



November 27, 2018

Virginia O'Connell, Manager
Arizona Water Banking Authority
1110 W. Washington, 4th Floor
Phoenix, Arizona 85007

Dear Ms. O'Connell,

The Arizona Municipal Water Users Association (AMWUA) submits the following comments in response to the Arizona Water Banking Authority's (AWBA) request for comments on its draft AWBA 2020 Annual Plan of Operation:

The Annual Plan should acknowledge the AWBA's participation as one of the three agencies leading the Recovery Planning Advisory Group (RPAG) effort. The successful recovery of credits acquired by the AWBA is critical to our members and other stakeholders who possess M&I subcontracts for Colorado River water. The RPAG process is crucial for developing certainty for stakeholders as to how recovery will be executed during shortages. AWBA should denote in the Annual Plan its continued involvement in recovery planning.

The Annual Plan frequently refers to the AWBA's firming goal and includes Table 5 to show the progress expected to meet the AWBA's goals and obligations in 2020. Since its inception, the AWBA has been pursuing these firming goals. Nevertheless, the Annual Plan acknowledges up front that, "The role of the AWBA has changed considerably since its inception in 1996." The AWBA should consider initiating a discussion of whether the AWBA's firming goals remain appropriate for the AWBA to pursue. Setting aside the AWBA's tribal and other obligations, the AWBA should have a conversation in 2020 with the water community about whether the firming goals should be modified and if they remain the AWBA's primary goal considering the importance of ensuring the recovery of stored credits in the near future.

My staff and I are happy to provide any additional explanation or clarification if necessary.

We appreciate your consideration of these comments.

Sincerely,

A handwritten signature in blue ink that reads "Warren Tenney". The signature is written in a cursive style and is positioned above the printed name and title.

Warren Tenney
Executive Director

Arizona Municipal Water Users Association