



CITY OF CASA GRANDE | STRONGER UNITED

510 E. Florence Blvd., Casa Grande, Arizona 85122
(520) 421-8600 | www.CasaGrandeAZ.gov

May 2, 2024

Arizona Department of Water Resources
1110 W. Washington Street, Suite 310
Phoenix, AZ 85007

Re: ADAWS and CAWS Rule Changes

Dear Director Buschatzke,

I am writing today to memorialize the comments I have provided at the open stakeholder meetings. I want to thank the Arizona Department of Water Resources (ADWR) for taking the initiative to develop these proposed and much-needed amendments to the Assured Water Supply Rules. As you are aware, the last Certificate of Assured Water Supply was issued in the Pinal AMA on July 15, 2011, nearly 13 years ago. The last issuance of any type of new Assured Water Supply determination was issued on August 10, 2015. Since October of 2019, landowners and communities in the Pinal AMA have been working with ADWR to resolve unmet demands in the Pinal AMA model which has been accomplished and awaiting approval by ADWR. The Phoenix AMA was informed of a similar issue on June 1, 2023. Less than a year later, ADWR proposed the ADAWS as a solution in the Phoenix AMA but did not offer the same solution in the Pinal AMA. The Pinal AMA must be able to take advantage of any and all paths to secure an Assured Water supply in the ADAWS.

The City of Casa Grande is one of the two largest cities in Pinal County with nearly 72,000 people. The primary water provider in Casa Grande is Arizona Water Company, who is the largest provider in Pinal County and happens to depend on Certificates of Assured Water supply. Starting in 2019, the City of Casa Grande and Arizona Water Company began developing a joint, living Water Resources Plan. From this Water Resources Plan came several key initiatives. Two of the strategies have already been implemented. In 2020, the City prepared its 2030 General Land Use Plan with water at the center of the Plan, including reusing 100% of the City's A+ effluent, as well as reducing per capita groundwater demand by 15%. The partnership also assembled a team to attend the Inaugural Growing Water Workshop in 2020 where we finalized the development of the SAVE IT Program. Casa Grande was the first Integrated Demand Management Plan program in the State. This program has been modeled throughout the State.

STRONGER UNITED

Founded in 1879, the mission of the City of Casa Grande is to provide a safe, pleasant community for all citizens.

The City's Wastewater Reclamation Facility currently produces six mgd (6,700 AF per year) of effluent annually, directly uses some of that water, and stores the remainder in a managed recharge project. The City is currently working in partnership with Arizona Water Company to develop strategic locations for storing effluent in various locations throughout the incorporated city limits. Casa Grande is currently experiencing an industrial boom and is expecting more than 20,000 new jobs in the next 20 years that will not only support the economy of Casa Grande but the entire State. These jobs bring with them the need to provide new housing to support that employment base.

Any potential options for securing an Assured Water Supply should be made available in the Pinal AMA. We are confounded as to why, after working with ADWR and spending hundreds of thousands of dollars to find a solution for Pinal since 2019, a solution would be offered by ADWR to the Phoenix AMA less than a year after the release of the Phoenix AMA model. ADWR should take the opportunity allow this public/private partnership to implement the sustainable Water Resources Plan and the goals and strategies outlined within which include "(1) obtain and maintain a diverse water supply, and (2) promote the efficient use of those water supplies. ...water supplies that are reliable and sustainable under a variety of hydrological and operational conditions.... That balances redundancy with affordable water prices."

Moreover, the Pinal AMA has very little M&I CAP Subcontracts. The only way for property owners in the Pinal AMA to realize any additional direct benefits from the tax dollars it pays to the Central Arizona Water Conservation District (CAWCD) is through the Central Arizona Groundwater Replenishment District (CAGR) offsetting groundwater pumping (i.e. replenishment). The idea that the CAGR is not capable of providing such services in the Pinal AMA but can continue to do so in the Phoenix AMA is as unacceptable to us as excluding the Pinal AMA from a potential path forward.

The City of Casa Grande is excited about the possibility of an ADAWS in our community. Thank you in advance for your consideration. Please feel free to contact me if you have any questions or concerns.

Respectfully,



Craig McFarland
Mayor

STRONGER UNITED

Founded in 1879, the mission of the City of Casa Grande is to provide a safe, pleasant community for all citizens.