

Law Offices
of
Maureen Rose George, P.C.
2000 McCulloch Boulevard N., Suite B
Lake Havasu City, AZ 86403
E-mail: mrglaw1@frontier.com

March 24, 2015

VIA ELECTRONIC MAIL ONLY

Sharon M. Scantlebury
Docket Supervisor
Arizona Department of Water Resources
3550 North Central Ave
Phoenix, AZ 85012

RE: CAGRD 2015 Plan of Operation

Dear Ms. Scantlebury:

The comments below are submitted on behalf of the Mohave County Water Authority (MCWA):

1. MCWA appreciates the work which went into this plan and the public process to have input on same.
2. MCWA supports a proposed midterm adjustment to allow better reaction to actual CAGRD demand versus that forecasted and the idea of performance benchmarks.
3. MCWA is very concerned about CAGRD's proposed use of water from the mainstem of the Colorado River whether by lease, fallowing or transfer (all of which we consider transfers). More than half of Arizona's Colorado River allocation was moved off the mainstem with little if any consideration given to mainstem impact, other than on Yuma. MCWA recognizes the Plan, and CAWCD Board policy, call for analysis of, and sensitivity to, the area of origin but transfers impact the entire system, not just the area of origin. Any transfers, by whatever name, off the mainstem should only be done pursuant to a full and open public process on a statewide basis. These transfers are an effective reallocation of the Colorado River in Arizona, a policy decision which should be made in a broader forum and with all parties represented. The reference to 200,000 a/f of MSCP coverage available to CAGRD for transfers is also troubling since several transfers have already been made and/or are pending by other parties pursuant to that MSCP provision. Furthermore, reliance, even in part, on Colorado River supplies should include more discussion and analysis of shortage and structural deficit impacts.

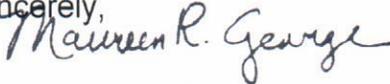
"As you drink the water, remember the spring."

- Chinese proverb -

4. Beyond the "Plan", MCWA supports analysis and discussion of whether this "replenishment" approach is sustainable over the long term.

Do not hesitate to contact me if you have any questions on the foregoing. Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Maureen R. George".

MAUREEN R. GEORGE
LAW OFFICES OF MAUREEN ROSE GEORGE, P.C.
GENERAL COUNSEL
MOHAVE COUNTY WATER AUTHORITY

c: MCWA Boardmembers