



September 27, 2016

Ms. Virginia O'Connell, Manager
Arizona Water Banking Authority
3550 North Central Avenue, Second Floor
Phoenix, Arizona 85012

Re: Comments on Draft Storage Facility Inventory

Dear Ms. O'Connell:

Thank you for the opportunity to comment on the Draft Storage Facility Inventory for the Arizona Water Banking Authority (AWBA). Metropolitan Domestic Water Improvement District (District) supports AWBA's recommendation to include recharge facilities that are permitted to store effluent.

The AWBA has helped contribute towards meeting the CAP M&I Firming goal for the Tucson Active Management Area (TAMA) and has established a storage priority system for recharging at TAMA recharge facilities with recovery capabilities. The District recommends AWBA's Storage Facilities Inventory include recovery capability, since recovery will be more imminent for AWBA and CAWCD as CAP shortages loom in the near future. An additional column in Table 1, Appendices A and B could accomplish this task as well as discussion in the Background and Conclusions.

The District's planned CAP Recharge, Recovery and Delivery System (RRDS) will be capable of recovery CAP water in the Marana area from two underground storage projects and two groundwater savings projects where AWBA has stored CAP water. Additionally, CAP RRDS will be able to recover effluent from the managed recharge project.

On Page 3, please add Cortaro-Marana Irrigation District Groundwater Savings Facility and BKW Farms Groundwater Savings Facility to the last sentence of the third paragraph. These facilities as noted in Appendix B also include effluent as permitted source water.

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

Sincerely,

A handwritten signature in blue ink that reads "Michael Block". The signature is fluid and cursive, with a large initial "M".

Michael W. Block
Water Resources Manager

MWB/mwb

c: Joseph Olsen, General Manager, MDWID
Laura Grignano, Senior Policy Analyst, CAWCD