October 8, 2021

Thomas Buschatzke, Director
Arizona Department of Water Resources
1110 W. Washington St., Suite 310
Phoenix, Arizona 85007

Dear Director Buschatzke:

SRP appreciates the Arizona Department of Water Resources (ADWR) efforts to facilitate stakeholder discussions for the Fifth Management Plan. We recognize the expedited timeline that the Department has had to promulgate not only the Fourth Management Plan, but also the Fifth Management Plan. SRP commends your efforts in staying on track to meet the deadline while also being adept at listening and addressing stakeholder concerns. We are pleased to see a continued emphasis on improved water management strategies and look forward to discussions beyond 2025.

As the valley’s largest water and power provider, SRP has many shareholder, customer, and stakeholder interests in embedded in each Chapter of the Fifth Management Plan. SRP staff members have attended each subgroup to understand the potential impacts to SRP and its interests. After reviewing the Fifth Management Plan, we wanted to highlight a particular provision of the Industrial Chapter. We appreciate that the Department included a provision to obtain a waiver on cycles of concentration for power generation facilities that discharge to a beneficial reuse. Prior to the introduction of 6-708, power generation facilities with 100 percent beneficial reuse plans were required to go through the administrative review process under each management plan, which left some uncertainty for waiver renewals for certain power generation facilities. The waiver enables a beneficial reuse to continue which is a benefit to the aquifer and AMA. For other matters related to SRP’s stance on safe-yield and other pertinent questions to related recharge, we refer to the letters and ADWR’s public survey process where SRP has submitted its feedback.

SRP has long recognized the importance of water in the valley and across the State of Arizona. With declining elevations in both Lake Mead and Lake Powell, there may be tough dialogue, diplomacy, and policy changes pertaining to water management. As we move forward to continue to improve upon Arizona’s water resiliency, we heed the call to find solutions to new challenges.

Sincerely,

David C. Roberts
Associate General Manager
Water Resources