



SOUTHERN ARIZONA WATER USERS ASSOCIATION
PO Box 35481
Tucson AZ 85740-5481

December 10, 2012

Ms. Sandra Fabritz-Whitney, Chairperson
Arizona Water Banking Authority
3550 North Central Avenue, Second Floor
Phoenix, Arizona 85012

RE: Draft AWBA 2013 Plan of Operations

MEMBERS

Aqua Water Coop

B&W Farms

*Community Water Company
of Green Valley*

FICO Farmers Water Co.

Flooding Wells Irrigation District

*Green Valley Domestic Water
Improvement District*

Kal Farms

*Town of Marana Municipal
Water System*

Metro Water District

Oro Valley Water Utility

*Pima County Regional Wastewater
Reclamation Department*

Red Rock Utilities, LLC

Sahuarita Water Company

*Town of Sahuarita Wastewater
Treatment and Reclamation Facility*

Tucson Water Department

CONTACT INFORMATION

Mary Bauer, Executive Assistant
(520) 406-2229
marybauer@gmail.com

Stuart Goodman, Capitol Lobbyist
(602) 277-0911
sgoodman@goodmanschwartz.com

Dear Ms. Fabritz-Whitney:

The Southern Arizona Water Users Association (SAWUA) appreciates the continued support given by the Arizona Water Banking Authority (AWBA) to develop viable plans for achieving the M&I firming water goals in the Active Management Areas (AMAs). A concern of SAWUA members is whether the AWBA will be able to fulfill the M&I firming water goal within the Tucson AMA in light of reductions in the availability of Excess CAP water in 2013.

SAWUA believes the reduction in Excess CAP water is a trend that AWBA needs to assess. If the M&I firming goal in the Pinal AMA (243,000 acre-feet) and Phoenix AMA (1,566,000 acre-feet) has been reached then Excess CAP water should be redirected to other unfilled AWBA goals. Table 7 from the draft 2013 Plan of Operations notes that the Pinal AMA will be at 83% of the M&I firming goal through 2013 with 200,551 acre-feet of credits earned by the Ad valorem tax and at 400,164 acre-feet if Groundwater Withdrawal credits are utilized. The combined credits would equate to 247% of the M&I firming goal for the Pinal AMA. The Phoenix AMA would be at 101% of the M&I firming goal if both the Ad valorem tax and Groundwater Withdrawal fees are used through 2013. More notably, the TAMA will only be significantly short of its goal with only 54% of its M&I firming goal.

AWBA initial draft Plan had 29,000 acre-feet of Excess CAP water storage in the TAMA for M&I firming. The revised draft Plan now has 16,784 acre-feet. SAWUA does not support this large reduction given there are sufficient funds for M&I firming in the TAMA and given the remaining amount of M&I firming required for the TAMA.

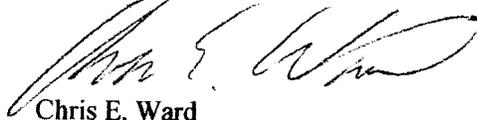
At the November TAMA GUAC meeting, AWBA staff explained that priority is given to storing at Groundwater Saving Facilities (GSF) because the water is directly being used in agricultural activities. This is why with the reduction of Excess CAP water, the amount of water for the Pinal AMA had not changed from the initial draft Plan. While we appreciate the emphasis given GSF storage, SAWUA believes an equal, or even higher priority, ought to be given to meeting the M&I firming goal in the Tucson AMA, especially if the funds exist from the Tucson AMA for such storage. AWBA staff has acknowledged that the AWBA will not be able to meet the firming goal for the Tucson AMA, which is all the more reason that as much of the available Excess water ought to be used to meet that firming goal.

Advancing long-term quality water for Southern Arizona

© 2012 SAWUA, Inc.

We trust that AWBA will make certain that the promise of achieving the M&I firming needs of all of the CAP M&I subcontractors is achieved in an equitable and timely manner.

Sincerely,



Chris E. Ward
President

c: John Mawhinney
Lisa Atkins
Cliff Neal
Maureen George
Virginia O'Connell ✓
Val Little
Jeff Biggs
Leo Leonhart
Dan M. Offret
Kathleen Ferris