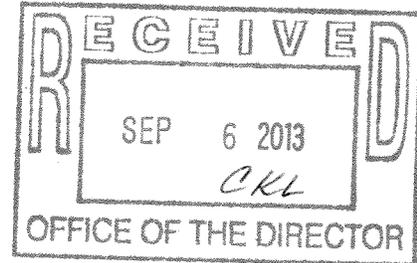




September 3, 2013

Sandy Fabritz-Whitney, Director
Arizona Department of Water Resources
3550 North Central Avenue
Phoenix, AZ 85012



Dear Sandy:

I am writing to express my concern with the negative affects that the Arizona Department of Water Resources (ADWR) enhanced aquifer management proposal would have on the Flowing Wells Irrigation District (District).

As you know, the District is fairly new to ADWR's Assured Water Supply (AWS) program. Deciding to apply for a designation required a large financial commitment on the part of our Board of Directors. We have participated in the recharge program each year and are currently recharging our full allocation of CAP water.

After raising our customer rates substantially to get to the point of acquiring the full allocation each year, it would be an added burden in tough economic times to ask them to pay more in additional rates to meet the demands of this proposal.

The District has worked with the other Northwest water providers for the past several years to develop a CAP treatment and delivery system for all of our service areas. The Northwest providers continue to explore options to reduce groundwater pumping. The Town of Oro Valley is currently delivering CAP and reclaimed water in its service area. The District is taking delivery of reclaimed water for some of its customers. The enhanced aquifer proposal would divert funds form these wet water delivery projects and move it to required additional recharge of CAP with no benefits to our rate payers.

Recent data show the Tucson Active Management Area (TAMA) to be at safe yield. The TAMA is at safe yield because municipal providers are already recharging more CAP water than they recover. It seems the proposal is attempting to fix a problem that does not exist. Any additional water recharged by the District would not provide any wet water benefit to the District or its ratepayers.

I believe the Tucson designated water providers have invested a lot to get the TAMA to safe yield and will continue to do what is needed to keep it there. This proposal will add nothing to that goal.

Yours truly,


David Crockett, Superintendent

cc: Jeff Tannler, TAMA Director

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