



Docket Supervisor - ADWR <docketsupervisor@azwater.gov>

Submission of ADAWS Comments

1 message

Laura Grignano <lgrignano@cap-az.com>

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To: "docketsupervisor@azwater.gov" <docketsupervisor@azwater.gov>

Cc: Patrick Dent <pdent@cap-az.com>, "Landon W. Loveland" <lloveland@cap-az.com>, Adam Schwartz <aschwartz@cap-az.com>

For the record, my name is Laura Grignano. I am the Manager of the Central Arizona Groundwater Replenishment District (CAGRDR). I appreciate the opportunity to comment on the draft ADAWS rules during this informal portion of the Rulemaking process.

CAWCD staff have analyzed the impacts of the draft ADAWS rules from a policy and operational perspective and have identified the following impacts on CAGRDR. By intent of the ADAWS rules, these changes could shift a significant amount of CAGRDR's replenishment obligation from current Member Lands to new Member Service Areas (MSAs). A shift to MSAs would increase the amount of groundwater subject to the AWS rules and could result in higher CAGRDR replenishment obligations. The pace of growth in ADAWS MSAs will have a large impact on CAGRDR reliance, and the specific terms of the MSA agreements between CAWCD and the ADAWS water providers will also strongly affect the timing of obligation for those MSAs.

Any changes to the proposed rules related to the groundwater physical availability calculation, the groundwater allowance calculation, or the percentage of new alternative supplies required to reduce current groundwater pumping will require new analysis by CAWCD staff to determine impacts on CAGRDR.

Minimizing potential risks to CAGRDR's operations and finances will be critical as the Rulemaking process progresses. During this legislative session, CAGRDR worked closely with entities that may qualify for an ADAWS to give the water provider ample time to absorb the reporting and assessments of existing Member Land obligations. Any future CAGRDR MSA agreements with ADAWS applicants must ensure continued financial viability for CAGRDR.

Thank you.

Laura Grignano
CAGRDR MANAGER

O (623) 869-2113 **M** (520) 609-5430

E lgrignano@cap-az.com

L 23636 North 7th Street, Phoenix, Arizona 85024





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