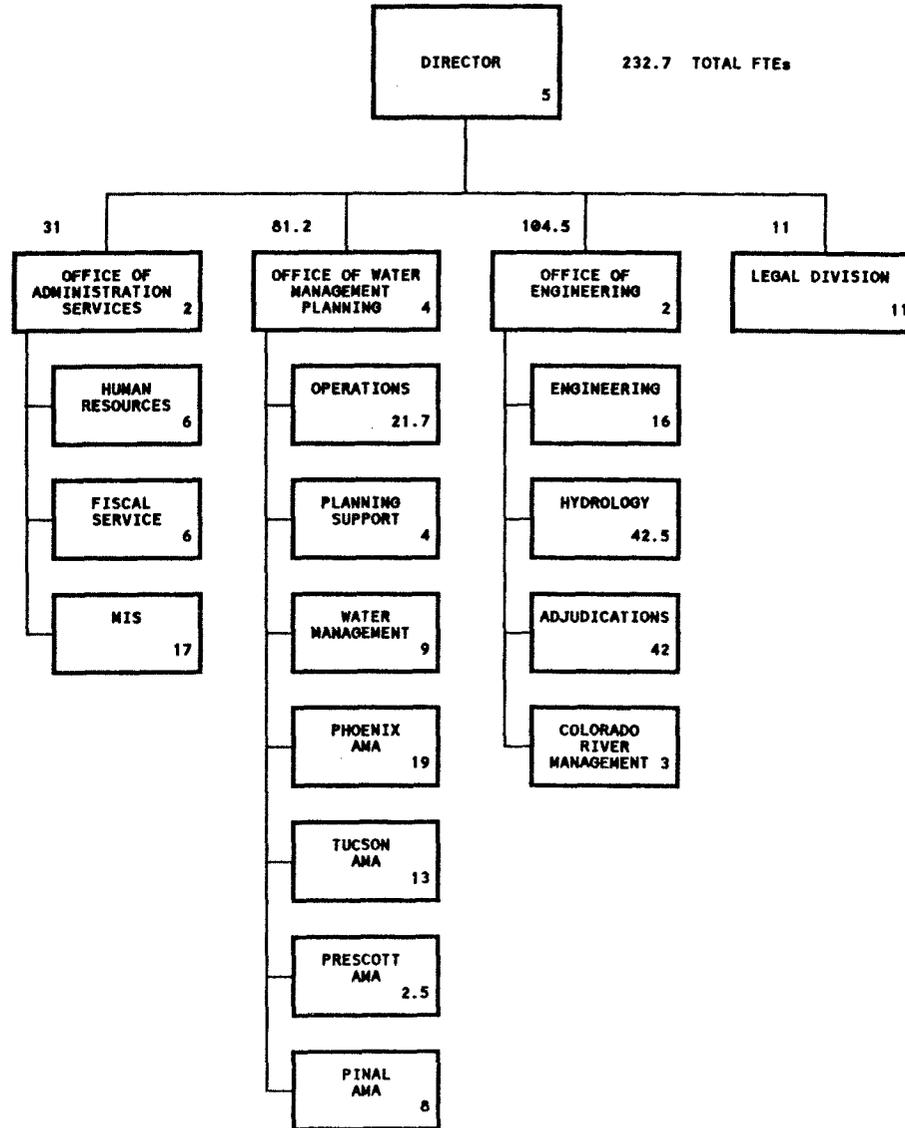
## SLIM INTERVIEW LIST

DWR

Name	Title	Date
Elizabeth Rieke	Director	Feb. 11, 92
Larry Linser	Mgr.-Engrng. & Adjud.	Feb. 20, 92
Dan Lawrence	Chief-Engrng. Div.	Feb. 25, 92
Steve Szyprowski	Hydro IV-Supv.	Feb. 25, 92
Karen Modesto	Hydro III	Feb. 25, 92
Greg Wallace	WR-Mgr.II	Feb. 26, 92
Dan Holden	Hydro III	Feb. 26, 92
Bill Jenkins	Chief-Safety of Dams	Feb. 26, 92
Jim Morris	Supv.-Flood Mgmt. Systems	Feb. 26, 92
Steve Erb	Chief-Adjud. Section	Feb. 26, 92
Ann Marquez	Mgr.-Admin.Support Section	Feb. 26, 92
Don Gross	Mgr.-Investigation Section	Feb. 26, 92
Reg Barnes	Hydro III	Feb. 27, 92
Frank Corkhill	Hydro III	Feb. 27, 92
Herb Dishlip	Dep.Dir.,Off. of WM	Feb. 27, 92
Charles Cullom	Water Resource Analysis	Feb. 27, 92
Michael Parton	Section Mgr.-Tech.Support	Feb. 27, 92
Eric Kamienski	W.R.Supv.,Little Colorado	Feb. 27, 92
Bill Remick	Hydro IV-Supv.	Feb. 28, 92
Bruce Hammett	Hydro III-	Feb. 28, 92
Frank Barrios	Area Dir.-PHX AMA	Mar. 3, 92
Jim Hoyt	Supv.-PHX-AMA-Comp./Enf.	Mar. 3, 92
Terri-Carrol	Supv.-PHX-AMA-Spec.Stud.	Mar. 4, 92
Tom Carr	Area Dir.-Pinal AMA	Mar. 4, 92
Kathy Jacobs	Area Dir.-Tucson AMA	Mar. 6, 92
Linda Stifzer	WR Supv.-Planning Tucson AMA	Mar. 6, 92
Dennis Kimberlin	WR Mgr.I-OWM	Mar. 9, 92
Dennis Sundie	WR Mgr.I	Mar. 9, 92
Mason Bolitho	WR Supv.	Mar. 9, 92
Linda Stevens	Training Officer I	Mar. 12, 92
Betsy Reike	Director	Mar. 17, 92
Frank Secondo	A.D.-Administration	Mar. 18, 92
Howard Billings	Tech.Supp.Spec.II	Mar. 18, 92
Steve Peddy-Coart	Sys.Proj.Leader	Mar. 18, 92
Howard Stapleton	Sys.Proj.Leader	Mar. 18, 92
Ken Slowinski	Attorney-Legal Division	Mar. 23, 92
Pat Schiffer	Chief Counsel Asstnt.	Mar. 23, 92
Chuck Cahoy	Attorney III	Mar. 23, 92

**CURRENT ORGANIZATION CHART  
DEPARTMENT OF WATER RESOURCES**

EXHIBIT 2



DWR - 10

DEPARTMENT OF WATER RESOURCES SUMMARY OF TITLES & SAVINGS

Rec	Recommendation Title	Agency Total	Total				Federal					State					
			Revenue Enhance	Avoided Cost	Saved Cost	FTE	Vacant FTE	Revenue Enhance	Avoided Cost	Saved Cost	FTE	Vacant FTE	Revenue Enhance	Avoided Cost	Saved Cost	FTE	Vacant FTE
1	Safety of Dams Inspections	39,559	0	39,559	0	0	1										1
2	Modeling Section	190,175	0	102,175	88,000	2	3			88,000	2				102,175		3
3	DWR-DEQ Groundwater Coordinati	0	0	0	0	0	0										
4	Regulating Fewer Water Rights	122,430	0	43,430	79,000	2	1							43,430	79,000	2	1
5	Planning & Compl.	174,000	0	0	174,000	3	0								174,000	3	
6	Water Mgmt. Support Div.	222,500	0	44,125	178,375	4	1			67,319	2			44,125	111,056	2	1
7	Management Information System	0	0	0	0	0	0										
8	Legal Division	53,000	0	53,000	0	0	1							53,000			1
	Water Resources Subtotal	801,664	0	282,289	519,375	11	7	0	0	155,319	4	0	0	282,289	364,056	7	7

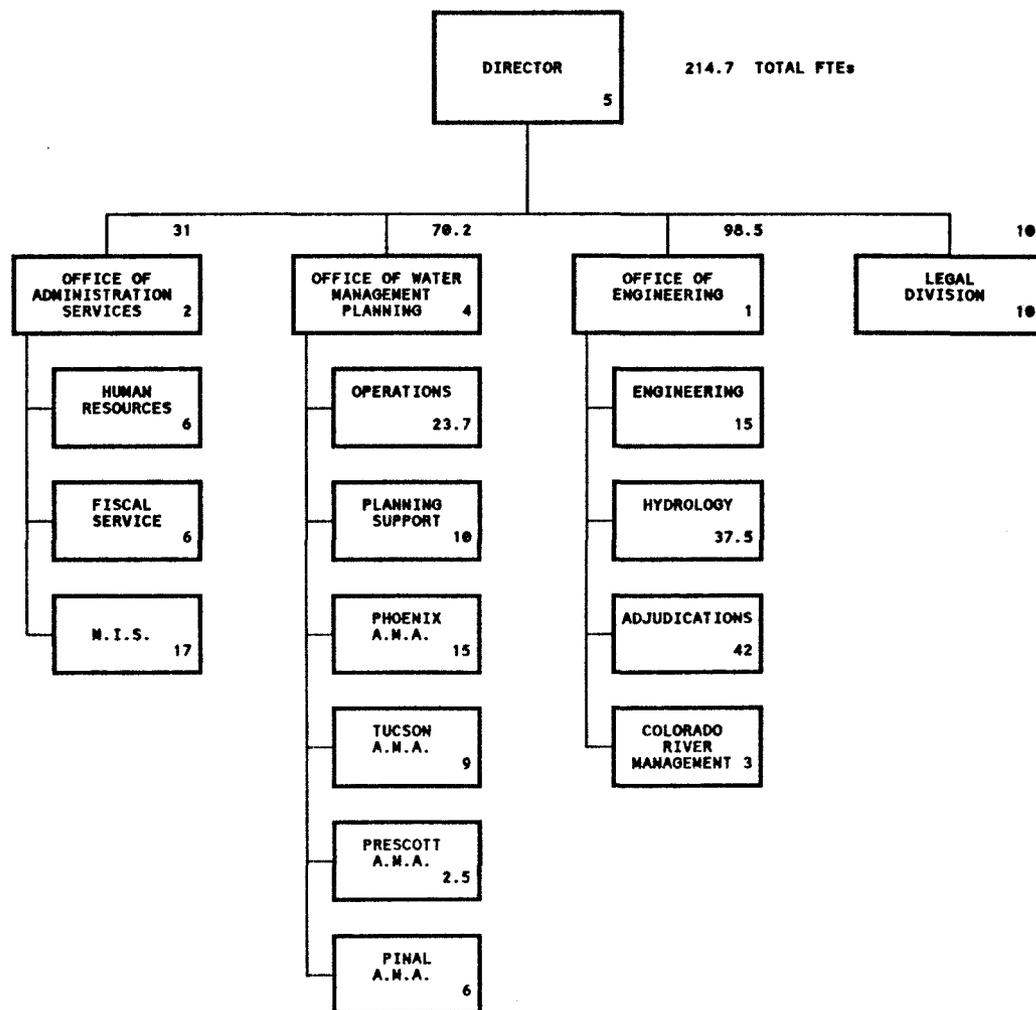
Rec	Recommendation Title	Revenue Enhance	Avoided Cost	Other Saved Cost	FTE	Vacant FTE	Public Total	One Time		Statute Change	Rule Change	Computer Program	Months
								Savings	Cost				
1	Safety of Dams Inspections												
2	Modeling Section												1
3	DWR-DEQ Groundwater Coordinati												
4	Regulating Fewer Water Rights									X			2
5	Planning & Compl.									X			12
6	Water Mgmt. Support Div.												12
7	Management Information System												
8	Legal Division												6
	Water Resources Subtotal	0	0	0	0	0	0	0	0				

DWR - 11

SUMMARY OF POSITION SAVINGS — DWR

	CURRENT	RECOMMENDED CHANGE	REMAINING
Office of Engrng.	104.5	-6	98.5
Off. of Water Mgmt.	81.2	-11	70.2
Admin. Services	31	0	31
Legal	11	-1	10
Director	5	0	5
Totals	232.7	-18	214.7

PROPOSED ORGANIZATION CHART  
DEPARTMENT OF WATER RESOURCES



DWR - 13

# DWR IMPLEMENTATION SCHEDULE (PRELIMINARY)

EXHIBIT 6

	MONTHS																			
TITLE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
<b>OFFICE OF ENGINEERING</b>																				
<b>PRE-IMPLEMENTATION PREPARATION</b>	→																			
1. SAFETY OF DAM INSPECTIONS	→																			
2. ELIMINATION OF MODELING SECTION	→																			
3. DWR-DEQ COORDINATION OF GROUNDWATER QUALITY WORK	→																			
<b>OFFICE OF WATER MANAGEMENT</b>																				
4. REGULATING FEWER WATER RIGHTS	→																			
5. PLANNING AND COMPLIANCE MANAGEMENT	→																			
6. WATER MANAGEMENT SUPPORT DIVISION	→																			
<b>OFFICE ADMINISTRATIVE SERVICES</b>																				
7. MIS	→																			
<b>LEGAL DIVISION</b>																				
8. LEGAL DIVISION	→																			

DWR - 14

## SAFETY OF DAMS INSPECTIONS

### Current Situation

The Safety of Dams Program is conducted by the Safety of Dams Section in the Engineering Division. As of January 1, 1992 there were five FTEs authorized and budgeted with one vacancy.

The primary functions of this section are: 1) review and approve applications to construct or enlarge dams; 2) establish filing fees for dam construction; 3) collect annual fees on dams; 4) investigate the design and construction of dams; 5) review loan requests and grants for non-emergency dam repair; 6) perform periodic inspections of existing dams and dams under construction; and 7) respond to inquiries regarding dam safety.

The section operates under the authority of A.R.S. Title 45-1203 through 45-1223 as amended, and implementing rules. All non-federal dams come under the jurisdiction of this section.

At the present time there are approximately 200 non-federal dams in Arizona. Approximately 50 of these are located at mining operations. Over the past several years three to four new dams have been constructed each year.

### Impact

According to a supervisor's estimate, two man-days are required to annually inspect and write a report on each of the 200 non-federal dams, including travel time. Based on this estimate, a total of 400 man-days is required for inspections. This equates to approximately two FTEs at 1700 productive man-hours available each year per employee. It is estimated that review of applications, investigation of designs, responding to inquiries, reviewing loan requests and other miscellaneous activities require two FTEs. The total section work activity should then require four FTEs including the supervisor as opposed to the five now authorized.

The Section Manager was in the process of preparing instructions to standardize the design review process, reports, check lists, and general guidelines for the dam inspection effort. These instructions will ensure that inspections are complete and will provide a training tool for all new employees. All personnel will follow the same process thereby minimizing the possibilities of errors and omissions.

### Recommendations

We recommend that DWR:

- Finalize and Implement standard operating procedures in draft as early as possible
- Develop standard procedures for other functions performed within the Safety of Dams Inspection Section
- Reduce authorized positions from five to four for this section.

### Benefits

The following benefits should accrue:

- Better utilization of personnel
- Standard procedures to ensure integrity of inspections and use as training aids
- Savings of approximately \$39,559 per year through cost avoidance (one FTE including ERE) – State budgeted
- Reduction of inspection time, not quantifiable at the present.

### Implementation

Immediate decision to reduce authorized positions and not hiring on current vacancy.

## MODELING SECTION

### Current Situation

The Modeling Section is part of the Hydrology Division in the Office of Engineering. It is broken into two units, the Water Management Support Unit and the Groundwater Quality Support Unit. Exhibit 7, Office of Engineering – Modeling Section, shows this Section structure.

The section has nine positions as shown on the organization chart. Six of the positions are filled and the remainder are vacant. The three vacant positions are federally funded by the Environmental Protection Agency (EPA), and it is currently not clear if these positions will receive renewed contracts.

From information provided in our interviews, we were told that modeling in DWR has been present almost since its inception in 1980 and has serviced both the Active Management Areas (AMA) and the EPA as a support function. In recent years since the emergence of the Department of Environmental Quality (DEQ) much of the modeling work has been coordinated with Groundwater Hydrology in DEQ, as well as the EPA.

DWR has developed approximately eight models over the past 12 years, of which four were water quality models in conjunction with the EPA.

One of the remaining four models was developed after 1990 for the Yuma area, but outside the four AMAs and funding is about to expire. The model work is scheduled to be completed in June of 1992.

The remaining three models are Pima, Tucson, and Phoenix AMA oriented projects. DWR's administrative objective with modeling is to support AMA Water Management planning in connection with both volume and quality.

### Impact

The four EPA related models that have been completed by the Modeling Section are Water Quality Contamination Projects, clearly under the mandate of both the EPA and/or DEQ. Most, but not all of the work on these models was initiated prior to the formation of DEQ, and are all part of Superfund Federal Projects.

According to our interviews, one of these four models, the 52nd Street Motorola Project, is being given to the EPA. According to EPA requirements, all four must be updated every 10 years to remain useful. This presents a problem since it is currently not known if DWR will be able to renew their contracts for the positions previously supported with funding by the EPA.

Future funding for Arizona on projects of this nature may well be established between the EPA and DEQ since water quality issues, especially those dealing with industrial contamination, are clearly issues with DEQ statutory mandates. In addition to this, DEQ currently has modeling capability.

While modeling itself may not be a statutory requirement, it is accepted and appears to be a useful, if not totally conclusive, tool for developing "what if" scenarios within the scope of DWR's work activities. This is particularly true in the areas of planning.

For these reasons we believe the Water Management Plan, particularly within the four AMAs should include some modeling capability. There currently exists three models, two are complete and in use, relevant to planning within the three largest AMAs. Based on interviews, the best estimates indicate that two modelers are sufficient to do AMA-related modeling work.

#### Recommendation

We recommend that modeling within DWR focus on planning, primarily within the four AMAs, with changes as follows:

- Retain one Hydro IV and one Hydro III, but transfer them to the Central Planning Support Division in the office of Water Management, as shown on Exhibit 8, OWM – Planning Support Division
- Give the EPA modelers to DEQ or the EPA for possible continued use
- Eliminate the remaining vacant positions: two Hydro IIs (Federal funds), and one W/R Tech. II (Federal funds)
- Eliminate the following filled positions: one Hydro II (Federal funds), and one Hydro III (State funds)

- Review all remaining positions for justification during the implementation phase based on quantitative work load measurements.

### Benefits

The cost savings achieved would be as follows:

- Two vacant Hydro IIs = \$79,000, one vacant W/R Tech. II = \$23,175 for a total cost avoidance of \$102,175 (All Federal funds)
- One filled Hydro II = \$39,500 (Federal funds), one filled Hydro III = \$48,500 (State funds) for a total cost reduction of \$88,000
- Total savings = \$190,175 (Federal funds \$141,675; State funds \$48,500).

### Implementation

Implementation requires the following steps:

- Find the appropriate agency for completing the EPA models (e.g., EPA, DEQ)
- Transfer one Hydro IV and one Hydro III to the Planning Support Section
- Eliminate positions per recommendation
- Sixty days to accomplish implementation.

**OFFICE OF ENGINEERING**  
 Deputy Dir\* AWC0004AHO Linsler  
 Admv Secy II AWC0310AAN (.5) Coffman

2200

**HYDROLOGY DIVISION**  
 WR Mgr II AWC0104AAE Wallace  
 Admv Asst II AWC0176AAE Lasky  
 Admv Secy I AWC0350AAN Woodall  
 Hydro IV AWC0344AAE Goff

2100

**ENGINEERING DIVISION**  
 WR Eng Mgr AWC0117AAE Lawrence

**ADMINISTRATIVE SUPPORT SECTION**  
 Admv Asst II AWC0332AAN Oakman  
 Admv Secy I AWC0115AAN Young, M. (U/F)

**SAFETY OF DAMS SECTION**  
 WR Eng Supvr AWC0118AAE Jenkins, W  
 WR Eng AWC0116AAE Hussain  
 WR Eng AWC0120AAE Cox, G  
 WR Eng § AWC0128AAE Vacant  
 WR Eng Assoc # ¶ AWC0281ACN Richman

**FLOOD MGMT PROGRAM SECTION**  
 Prog & Proj Spec II AWC0287AAE Miller, M  
 WR Spec II § AWC0151AAE Helm  
 Admv Asst I § AWC0251AAN Strawn

**FLOOD MGMT ENG SECTION**  
 WR Eng Supvr AWC0123AAE Morris

**FIELD ENGINEERING**  
 WR Eng AWC0114AAE Linkswiler  
 WR Eng Assoc AWC0139AAN Casey

**ENGINEERING REVIEWS**  
 WR Eng AWC0126AAE Creighton  
 WR Eng Spec AWC0260AAE Johnson, J

**WATER RESOURCES SECTION**  
 Hydro IV AWC0130AAE Szyprowski

**WATER SUPPLY UNIT**  
 Hydro III AWC0113AAE Modesto  
 Hydro III AWC0227AAE Lovvik  
 Hydro II AWC0121AAE Troisi

**SPECIAL STUDIES UNIT**  
 Hydro III AWC0346AAE Holden  
 Hydro III AWC0143AAE Swieczkowski  
 Hydro II AWC0348AAE Malek-Zadegan  
 Hydro I AWC0164AAN Mason, D

**BASIC DATA SECTION**  
 Hydro IV AWC0149AAE Remick  
 WR Spec III AWC0162AAE Black  
 Secy AWC0153AAN Martin  
 W/R Tech II # ¶ AWC0271ACN Vacant

**COMP SUPPORT UNIT**  
 Hydro III AWC0199AAE Hammett  
 WR Spec III AWC0242AAE Herther  
 WR Spec II AWC0238AAE Winder  
 WR Spec II AWC0237AAE Young R.  
 WR Spec I AWC0236AAN Sicard (U/F)

**USGS/DWR UNIT**  
 Hydro III AWC0226AAE Barnes  
 Hydro II AWC0312AAE Schwab  
 Hydro II AWC0170AAE Rascona  
 Hydro I AWC0165AAN Overby  
 Hydro I AWC0148AAN Hanus  
 WR Spec I AWC0150AAN Oram  
 Graph Dsr II AWC0311AAN Renteria

**SURFACE WATER/RECHARGE**  
 Hydro IV AWC0347AAE Bushner  
 Hydro III # ¶ AWC0247ADE (.5) Mitchell  
 Hydro III AWC0145AAE Erwin  
 Hydro III AWC0318AAE Cooley  
 Hydro II AWC0136AAE Harbour  
 Hydro I AWC0171AAN Ehlers, S

**MODELING SECTION**  
 Hydro IV AWC0345AAE Putman  
 W/R Tech II § # AWC0267ACN Vacant

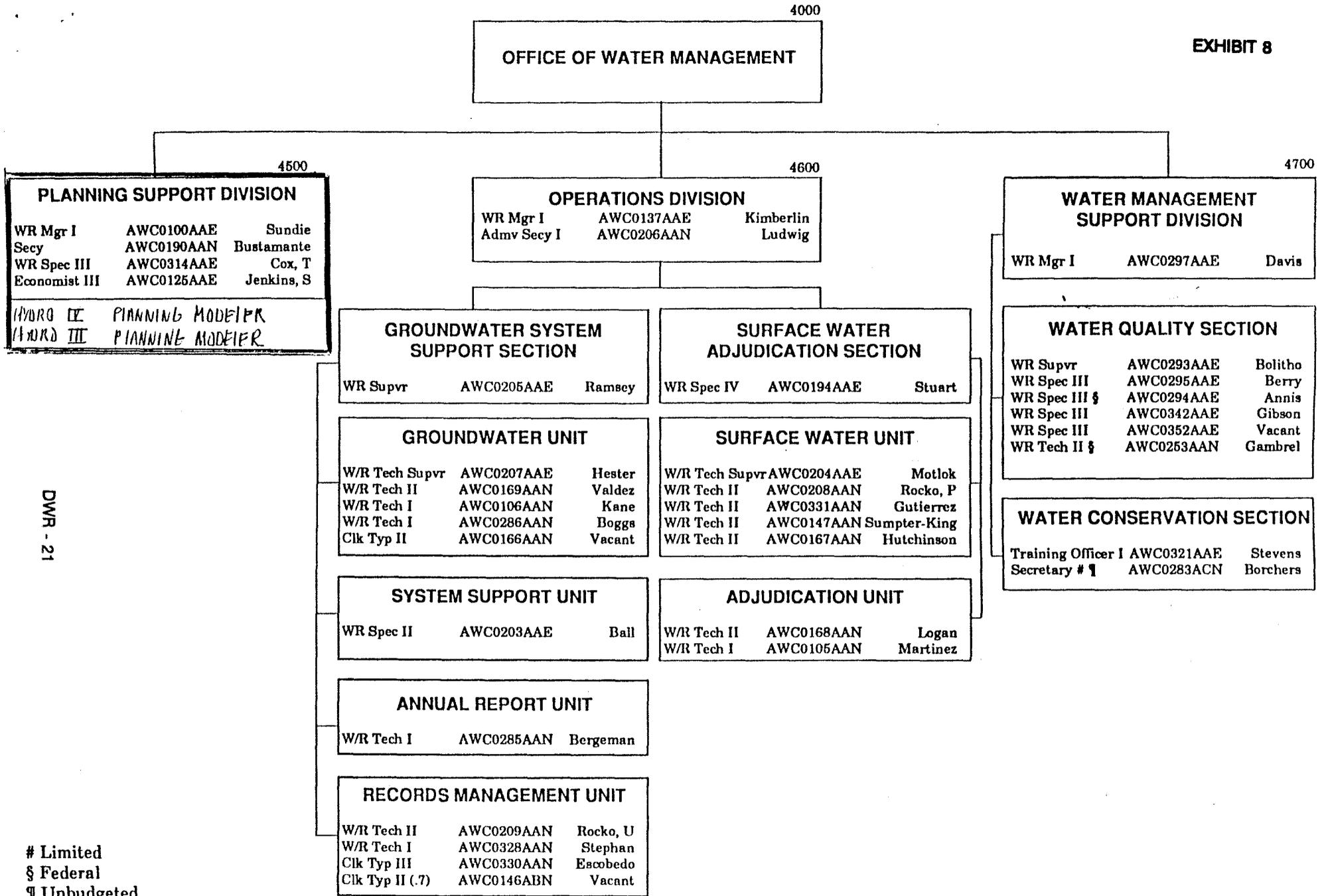
**WATER MGMT SUPP UNIT**  
 Hydro III AWC0292AAE Hill  
 Hydro III AWC0134AAE Plato (U/F)  
 Hydro II § AWC0320AAE Vacant

**GROUNDWATER QUALITY SUPP UNIT**  
 Hydro III AWC0310AAE Corkhill  
 Hydro III AWC0349AAE Corell  
 Hydro II § AWC0319AAE Vacant  
 Hydro II AWC0296AAE Vacant

DWR - 20

FILLED

# Limited  
 § Federal  
 ¶ Unbudgeted  
 \* Exempted Position



DWR - 21

- # Limited
- § Federal
- ¶ Unbudgeted
- \* Exempted Position

## DWR - DEQ COORDINATION OF GROUNDWATER QUALITY WORK

### Current Situation

The Department of Water Resources (DWR) was established in 1980 when the Groundwater Management Act (GMA) became law. There are several statutes that give DWR authority to develop Water Quality Monitoring Programs. These statutes include A.R.S. 45-105, A.R.S. 45-576 and 577, A.R.S. 45-594, A.R.S. 45-603, and A.R.S. 45-611. Many of these statutes tie certain aspects of delivering water to quality.

The Hydrology Division in the Office of Engineering, through its Basic Data Section does a series of activities relating to water discharge, and measurement as well as Quality Monitoring. This section is shown in bold outline on Exhibit 9, OOE -- Basic Data Section.

Specifically DWR does Water Quality monitoring within the four Active Management Areas (AMA) and have since their inception (12 years ago) developed a quality monitoring program in connection with their other water work activities. They have developed this program outside the four AMAs as well, and last year took over 200 water samples that were analyzed for general inorganic properties such as ph, conductivity, dissolved oxygen, alkalinity, iron and other metals and have provided this information to the Department of Environmental Quality (DEQ). The annual cost of the analysis is approximately \$60,000.

DEQ's Groundwater Quality Monitoring program of a similar nature (Ambient Monitoring) sampled 15-20 wells in three of the 50 water basins statewide. DEQ also has a "targeted" groundwater monitoring program that focuses on pollutants such as radioactive material, and agricultural pollutants such as Nitrogen and pesticides, as well as mining pollutants. Even their "targeted" monitoring program has been limited in comparison to the work being done by DWR.

The level of development of DWR's program is shown on Exhibit 10, Number of Annual Index Wells (Actual) and Exhibit 11, Number of Water Levels in Basin Studies. They have large numbers of wells indexed (visited annually, with historic records and location verified) in many of the state's 50 water basins and some indexed wells in all 50 of the basins.

### Impact

Since DEQ's emergence in 1986 they have been charged with the mandate to play the lead role in Water Quality matters. This is stated in A.R.S. 49-221-225.

Since DWR has the physical infrastructure in place, i.e. fixed monitoring stations, indexed wells, water basin, investigation file programs driven by well measurement or supply project work, the opportunity exists to fulfill the mandate DEQ has in this area without the need for DEQ to expand manpower into the future in groundwater quality work.

Measurement and quality monitoring compliment each other in groundwater programs because quality monitoring can be done when measurement cannot and visa versa, outside AMAs during the spring and summer months.

Inside the four AMAs, water discharge and quality monitoring can be done during the summer, but in the fall and winter months measurement monitoring becomes the focus.

Regardless of who plays the lead role in Water Quality Issues, DWR's mandates in water delivery constantly interface with quality issues.

#### Recommendations

We recommend DEQ take the lead role as statutorily mandated. We believe that DWR should facilitate and DEQ respond to an inter-agency cooperative agreement where DWR would provide groundwater quality monitoring services to DEQ subject to the following factors:

- Maximum use of existing and future indexed wells within DWR's program
- DEQ should determine how many wells they want monitored, where, and how many samples
- DEQ should agree to pay for sample analysis
- DEQ should provide any additional needed training.

#### Benefits

- DEQ would benefit by being able to develop a comprehensive state-wide groundwater quality monitoring program without additional staffing

- DWR would benefit by continued effectiveness of existing manpower for measurement and discharge activity
- Costs could be shared, DEQ providing sample analysis costs, DWR performing monitoring activity within their present scope of tasks
- DEQ would benefit by being able to devote present manpower to special monitoring projects not in the scope of DWR Basic Data Section Tasks, such as their Targeted Monitoring Program
- DWR would benefit from DEQ paying annual sample analysis costs of Basic Data Section of \$60,000.

#### Implementation

Implementation will require the following:

- Development of an Inter-agency Governmental Agreement (IGA) between DEQ and DWR
- Approximately three to six months to accomplish.

2000

**OFFICE OF ENGINEERING**

Deputy Dir\* AWC0004A110 Dinner  
 Adm Secy II AWC0310AAN (.5) Collman

2200

**HYDROLOGY DIVISION**

WR Mgr II AWC0104AAE Wallace  
 Adm Asst II AWC0176AAE Lusky  
 Adm Secy I AWC0350AAN Woodall  
 Hydro IV AWC0344AAE Golf

2100

**ENGINEERING DIVISION**

WR Eng Mgr AWC0117AAE Lawrence

**ADMINISTRATIVE SUPPORT SECTION**

Adm Asst II AWC0332AAN Onkman  
 Adm Secy I AWC0116AAN Young, M. (U/F)

**SAFETY OF DAMS SECTION**

WR Eng Supvr AWC0118AAE Jenkins, W  
 WR Eng AWC0116AAE Hussain  
 WR Eng AWC0120AAE Cox, G  
 WR Eng § AWC0128AAE Vacant  
 WR Eng Assoc #1 AWC0281ACN Richman

**FLOOD MGMT PROGRAM SECTION**

Prog & Proj Spec I AWC0287AAE Miller, M  
 WR Spec II § AWC0151AAE Helon  
 Adm Asst I § AWC0261AAN Strawn

**FLOOD MGMT ENG SECTION**

WR Eng Supvr AWC0123AAE Morris

**FIELD ENGINEERING**

WR Eng AWC0114AAE Linkswiler  
 WR Eng Assoc AWC0139AAN Cnacy

**ENGINEERING REVIEWS**

WR Eng AWC0126AAE Creighton  
 WR Eng Spec AWC0260AAE Johnson, J

**WATER RESOURCES SECTION**

Hydro IV AWC0130AAE Szyrowski

**WATER SUPPLY UNIT**

Hydro III AWC0113AAE Modesto  
 Hydro III AWC0227AAE Lovvik  
 Hydro II AWC0121AAE Troisi

**SPECIAL STUDIES UNIT**

Hydro III AWC0346AAE Holden  
 Hydro III AWC0143AAE Swieczkowski  
 Hydro II AWC0348AAE Malek-Zadegan  
 Hydro I AWC0164AAN Mason, D

**BASIC DATA SECTION**

Hydro IV AWC0149AAE Remick  
 WR Spec III AWC0162AAE Black  
 Secy AWC0163AAN Martin  
 W/R Tech II #1 AWC0271ACN Vacant

**COMP SUPPORT UNIT**

Hydro III AWC0199AAE Hammett  
 WR Spec III AWC0242AAE Herther  
 WR Spec II AWC0238AAE Winder  
 WR Spec II AWC0237AAE Young R.  
 WR Spec I AWC0236AAN Sicard (U/F)

**USGS/DWR UNIT**

Hydro III AWC0226AAE Barnes  
 Hydro II AWC0312AAE Schwab  
 Hydro II AWC0170AAE Rascona  
 Hydro I AWC0165AAN Overby  
 Hydro I AWC0148AAN Hanus  
 WR Spec I AWC0150AAN Gram  
 Graph Dsr II AWC0311AAN Renteria

**SURFACE WATER/RECHARGE**

Hydro IV AWC0347AAE Bushner  
 Hydro III #1 AWC0247ADE (.5) Mitchell  
 Hydro III AWC0146AAE Erwin  
 Hydro III AWC0318AAE Cooley  
 Hydro II AWC0136AAE Harbour  
 Hydro I AWC0171AAN Ehlers, S

**MODELING SECTION**

Hydro IV AWC0345AAE Potman  
 W/R Tech II § # AWC0267ACN Vacant

**WATER MGMT SUPP UNIT**

Hydro III AWC0292AAE Hill  
 Hydro III AWC0134AAE Plato (U/F)  
 Hydro II § AWC0320AAE Vacant

**GROUNDWATER QUALITY SUPP UNIT**

Hydro III AWC0310AAE Corkhill  
 Hydro III AWC0349AAE Correll  
 Hydro II § AWC0319AAE Vacant  
 Hydro II AWC0296AAE Vacant

DWR - 25

- # Limited
- § Federal
- ¶ Unbudgeted
- \* Exempted Position





## REGULATING FEWER WATER RIGHTS (AMA)

### Current Situation

Arizona's four Active Management Areas (AMA) were established by the Groundwater Management Act (GMA) in 1980. Through the GMA, DWR has a mandate to develop and implement water conservation requirements for agricultural, municipal and industrial water users for four 10-year periods.

DWR Administers state water law inside the four AMAs through the Office of Water Management. The four AMAs are Phoenix, Tucson, Pinal and Prescott, and their organizations are shown on Exhibit 12, Phoenix and Tucson AMAs – OWM, Water Rights Administration Section, and Exhibit 13, Prescott and Pinal AMAs – OWM, Water Rights Administration Sections. Exhibit 14, Water Rights Administration, shows the number of water rights by the four AMAs.

The primary process for this group is to mail report forms in January, get them back in March, send account balances in June and July, and keep the data base up to date as water rights are conveyed from one holder to another. The Phoenix AMA currently has a backlog of approximately 300 conveyances.

The planning function in the four AMAs is the major driving force of water rights administration. The GMA directed DWR to develop and implement water conservation requirements for agricultural, municipal and industrial water users in five consecutive periods. At this writing DWR is operating in the second management period 1990-2000. The four AMAs Management Plans are summarized on Exhibit 15, Management Plans for AMAs.

Any Water Rights Holder (WRH) may request an administrative review of the Conservation Requirement. The planning group is currently dealing with 2,387 requests for administrative review which may go as far as a hearing. Even those that do not go to a hearing must be reviewed individually. According to our interviews, the estimated time required to process all of these requests for administrative review is four years.

### Impact

While the Phoenix AMA has the greatest difficulty dealing with the Administration of Water Rights, they also must administer more water rights than the other three AMAs combined, more than double at

8,327. All of the functions involved in administering water rights would be affected if small agricultural rights and small municipal providers were no longer regulated.

Approximately 50% or 4,938 of all agricultural rights are less than 10 acres. In the Phoenix AMA for example, these rights represent 58% of the total Irrigated Grandfather Rights (IGFR) but use only 4.3% of the total agricultural water, 46,573 Acre Feet (AF) of the 1,075,000 AF, total. In addition nearly 50% of all conveyances take place with IGFR that are less than 10 acres. This is one of the two areas backlogged in the Phoenix AMA administration.

Small municipal providers could also be eliminated from regulation since of the 332 providers in the Phoenix and Tucson AMA approximately 150 (45%) provide 90-95% of the municipal water. This general pattern is repeated in all the AMAs.

Of 11,882 total rights administered by all four AMAs, 5,138 of these rights could be dropped from regulation and 95% of all water used would still be managed out of total groundwater withdrawals. For example, in 1990, of a total of 1,875,522 AF, 1,781,745 AF would still be regulated under DWR Managements control.

Elimination of the workload and backlog associated with over 5,000 small users, would result in a substantial reduction in the staff required to administer the functions of water rights. Exhibit 16, Reduction in Activity of Proposed Rights Administration (Estimated), shows an approximate reduction of the amount of time spent on the activities listed. It does not list all of the activities performed by the various functions, and it does not assign the amount of time spent in each of those activities. Standards need to be developed within the scope of activities within the AMAs.

The exemption of WRHs of less than 10 acres will result in an approximate 50% reduction in conveyances and a reduction of requests for administrative reviews. This exemption will reduce the staffing requirements in Tucson and Phoenix, not counting the current backlog in Phoenix. The reduction in Phoenix will be offset to process the backlog over the next 12 months. Best estimates equate to two FTEs in Tucson and two in Phoenix. It is estimated that two FTEs will be required to process the backlog in Phoenix, resulting in no immediate savings. However, these two FTEs will become surplus at the end of the twelfth month due to the elimination of backlog and at that time these two FTEs will be eliminated.

## Recommendations

We recommend the following:

- DWR limit the water rights regulation on WRH with less than 10 acres, except for limited conveyance
- The same action be taken on municipal providers that fall below the users who combined make up 95% of municipal water use. In general large providers serve over 500 people and 100 AF of water per year
- Reductions in the Tucson AMA after 12 months
  - Elimination of two filled WR SPEC II positions: one in Planning and one in Operations
- Reduction in the Pinal AMA
  - Immediate elimination of the vacant WR Supervisor position in the operation section
- Standards be established within the AMAs
- Retaining the vacant WR Specialist III position in Phoenix AMA Planning and Special Studies, and one filled WR Specialist II position in either Compliance or Water Rights Administration to process the backlog.

## Benefits

- Standards will result in improved efficiency
- The opportunity to simplify the workload thereby improving the efficiency of administration of water rights
- Cost avoidance of \$43,430 one vacant WR Supervisor
- Cost reduction of \$79,000, two filled WR SPEC II positions

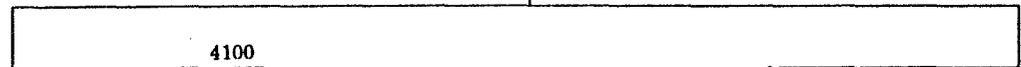
- Total savings of \$122,430, all State budgeted
- Reduction in regulatory burden of small WRH and providers.

Implementation

- Requires Legislative action
- Time frame: 18 months.

**OFFICE OF WATER MANAGEMENT**  
 Deputy Dir\* AWC0005AHO Dishlip  
 Adm Secy II AWC0210AAN Coffman

WR Supvr AWC0189AAE Rossi  
 WR Spec III AWC0119AAE Vacant



**PHOENIX AMA** 4100  
 WR Area Director\* AWC0157AHE Barrios  
 WR Mgr I AWC0186AAE Frank

**TUCSON AMA** 4200  
 WR Area Director\* AWC0159AHE Jacobs  
 WR Mgr I AWC0211AAE Richmond

**PLANNING/SPECIAL STUDIES**  
 WR Supvr AWC0124AAE Carroll  
 WR Spec III AWC0353AAE Vacant  
 WR Spec III AWC0187AAE Risk  
 WR Spec III AWC0308AAE Goy  
 WR Spec II AWC0243AAE Fortune  
 WR Spec II AWC0323AAE Wahl  
 WR Spec II AWC0306AAE Brown

**ADMINISTRATIVE SUPPORT SECTION**  
 Admv Secy I AWC0184AAN Myer  
 Admv Secy I AWC0161AAN Farmer

**OPERATIONS SECTION**  
 WR Supvr AWC0222AAE DosSantos  
 WR Spec III AWC0326AAE Speyer  
 WR Spec II AWC0181AAE Tannler  
 WR Spec II AWC0221AAE Bodenchuk

**ADMINISTRATIVE SUPPORT SECTION**  
 Admv Secy I AWC0162AAN Peterson  
 Secy AWC0220AAN Klinger

**COMPLIANCE/ENFORCEMENT SECTION**  
 WR Supvr AWC0324AAE Holt  
 WR Spec III AWC0185AAE Andrews  
 WR Spec III AWC0300AAE Vacant  
 WR Spec II AWC0234AAE McAnulty (U/F)  
 WR Spec II AWC0240AAE(.5) Swanson (U/F)

**WATER RIGHTS ADMINISTRATION SECTION**  
 WR Spec III AWC0180AAE Willman (SD)  
 WR Spec II AWC0188AAE Stewart (U/F)  
 WR Spec II AWC0240AAE(.5) Swanson (U/F)  
 WR Spec I AWC0307AAN Caravetta

**PLANNING SECTION**  
 WR Supvr AWC0282AAE Stitzer  
 WR Spec III AWC0327AAE Johnson, D  
 WR Spec III AWC0303AAE Caporaso  
 WR Spec II AWC0325AAE Welford  
 WR Spec II AWC0233AAE Wickham

DWR - 32

# Limited  
 § Federal  
 ¶ Unbudgeted  
 \* Exempted Position



NUMBER OF WATER RIGHTS ADMINISTRATION PER FTE

WATER RIGHTS ADMINISTRATION

TYPE OF RIGHT	ACTIVE MANAGEMENT AREA			
	PHOENIX	PINAL	PRESCOTT	TUCSON
IRRIGATION	7348	1548	186	876
NON-IRRIGATION	530	132	21	436
PROVIDER	164	36	19	168
USER	174	10	0	43
PERMIT	111	26	9	45
TOTAL	8327	1752	235	1568
PER CAPITA	640/1	350/1	235/1	175/1

8,327 RIGHTS + 13 FTE = 640/1

1,568 RIGHTS + 9 FTE = 175/1

1,752 RIGHTS + 5 FTE = 350/1

## MANAGEMENT PLANS FOR AMAs

To reach the goal established for each AMA, the Code directs DWR to develop and implement water conservation requirements for agricultural, municipal and industrial water users in five consecutive periods:

- First Management Period: 1980–1990
- Second Management Period: 1990–2000
- Third Management Period: 2000–2010
- Fourth Management Period: 2010–2020
- Fifth Management Period: 2020–2025

With each consecutive period, the management plans will contain more rigorous water conservation and management requirements.

DWR works closely with groundwater users to develop conservation programs that meet the Code's goals and Arizona's water needs. The Code established a five-member Groundwater Users Advisory Council for each AMA. Members are appointed by the governor to represent groundwater users. They are chosen on the basis of their knowledge, interest and experience with water management problems. The Councils meet with AMA officials monthly to discuss the progress of plans and conservation options under consideration. The meetings are open to the public.

Conservation programs have been developed for agricultural, municipal and industrial water uses in the AMAs. These are summarized below. Detailed descriptions of the conservation requirements are contained in the management plan for each AMA.

REDUCTION IN ACTIVITY OF PROPOSED RIGHTS ADMINISTRATION (ESTIMATED)

<u>FUNCTION</u>	<u>ACTIVITY</u>	<u>APPROXIMATE # REDUCTION</u>
ADMIN	JANUARY MAIL-OUT REPORT FORMS	50%
ADMIN	NUMBER REPORTS TO INPUT MARCH 31	50%
ADMIN	FLEXIBILITY ACCOUNT ACTIVITY	50%
COMPLIANCE	NO CONSERVATION REQUIREMENT	50%
ADMIN	LIMITED CONVEYANCE (SPLITTING )	75%
COMPLIANCE	FAILURE TO FILE REPORT	95%
PLANNING	AUDIT ANNUAL REPORTS	50%
PLANNING	FUTURE ADMINISTRATIVE REVIEW	20%
ADMIN	DATA MAINTENANCE (REGISTRY)	50%
PLANNING	EDUCATION WORKSHOPS COMPLETION OF ANNUAL REPORT	30%

\* NOTE: PINAL AMA WOULD BE LESS

## PLANNING AND COMPLIANCE MANAGEMENT

### Current Situation

This discussion concerns the organization of the four AMAs and the Planning Support Division which are under the Deputy Director in the Office of Water Management and Planning.

There are currently 14 positions in planning and eight positions in compliance involved in planning-compliance within the four AMAs. Exhibits 17, OWM -- Planning/Compliance -- Phoenix & Tucson AMAs -- Present, and 18, OWM -- Planning/Compliance -- Prescott & Pinal AMAs -- Present, shows this organization. In the Pinal and Tucson AMAs, compliance is a part of the operations sections.

Also at the present time (including recommendations from various points in the report) there are eight FTEs in the planning support division, as is shown on Exhibit 19, OWM -- Planning Support Division. The positions that have already been recommended earlier in this report are noted on the organization chart.

At the present time each AMA writes its own management plan, and there are three more revisions to research and write for each AMA between now and the year 2020. Each plan ranges from 225-350 pages. We have been advised that research will begin in 1994 for the third plan, due in the year 2000. Exhibit 20, Management Plans for AMAs, generally describes the plans and plan years. Each AMA develops its own formats and instructions to users to complete annual report addendum.

Special studies are assigned to Planning Sections in each AMA by the Deputy Director of the Office of Water Management and Planning (OWMP). These studies are often generated by the Legislature.

Each AMA operates within its own section in dealing with compliance issues and priorities, and variability exists on these issues. There are no standard guidelines for compliance in the agency.

On occasion, each AMA is assigned a special detail project. A special project may last from six months to two years, is generally handled by the area directors, and may utilize 40% or more of their time. The two present projects are policy development programs affecting DWR statewide both inside the four AMAs and outside.

At the present time the Planning Support Division does demographics (population) work with an economist. It also does work on new water supply methodology as it is associated with weather modification and watershed management, and act as a general resource information center for the four AMAs.

### Impact

Unless a committed effort is made to change the planning and compliance role of the Planning Support Division, both staffing and corresponding budget requirements will escalate.

Total existing staffing, particularly in the area of planning, could be reduced or redistributed to other areas of the agency beyond the recommendations in this report if changes were made.

The Planning Support Division (PSD) could play a significant role in the elimination of separate preparation of generic parts of the four management plan books and consider the least effective cost approaches to researching the management plans. Evaluation of an alternative method of measurement to the gallons per capita per day concept, for example, gallons per day per service connection would result in less requirement of manpower. Other work activity areas where PSD could efficiently assist are the preparation of annual report addendums, water conservation and annual report education workshop preparation.

If two positions in each AMA were really required to administer the Groundwater Code (an Area Director and a WR Manager I), it would not be possible to give Area Directors special assignments to statewide programs requiring up to and even exceeding 40% of their time.

The Position Description Questionnaires (PDQ) of both the area Directors and the WR Manager I positions indicate duplication and similarity in job responsibilities, supervision, authority, skills, input and work processes, as well as expertise required for the positions.

Using the mid-point of a Grade 23 (WR Manger I), and the mid-point of a Grade 24 (Area Director), \$121,750 is required annually to manage and administer the Groundwater Code in each AMA. This is substantially more than agency directors are paid to administer dozens of programs with far more responsibility, personnel and budget.

The PSD could assume this activity of special assignment because these statewide issue assignments are not germane to a specific AMA.

The PSD should also implement statewide policy on compliance issues which are clearly state-wide in nature. Examples that demonstrate this are shown on Exhibit 21, Statewide Planning/Compliance Issues.

The role surface water plays in the Groundwater Code and the lack of a surface water statutory mandate is also an issue which could be reviewed by the PSD.

The local community does not and should not have to give up input or influence on water issues affecting their management areas. Four independent AMA's cannot form effective, efficient statewide policies.

### Recommendations

We believe that the PSD should become more vital to DWR, the four AMAs, and the Operations Division of the OWMP. We recommend the following changes:

- Eliminate the three WR Manager I positions in the Pinal, Tucson and Phoenix AMA, shown on Exhibits 22, OWM – Planning/Compliance – Phoenix & Tucson AMAs – Proposed, and Exhibit 23, OWM – Planning/Compliance – Prescott & Pinal AMAs – Proposed
- Transfer the Phoenix AMA and the Tucson AMA WR Supervisor planning positions to the PSD as shown on Exhibit 22
- Assign the new PSD the following tasks:
  - Eliminate duplication with cost reduction a major focus
  - Develop integrated policy both inside the four AMAs and outside, covering both planning and compliance
  - Assume special assignment work currently being handled by the AMA Directors.

### Benefits

Implementing these recommendations will provide the following benefits:

- Cost reduction savings – three WR Manger I Positions \$174,000 (State funds)
- Streamlined Management structure in four AMAs with work activity related to each specific AMA
- Elimination of AMA duplication
- Development cohesive state-wide policy on planning and compliance (maintaining local input from the AMA community)

### Implementation

Implementation will require the following steps:

- Reassign WR Supervisor I Planning positions in Phoenix AMA and Tucson AMAs to Planning Support Division
- Eliminate WR I Manager position in Phoenix, Tucson and Pinal AMAs
- Reassign statewide assured water special assignments and all other future special assignments to Planning Support
- Planning Support assume all planning activities that avoid duplication and reduce cost of the planning function
- Implementation time: One year in duration.

4000

OFFICE OF WATER MANAGEMENT		
Deputy Dir*	AWC0006A110	Dishlip Collman
Adm Secy II	AWC0210AAN	

WR Supvr	AWC0189AAE	Rossi
WR Spec III	AWC0119AAE	Vacant

4100

PHOENIX AMA		
WR Area Director*	AWC0157A11E	Barrios
WR Mgr I	AWC0186AAE	Frank

4200

TUCSON AMA		
WR Area Director*	AWC0159A11E	Jacobs
WR Mgr I	AWC0211AAE	Richmond

PLANNING/SPECIAL STUDIES		
WR Supvr	AWC0124AAE	Cnroll
WR Spec III	AWC0353AAE	Vacant
WR Spec III	AWC0187AAE	Risk
WR Spec III	AWC0308AAE	Goy
WR Spec II	AWC0243AAE	Fortune
WR Spec II	AWC0323AAE	Wahl
WR Spec II	AWC0306AAE	Brown

ADMINISTRATIVE SUPPORT SECTION		
Admv Secy I	AWC0184AAN	Myer
Admv Secy I	AWC0161AAN	Farmer

OPERATIONS SECTION		
WR Supvr	AWC0222AAE	DosSantos
WR Spec III	AWC0326AAE	Speyer
WR Spec II	AWC0181AAE	Tannler
WR Spec II	AWC0221AAE	Bodenchuk

ADMINISTRATIVE SUPPORT SECTION		
Admv Secy I	AWC0162AAN	Peterson
Secy	AWC0220AAN	Klinger

WATER RIGHTS ADMINISTRATION SECTION		
WR Spec III	AWC0180AAE	Willmann (SD)
WR Spec II	AWC0188AAE	Stewart (U/F)
WR Spec II	AWC0240AAE(.5)	Swanson (U/F)
WR Spec I	AWC0307AAN	Carnavatta

PLANNING SECTION		
WR Supvr	AWC0282AAE	Sitzer
WR Spec III	AWC0327AAE	Johnson, D
WR Spec III	AWC0303AAE	Cnporaso
WR Spec II	AWC0325AAE	Welford
WR Spec II	AWC0233AAE	Wickham

COMPLIANCE/ENFORCEMENT SECTION		
WR Supvr	AWC0324AAE	Holt
WR Spec III	AWC0185AAE	Andrews
WR Spec III	AWC0300AAE	Vacant
WR Spec II	AWC0234AAE	McAnulty (U/F)
WR Spec II	AWC0240AAE(.5)	Swanson (U/F)

DWR - 41

- # Limited
- § Federal
- ¶ Unbudgeted
- \* Exempted Position



4000  
OFFICE OF WATER MANAGEMENT

4600  
**PLANNING SUPPORT DIVISION**

WR Mgr I	AWC0100AAE	Sundlo
Secy	AWC0190AAN	Bustamante
WR Spec III	AWC0314AAE	Cox, T
Economist III	AWC0126AAE	Jenkins, S

HYDRO III	PLANNING	MODELER
HYDRO IV	PLANNING	MODELER
OFFICER I	TRAINING	
SECRETARY		

4600  
**OPERATIONS DIVISION**

WR Mgr I	AWC0137AAE	Kimberlin
Admin Secy I	AWC0206AAN	Ludwig

4700  
**WATER MANAGEMENT SUPPORT DIVISION**

WR Mgr I	AWC0297AAE	Davis
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**GROUNDWATER SYSTEM SUPPORT SECTION**

WR Supvr	AWC0206AAE	Hinney
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**SURFACE WATER ADJUDICATION SECTION**

WR Spec IV	AWC0194AAE	Stuart
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**GROUNDWATER UNIT**

WR Tech Supvr	AWC0207AAE	Heater
WR Tech II	AWC0169AAN	Valdez
WR Tech I	AWC0106AAN	Kane
WR Tech I	AWC0286AAN	Hoggs
Clk Typ II	AWC0166AAN	Vacant

**SURFACE WATER UNIT**

WR Tech Supvr	AWC0201AAE	Mollok
WR Tech II	AWC0208AAN	Rocko, P
WR Tech II	AWC0331AAN	Cutlerrez
WR Tech II	AWC0147AAN	Sumpter-King
WR Tech II	AWC0167AAN	Hutchinson

**WATER QUALITY SECTION**

WR Supvr	AWC0293AAE	Bolitto
WR Spec III	AWC0296AAE	Berry
WR Spec III §	AWC0294AAE	Annis
WR Spec III	AWC0342AAE	Gibson
WR Spec III	AWC0352AAE	Vacant
WR Tech II §	AWC0263AAN	Gambiel

**SYSTEM SUPPORT UNIT**

WR Spec II	AWC0203AAE	Ball
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**ADJUDICATION UNIT**

WR Tech II	AWC0168AAN	Logan
WR Tech I	AWC0106AAN	Martinez

**ANNUAL REPORT UNIT**

WR Tech I	AWC0286AAN	Bergeman
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**RECORDS MANAGEMENT UNIT**

WR Tech II	AWC0209AAN	Rocko, U
WR Tech I	AWC0328AAN	Stephan
Clk Typ III	AWC0330AAN	Encobedo
Clk Typ II (*)	AWC0146AAN	Vacant

**WATER CONSERVATION SECTION**

Training Officer I	AWC0321AAE	Stevens
Secretary # 1	AWC0283ACH	Borchers

DWR - 43

- # Limited
- § Federal
- ¶ Unbudgeted
- \* Exempted Position

## MANAGEMENT PLANS FOR AMAs

To reach the goal established for each AMA, the Code directs DWR to develop and implement water conservation requirements for agricultural, municipal and industrial water users in five consecutive periods:

First Management Period: 1980–1990  
Second Management Period: 1990–2000  
Third Management Period: 2000–2010  
Fourth Management Period: 2010–2020  
Fifth Management Period: 2020–2025

With each consecutive period, the management plans will contain more rigorous water conservation and management requirements.

DWR works closely with groundwater users to develop conservation programs that meet the Code's goals and Arizona's water needs. The Code established a five-member Groundwater Users Advisory Council for each AMA. Members are appointed by the governor to represent groundwater users. They are chosen on the basis of their knowledge, interest and experience with water management problems. The Councils meet with AMA officials monthly to discuss the progress of plans and conservation options under consideration. The meetings are open to the public.

Conservation programs have been developed for agricultural, municipal and industrial water uses in the AMAs. These are summarized below. Detailed descriptions of the conservation requirements are contained in the management plan for each AMA.

**STATEWIDE PLANNING & COMPLIANCE ISSUES**

**STATEWIDE COMPLIANCE ISSUES**

Exceeding Limit of Water Withdrawal

Illegal Irrigation

Well Activity

Open Well Enforcement

**STATEWIDE PLANNING AND COMPLIANCE ISSUES**

Surface Water Rights Administration

Incorporation Surface Water -- Groundwater Code

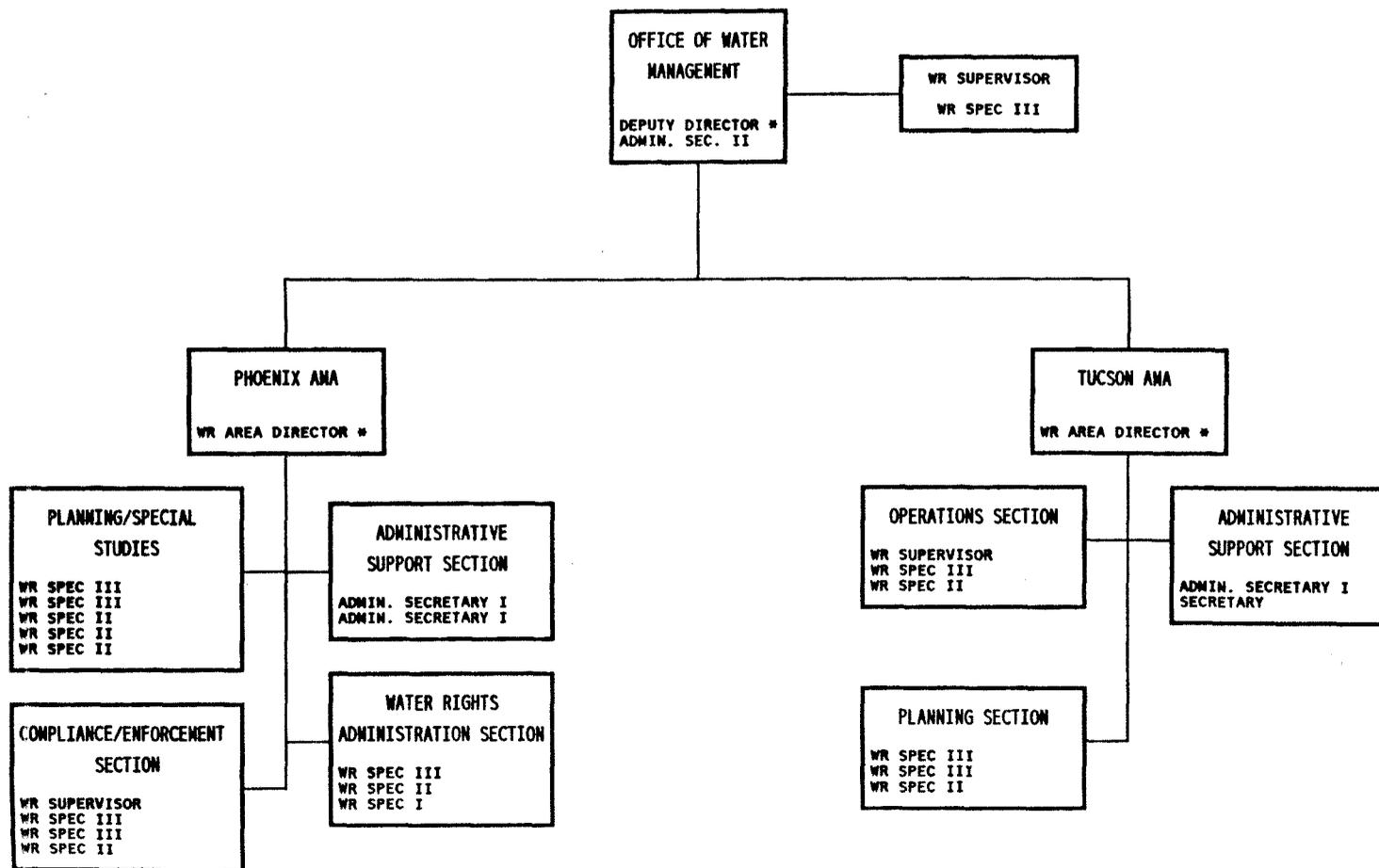
Who Should be Allowed to Negotiate Conservation Requirement

What Enforcement Options is DWR Going to Employ When Providers Exceed Water Use.

**OWM -- PLANNING/COMPLIANCE  
PHOENIX AND TUCSON AMA'S  
PROPOSED ORGANIZATIONAL STRUCTURE**

EXHIBIT 22

DWR - 46



\* EXEMPTED POSITION



## WATER MANAGEMENT SUPPORT DIVISION

### Current Situation

The Water Management Support Division which is in the Office of Water Management has two sections. One section is the Water Quality Section and the other is the Water Conservation Section. The Water Quality Section has one WR Supervisor, four WR Spec. IIIs, of which one is vacant, and one WR Tech II.

The Water Conservation Section has one Training Officer I and one secretary. The organization is shown in Exhibit 24, OWM – Water Management – Support Division.

The Water Quality Section has authority to operate under A.R.S. 45-105, A.R.S. 45-565, A.R.S. 45-576,577, and these statutes are tied in various ways to Water Quality. There is statutory authority regulating work associated with well construction, well spacing, regulation of groundwater recharge operations, and activities permitting water withdrawal.

The Water Quality Section processes approximately 10 - 15 permits for Poor Quality Groundwater Withdrawal annually. A Poor Quality Groundwater Permit can be issued to a non-irrigation user to withdraw poor quality groundwater if the groundwater to be withdrawn, because of its quality, has no other beneficial use at the present time. Permits are generally written by the Water Quality Section within the four AMAs, which permits outside the four AMAs are written by the Groundwater System Support Section in DWR's Operations Division.

The Water Quality Section also reviews approximately 73 permit applications for the Groundwater System Support Section and 75 - 100 DEQ permit applications annually. The DES permit applications are National Pollutant Discharge Elimination System (NPDES) Permits, Aquifer Protection Permits (APP), and Wastewater Reuse Permits (WRP). These are reviewed to insure compliance with Title 45.

Most of DEQ's permit applications are in Water Quality Assurance Revolving Fund (WQARF) and federal EPA contamination sites, many of which are hazardous waste sites and or landfills.

**Impact**

House Bill (HB) 2073, presently before the legislature, seeks exemption from any other permit process, other than what DEQ requires for on-site remedial action of contaminated sites. Passage of the bill will mean that the Water Quality Division and superfund sites, most of which are located within the four AMAs, would be exempt from Poor Quality Groundwater Permits. Water Quality Section in the Water Management Support Division.

If the Bill passes, it is not clear what this may mean for Poor Quality Groundwater Withdrawal permitting. A part of HB 2073 is shown on Exhibits 25, WQD Site Assignments, and Exhibit 26, House Amendments to HB 2073.

The permits reviewed by the DWR Water Quality Section are already reviewed by DEQ personnel. Sending the applications to DWR is a duplication of the review process. Since both DEQ and DWR are state agencies, this review process should not be duplicated. DEQ has a mandate in A.R.S. 49-303 that supersedes DWR on Water Quality Contamination issues. If the Poor Quality Groundwater Withdrawal Permit continues to be a viable instrument in "on-site" or "near-on-site" locations, DEQ personnel who play the lead role should review and issue these permits instead of DWR.

The permit applications (75) that the Water Quality Section in DWR review are Poor Quality (outside the four AMAs), General Industrial, Well Construction, and Well Spacing Dewatering, which are all issued by the Groundwater System Support Section in the Operations Division of DWR. This section in DWR could take over the review of the permits they issue.

According to our interviews the average review requires approximately 30 minutes.

- 75 reviews X .5 hours = 37.5 hours required to review permit applications for the Operations Division
- Reviewing DEQ permit applications for Title 45 compliance; 100 reviews X 1 hour = 100 hours
- Writing 15 permits (Poor Quality Groundwater Withdrawal) X 24 hours each = 360 hours

- 10 - 15 % of five FTE in the field and at meetings = five FTE X 1,675 productive hours = 8,375 total hours X .10 = 838 hours spent in field and meetings
- Totals are:
 

838.0 hours/five FTE =	168.0	hours per FTE in Field/meetings
360.0 hours/five FTE =	72.0	hours per FTE in permitting
100.0 hours/five FTE =	20.0	hours per FTE in review of DEQ permits
<u>37.5</u> hours/five FTE =	<u>7.5</u>	hours per FTE in review of Operation permits
1,335.5 hours/five FTEs =	<u>267.5</u>	hours per FTE Total (of 1,675 total productive hours).

**Recommendations**

We recommend the following activities:

- Negotiate with DEQ to handle Poor Quality Groundwater Permitting (PQGP) in and around Superfund and Water Quality Contamination sites, and all sites inside the four AMA, if HB 2073 passes. If the bill does not pass, then the Operation's Division could handle PQGP
- Negotiations be tied to the Hydrology Division Cooperative Agreement recommended earlier in Point "DEQ-DWR Water Quality Monitoring Coordination," and that the reporting also be tied to the Hydrology Division
- Eliminate one vacant WR Specialist III position
- Eliminate one WR Technician II, one WR Specialist III (both federally funded), one WR supervisor and one WR Manager position (all filled)
- Transfer two WR Specialist III positions to Operations Division to be used in the Groundwater System Support Section for permit review, Open Well Enforcement, and or in Surface Water adjudications for surface water diversion protest work activity

- Transfer one Training Officer I and secretary in the Water Conservation Section to the Planning Support Division. See Exhibit 27, OWM – Planning Support Division, for recommendations on the Planning Support Division.

### Benefits

The following benefits will be gained from this Recommendation:

- Eliminate duplication, (type of work activity)
  - Review of DEQ Permits
  - Two different agencies issuing permits in water and superfund sites
- Reduce the backlog of Surface Water rights protests going back to 1979
- Eliminate one vacant WR Specialist III, with cost avoidance of \$44,125
- Eliminate one WR Technician II, one WR Specialist III, one WR Supervisor, and one WR Manager I, with cost reduction of \$178,375
- Total savings of \$44,125 + \$178,375 = \$222,500 (State funds \$155,181; Federal funds \$67,319).

### Implementation

- Transfer two FTEs -- and train (Operations Division)
- Cooperative agreement DEQ
- Transfer two FTEs (Planning Support)
- Time frame: six months.



12/7/90

## WQD SITE ASSIGNMENTS

	MASON	GRANT	DAVE	KAREN
INDIAN BEND WASH-NORTH	L			S
PHOENIX-GOODYEAR AIRPORT	S	L		
TUCSON AIRPORT AREA	L	S		
HASSAYAMPA LANDFILL		L	S	
MOTOROLA 52ND ST			S	L
MOTOROLA MESA			S	L
APACHE POWDER COMPANY		S		L
WILLIAMS AFB		S	L	S
LUKE AFB			L	S
YUMA MARINE CORPS AIR STATION			L	S
HONEYWELL DVCP		L		S
HONEYWELL PEORIA		L		S
AANG - TUCSON	L	S		
DAVIS-MONTHAN AFB			L	S
FT. HUACHUCA		S	L	
GTE TEMPE			L	S
19TH AVENUE LANDFILL	S	L		
NORTHWEST SERVICE CENTER		L		S
27TH AVENUE LANDFILL	S	L		
16TH STREET LANDFILL	S	L		
INDIAN BEND WASH - SOUTH		L		S
CASA GRANDE PESTICIDE		L		S
WEST CENTRAL PHOENIX		L		S
ESTES LANDFILL		S	L	
SOUTH MESA WQARF			L	S
NAVAJO ARMY DEPOT			L	S
YUMA PROVING GROUND		S	L	
161ST AIR REFUELING GROUP		S	L	
NORTHEAST MESA WQARF			S	L
MIDDLE GILA-PAINTED ROCK STATE PARK				L
HEXCEL WASTE DUMP	S			L
WEST VAN BUREN WQARF	S		L	
MIRACLE MILE WQARF	L			S
EAST WASHINGTON WQARF (EASTLAKE PARK)	S			L
EAST CENTRAL PHOENIX WQARF			S	L
TRI-CITIES LANDFILL			S	L
EAST BROADWAY LANDFILL WQARF	S			L
LOS REALES LANDFILL WQARF	S			L
PIMA COUNTY LANDFILLS	S			L
GABRIELLI PROPERTY	S			L

L = LEAD  
S = SUPPORT

1 unreasonably fails to comply with an order issued pursuant to subsection E  
2 of this section. The attorney general, at the request of the director,  
3 may commence an action in superior court to recover civil penalties  
4 provided for in this subsection. In determining the amount of a civil  
5 penalty under this subsection, the court shall consider:

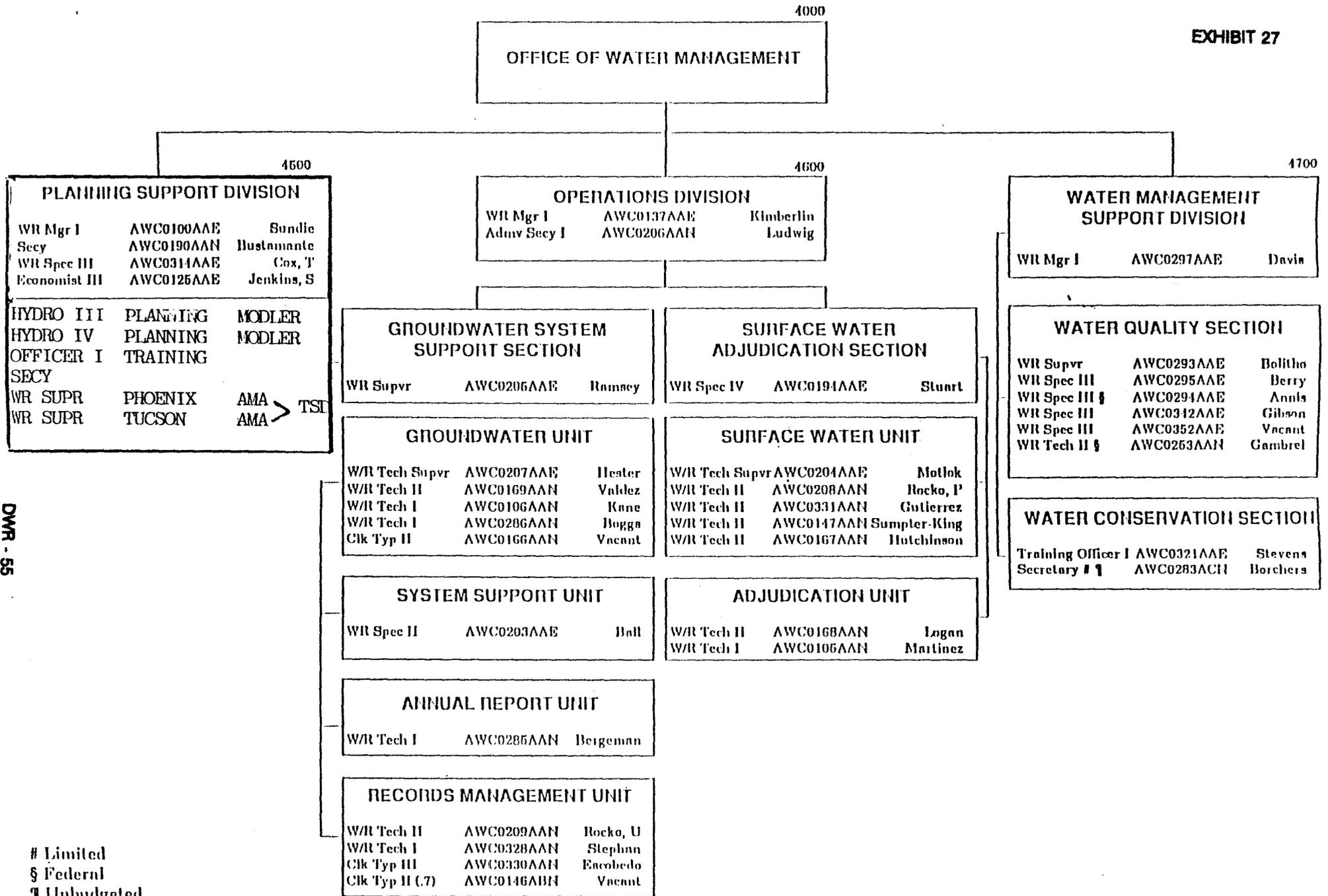
- 6 1. The seriousness of the act of noncompliance under this section.
- 7 2. As an aggravating factor only, the economic benefit, if any,  
8 resulting from the act of noncompliance under this section.
- 9 3. Any history of such violation.
- 10 4. Any good faith efforts to comply with the order.
- 11 5. The economic impact of the penalty on the person.
- 12 6. Such other factors as the court deems relevant.

13 H. Nothing in this section shall preclude the director from  
14 securing access or obtaining information in any other lawful manner.

15 Sec. 8. Title 49, chapter 2, article 5, Arizona Revised Statutes,  
16 is amended by adding sections 49-290, 49-291, 49-292, 49-293, 49-294,  
17 49-295 and 49-296, to read:

18 49-290. Exemption from permit requirements; definition

19 A. NOTWITHSTANDING ANY OTHER STATUTE, A PERSON WHO CONDUCTS ANY  
20 PORTION OF A REMEDIAL ACTION THAT IS APPROVED BY THE DEPARTMENT AND THAT  
21 IS CONDUCTED ENTIRELY ON SITE AND IN COMPLIANCE WITH THIS ARTICLE IS  
22 EXEMPT FROM ANY REQUIREMENT TO OBTAIN ANY STATE OR LOCAL PERMIT, APPROVAL  
23 OR OTHER FORM OF AUTHORIZATION THAT WOULD OTHERWISE BE REQUIRED FOR THE  
24 ON-SITE REMEDIAL ACTION. TO QUALIFY FOR AN EXEMPTION PURSUANT TO THIS



DWR - 55

# Limited  
 § Federal  
 ¶ Unbudgeted  
 \* Exempted Position

## MANAGEMENT INFORMATION SYSTEM

### Current Situation

In 1980 the Groundwater Management Act created the Department of Water Resources (DWR). An outside consultant was brought into DWR to evaluate the requirements of a Management Information System (MIS).

The consultant concluded that DWR needed their own Data Center. DWR secured appropriate justification through the Department of Administration (DOA). Subsequently, MIS ended up with three hardware systems, IBM, Prime, and NBI.

The data essential to DWR is gathered from the following divisions: Adjudications, Hydrology, the Active Management Areas (AMA) and Operations. The MIS portion of the Administrative Services Division contains 17 FTEs as shown on Exhibit 28, Office of Administrative Services -- Management Information Services (MIS) Division.

Staffing includes programmers, software maintenance, PC maintenance, geographic information system (GIS), and technical support.

### Impact

Approximately one year ago DWR's MIS Section acted on a decision to purchase new software (DB-II) for the IBM 4381. One reason was because the old software (CICS) was not user friendly. DWR has large volumes of data on CICS software. They also have approximately 80 PC's which have difficulty retrieving data from the IBM mainframe with CICS software.

Data conversion from the old CICS software to the new DB-II, programming will be required. With the current FTEs and assistance from outside consultants, it is estimated this will take three years. Estimated costs, including the programming fees and outside consultants, will be nearly \$500,000.

In another interview we were told that 80% of the time of the programming staff would be spent over the next 1 1/2 years using the DB-II software in the development of an electronic docket program for

Adjudications. Therefore while the estimate of cost isn't different for converting to DB-II from CICS, it would actually be 4 1/2 years before the huge volume of data could physically be converted, rather than three as stated earlier.

The MIS plan also calls for linking Prime which has GIS to the Prime which has GIS at the State Land Department, and providing PC work stations and PC networking, along with linking the network of PCs to DB-II on the IBM.

There are a substantial number of different Division and Section Managers, as well as other program people within DWR, who believe the work with DB-II should be suspended until a feasibility study is conducted. They also believe emphasis on work stations for Hydrology, Basic Data, Operations, Adjudications and Administration should become a priority. They would like to see LAN-connected work stations.

This group argues they cannot wait 18 months, let alone three or four years, to see these things come about. They also argue that PCs are more than capable of storing much of the data from the mainframe.

There are other issues. Adjudications would rather see existing effort and monies put into the networking (discussed above), and computer assisted drafting ("CAD"). The Adjudications Division has also developed a proposal for a change in direction of the MIS program in DWR.

### Recommendations

We recommend the following:

- Review DWR's MIS strategic plan, and reach agreement on priorities and performance requirements for each user group
- Review to be conducted with users input as well as the input of MIS
  - Review the proposal submitted by the Adjudications staff to the Deputy Director of Finance

### Benefits

- An MIS program within DWR which is responsive to the user's needs, and a program which can access outside sources as well
- Quantifications on benefits could be achieved through an MIS study, with costs/profits analysis.

### Implementation

Implementation should be achieved by:

- Conducting the above referenced study
  - Time frame: Two months
- Presenting the study to effected users
- Accomplish buy-in with users
- Obtain feedback of the users.

DWR - 59

1300

OFFICE OF ADMINISTRATIVE SERVICES		
Asst Director*	AWC0354AHE	Secndo Buckley
Admv Secy II	AWC0212AAN	

1300

Fiscal Services Division		
Fis Svs Spec V	AWC0156AAE	Crews

Accounting Section		
Acctg Supp Unit Supv	AWC0191AAN	Garza
Acctg Tech II	AWC0177AAN	McAuley
Acctg Tech II	AWC0244AAN	Thomas, S
Acctg Tech II	AWC0322AAN	Foley

Purchasing Section		
Buyer II	AWC0103AAN	Surface

Ancillary Service Section		
Admv Supp Supv	AWC0174AAN	Parkinson
Clk Typ III # 1	AWC0269ACN	Hivas
Drivers	AWC0129AAN	Schwartz (.5)
	AWC0129BAN	Vacant

Information Processing		
Admv Asst II	AWC0133AAN	Ynw Felix
Info Proc Spec II	AWC0213AAN	

Human Resource Division		
ASO I Pers Tech	AWC0257AAE	Trill O'Loughlin

Budget Division		
ASO II	AWC0172AAE	Weber

1400

MANAGEMENT INFORMATION SYSTEM DIVISION		
EDP Mgr II	AWC0182AAE	Vacant
Admv Secy I	AWC0102AAN	Tewa

System Support Processing		
EDP Sup Tech Spec II	AWC0140AAE	Post Billings
EDP Sup Tech Spec II	AWC0231AAE	Smith, R
EDP Prog/Anlyst II	AWC0216AAN	Yankovich
EDP Prog Anlyst I	AWC0329AAE	

Operation Section		
EDP Comp Opr Supvr	AWC0214AAE	LaBundy
EDP Comp Opr III	AWC0363AAN	Vacant

Administrative System Section		
EDP Sys Proj Ldr	AWC0216AAE	Peddy-Coart
EDP Prog/Anlyst III	AWC0131AAE	Volp
EDP Prog/Anlyst II	AWC0173AAN	Itedmond
EDP Prog/Anlyst II	AWC0230AAN	Heimer

Geographic Info/Scientific Section		
EDP Sys Proj Ldr	AWC0301AAE	Stapleton
EDP Prog/Anlyst II	AWC0176AAN	Maczugn

Remote Sensing		
EDP Prog/Anlyst III	AWC0316AAE	Elder

- # Limited
- \$ Federal
- U Unbudgeted
- \* Exempted Position

## LEGAL DIVISION

### Current Situation

In the Department of Water Resources (DWR), A.R.S. 45-104.G authorizes the Director to employ legal counsel to represent the Department with legal matters before other departments and agencies of Arizona.

Currently the DWR Legal Division is composed of 11 positions: one Chief Legal Counsel, one Assistant Chief Legal Counsel, three Attorney IVs, three Attorney IIIs, and three Legal Secretary IIs as shown in Exhibit 29, DWR – Legal Division, Present Organizational Structure.

The Chief Legal Counsel advises with the Director and writes decisions on the results of legal hearings conducted on DWR issues.

The Assistant Chief Legal Counsel is the lead attorney at the internal "in process review" meetings to review permit applications, and also assists in supervision of the legal staff. The balance of time for this position is spent writing Rules, and working with another attorney on groundwater recharge issues.

Activities of the other attorneys include enforcement, annual report, auditing of annual reports, litigation, review of internal agency matters, writing legislative packages, and drafting Rules.

### Impact

Exhibit 30, DWR – Legal Staff Annual Work Activity, shows the hours of work and the work activity conducted by the Legal Division. Drafting Rules is an activity that in nearly all other agencies originates within the programs. Rules may or may not be reviewed by a "legal" person before they enter the formal rule making process. The Rules drafting could be more decentralized to the programs within DWR, reducing the workload on the legal staff.

Some of the work activities listed on Exhibit 30, DWR – Legal Staff Annual Work Activity Estimate, have asterisks beside them. These activities, in addition to those already mentioned (Rules), will not require the same effort in the future as they are currently noted. For example, the 418 hours of conservation rewrite has been completed.

By combining these marked hours with the calculated surplus hours on the same Exhibit, there is a showing of approximately 2,181 hours of non-essential work activity, which translates to 1.3 FTE.

**Recommendations**

We recommend the following:

- Eliminate the vacant Attorney III position (see Exhibit 31, DWR -- Legal Division -- Proposed).

**Benefits**

The benefits to be realized from this recommendation include:

- Cost avoidance of one vacant Grade 22 Attorney III at \$53,000 (State funds).

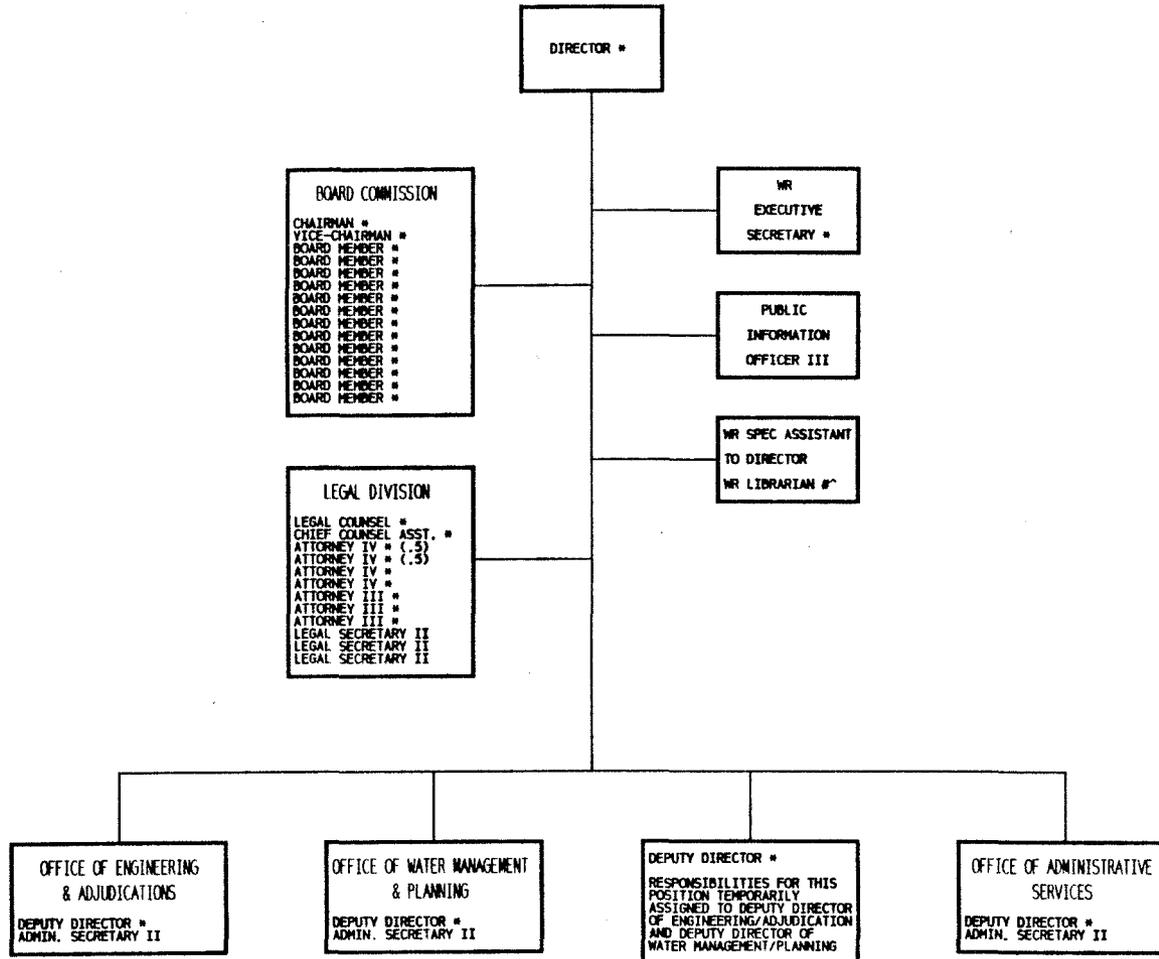
**Implementation:**

Implementation time frame can be accomplished in three months through the following steps:

- Action required to initiate termination
- Assignment of work activities.

ARIZONA DEPARTMENT OF WATER RESOURCES  
DWR -- LEGAL DIVISION  
PRESENT ORGANIZATIONAL STRUCTURE

EXHIBIT 29



DWR - 82

\* EXEMPTED POSITION  
# LIMITED  
- UNBUDGETED

DWR LEGAL STAFF ANNUAL WORK ACTIVITY ESTIMATE

(Excludes Chief and Assistant Chief Counsel)

<u>Position</u>	<u>Status</u>	<u>Work Activity</u>	<u>Hours Req'd</u>	<u>Surplus Hours</u>
Attorney IV	.5	Enforcement Hrngs Audits Stipulation Consent Orders Total:	192 hours 84 hours <u>324 hours</u> 600 hours	837.5 - 600 = 237.5 surplus
Attorney IV	.5	Written decisions Amended Rules Litigation Total:	270 hours 84 hours <u>415 hours</u> 773 hours	837.5 - 773 = 74.5 surplus
Attorney IV	1.0	* Conservation rewrite Administrative review Drafting legislation Surface water cases * Rule making Total:	418 hours 565 hours 251 hours 167 hours <u>251 hours</u> 1,652 hours	1675 - 1652 = 23.0 surplus
Attorney IV	1.0	Chief, Enforcement	1,600 hours	1675 - 1600 = 75.0 surplus
Attorney III	1.0	Surface Water enforce. Groundwater enforce. Recharge issues Legislation, draft * Rule package draft Total:	72 hours 500 hours 335 hours 251 hours <u>251 hours</u> 1,407 hours	1675 - 1404 = 266.0 surplus
Attorney III	1.0	Assured water supply * Rules, legal questions Review intern. Agency Enforcement * Environmental (PWQ) Total:	251 hours 335 hours 251 hours 502 hours <u>335 hours</u> 1,675 hours	no surplus
Attorney III	1.0	Vacant	[Hours not counted]	
TOTALS:			<u>7,709 hours</u>	<u>666 surplus hrs</u>

\* Additional potential savings = 1,255; combined surplus: 1,921 hours

(5 FTES X 1675 annual hours = 8,375 hours)

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