



March 5, 2025

Re: Ag-to-Urban informal stakeholder process

I am writing to today on behalf of Audubon Southwest. At Audubon, we work with partners throughout Arizona to advance policies that improve Arizona's water outlook—for people and birds.

We appreciate the informal stakeholder process being led by the Arizona Department of Water Resources (ADWR) to gather feedback and information on the feasibility and utility of the "Ag-to-Urban" concept. As we understand it, the ag-to-urban concept explored in the ADWR informal stakeholder process would allow eligible agricultural lands within the Phoenix and Pinal Active Management Areas to retire their historic groundwater rights in exchange for physical availability credits utilized by Designated Water Providers to facilitate smart urban growth. The current analysis by ADWR demonstrates that under the parameters in discussion there would be groundwater savings over the long term with this program. Additionally, the program would allow growth to continue that upholds the consumer protections offered by the long-standing Assured Water Supply Program.

We recognize the economic importance of our urban areas, the need for affordable housing and places to work, and that it is essential for these developments to grow on reliable water supplies. We also recognize that this program could convert historic irrigated grandfathered rights to a lesser quantified volume of physical availability credits. For these reasons we support the proposed concept that this program applies to Designated Water Providers—those who have invested in the long-term water treatment and delivery of diverse water supplies for their service areas and can continuously prove a 100-year available water supply to accommodate growth. By applying this program to Designated Water Providers, all types of urban growth—commercial, industrial, and housing—are subject to groundwater replenishment requirements.

Given the water supply reality we face on the Colorado River, we must adapt. This concept allows for urban growth while respecting the intentions enshrined in the seminal Groundwater Management Act. It demonstrates that Arizona remains committed to securing water before growth while maintaining existing consumer protections.

Thank you for the opportunity to submit these comments on behalf of Audubon Southwest.

Sincerely,

*Haley Paul*

Arizona Policy Director | Audubon Southwest