

1                                   **ARIZONA DEPARTMENT OF WATER RESOURCES**  
2                                   **BEFORE THE DIRECTOR**

3   **IN THE MATTER OF THE CENTRAL            )    DECISION AND ORDER**  
4   **ARIZONA GROUNDWATER                    )    DETERMINING THAT PLAN OF**  
5   **REPLENISHMENT DISTRICT’S PLAN         )    OPERATION IS CONSISTENT WITH**  
6   **OF OPERATION FOR THE PINAL             )    ACHIEVING THE MANAGEMENT**  
7   **ACTIVE MANAGEMENT AREA                )    GOAL OF THE PINAL ACTIVE**  
8   **SUBMITTED ON DECEMBER 30, 2024        )    MANAGEMENT AREA**  
9                                   **\_\_\_\_\_  )**

10                   **I.       INTRODUCTION**

11           On December 30, 2024, the Central Arizona Groundwater Replenishment District  
12   (“CAGRD”), a division of the Central Arizona Water Conservation District (“CAWCD”),  
13   submitted to the Arizona Department of Water Resources (“Department”) its 2025 Plan of  
14   Operation (“Plan”) pursuant to A.R.S. § 45-576.02(C)(2). The Plan describes the activities that  
15   CAGRD proposes to undertake for the Phoenix, Pinal, and Tucson Active Management Areas  
16   (“AMAs”) during the 100 years following submission of the Plan. By letters dated February 28 and  
17   July 1, 2025, the Department determined there was not sufficient information to determine whether  
18   the Plan would be consistent with the management goals of the AMAs and requested additional  
19   information. CAGRD responded to those requests on May 21 and September 9, 2025, respectively,  
20   with revised versions of the Plan. In accordance with A.R.S. § 45-576.03(K), the Department held  
21   public hearings on the Plan in Pinal and Tucson on October 9, 2025, and in Phoenix on October 10,  
22   2025. The hearing record remained open until October 17, 2025, at 5:00 p.m. for the submission of  
23   written comments.

24           The Director of the Department (“Director”) is required by A.R.S. § 45-576.03(M) to issue  
25   a decision for each of the three AMAs determining whether the Plan is consistent with achieving  
26   the management goal of each respective AMA. The Director must include findings with the decision  
27   and a summary of all public comments received in writing and made at the public hearings held  
28   with respect to this matter.

29           As provided in A.R.S. § 45-576.03(N), the Director must determine that the Plan is

1 consistent with achieving the management goal for each AMA if all the following have been  
2 demonstrated:

3 A. CAGRD has identified sufficient water supplies to meet its replenishment  
4 obligations for current members during the 20 calendar years following submission of the Plan and  
5 has identified additional water supplies potentially available for its projected groundwater  
6 replenishment obligations for the 100 calendar years following submission of the Plan for current  
7 members and potential members based on reasonable projections of real property and service areas  
8 that could qualify for membership in the 10 years following submission of the Plan.

9 B. The replenishment reserve target for each AMA was calculated as prescribed in  
10 A.R.S. § 48-3772(E), and CAGRD is developing a replenishment reserve in each AMA pursuant  
11 to A.R.S. § 48-3772(E).

12 C. CAGRD has identified sufficient capacity at storage facilities and projects to be used  
13 for replenishment purposes during the 20 calendar years following submission of the Plan.

14 D. CAGRD has made a reasonable estimate of its projected replenishment obligations  
15 for the 100 calendar years following submission of the Plan as required by A.R.S. § 45-  
16 576.02(C)(2)(b).<sup>1</sup>

## 17 II. SUMMARY OF PUBLIC COMMENTS

18 No oral comments were made at the public hearings conducted in connection with the Plan.  
19 The Department received written comments which are summarized below.

20 The Department received supportive comments from: Arizona Municipal Water Users  
21 Association; Maricopa-Stanfield Irrigation and Drainage District; Central Arizona Irrigation and  
22 Drainage District; Garrett Development Corp.; DMB Associates, Inc.; Buckeye Tartesso, LLC.;  
23 and Douglas Ranch Management Development Company, LLC.

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25 <sup>1</sup> The analysis of the projected replenishment obligation in this Decision and Order is based on the  
26 statute in effect as of September 26, 2025.

1 On October 30, 2025, pursuant to A.R.S. § 45-576.03(L), CAGRD responded to those  
2 supportive comments and provided a revised Table 6.1: Available AMA Storage Capacity  
3 (Attachment A).

### 4 III. FINDINGS

5 After reviewing the Plan and public comments received during the public comment period,  
6 the Director makes the following findings:

7 A. CAGRD has identified sufficient water supplies to meet its replenishment obligations for  
8 current members in the Pinal AMA during the 20 calendar years following the submission  
9 of the Plan.

10 1. CAGRD has estimated its replenishment obligations for current members during the 20  
11 years following submission of the Plan, culminating in a total obligation of 83,600 acre-  
12 feet for the year 2044 for all three AMAs. For the Pinal AMA only, CAGRD has  
13 estimated that its replenishment obligation for current members will be 4,900 acre-feet  
14 for the year 2044.

15 2. CAGRD has identified an average of 38,495 acre-feet per year over 100 years of  
16 “secured” supplies, identified in Table 4.1 of the Plan, which it plans to use to meet its  
17 replenishment obligations in all three AMAs.<sup>2</sup> This amount includes 3,172 acre-feet per  
18 year averaged over 100 years of Long-Term Storage Credits (“LTSCs”) located in the  
19 Pinal AMA.

20 3. In addition to these “secured” supplies, CAGRD has identified between 303,500 and  
21 780,850 acre-feet per year of additional supplies that CAGRD states are currently  
22

23  
24  
25 <sup>2</sup> By letter dated February 28, 2025, the Department requested that CAGRD remove the Non-  
26 Indian Agricultural (“NIA”) Priority Central Arizona Project water due to the uncertainty of  
future availability. CAGRD did so in its response.

1 available and likely to be used to meet its 20-year replenishment obligation for current  
2 members within all three AMAs.<sup>3</sup>

- 3 4. With respect to CAGRD's obligation to identify supplies to meet its replenishment  
4 obligations for current members during the 20 years following submission of the Plan,  
5 CAGRD is not required to demonstrate that it has already acquired all the supplies needed  
6 to meet its projected replenishment obligations. Instead, CAGRD may identify supplies  
7 which are likely to be available for acquisition by CAGRD for purposes of satisfying its  
8 replenishment obligation for current members during the 20 years following submission  
9 of the Plan. These must be supplies which are not presently subject to legal or  
10 administrative barriers preventing their acquisition and use for replenishment purposes  
11 during that 20-year period. In its review of the 2025 Plan of Operation, the Department  
12 reviewed the low estimates of supplies that are likely to be available to CAGRD to provide  
13 a conservative review of whether the Plan is consistent with the management goal of each  
14 AMA.

15 **B. Long-Term Storage Credits**

- 16 1. Beyond the amounts of "secured" supplies listed in Table 4.1 of the Plan, CAGRD has  
17 identified between 14,200 and 49,600 acre-feet per year of LTSCs within the AMAs as  
18 being available for replenishment purposes during the 20 years following the submission  
19 of the Plan with between 4,400 and 9,500 acre-feet per year of LTSCs that could be  
20 available to CAGRD. CAGRD defines LTSCs for this purpose as any existing LTSC not  
21 currently owned (or subject to an existing purchase agreement) by CAWCD, CAGRD, or  
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23 <sup>3</sup> Some of the supplies identified by CAGRD may require consultation with or review by the  
24 Director, including a recommendation to the Secretary of the Interior or issuance of a permit or  
25 other license. Nothing in this Decision and Order reflects the necessary consultation, review, or  
26 approval required by law. The Director will consider such matters upon submittal of the  
appropriate request(s) or application(s).

1 the Arizona Water Banking Authority, and not currently pledged to a Designation of  
2 Assured Water Supply. CAGR D has calculated an annual available supply of existing  
3 LTSCs by dividing the total number of LTSCs by available 100 years.

4 2. While LTSCs will be available in all three AMAs, only those LTSCs which are located  
5 within the Pinal AMA should be included for purposes of CAGR D's identification of  
6 supplies available to meet its 20-year replenishment for current members in the Pinal  
7 AMA. For LTSCs in one AMA to be available for replenishment purposes within another  
8 AMA, water would need to be recovered and physically transferred to the other AMA.  
9 This most likely means that the water would need to be transported though the CAP canal,  
10 or "wheeled." Wheeling of such water would require an agreement between the U.S.  
11 Bureau of Reclamation and CAWCD, which has yet to be executed. Because LTSCs  
12 located in the Phoenix and Tucson AMAs are presently subject to a legal and/or  
13 administrative barrier which would prevent their physical transfer to the Pinal AMA, they  
14 may not be included in CAGR D's calculation of supplies available to meet its 20-year  
15 replenishment obligation for current members in the Pinal AMA.

16 3. CAGR D identified 316,500 LTSCs in the Pinal AMA. However, those are used  
17 exclusively for the GRIC-CAP exchange agreement and CAGR D does not consider those  
18 available to meet its replenishment obligation. Nevertheless, CAGR D also identified  
19 311,108 acre-feet, 3,111 acre-feet per year, of CAWCD dedicated LTSCs that pursuant to  
20 CAWCD Board policy, may be used to satisfy CAGR D's replenishment obligation.

21 4. Based on the Department's accounting, approximately 18% of all available LTSCs are  
22 located in the Pinal AMA, so CAGR D's estimate of 4,400 acre-feet per year of available  
23 credits it can acquire (31% of 14,200) is high comparatively. However, 18% of 14,200  
24 equates to 2,556 acre-feet per year, which, added to the CAWCD dedicated credits, exceeds  
25 the 20-year replenishment obligation in the Pinal AMA.  
26



1 C. CAP Water

- 2 1. CAGR D has identified between 91,700 and 183,400 acre-feet per year of CAP water as  
3 likely to be available for replenishment purposes during the 20 years after submission of  
4 the Plan in all three AMAs. In arriving at this estimate, CAGR D assumed that any M&I  
5 or Indian priority CAP water not currently utilized as part of a long-term commitment  
6 may be currently available. This includes: (1) all supplies that CAP subcontractors have  
7 not ordered from 2018-2022; (2) supplies currently being used to develop LTSCs; and (3)  
8 supplies that are currently subject to short-term lease agreements or short-term Colorado  
9 River system conservation programs. CAGR D further reduced these estimates by 9,200  
10 acre-feet to account for CAP Water allocated to tribes that is not available for use off  
11 reservation.
- 12 2. CAGR D reduced its high estimate of 183,400 by 50% to arrive at 91,700 to provide a  
13 conservative estimate that accounts for uncertainty regarding the future availability of  
14 Colorado River supply through the CAP post-2026.
- 15 3. At the request of the Director, CAGR D removed all CAP NIA supplies as a source of  
16 supply to meet its replenishment obligation and reserve activities due to likely short-term  
17 unavailability of those supplies and considerable uncertainty regarding long-term  
18 availability of those supplies.
- 19 4. CAGR D modeled CAP water availability under an assumed Tier 3 shortage under the  
20 current and yet-to-be-replaced 2007 Interim Guidelines and the 2019 Lower Basin  
21 Drought Contingency Plan which would trigger a 720,000 acre-feet per year reduction in  
22 supplies consisting of all NIA Priority CAP water and some M&I and Indian Priority  
23 water. CAGR D showed how it could still meet its 20-year replenishment obligation in  
24 each AMA, relying on 481,500 acre-feet of LTSCs in the Phoenix AMA, 23,826 acre-feet  
25 per year of "wet water supplies" such as effluent, Tribal Priority CAP water (GRIC  
26

1 Exchange), M&I Priority CAP water, and CAWCD dedicated credits. Figure 4.1 in the  
2 Plan shows CAGRD able to meet its 20-year replenishment obligation in all AMAs with  
3 zero NIA Priority CAP water available and slightly reduced availability of M&I and  
4 Indian Priority CAP water.

- 5 5. The Director finds that CAGRD's demonstration of its ability to meet its 20-year  
6 replenishment obligation in the Pinal AMA under a Tier 3 shortage condition pursuant to  
7 the current Colorado River operating guidelines to be reasonable.
- 8 6. The Director finds that CAGRD's estimate of 15,000 CAP Indian Priority (GRIC  
9 Exchange) water, 6,426 CAP M&I water, and 91,700 acre-feet per year of additional CAP  
10 water is available to CAGRD to meet its 20-year replenishment obligations in all three  
11 AMAs including the Pinal AMA.

12 **D. Colorado River Water (Other Than CAP Water)**

- 13 1. CAGRD has identified between 99,700 and 199,500 acre-feet per year of Colorado River  
14 water (Priority 4 or higher) as being available for replenishment purposes for all three  
15 AMAs during the 20 years following submission of the Plan.
- 16 2. The identified Colorado River water consists of a 20% consumptive use portion of some  
17 individual contract holder entitlements in addition to fallow/lease agreements with other  
18 entitlement holders. The low estimate presented above is 50% of the assumed high  
19 estimate assumed by CAGRD.
- 20 3. The Department's Substantive Policy Statement "Policy and Procedure for Transferring an  
21 Entitlement of Colorado River Water is still in place and sets for the policies and  
22 procedures for obtaining the Director's review and advice on proposed transfers of  
23 Colorado River entitlements from a non-Indian contractor or subcontractor for a term of  
24 more than one year pursuant to A.R.S. § 45-107(D). This Substantive Policy Statement  
25 sets forth requirements for public notice and for opportunity for public comments in the  
26

1 context of proposed conveyances and leases.

- 2 4. While the volume of Colorado River identified by CAGRD in the Plan is part of CAGRD's  
3 acquisition program and is not yet "secured", CAGRD is not required to have all supplies  
4 it plans to use to meet its 20-year replenishment obligation and may include supplies likely  
5 to be available if those supplies are not subject to legal or administrative barriers that  
6 prevent their use. However, the Director finds that Colorado River water should not be  
7 included in the water supplies likely to be available for acquisition by CAGRD to meet its  
8 20-year replenishment obligation for current members. For Colorado River water to be  
9 physically and legally available for replenishment purposes within the three AMAs, such  
10 water must necessarily be wheeled through the CAP canal. These supplies are presently  
11 subject to the same legal and administrative barriers specified in Finding (B)(2) that  
12 currently prevents their transfer to the three AMAs. Therefore, this supply may not be  
13 included in CAGRD's calculation of supplies available to meet its 20-year replenishment  
14 obligation for current members.

15 **E. Effluent**

- 16 1. CAGRD has identified between 38,400 and 116,400 acre-feet per year of additional  
17 effluent as being available for replenishment purposes during the 20 years following  
18 submission of the Plan for all three AMAs with between 1,400 and 4,300 acre-feet per  
19 year in the Pinal AMA. CAGRD describes effluent supplies as being currently discharged  
20 from water reclamation facilities and not reused or recharged to earn LTSCs.
- 21 2. The 116,400 acre-feet per year identified in the Plan is effluent CAGRD identifies as  
22 currently discharged from water reclamation facilities based on its review of discharge  
23 data from the Arizona Department of Environmental Quality's Aquifer Protection Permits  
24 and Arizona Pollutant Discharge Elimination System Permits located in each AMA. The  
25 Department's own accounting of unused effluent supplies is similar across all three AMAs  
26



1 and split out by individual AMA.

2 3. The lower number identified, 38,400 acre-feet per year is based on CAGRD's judgment  
3 that utilization of effluent by entities currently discharging it is likely to increase as a  
4 future water supply for those entities to keep up with increased demands.

5 4. Assuming that the lower volume of effluent is likely to be available to CAGRD in the  
6 following 20 years, the Director finds that CAGRD's estimate of 1,400 acre-feet per year  
7 of effluent as available to CAGRD to meet its 20-year replenishment obligation in the  
8 Pinal AMA.

9 **F. Imported Groundwater**

10 CAGRD has identified 59,500 to 119,100 acre-feet per year of pumped groundwater from  
11 Harquahala and Butler Valley basins as being potentially available to meet its 20-year  
12 replenishment obligation and potentially available to meet its 100-year replenishment obligation in  
13 Table 4.3 of the Plan. However, the Plan notes in section 4.6.5 that these values are based on 100-  
14 year estimates and, like Colorado River Water and LTSCs located in other AMAs, Imported  
15 Groundwater requires a yet-to-be-completed wheeling agreement with the U.S. Bureau of  
16 Reclamation. The Director cannot conclude that these supplies are available to CAGRD to meet its  
17 20-year replenishment obligation.

18 **G. Desalinated Water**

19 CAGRD includes 0 to 100,000 acre-feet per year of potential supply to meet its 20-year  
20 replenishment obligation in Table 4.3. The Director cannot consider any of this water to be available  
21 for CAGRD to meet its 20-year replenishment obligations because there are no current plans to  
22 develop desalination projects, as acknowledged by CAGRD in section 4.6.7.

23 **H. 20-Year Obligation Supplies**

24 Based on the foregoing, the Director finds it reasonable to assume a minimum total of 182,795  
25 acre-feet per year of supplies will be available for purposes of meeting CAGRD's 20-year  
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replenishment obligation for current members in all three AMAs. This amount includes CAGRD's presently "secured" supplies in the amount of 38,495 acre-feet per year and supplies likely to be available for acquisition by CAGRD in the amount of 144,300 acre-feet per year. This amount does not include any CAP NIA water, Colorado River Water, Imported Groundwater, New Verde River, or Desalinated Water supplies. For the Pinal AMA specifically, the Director finds that 8,911 acre-feet per year is available for CAGRD's replenishment obligation in the Pinal AMA.

1. The supplies identified by CAGRD to meet its replenishment obligations for current members during the 20 calendar years following submission of the Plan include supplies which are located in specific AMAs ("AMA-specific supplies"), as well as supplies which are likely to be available to the entire CAP service area generally. CAGRD has identified sufficient AMA-specific supplies and CAP service area supplies for purposes of meeting its 20-year replenishment obligation for current members in the Pinal AMA, as reflected in the table below:

	Phoenix AMA	Tucson AMA	Pinal AMA
Replenishment Obligation (in acre-feet) for Year 2044 for Current Members	69,800	8,900	4,900
"Acquired" LTSCs Available for Year 2044 (in acre-feet) per Table 4.1 of Plan	(6,701)	(1,623)	(3,111)
Additional LTSCs Available for Year 2044 (low estimate in acre-feet)	(7,600)	(2,200)	(4,400)
"Acquired" Effluent for Year 2044 (in acre-feet) per Table 4.1 of Plan	(2,400)	0	0
Additional Effluent Available for Year 2044 (low estimate in acre-feet)	(30,600)	(6,400)	(1,400)
"Acquired" AMA-specific CAP water for Year 2044 (in acre-feet) per Table 4.1 of Plan	(21,426)	0	0
Replenishment Obligation (in acre-feet) for Year 2044 for Current Members Not Met by AMA-specific supplies	1,073	none	none
Total available CAP water attributable to the CAP service area generally (low estimate in acre-feet)	(91,700)		
<b>Unmet Replenishment Obligation (in acre-feet) for Year 2044 for Current Members</b>	<b>none</b>	<b>none</b>	<b>none</b>

1 2. CAGR D has identified additional water supplies potentially available for its projected  
2 groundwater replenishment obligations in the Pinal AMA for the 100 calendar years  
3 following submission of the Plan for current members and potential members based on  
4 reasonable projections of real property and service areas that could qualify for  
5 membership in the 10 years following submission of the Plan.<sup>4</sup>  
6

7 a. CAGR D has estimated its replenishment obligations for current and potential  
8 members in all three AMAs in the 100 years following submission of the Plan, culminating  
9 in 104,400. For the Pinal AMA, CAGR D has estimated that its replenishment obligation for  
10 current and potential members will be 4,240 acre-feet for the year 2124.

11 b. With respect to the requirement that CAGR D identify supplies sufficient to  
12 meet its obligations for both current and potential members in the 100 years following  
13 submission the Plan, CAGR D is entitled to rely upon not only supplies which are currently  
14 and likely to be available but also supplies which *potentially* will be available for acquisition  
15 in the future. New Verde River Supply is not available for use in the Pinal AMA. As noted  
16 above, Colorado River Water, Imported Groundwater, and Desalinated Water should not be  
17 viewed as currently available for purposes of meeting CAGR D's 20-year replenishment  
18 obligation for current members in the Pinal AMA because no standard form of wheeling  
19 agreement necessary to transport Colorado River Water and Imported Groundwater has  
20 been approved and the proposed Desalinated Water projects may not come to fruition during  
21 the next 20 years. However, the Bureau of Reclamation may approve a standard form of  
22 wheeling agreement in the future. The projects necessary for Desalinated Water may be  
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24 <sup>4</sup> Some of the supplies identified by CAGR D may require consultation with or review by the  
25 Director, including a recommendation to the Secretary of the Interior or issuance of a permit or  
26 other license. Nothing in this Decision and Order reflects the necessary consultation, review, or  
approval required by law. The Director will consider such matters upon submittal of the  
appropriate request(s) or application(s).

1 built as demand for those projects increases. Therefore, some supplies of Colorado River  
2 Water, Imported Groundwater, and Desalinated Water may be included for purposes of  
3 demonstrating sufficient potentially available supplies for purposes of meeting CAGRD's  
4 total replenishment obligation for current and potential members in the 100 years following  
5 submission of the Plan.

6 c. CAGRD calculates that a minimum of 256,300 acre-feet per year of  
7 combined LTSCs, Effluent, CAP Water, Colorado River Water, and Imported Groundwater  
8 are potentially available for purposes of meeting its projected replenishment obligations for  
9 current and potential members in all three AMAs in the 100 calendar years following  
10 submission of the Plan.

11 d. Beyond the categories of supplies identified for purposes of meeting  
12 CAGRD's 20-year replenishment obligation and potentially available for meeting  
13 CAGRD's 100-replenishment obligation, CAGRD has identified estimates of potentially  
14 available Desalinated Water. However, it appears that the total volume that CAGRD  
15 estimates for this additional category of supplies may not be potentially available for  
16 replenishment purposes. Nevertheless, the Director need not reach a determination with  
17 respect to whether these additional sources of supply are potentially available for purposes  
18 of satisfying CAGRD's 100-year replenishment obligation, as CAGRD has identified  
19 sufficient other supplies in satisfaction of the requirements of A.R.S. § 45-576.03(N)(1).

20 e. CAGRD's low estimate of 256,300 acre-feet per year of potentially available  
21 supplies of combined LTSCs, Effluent, CAP Water, Colorado River Water, and Imported  
22 Groundwater provides a conservative estimate of potentially available supplies consistent  
23 with the Department's review of this plan. The identified supplies exceed CAGRD's  
24 projected total 100-year replenishment obligation in all three AMAs, as shown in the table  
25 below:  
26



Replenishment Obligation (in acre-feet) for Year 2124 for Current and Potential Members	88,200 Phoenix AMA 12,000 Tucson AMA 4,240 Pinal AMA 104,440 Total
Potentially Available Supplies for Year 2124 (low estimate)	(256,000)
<b>Unmet Replenishment Obligation (in acre-feet) for Year 2124</b>	<b>none</b>

f. CAGRD's demonstration that total available supplies exceed its total replenishment obligations for all three AMAs is adequate for purposes of identifying sufficient supplies for CAGRD's 100-year replenishment obligation in the Pinal AMA. As discussed above, a standard form of wheeling agreement permitting the movement of non-CAP water through the CAP canal may be approved in the future. Therefore, currently unavailable mechanisms to "transfer" supplies for replenishment purposes, such as through recovery and movement of water through the CAP canal and wheeling of Imported Groundwater or Colorado River Water potentially will be available in the future, making even AMA specific supplies available to the CAP service area generally.

3. The replenishment reserve target for the Pinal AMA was calculated as prescribed in Section 48-3772(E), and the CAGRD is developing a replenishment reserve in the Pinal AMA pursuant to A.R.S. § 48-3772(E).

a. CAGRD calculated and established the replenishment reserve target in the Pinal AMA consistent with A.R.S. § 48-3772(E) at 12,154 acre-feet in Table 5.1 of the Plan.

b. CAGRD has accrued 6,192 acre-feet of LTSCs in the Pinal AMA Replenishment Reserve Sub-account through calendar year 2024 and has identified an additional 5,962 acre-feet of LTSCs dedicated by CAWCD for CAGRD replenishment reserve purposes in the Pinal AMA. While short of its reserve target in the Pinal AMA, in Table 5.2 of the Plan, the CAGRD has demonstrated a steady accrual of LTSCs in its Pinal

1 AMA Replenishment Reserve Sub-account over the past 10 years. CAGR D has also  
2 demonstrated that sufficient LTSCs are currently available to meet CAGR D's combined  
3 reserve target amounts for all three AMAs, relying on a combination of existing CAGR D  
4 reserve credits and LTSCs held by CAWCD which have been dedicated to CAGR D for  
5 replenishment reserve purposes. A significant volume of CAWCD credits is located in the  
6 Phoenix and Pinal AMAs. CAGR D states that it will evaluate mechanisms by which to  
7 "transfer" or "exchange" LTSCs as necessary to meet its replenishment obligations and/or  
8 reserve target amounts in other AMAs. CAGR D states that the CAWCD-dedicated credits  
9 ensure that CAGR D can continue building the Pinal AMA's reserve target while meeting  
10 the replenishment obligation in the Phoenix AMA.

11 c. In view of this information, CAGR D has demonstrated that it has established  
12 and is building toward its replenishment reserve target in the Pinal AMA and is taking  
13 reasonable steps to develop the replenishment reserve in accordance with A.R.S. § 48-  
14 3772(E).

- 15 4. The CAGR D has identified sufficient capacity at storage facilities and projects to be used  
16 for replenishment purposes in the Pinal AMA during the 20 calendar years following the  
17 submission of the Plan.

18 a. CAGR D has identified 221,214 acre-feet of available annual storage in  
19 groundwater savings facilities ("GSF") in the Pinal AMA which CAGR D calculated based  
20 on the total annual storage capacity of the Central Arizona Irrigation and Drainage District  
21 and Maricopa Stanfield Irrigation and Drainage District GSF space potentially available to  
22 CAGR D minus the historic usage of these storage facilities by non-CAGR D entities. By  
23 reviewing GSF permits in the Pinal AMA, ADWR found that storage capacity for CAGR D  
24 exceeds CAGR D's estimates. Thus, the Director finds that these facilities provide more  
25 than sufficient capacity to be used by CAGR D for replenishment purposes in the Pinal AMA  
26

1 for the next 20 years.

2 I. CAGR D has made a reasonable estimate of its projected replenishment obligations in the Pinal  
3 AMA for the 100 calendar years following the submission of the Plan as required by A.R.S. §  
4 45-576.02(C)(2)(b).

5 1. Section 45-576.02(C)(2)(b) provides that the CAGR D shall make an estimate of the  
6 CAGR D's projected groundwater replenishment obligations for the 100 calendar years  
7 following submission of the Plan for current members and potential members based on  
8 reasonable projections of real property and service areas that could qualify for membership  
9 in the ten years following the submission of the Plan.

10 2. The Department reviewed CAGR D's projections of real property and service areas that  
11 could qualify for membership in the ten years following submission of the Plan. The  
12 Department considered projected population growth for the three AMAs, projected supply  
13 and demand for each water use sector, location of expected growth, projected water storage  
14 activities, impacts of the lack of groundwater physical availability on growth and  
15 replenishment in the Phoenix and Pinal AMAs, impact of likely ADAWS providers, and  
16 CAGR D's analysis of the likely impact of SB1611 on development and replenishment to  
17 verify CAGR D's projections of its future replenishment obligations are reasonable. The  
18 Director determined from this review that CAGR D's projections are reasonable.

19 **IV. DECISION**

20 Based on the above findings, the Director hereby determines that the Plan is consistent with  
21 achieving the management goal for the Pinal AMA.

22 **ORDER**

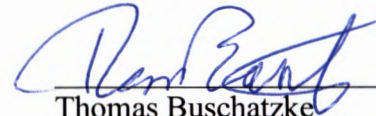
23 IT IS HEREBY ORDERED:

24 1. CAGR D's Plan of Operation is determined to be consistent with achieving the  
25 management goal of the Pinal AMA.

2. Except as provided in A.R.S. § 45-576.03(R), this determination shall expire on the date provided in A.R.S. § 45-576.03(M).

3. This Order shall become effective upon the date signed by the Director below.

GIVEN under my hand this 22 day of December, 2025.

  
Thomas Buschatzke  
Director

**COPY** of the foregoing Decision and Order was sent by certified mail this 22 day of December, 2025 to:

Laura Grignano  
Manager, CAGRD  
Central Arizona Project  
P.O. Box 43020  
Phoenix, Arizona 85080

CMRRR#

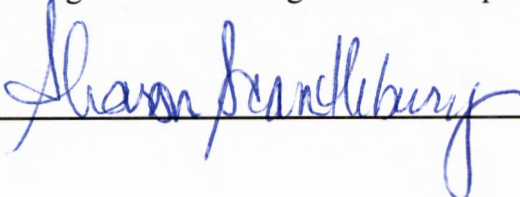
9489 0090 0027 6628 4899 71

**COPY** of the foregoing Decision and Order was sent via electronic mail this 22 day of December, 2025 to the following persons who submitted written comments regarding the Plan:

Robert Anderson

Fennemore Craig, P.C.  
*Attorney for DMB Associates, Inc.*

Arizona Municipal Water Users Association  
Maricopa-Stanfield Irrigation and Drainage District  
Central Arizona Irrigation and Drainage District  
Garrett Development Corp.  
Buckeye Tartesso, LLC.  
Douglas Ranch Management Development Company, LLC





**Table 6.1****Available AMA Storage Capacity**

		2025	2030	2035	2040	2044
Phoenix AMA	Capacity Available	336,901	336,901	336,901	336,901	336,901
	CAGR D Obligation	36,900	48,400	55,700	64,900	70,500
	Excess Capacity	300,001	288,501	281,201	272,001	266,401
Pinal AMA	Capacity Available	221,214	221,214	221,214	221,214	221,214
	CAGR D Obligation	550	1,240	2,940	4,140	4,940
	Excess Capacity	220,664	219,974	218,274	217,074	216,274
Tucson AMA	Capacity Available	55,138	55,138	55,138	55,138	55,138
	CAGR D Obligation	3,500	6,700	8,700	9,500	9,900
	Excess Capacity	51,638	48,438	46,438	45,638	45,238