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Via Electronic Mail to Madeleine Oliver at moliver@azwater.gov.

Rebecca Bernat
Manger
Arizona Water Banking Authority
1110 West Washington Street
Phoenix, Arizona 85007

Re: AWBA Draft 2023 Annual Report

Dear Ms. Bernat:

I am writing to provide comments on the Arizona Water Banking Authority's (AWBA) Draft 2023 Annual Report.

Currently, the Ten-Year Plan only includes a two-year period due to the "deep uncertainty" of post-2026 operations of the Colorado River. While I understand the uncertainty involved, it is important to extend the plan to the required ten-year horizon using the best available data.

There are various assumptions that can be utilized to complete the Ten-Year Plan, including utilizing the minimum reductions of 760,000 acre-feet to Arizona that is included in the Lower Basin Proposal. Another option would be to run the model as if the current guidelines were still in place. A more thorough option could be to provide the range of possible post-2026 outcomes and scenarios being considered. The narrative can be updated to justify the assumption(s) utilized and indicate that the plan is subject to change when post-2026 operations have been determined.

The Ten-Year Plan is more than a statutory requirement. It demonstrates that AWBA is appropriately planning to firm CAWCD and M&I subcontractors during times in which CAWCD's diversions from the Colorado River will be disrupted by shortages on the Colorado River. Given that a future with less Colorado River water is a certainty, providing a complete Ten-Year Plan is the minimum necessary step to indicate the AWBA's willingness and capacity to address the challenges posed by potentially permanent reductions.

Sincerely,

Tina Sleeper
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