

May 3, 2024

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

RE: Informal Rulemaking: Comments on the Alternative Designation of Assured Water Supply

Director Buschatzke:

The City of Buckeye is dedicated to responsible stewardship of our aquifer and fostering sustainable, long-term development within our community. The City's goal is to attain an assured water supply designation, enabling us to manage our own water resources. We appreciate the Arizona Department of Water Resources, the Water Policy Council, and the Governor's Office for their collaborative efforts in devising an innovative framework for achieving this designation. Buckeye remains steadfast in its commitment to identifying enduring water solutions that facilitate ongoing development and prosperity. With this in mind, we offer the following comments on the proposed rules for the Alternative Designation of Assured Water Supply (ADWAS).

Section R12-15-701. Definitions - Assured and Adequate Water Supply Programs

- **Section 53** - Include a volume of water that is not groundwater withdrawn from an AMA and has not been served with the service area of a public/private provider the calendar year **2023**, or the year preceding the application for designation. The current proposed ground water allowance based on 2021 would result in Buckeye starting the ADAWS in an approximately 15 percent groundwater deficit.

R12-15-710 Designation of Assured Water Supply

- **Section H** - The groundwater volume shall be reduced by no more than **fifteen** percent of the 100-year volume of each new alternative water supply included in the ADAWS.
- **Section I** – The percentage reduction to the new alternative water supplies should exclude effluent produced as a byproduct from an alternative supply that has already undergone a replenishment obligation prior to delivery.

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R12-15-711 Designation of Assured Water Supply; Annual Report Requirements, Review, Modification, Revocation.

- **Section G** - During the term of the designation, a provider may request an expedited modification to include a volume of groundwater if new physically availability groundwater is identified within the provider's service area.

The City of Buckeye is dedicated to working collaboratively on this process and we thank you for your consideration of these changes. Please do not hesitate to contact us if we can provide any additional information.

Sincerely,

Terry Lowe

Terry Lowe
Director, Water Resources Department
City of Buckeye