

# ROOSEVELT WATER CONSERVATION DISTRICT

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## Via E-mail & US Mail

February 28, 2014

Central Arizona Water Conservation District  
Resources Planning and Analysis Department  
Attention: Laura Grignano  
P.O. Box 43020  
Phoenix, AZ 85080  
lgrignano@cap-az.com

Re: Comments, Joint Recovery Plan

Ms. Grignano:

As the General Manager for Roosevelt Water Conservation District (RWCD or the District), I am writing in response to the request for comments on the draft plan titled "Recovery of Water Stored by the Arizona Water Banking Authority" (the "Joint Recovery Plan"), which was jointly developed by the Central Arizona Project, the Arizona Water Banking Authority, and the Arizona Department of Water Resources.

The Joint Recovery Plan identifies RWCD as a potential third party recovery partner. The District submits these comments to confirm RWCD's interest in and willingness to serve as a recovery partner. As stated in the Joint Recovery Plan, RWCD has a strategically located regional water delivery system. RWCD's service area covers approximately 40,000 acres in the east valley and the District maintains existing connections with the Gila River Indian Community, Salt River Project, and the CAP canal. RWCD's entire service area is also a permitted ground water savings facility (GSF) and a majority of its wells are permitted recovery wells. As a GSF, RWCD has stored close to one million acre-feet in the Phoenix AMA, including 58,757 acre-feet of long-term storage credits for the AWBA. Given RWCD's extensive and well-maintained physical infrastructure, RWCD is uniquely situated to serve as a third party recovery partner.

RWCD's recovery well permit (Permit No. 74-216372.0000) authorizes us to use 43 wells to recover stored water. These wells are part of RWCD's current operating system and, as such, are well-maintained. Additionally, RWCD's wells are large production wells that have the capacity to provide the flexibility and certainty needed to meet recovery goals and obligations as they may vary over time.

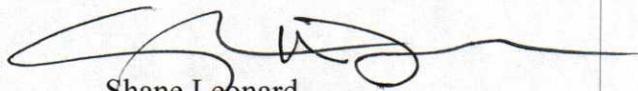
Furthermore, RWCD's existing physical connection to the Gila River Indian Reservation (GRIC) also makes RWCD a valuable third party recovery partner. As the Joint Recovery Plan points out, the Arizona Water Settlement Act requires the State to firm 23,724 acre-feet of NIA Priority Water, 15,000 acre-feet of which is to be firmed on behalf of GRIC. RWCD's connection to the GRIC could facilitate the recovery and delivery of stored water to meet this firming obligation. In fact, the Bureau of Reclamation has been storing CAP water at RWCD's GSF for several years in order to develop the water needed to satisfy the federal government's corresponding firming obligations. RWCD and the Bureau have begun discussing recovery plans for this water. RWCD has the capacity to work with both state and federal parties to ensure timely recovery for Indian firming purposes whenever the need may arise.

In addition, RWCD's connection with GRIC could also provide additional flexibility to CAWCD in other recovery scenarios. For example, RWCD could recover long-term storage credits for delivery to GRIC, GRIC could then reduce its CAP water order by a corresponding amount, and CAWCD could, in turn, deliver the extra CAP water to its other CAP subcontractors. In such a scenario, RWCD could recover any amount of the 58,757 acre-feet of AWBA long-term storage credits already stored in RWCD's GSF or, potentially, recover AWBA credits stored at the Granite Reef Underground Storage Project, located immediately north of RWCD.

For the reasons stated above, the District welcomes future discussions between the cooperating agencies and RWCD to evaluate our potential role in future recovery efforts and to consider entering into a recovery agreement to establish such a role.

The District thanks the agencies for their continued efforts to plan for the State's future water needs and for the opportunity to comment on the Joint Recovery Plan. RWCD looks forward to working with CAP, ADWR and AWBA to assist in future recovery efforts.

Respectfully,

A handwritten signature in black ink, appearing to read 'Shane Leonard', with a long horizontal flourish extending to the right.

Shane Leonard  
General Manager