

From: Doyle Wilson
To: [Sharon Scantlebury](#)
Subject: Lake Havasu City additional comments
Date: Wednesday, November 15, 2017 11:33:54 AM
Attachments: [LHC Additional Comments to ADWR 11-15-17.pdf](#)

Dear Ms. Scantlebury:

Lake Havasu City would like to submit additional comments about the pending Colorado River water lease agreement between the Central Arizona Water Conservation District and the Town of Quartzite. Lake Havasu City originally submitted comments on 11-13-2017 during the Arizona Department of Water Resources public meeting in Bullhead City.

Thank you very much.

Doyle Wilson

Doyle Wilson, Ph. D., RG
Water Resources Coordinator
Operations Department
1150 McCulloch, Blvd.
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Phone: (928) 855-2618



November 15, 2017

To: Arizona Department of Water Resources
Attn: Sharon Scantlebury, Docket Supervisor

Dear Ms. Scantlebury:

Lake Havasu City would like to submit the following additional comments to those already submitted to the Department, concerning the pending lease agreement for 1070 ac-ft of 4th Priority Colorado River water from the Town of Quartzite to the Central Arizona Water Conservation District.

- 1) The Central Arizona Project (CAP) receives, for beneficial use, all excess Colorado River water each year not allocated to other Arizona Colorado River contract holders. This includes the Town of Quartzite water allocation that has not been used by Quartzite since the assignment of its contract in 1999. The proposed lease agreement between Central Arizona Water Conservation District and Quartzite would accomplish the same thing. This agreement effectively does not add water to the CAP system. The Central Arizona Groundwater Replenishment District (CAGRDR) emphasizes that this water is needed to help meet state groundwater replenishment requirements. Since CAP already takes this water and this transaction agreement indicates that Quartzite will not need the water in the next 25 years, this precedent setting transaction is not necessary.
- 2) Further, comments made to ADWR during this comment period in Bullhead City on 11-13-2017 from Quartzite residents indicates that the citizenry of Quartzite, those directly affected by the consequences of this proposed transaction, have not been adequately informed by local officials or have been given extremely limited time to participate in an early comment process prior to town council approval of the lease.
- 3) The underlying problem as stated publicly by CAGRDR officials are provisions in the 1993 Groundwater Replenishment District Act, which requires the District, to replace within 3 years, an equal amount of groundwater that was withdrawn within each Active Management Area (AMA). Though replenishment must happen within the AMA from which groundwater was pumped, water may be transferred into the AMA from other areas. These provisions may hold the CAGRDR and the AMAs to a rigorous standard of safe groundwater yield, but over the long term may also set them up for failure if groundwater management practices in those areas are not

sustainable. This in turn forces them to look at other parts of the state, effectively penalizing those areas for the actions of central Arizona. CAGRDR has three other proposed transactions of mainstream Colorado River water transfer to central Arizona. The Quartzite lease is believed to be the "litmus test" for possible future mainstream to central Arizona transactions that will remove water originally designated by the state to remain on the river for future economic growth. Instead, the state legislature should re-examine and revise the pertinent statutes that force CAGRDR into this position.

Sincerely,

A handwritten signature in cursive script, appearing to read "Doyle Wilson".

Doyle Wilson, Ph. D., RG
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