



Ben Bryce <bbryce@azwater.gov>

Comments on ADWR's Ag to Urban Proposal Presented on February 26, 2025

2 messages

David Roberts <[REDACTED]>

Wed, Mar 5, 2025 at 8:14 AM

To: Ben Bryce <bbryce@azwater.gov>

Cc: Noel Carter <[REDACTED]>, Donovan Neese <[REDACTED]>

Ben -

Attached please find comments on ADWR's Ag to Urban Proposal presented on February 26, 2025. These comments are on behalf of the Buckeye Water Conservation & Drainage District and the Roosevelt Irrigation District. If you have any questions about these comments, please do not hesitate to contact me at 602-818-7747.


In addition to these comments, I also want to comment on the Department's premise in the proposal regarding the era of limits we face in the Phoenix AMA and more specifically on the current and future shortages on the Colorado River. It seems this issue is driving some of the Department's work on Ag to Urban and is certainly the basis for the reactions we see coming from AMWUA and its members. I certainly agree that Arizona is facing some challenges regarding its water supply from the Colorado River, and more specifically the supply available to the Central Arizona Project. Arizona actually should not be surprised about the limited supply of Colorado River water for CAP as this was predicted many years ago (1950s and 1960s) when the Bureau of Reclamation began its analysis of the available water supply for CAP. The projections then suggested that Arizona's long-term supply would be around 1,000,000 acre-feet, not the 1,500,000+ that was under contract in the past. That is also why nearly 500,000 acre-feet of the supply was allocated on a percentage of available supply basis and not a specific quantity.

While Arizona knew its long-term Colorado River supply was limited, it still took significant efforts to plan for these shortages by developing strategies and laws to store water underground for future use. Additionally, when the Assured Water Supply rules were put in place, the Department granted significant quantities of groundwater allowances, the vast majority of which apply to AMWUA members (4,300,000 acre-feet or so). In total, for the Phoenix AMA, the amount of water under these categories and available to be used by CAP customers (mostly AMWUA members) who find their supplies shorted is more than 9,000,000 acre-feet. Moreover, all of this water is already accounted for in the Phoenix AMA groundwater model. Accordingly, the use of this water to replace CAP supplies that are shorted, does NOT affect the amount of unmet demand as some I think believe.

I raise this issue to put into perspective where AMWUA members stand and specifically their concerns about ensuring an Ag to Urban program doesn't further impact the groundwater supplies in the AMA. None of those members are impacted by the Ag to Urban program and in fact they will be beneficiaries (just like the Water Bank benefitted them) because of the significant amount of groundwater that WILL be saved, particularly within AMWUA member service areas.

I agree that we are in a time of limits on our supplies (and hopefully soon we'll do more to augment supplies), but the fact of the matter is that Arizona planned for this by storing water and granting allowances and none of this affects our ability to meet our groundwater management goals. The unmet demand or over-allocation of groundwater in the Phoenix is the issue and a successful Ag to Urban program will fix that problem.

Dave

 **2025.3.5 Ag to Urban Comment Letter.pdf**
2779K

Ben Bryce <bbryce@azwater.gov>

Wed, Mar 5, 2025 at 10:27 AM

To: David Roberts <[REDACTED]>

Cc: Noel Carter <[REDACTED]>, Donovan Neese <[REDACTED]>

Thank you, Dave. We will carefully review these and reach out if we have any questions. I really appreciate the time you've spent with us on this project.

Ben Bryce | *Special Advisor to the Director*

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