**Southern Arizona Water Users Association**
**Enhanced Aquifer Management Proposal for the Tucson Active Management Area – March 19, 2014**

The Southern Arizona Water Users Association (SAWUA) would like to propose an alternative to the current Arizona Department of Water Resources (ADWR) enhanced aquifer management proposal for the Tucson Active Management Area (TAMA). With the increasing volume of renewable supplies being wheeled amongst SAWUA members, we feel the past hydrologic disconnect between storage and recovery locations has been greatly reduced. Other funded plans exist to increase wheeling to current and new participants. In addition, both a new recharge facility and utilizing a groundwater savings facility in the Green Valley area are being implemented that will be hydrologically connected to recovery in that area. Efforts are continuing to increase the utilization of Central Arizona Project water in the Northwest TAMA through recharge and recovery projects. Also, Southern Arizona has a long record and continued effort to deliver reclaimed water through Tucson, Oro Valley, Sahuarita and Metro Water's reclaim systems. These projects should have a positive impact on enhancing areas that the ADWR model shows increasing declines. Empirical data shows that water levels are rising in large parts of the TAMA. We feel that planned wheeling and recharge projects can stabilize other areas in the TAMA that are currently experiencing water level declines.

SAWUA believes that greater partnering among municipal providers has increased the use of renewable supplies throughout the TAMA; and therefore, is closing hydrologic disconnects in the TAMA and moving us faster to the goal of safe-yield. This has been accomplished by working within the current regulatory and policy framework.

For these reasons, SAWUA proposes for the TAMA the following:

- First, retain the current policies regarding the cut to the aquifer be left in place for the TAMA. Specifically, there should be no cuts to annual storage and recovery volumes for CAP water and effluent; no cuts to long term storage credits for effluent at constructed effluent recharge projects (GSF and USF); and only a 5% cut to the aquifer for long term storage credits for CAP water projects.
- Second, the application of the 5% cut to the aquifer should be by volume each year, or at the time of recovery. SAWUA feels that all cuts to the aquifer in the past and the future should be preserved for the aquifer and not be included in physically available groundwater for future Certificates or Designations of Assured Water Supply applications.
- Finally, SAWUA supports retention of effluent as eligible for recharge credits beyond 2025 and continuation of the remediated water exemption beyond 2025.

SAWUA members are working closely with ADWR to develop a better TAMA model projection out to 2025 as well as create a platform of consistent water-related data and information across multiple water accounting areas throughout the TAMA. We believe these efforts along with the above proposal will enhance the aquifer so that the TAMA will reach safe-yield; whereas, the ADWR proposal would dissuade the use of renewable supplies and hinder achieving safe-yield. Regarding the costs associated with the current ADWR proposal, there should be a closer look at what real impacts the increased cuts to the aquifer would have on safe yield. Any evaluation of success regarding measures taken to reduce hydrologic disconnections between storage and recovery, and ultimately safe yield, should be based on empirical data collected from production wells in the TAMA.

SAWUA is well aware of the challenges to close hydrologic disconnects in the TAMA. We have always been willing to partner with ADWR to make safe-yield a reality. With what we have achieved so far in Southern Arizona, we believe this proposal will only enhance the momentum to close hydrologic disconnects and for attaining safe-yield.