



La Paz County Board of Supervisors

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Via E-mail: sscantlebury@azwater.gov

Director Thomas Buschatzke
Arizona Department of Water Resources
Attn: Sharon Scantlebury, Docket Supervisor
P.O. Box 36020
Phoenix, Arizona 85967-6020

*re: Request for Consultation on Transfer of 4th Priority Colorado River Water Right
GSC Farm, LLC to the Town of Queen Creek- Rebuttal to GSC Farm, LLC and Queen
Creek Response to Public Comment dated May 7, 2020*

**La Paz Counties Response to Public Comment Regarding GSC Farm, LLC and the Town of Queen Creek
Proposed Transfer of Arizona 4th Priority Colorado River Entitlement**

Director Buschatzke,

La Paz County believes if the transfer of the Arizona 4th priority Colorado River Entitlement it would have negative and devastating impacts not only to La Paz County but to all the River Communities. Reasons are as follows:

- The 4th Priority water entitlements and policies were created to establish and protect the water supply specifically for agriculture use, tourism and economic development for the River Communities. Allowing the transfer of this water would have negative impacts to the County of La Paz along with the other River Communities damaging the Counties tourism which provides much needed revenue by visitors who come and enjoy recreation up and down the Colorado River and have for decades. Retiring these parcels would create a negative impact to the future of La Paz Counties economic development directly.

The property identified for this transfer can be re-zoned for commercial use, create sub-divisions, or single-family dwellings. This would create a larger tax base to La Paz County which currently has less than 6% privately owned land vs the \$12,000 which was the estimate given by GSC that the county would receive. Negatively impacting future revenue streams only to provide a water reserve to the Town of Queen Creek, due to lack of responsible development and use of resources within their area.

- Allowing this transfer would be setting a very dangerous precedence for the future use of the 4th Priority water entitlements. If this transfer would occur it would open the door for future application to the DWR to transfer other entitlements to other metropolitan areas who are facing these same scenarios. The current practices and policies were put into place for specific uses and transferring this water to areas outside the River Communities for a profit was not one of them.
- The current directors of the CVID do not have the best interest or has taken into consideration the negative impacts of La Paz County or the River communities. CVID directors are made up of California residents that lease Arizona State Land for farming along with a representative from GSC. They have used their position as directors for their own personal gain by assigning contracts to individual board members in an attempt to create a "water property right" that can be marketed by the individual board member land owners to the detriment of other land owners, especially non-ag owners. If this thought is pursued care must be taken to not create issues for our friends in Yuma.
- Applicants assert that On-river communities have sufficient entitlements to accommodate further growth. As we continue to see more interest from the metropolitan areas for water grabs not only from the Colorado River but also from our Ground water basins, it is critical that the River communities stand together to keep this natural resource in rural Arizona. Lands in unincorporated areas of La Paz County also lack water entitlements.

In closing, water is a very precious natural resource for all to survive. We have begun to see more declines not only in the Colorado River due to years of drought, but also within our groundwater basins here in La Paz County and throughout the State of Arizona. Now is the time for responsible management of our natural resource not to reward areas such as the Town of Queen Creek for lack of responsible development or water practices.

Any transfer of Reserved 4th Priority water off the main stem threatens to upset the delicate balance developed through years of cooperation in the management of the river. The Reserved 4th Priority water is less than 10% of Arizona's full entitlement. The river communities have no other source of water and lack the ability to store water without incurring significant costs. The negative impact to all On-river users, and especially the On-river communities, is significant and difficult to quantify.

Allowing the transfer of the 4th Priority water to the Town of Queen Creek would be damaging the future of La Paz County and its natural resource along with our River Communities. Changing the practice of how historically this natural resource has been used would only open up the door for others in line that are wanting to gain financially at our expense, and it cannot be allowed.

Sincerely,



Holly Irwin
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