



Docket Supervisor - ADWR <docketsupervisor@azwater.gov>

Comment on the Management Goal for the DAMA

2 messages

Mary Ann Capehart <Personal Identifying Information>
To: docketsupervisor@azwater.gov

Wed, Jun 28, 2023 at 11:06 PM

I am commenting regarding the Proposed Douglas AMA Management Goal. Like many others, I am disappointed by the word 'attempting' in the goal. Attempting sounds weak and non-committal on the part of the ADWR. 'Attempting to reduce the rate of aquifer depletion' could mean many things and sounds like it's open to failure. Surely the 'rate at which the aquifer is depleted' could be reduced to some degree and would actually be reduced by the rules in place in the current statutory language of the AMAs.

On the other hand, when I think about the wording of the goal, I conjecture that perhaps a reasonable number for a rate of depletion could not be found. Why? Because, in fact, not a lot will change regarding withdrawals under AMA rules: on the part of agriculture currently irrigating, many of whom do good conservation; domestic users, who also do good conservation, as does industry. (And any amount of feasible recharge doesn't touch withdrawals.) Perhaps the only real reduction in the rate of aquifer depletion is a virtual one; e.g. the non-expansion rules of the AMA, will prevent even more severe aquifer depletion *in the future* than is happening now. The current rate of depletion will not be reduced but only NOT become much greater. (It was alarming to hear today at the June 28th meeting, that purportedly, huge tracks of land have been cleared recently in the DAMA and I hope this land was approved for irrigation before August 30th when the DAMA vote was put on the ballot in Cochise County.)

I also wonder if this weak language is suggested because the goal of 'achieving safe-yield by 2025' in the goals of three of the original AMAs, will NOT be met 45 years later. Therefore it is not advisable (or even legal) to have safe-yield as a goal for the DAMA knowing what we know now about drought, the actual power of the ADWR to put significant restrictions on withdrawals, and the lack of buy-in on the part of users to make this happen voluntarily.

However it still seems lax and defeatist to only 'attempt'. Cannot even a small number be put to the depletion reduction, like a '5% reduction in groundwater depletion across all sectors by 2035' so that the goal can inspire confidence in the DAMA and the ADEQ, and the work of reducing depletion can, at least, begin?'

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Wed, Jun 28, 2023 at 11:58 PM

Please change ADEQ to ADWR in the last sentence of this comment. A typo. Thank you very much.

Begin forwarded message:

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