



ARIZONA STATE LEGISLATURE
1700 WEST WASHINGTON
PHOENIX, ARIZONA 85007

April 29, 2024

Tom Buschatzke, Director
Arizona Department of Water Resources
1110 West Washington Street, Suite 310
Phoenix, Arizona 85007

RE: Comments on Proposed Rulemaking – Alternative Path to Designation of 100-Year Assured Water Supply (ADAWS)

Director Tom Buschatzke:

The proposed ADAWS Rules provide that grandfathered groundwater volume will be reduced by 25% of the new supplies. We are writing to strongly urge you to restore this volume to 30% as recommended by the Governor's Water Policy Council (GWPC).

The Phoenix AMA Groundwater Model, released in June 2023, projected an unmet groundwater demand of 4.86 maf over a period of 100 years. Due to this unmet demand, the state announced it will no longer approve new determinations of Assured Water Supply (AWS) within the Phoenix AMA based on groundwater supplies. In response to this moratorium, the GWPC developed ADAWS as an innovative way for Phoenix AMA water providers that are historically reliant on groundwater to obtain an AWS designation and to grow incrementally on alternative supplies, such as effluent, surface water, CAP water, and transported groundwater, while decreasing groundwater mining.

In ADWR's October 17, 2023, [PowerPoint Presentation](#) to the GWPC – Assured Water Supply Committee, it declared that the intent of the ADAWS 30% groundwater allowance was *"to strike a balance between the desire to support new growth and the need to reduce existing and approved groundwater use in the long-term to protect AMA residents from unmet groundwater demands, as otherwise projected in the model."* Further, ADWR stated it *"has not considered decreasing the 30% amount because the goal is to reduce reliance on groundwater."* Lastly, ADWR noted that *"[t]he 30% requirement would no longer apply once a provider could qualify for a designation under the traditional designation rules, which would mean the provider is no longer using groundwater or the model no longer shows unmet groundwater demand."*

For these reasons, we strongly support restoring the ADAWS grandfathered groundwater volume to 30% of the new supplies as recommended by the GWPC.

Sincerely,

A handwritten signature in black ink, appearing to read "Priya Sundareshan".

Priya Sundareshan
Senator, District 18

A handwritten signature in black ink, appearing to read "Christopher Mathis".

Christopher Mathis
Representative, District 18