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**METROPOLITAN
DOMESTIC
WATER
IMPROVEMENT
DISTRICT**
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December 9, 2009

Kim Mitchell, Manager
Arizona Water Banking Authority
3550 North Central Avenue
Phoenix, Arizona 85012

Re: Draft 2010 Plan of Operation

Dear Ms. Mitchell:

Thank you for the opportunity to comment on the Draft 2010 Annual Plan of Operation for the Arizona Water Banking Authority (AWBA). As a public water provider who is actively recharging CAP water and involved with regional water resources management within the Tucson Active Management Area (AMA), the Metropolitan Domestic Water Improvement District (District) requests our comments be incorporated into the final plan. Our comments are the following:

1. On Page 3, the volume of 2.81 MAF in the first full paragraph under 2009 Plan of Operations does not match the total volume of 2.84 MAF listed on Figure 1. If space is available in the 2011 Plans and beyond, the AWBA should include a greater number of years on Figures 1, 2 and 3, such as the last five years instead of 3 years for trend analysis.
2. Under Available Funds on Page 7, last paragraph, last sentence, suggest clarifying why the funds are needed, such as "for meeting M&I firming goals by 2019."
3. On Table 2, please either remove the interstate designation for recharge facilities or note all recharge facilities with an interstate designation. Additionally, the text on Page 7 under "Available Storage Facility Capacity" notes that AWBA has sufficient capacity to meet any new storage needs if additional supplies become available. A new column should be included on Table 2 adjacent to Permitted Capacity to reflect the available capacity to AWBA. If additional supplies were made available, the information would prove valuable for stakeholder input and provide transparency for decisions on intrastate and interstate storage.
4. The District strongly recommends the section on Page 11 regarding CAWCD Recovery be amended. The section needs to clarify that the current plan is prepared by CAWCD staff and not endorsed as policy by the CAWCD Board. At the most recent CAWCD Board meeting, the plan recommendation on indirect recovery and credit exchange did not receive favorable comments or support by CAWCD Board members.

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5. The District appreciates the decision by AWBA to have differential pricing for groundwater savings facilities in the Tucson AMA compared to the Phoenix and Pinal AMA's. The decision for a lower cost share in the Tucson AMA will significantly help the AWBA meet its M&I firming goal in the Tucson AMA.
6. It would be helpful if Table 6 under Interstate included the breakdown by AMA on how many credits have been stored from the 595,620 acre-feet.

Again, thank you for the opportunity to comment on the draft plan. Please call me at (520) 575-8100, if you have any questions on my comments.

Sincerely,

A handwritten signature in black ink that reads "Michael Block". The signature is written in a cursive style with a large, looping initial "M".

Michael W. Block
District Hydrologist

MWB/mwb

c: Warren Tenney