



November 8, 2021

Dear Warren and Cheryl,

The Water for Arizona Coalition is grateful for the hard work and tough conversations you are undertaking with the Post-2025 AMAs Committee to identify groundwater management issues and work toward solutions. We appreciate the work you are doing to lead this important forum.

Arizona is rapidly entering a new water reality that is defined by aridification. If we are going to find ways to adapt our groundwater management systems to meet this moment, we need to collectively acknowledge this reality. The past can no longer be our reference point for what we face now and in the future.

Earlier in the Post-2025 AMAs process, the Committee identified a set of relevant and pressing issues, and then selected three for initial focus: hydrologic disconnect, unreplenished groundwater pumping, and groundwater in the Assured Water Supply Program. As the process has continued drilling deeper into policy details, we wish to again take a step back with this letter and ask bigger-picture questions. Will our current management policies and practices in the AMAs sufficiently safeguard our groundwater supplies in the face of climate change and a shrinking Colorado River?

Much of the Groundwater Management Act was built upon the assumption that there would be adequate Colorado River surface water coming into the central part of the state to offset groundwater pumping. What happens to groundwater stability and water security more broadly in Central and Southern Arizona when we hit Tier 3 water shortages on the Colorado River multiple years in a row? In anticipation of those times and limits, how should we be planning?

Aridification across the Colorado River Basin and shortages on the Colorado River itself are strong indicators that we must fundamentally change our relationship to water. The Post-2025 AMAs Committee has an opportunity to elevate this broader issue and lead the water community in working through these bigger picture questions. The fact is that Colorado River shortages are going to impact our ability to sustainably manage groundwater in the AMAs.

A number of the proposed policy solutions that have been brought forward by committee members thus far are promising and should receive robust and accelerated debate as the Committee's process proceeds. We must preserve and strengthen the Assured Water Supply rules to ensure consumer protections even as our water supply picture changes dramatically in the coming years. We should think further about how to incentivize groundwater recharge closer to the area where the water will be withdrawn. We should look hard at why we still are not reaching safe yield in the AMAs, negotiate in good faith on ways to address this, and potentially even explore alternative approaches to understanding overall aquifer health. We also support the authorization of a 6th management period. Groundwater management must continue to adapt and evolve, and a 6th management period enables this positive evolution. There are most certainly other ideas and solutions yet to be thought of, and we are going to need all the creativity we can get. Keeping the bigger picture front and center can help foster that creativity.

We certainly should not be weakening what Arizona has already built in the Groundwater Code. As we look ahead to a hotter and drier Colorado River Basin, now is the time to make what we have even stronger. With decades of learning behind us, the water community collectively has what it takes to address gaps to strengthen the state's commitment to security in the AMAs, and in doing so, help ensure that Arizona continues to be a place where communities and businesses thrive.

We raise these issues and questions with the purpose to start a conversation about how we can be helpful in advancing the efforts of the Committee even further. Thank you for your leadership of the Post-2025 AMAs Committee.

Sincerely,

Haley Paul, Policy Director, Audubon

Chris Kuzdas, Senior Water Program Manager, Environmental Defense Fund

Co-leads, Water for Arizona Coalition