



DOUGLAS A. DUCEY
Governor

THOMAS BUSCHATZKE
Director

ARIZONA DEPARTMENT of WATER RESOURCES
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Phoenix, Arizona 85007
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January 20, 2021

Sent U.S. Mail and Via E-mail

Leslie Meyers
Bureau of Reclamation
6150 West Thunderbird Rd.
Glendale, AZ 85306-4001

Dear Ms. Meyers,

On September 4, 2020, the Arizona Department of Water Resources (Department) recommended the transfer of GSC Farm LLC's (GSC) 1,078.01 acre-feet/year (af/yr) of Arizona fourth priority mainstem Colorado River entitlement to the Town of Queen Creek (Queen Creek). Under this recommendation, GSC is to retain 1005 af/yr for consumptive use which will translate into 1405.6 af of diversionary entitlement (400.6 af of return flows) for future uses. The Department also recognized that the quantity may be subject to change based on additional detail concerning future uses and indicated availability to work with the Bureau of Reclamation (Reclamation), GSC and Queen Creek in that regard.

Subsequently, GSC and Queen Creek filed documents with Reclamation commencing the transfer process with Reclamation and indicating that GSC and Queen Creek plan to present documents to the Department suggesting a different volume of water for retention by GSC lands for future use. In November 2020, GSC shared several documents with the Department with information on development opportunities in Cibola Valley (GSC Development Plans), future water demand analysis for GSC Farms and information regarding natural vegetation and revegetation in the Cibola Valley. Pursuant to a request from Reclamation, GSC, Queen Creek, and the Department analyzed the GSC Development Plans. As more fully explained in the enclosed evaluation, the Department concludes that it is suitable for GSC to retain 50 af/yr for future consumptive uses conditioned on the successful and permanent completion of the covenants, deed restrictions or any other restrictions on the GSC lands. In parallel, the volume of water to be transferred to Queen Creek could change to 2033.01 af/yr. The Department also understands that as a part of approving the transfer, and in compliance with the National Environmental Policy Act (NEPA) process, Reclamation will take public comment on the volume being transferred by GSC to Queen Creek.

The Department thanks Reclamation for the opportunity to provide its analysis on the GSC Development Plans. Should there be any comments or concerns regarding any of the above, please contact Kelly Brown at 602.771.8646.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tom Buschatzke", with a long horizontal flourish extending to the right.

Thomas Buschatzke
Director
Arizona Department of Water Resources