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**Via E-Mail and
U.S. Mail**

Thomas Buschatzke, Director
Arizona Department of Water Resources
1110 W. Washington St., Suite 310
Phoenix, AZ 85007
tbuschatzke@azwater.gov

Re: Proposed Substantive Policy Statement “Priority of Issued Assured Water Supply Demands in Hydrologic Studies for Assured Water Supply Applications Located in the Pinal Active Management Area Hydrologic Model Area”

Dear Director Buschatzke:

I am writing this letter on behalf of Walton Development & Management AZ, LLC (“Walton”) in response to the Department’s request for stakeholder comments on the Department’s draft substantive policy statement titled “Priority of Issued Assured Water Supply Demands in Hydrologic Studies for Assured Water Supply Applications Located in the Pinal Active Management Area Hydrologic Model Area” (the “Policy”).

Walton owns and is in the process of entitling a number of large properties located within the Pinal Active Management Area. Walton relies upon a number of Analyses of Assured Water Supply (“Analyses”) obtained to ensure a water supply is reserved for planned development within these properties. Since these Analyses were issued, it is our understanding the Department has made significant changes to the groundwater model used for evaluation of water physically available for assured water supply purposes that may affect the opinions previously given by the Department in Walton’s Analyses. We are also aware there is an ongoing stakeholder process to evaluate these and related issues, and that the Department’s opinions regarding model assumptions, and even the model itself may still change over time.

Without commenting on the ongoing stakeholder process issues or any changes that may be made to the groundwater model or the assured water supply program outside of the existing statutes and rules, Walton would like to offer its support for the Policy as drafted as appropriate now. We believe the Policy accurately describes the current rules and statutes as they have been

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interpreted in the past, and that the Department's decision to require assured water supply applicants to update the model determinations with a more current model run is needed as an interim measure to allow applicants to move forward now while stakeholder discussions continue.

Please call me if you have any questions about these comments.

Sincerely,

A handwritten signature in blue ink that reads "Michele Van Quathem".

Michele Van Quathem

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