



Docket Supervisor - ADWR <docketsupervisor@azwater.gov>

Fwd: Comments on the Douglas AMA Draft Management Goal

1 message

Roger McManus [Personal Identifying Information]
To: docksupervisor@azwater.gov

Wed, Jun 28, 2023 at 3:46 PM

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From: **Roger McManus** [Personal Identifying Information]
Date: Wed, Jun 28, 2023 at 3:30 PM
Subject: Comments on the Douglas AMA Draft Management Goal
To: <managementplans@azwater.gov>

Thank you for the opportunity to comment on this draft AMA management goal -

"The management goal of the Douglas AMA is to support the general economy and welfare of water users in the basin by attempting to reduce the rate of aquifer depletion by 2035 and every 10 years thereafter."

I am offering the following comments on behalf of the Friends of the Sonoran Desert.

This management goal seems to have a number of objectives which are vague and raise significant issues regarding their relevance for effective management of the AMA. .Particularly if the overall goal is to manage ground water for sustainable use?

- 1) "support the general economy" Would it not support the general economy if the management allowed as much money to be made from unlimited use of the water as possible? What is the relationship between supporting the general economy and maintaining sustainable use of the aquifer?. Will the Department be engaging in picking winners and losers regarding unsustainable water use?
- 2) "and welfare of water users" Would not securing as much money as possible as soon as possible best benefit many of the water users? Recognizing that it would be reasonable to assume that many would prefer to maximize income to best enable the most profitable exit from their current investments? Will the Department be engaging in picking winners and losers regarding unsustainable water use?
- 3) "by attempting to reduce the rate of aquifer depletion...." That suggests that is an acceptable goal is to try and reduce the rate of aquifer depletion? That is to accept a plan for unsustainable use?

Why take this approach?

Would we be mistaken in assuming that the overall goal is to establish sustainable use of the ground water? Some standard of safe yield?

How would the department demonstrate that any of these three goals had been met with success for the Douglas AMA in two or more years? Could some local economies be diminished by the goals while still supporting the "general economy"? How would the Department document support for achievement of "the welfare of water users"? Obviously, there are certain users who could greatly benefit, and others who could be harmed from such a ground water approach? The management goal is to try hard but not demonstrate quantifiable results that for example reduce unsustainable use, maintain sustainable yield, reduce or end subsidence? Why do the goals suggested for the Douglas AMA differ significantly from those of previously established AMAs?

We understand the draft plan could be altered within two years to reflect additional planning, research, and assessment. Is there additional information needed to establish sustainable use of the aquifer? Why not just start from there? Additional research could be conducted on current usage, such as to inform prevention of subsidence, or to demonstrate how sustainable use could be achieved? If what we are doing here is to buy time to enable greater precision in water availability and sustainability, then why not emphasize that goal?

Do we understand correctly that the Department's current limitations in establishing some level of safe yield supports near-term goals for establishing the goals for achieving that standard within the two year time frame? Why not characterize the management goals for the near term from that perspective?

Our comments are intended to support planning, development, and implementation of the Douglas AMA to be a success for sustainable use of the new AMA.

Thank you for your efforts to that end.

Roger E. McManus

Member of the Board of Directors, Friends of the Sonoran Desert