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April 7, 2015

Via U.S. Mail
and e-mail to: sscantlebury@azwater.gov

Thomas Buschatzke, Director
Arizona Department of Water Resources
3550 N. Central Ave.
Phoenix, Arizona 85012

**Re: Pulte Home Corporation's Comment on CAGR D's Proposed 10-
Year Plan of Operation (2015-2025)**

Dear Director Buschatzke,

I am writing this letter on behalf of Pulte Home Corporation ("Pulte"), a company that operates in a group of companies that include the brands Pulte, Centex and Del Webb. Pulte is both a developer and homebuilder with multiple residential projects in all three Central Arizona Project ("CAP") service area Active Management Areas (Phoenix, Pinal, and Tucson).

Pulte participated along with a diverse set of stakeholders in the Central Arizona Groundwater Replenishment District's ("CAGR D's") inclusive stakeholder process in development of the new Plan of Operation for 2015-2025. Data collected by CAGR D staff over the past 10 years of CAGR D and CAP operations, as well as data from other agencies, provided for a robust analysis of growth and water usage trends. The proposed Plan document and the supporting information submitted by CAGR D to the Department demonstrate a responsible approach that is consistent with the management goals of the Active Management Areas in which CAGR D operates for the next Plan period.

Pulte urges the Department of Water Resources to conclude, as we have, that CAGR D's proposed 2015-2025 Plan of Operation is consistent with achieving the CAP service area Active Management Area goals in accordance with A.R.S. § 45-576.03.

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RYLEY CARLOCK
& A P P L E W H I T E
Attorneys

Thank you for this opportunity to comment.

Sincerely,



Michele Van Quathem

c: Phil Turner, Pulte Home Corporation
Sharon Scantlebury, Docket Supervisor, ADWR
Dennis Rule, CAGR