

November 28, 2022

Submitted electronically at sscantlebury@azwater.gov

Arizona Dept. of Water Resources
1110 W. Washington, Suite 310
Conference Room 3175
Phoenix, Arizona 85007

RE: Draft Substantive Policy Statement Regarding the Drought Volume Exemption;
Public Hearing comments regarding A.A.C. R12-15-722(G)(1).

Dear Sirs,

The growth rate in Arizona over the past 2 decades has been detrimental to the water supply in concurrence with the even longer drought cycle. The resources in Arizona should be allocated to sustain the current, permanent residents. Our water supply must not be used for political or financial gain and can no longer be outsourced and used for tourist entertainment. It must be protected with the removal of the 100 Yr. Certificate that is not attainable. Developers should not be able to build at an unlimited rate.

There is a lot of misinformation regarding the amount of water in the aquifers in Pinal County for instance. The City of Casa Grande straddles a north-south trending underground ridge that lies between the Maricopa-Stanfield Sub-basin and the Eloy Sub-basin. Wells that serve the Casa Grande Area and Arizona City are mostly located in the Eloy Sub-basin. The City of Maricopa is supplied by the Maricopa-Casa Grande Sub-basin. The two sub-basins are no longer hydrologically connected due to the Extensive groundwater draw-down by farming in the 1940s through the 1980s. However, the City of Maricopa promotes a Surf Park in Maricopa through the 100 Yr. Certificate holder, Global Water Resources. Recent article stated "Global Water's overall efforts to keep the demand down to 8K acre-ft gives it the 2nd lowest gallon per capita per day water rate of all designated providers in the greater Phoenix and Pinal areas, officials said. The company is engaged with the state and ADWR and it's designation is almost "set in stone". Areas such as Stanfield or Casa Grande can't use the Maricopa water supply, so it's considered a "very secure water source".-Maricopa Monitor October 2022" The "very secure water source" is misleading in that it is used to mean *exclusive and abundant*, when in truth it means that the water level has dropped so significantly that the once combined *aquifer is now limited* to the 2 separate areas.

The restrictions and removal of Central AZ Project waters for agriculture will add additional strain on the ground water availability and already affects the food supply for humans and animals throughout the Southwest. The State and many farms outsource their water and crops to other countries that have been allowed to continue unchecked and does not profit our state.

New development uses mostly domestic water that is treated for drinking vs irrigation or recycled water. This also puts a strain on the ground water availability. ADWR does not currently account for the amount of water used for new construction when the 100 Yr. Certificate is issued. A 10-room, apartment building uses about 2 million gallons of water for construction before it is even occupied.

Corrupt ideas and the proposed use of water is the perfect example of why the 100 Yr. Certificate can not continue to be used and should have harsher requirements or be voided entirely.

The 100 Yr. Certificate Water holder in the City of Maricopa is Global Water Resources and has a franchise agreement with the City of Maricopa whereas the City benefits monetarily from each water connection. The City Mayor, Christian Price recently resigned to work for an Economic Development company that is contracted with the City of Maricopa to bring in more residents and development. The new Mayor, Nancy Smith along with her husband Anthony Smith, President & CEO of Pinal Partnership are publicly active in the movement of forcible take-over of Local Government Water Districts in the City of Maricopa. Anthony Smith as Pinal County Supervisor, Chairman teamed up with the City of Maricopa in 2020 while his wife

Nancy Smith was Vice Mayor to try and forcible take power of 2 Local Government Water Districts and then negotiate the sale to the City of Maricopa. When this plot failed, the City of Maricopa teamed up with AZ Senator Shope to try and pass new law to forcible take-over Local Government Water Districts through SB 1564. This law failed to pass but forcible control for water will most assuredly be tried again.

The City of Maricopa has also announced plans for using Federal Stimulus funds to gift Global Water Resources to extend their service area outside the City limits to be able to bring in more development. City Councilman, Rich Vitello is part owner of Kooline Plumbing & Heating which has become one of the fastest growing businesses in Maricopa with the new development approved by the City Council. Councilman, Vincent Manfredi is part owner of InMaricopa, a local magazine that is often used to promote misinformation regarding the abundance of water supply to promote more development.

The fight for water began many years ago and can only be stopped by Arizona Dept. of Resources revoking the current 100 Yr. Certificates and establishing new development guidelines that will stop the corrupt use of our precious water resources.

Thank you for your consideration and support in keeping our water in Arizona and for Arizona.

Respectfully,

S. H. Carroll