

June 27, 2023

I respectfully urge the Arizona Department of Water Resources to create a strong goal for the Douglas AMA, in keeping with ADWR's stated mission of "Protecting & enhancing Arizona's water supplies for current and future generations."

ADWR's proposed goal of "attempting to reduce the rate of aquifer depletion by 2035 and every 10 years thereafter" will do nothing to protect & enhance the Douglas groundwater basin.

In January, ADWR held a workshop in Douglas and clearly stated that a goal needs to have a measurable element. The proposed goal offers no metric regarding the targeted amount of reduction in the rate of depletion. Even worse, the use of the word "attempting" makes the goal meaningless. But even without that word, the goal is meaningless because it allows the aquifer to continue to be depleted, just more slowly. How much more slowly is, again, unspecified. As written, the goal is reached as long as ADWR makes some kind of attempt – however inconsequential – to slow the depletion of the Douglas Basin's finite water supply.

It is hard to understand how the proposed goal got written this way. In January 2022, ADWR issued a 47-page report titled *Overdraft, Safe-Yield, and the Management Goals of Arizona's Active Management Areas*. One conclusion stated in the report is this: "The statutory definition of safe-yield includes the phrase 'attempts to achieve,' which reflects the compromises made in the Groundwater Management Act and reflects consideration for reasonability and economic feasibility as progress is made toward the safe-yield goal. . . . In light of increasing supply challenges though, it may be that the "attempts to achieve" phrasing is due for reconsideration." (p. 36)

At the inaugural meeting of the Governor's Water Policy Council meeting in May ADWR Director Buschatzke gave a short summary of the DAMA and showed a slide with his proposed goal on it. He defended the "attempt" language and insisted that it was worded that way to be consistent with statute because the statute refers to attempting to achieve and maintain safe-yield. But his proposed goal says nothing about safe-yield. It doesn't make sense to use the statute defining safe-yield to justify a goal that's not about safe-yield.

A meaningful goal would be to require reaching stabilization of Douglas basin water levels within ten years and maintaining stable levels over the next decades. A strong goal would be to require increases in water levels over the next decades.

The Douglas Basin has the first subsequent AMA to be established since the original AMAs were formed, and the first established by a citizens initiative. This represents a unique and crucial opportunity to move past the purported inadequacy of safe-yield as defined in statute. If safe-yield is an unreachable goal, the answer isn't to give up altogether on accomplishing anything – as the proposed goal does – but instead to create a goal that drives management plans and objectives that can truly protect and enhance the groundwater in the Douglas Basin.

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