



October 16<sup>th</sup>, 2025

[DOCKETSUPERVISOR@AZWATER.GOV](mailto: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:

Garrett Development Corporation is a real estate investment and development firm actively investing and developing large residential and commercial projects throughout the Southwestern United States. We are currently developing Westpark, a large master-planned community in Buckeye, AZ and we continue to invest in growth opportunities across the West Valley. 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. Garrett Development Corporation 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"). Garrett Development Corporation urges the Department to approve the Plan by determining that the Plan is consistent with achieving the management goal of each of the AMAs (a "Consistency Determination").

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;
- In the Plan itself, CAGR D has satisfied all of the statutory elements required for a Consistency Determination for each of the AMAs; and

Thank you for the opportunity to comment on the Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey D. Garrett", with a stylized, looping flourish at the end.

Jeffrey D. Garrett

President  
Garrett Development Corporation

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