



October 30, 2025

Via email to Tbuschatzke@azwater.gov

Mr. Tom Buschatzke

Arizona Department of Water Resources
1110 W. Washington Street, Suite 310
Phoenix, Arizona 85007

Re: CAGRD Response to Public Comments on the 2025 Plan of Operation

Dear Director Buschatzke,

This letter summarizes the public comments¹ received regarding the 2025 CAGRD Plan of Operation (2025 Plan). The comment period, which concluded on October 17, 2025, yielded only supportive feedback from stakeholders and the public, with no questions or critical concerns submitted. This positive reception indicates strong public confidence in CAGRD's future planning efforts and operational history.

The supportive public comments highlighted several key positive themes as noted below:

- **CAGRD History of Compliance:** Commenters recognized that CAGRD has a consistent record of meeting its annual and long-term statutory obligations within the prescribed timeframes.
- **Comprehensive 2025 Plan Elements:** It was noted that CAGRD provided all the required elements for the 2025 Plan, demonstrating a thorough and compliant submission for review and ADWR approval.
- **Timely Approval for Program Implementation:** The necessity of a timely approval of the 2025 Plan was a consistent theme. Stakeholders emphasized that a swift approval of the 2025 Plan is vital for the successful

¹ Public comments were received from the following: Arizona Municipal Water Users Association, Buckeye Tartesso, LLC, Central Arizona Irrigation & Drainage District, DMB Associates, Inc., Douglas Ranch Management Development Company LLC, Garrett Development Corporation and Maricopa-Stanfield Irrigation & Drainage District.



implementation of new water management programs, specifically the Alternative Path to Designation (ADAWS) and “Ag-To-Urban” initiatives.

CAGRD believes that highlighting these positive public comments in our written response appropriately reflects the feedback received and underscores the consensus for moving forward with the 2025 Plan. This approach acknowledges the constructive support from our stakeholders and affirms the plan's readiness for final review and approval later this year.

In addition, we have included a revised Table 6.1 in our final response which demonstrates that CAGRD has identified sufficient storage capacity in all three AMAs covered by the 2025 Plan.

CAGRD appreciates the opportunity to respond to the public comments submitted and looks forward to the timely approval of the 2025 Plan to begin implementation of these important water management initiatives.

Sincerely,

Laura Grignano
CAGRD, Manager

Attachment

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