



Howard Hughes Communities
9950 Woodloch Forest Drive
Suite 1100
The Woodlands, TX 77380

October 17, 2025

DOCKETSUPERVISOR@AZWATER.GOV

Arizona Department of Water Resources
Attn: Sharon Scantlebury, Docket Supervisor
1802 W. Jackson Street
Phoenix, Arizona 85007

Re: Support for CAGR D 2025 Plan of Operation

Dear Ms. Scantlebury:

Douglas Ranch Management Development Company LLC, a Delaware limited liability company (“DRMDC”), is developing, on behalf of Douglas Ranch Land Company, LLC, a Delaware limited liability company (“DRLC”), a master planned community in the City of Buckeye known as Teravalis. Howard Hughes Communities is an experienced large-scale community development company with deep roots and decades of experience in responsible water management and conservation. As a company involved in the subdivision process, we recognize the vital importance of the Central Arizona Groundwater Replenishment District (“CAGR D”) in providing an assured water supply for our developments based on the responsible and sustainable use of groundwater. DRMDC strongly supports the 2025 Plan of Operation submitted to the Department by the CAGR D dated August 12, 2025 (the “Plan”) for the Phoenix, Pinal and Tucson Active Management Areas (“AMAs”). DRMDC urges the Department to approve the Plan by determining that the Plan is consistent with achieving the management goal of each of the AMAs.

The Department should approve the Plan and issue a Consistency Determination for each AMA because:

- Over the past 30 years, CAGR D has consistently and timely met all of its replenishment obligations in each of the AMAs; and
- In the Plan itself, CAGR D has satisfied all of the statutory elements required for a Consistency Determination for each of the AMAs.

Thank you for the opportunity to comment on the Plan.

Sincerely,

Signed by:

Charley Freericks,
Vice President