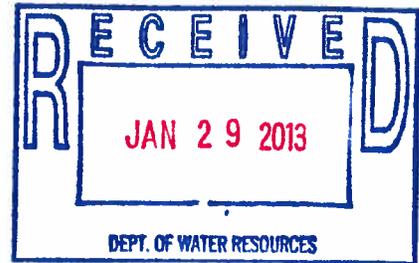




SOUTHERN ARIZONA WATER USERS ASSOCIATION  
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January 24, 2013

Scott Miller  
Arizona Department of Water Resources  
3550 North Central Avenue, Second Floor  
Phoenix, AZ 85012

**MEMBERS**

- Avra Water Co-op*
- BKW Farms*
- Community Water Company of Green Valley*
- FICU Farmers Water Co.*
- Flowing Wells Irrigation District*
- Green Valley Domestic Water Improvement District*
- Kal Farms*
- Town of Marana Municipal Water System*
- Metro Water District*
- Oro Valley Water Utility*
- Pima County Regional Wastewater Reclamation Department*
- Real Rock Utilities, LLC*
- Sahuarita Water Company*
- Town of Sahuarita Wastewater Treatment and Reclamation Facility*
- Tucson Water Department*

**Southern Arizona Water Users Association response regarding Enhanced Aquifer Management: Alternative Cut to the Aquifer Proposed by the Arizona Department of Water Resources**

The Southern Arizona Water Users Association (SAWUA) is concerned about the alternative cuts to the aquifer proposed by Arizona Department of Water Resources (ADWR). This could be a disincentive to future storage and use of renewable CAP Water and devalues renewable Central Arizona Project (CAP) Water. Some entities within SAWUA have built up their long-term storage credits (LTSC) for use in the future when shortages to M&I allocations occur. This proposal could reduce the amount of stored water available to those entities in the future, and water providers will need to replace those credits during a time when the water may not be available for purchase. This proposal will also change the value of LTSCs, depending on where they will be recovered.

SAWUA would appreciate some additional clarification on the implementation and consequences of the ADWR proposal:

- Will the proposed increased cuts to the aquifer apply to annual recharge and recovery which accounts for a large portion of renewable water resources used in the Tucson Aquifer Management Area (TAMA)? A 10% to 20% cut to the aquifer for annual storage and recovery could impose a loss in operational and capital expenditures to communities that have planned and constructed recharge and recovery infrastructure worth millions of dollars. These potential losses could discourage any further investment in recharge facilities or purchase of additional CAP renewable supplies.

**CONTACT INFORMATION**

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- Will the proposed increased cuts to the aquifer apply to the Arizona Water Banking Authority (AWBA) and/or Central Arizona Groundwater Replenishment District (CAGRDR)? The TAMA is currently at about 50% of its AWBA firming goal. Further reductions in credit availability will reduce the percentage of firmed water and probably increase the cost of those credits when a shortage affects M&I allocations in the future?
- Will the increased cut to the aquifer be retained to achieve Safe Yield in the TAMA, or will they be considered physically available groundwater for future Certificates or Designations of Assured Water Supply? If so, this could encourage growth outside of established service areas using renewable supplies and compound the problem of groundwater withdrawals unless new recharge facilities are constructed for CAGRDR replenishment.
- Does ADWR have or will it develop an adequate database and the appropriate staffing levels for the additional accounting this proposal will require for LTSCs? This could greatly complicate the management and reporting of water resources available for a community's use and long range planning.
- Will this proposal apply to wastewater effluent recharge? If so this could greatly reduce incentives to develop and store locally available renewable water supplies for future reuse. Many communities have taken costly steps toward fully utilizing wastewater that rely on recharge and recovery to manage this resource.

In conclusion, SAWUA members believe that the 5% cut to the aquifer should remain for accumulation of recharged long-term storage credits, and that annual recharge and recovery within the area of impact should remain at 0% cut to the aquifer. Any proposed cuts to the aquifer outside the area of impact for LTSCs should be balanced against measured water level changes in the community's service area. ADWR should consider that recovery of LTSCs outside the area of impact should receive no cuts (0%) in recovery areas where water levels are stable or rising.

Sincerely,



Chris E. Ward  
President, Southern Arizona Water Users Association  
SAWUA