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June 12, 2024

Via Electronic Mail to: moliver@azwater.gov

Madeleine Oliver
Water Resources Specialist 2
Arizona Water Banking Authority
1110 West Washington Street, Suite 310
Phoenix, AZ 85007

RE: Arizona Water Banking Authority 2023 Draft Annual Report – Town of Gilbert Comments

Dear Madeleine Oliver,

The Town of Gilbert is grateful for the opportunity to provide comments on the Arizona Water Banking Authority (AWBA) 2023 Draft Annual Report. The AWBA plays a critical role in the mitigation of the impacts of the impending Colorado River shortages to tribes and cities and the Annual Report and the included Ten-Year Plan is a helpful planning tool for these entities. Upon review of the draft report, Gilbert is providing the following comments:

- The draft plan only includes firming projections for 2025 and 2026. Although Gilbert recognizes the uncertainty that exists for 2027 and beyond, we request that the AWBA make an assumption for the Post-2026 Colorado River operations in order to make the plan a 10-year plan. These projections could be based on the static reduction zone of the Lower Basin Alternative Proposal as those are comparable to a Tier III shortage under DCP. The report does a good job discussing the uncertainty Post-2026, however Gilbert would like to see the plan better prepare for 2027, which is only 2.5 years away.
- Section 7.2.3 discusses triggers for M&I firming as they are under 2007 guidelines and DCP. Gilbert requests that this section mention that these triggers could change in 2027 depending on the adopted Post-2026 guidelines.
- Gilbert requests additional clarification on the volumes included in Tables 5 and 6 in Section 7.2.3. The narrative states that the volumes are based on reduction impacts to individual M&I subcontractors' annual direct uses, however the table states that the volumes are based on discussions with the subcontractors. It would be helpful to know how these two statements work together to generate the data in the tables.

If the AWBA has questions regarding Gilbert's comments, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Lauren Hixson". The signature is fluid and cursive, written in a professional style.

Lauren Hixson, P.E.
Water Resources Manager
Town of Gilbert