

MEMORANDUM



To: Natlie Mast, AMA Director
From: Casey Allman, Madison Moreno
Date: 11/5/2024
Re: **Douglas Active Management Area (AMA) Informal Comments on the Informal Draft Douglas AMA First Management Plan**

Comments: During the development of the Douglas AMA First Management Plan (1MP), the Department published an informal draft of the 1MP on August 21, 2024. All comments on the informal draft were accepted until the end of the day September 9, 2024. The Department received comments in regard to the Irrigation efficiency tiers, consumptive use, and the rate of reduction. Changes were made to each of those given the comments received, as well as additional data analysis by the subsequent AMA team.

Comments regarding irrigation efficiency tiers were provided. Comments specifically addressed farms of 150+ acres being required to adhere to 85% irrigation efficiency and the financial hardships which investments in that technology might cause. As such, ADWR conducted an analysis of applications and their claimed acres and found that it would be more logical to have the tiers split. The split facilitated a more equitable distribution of efficiency requirements in light of the wide variance in the size of farming operations within the Douglas basin. The Department sought to create irrigation efficiency tiers which represent the distribution of large and small agricultural users in the Douglas Basin. These percentages were set by the ratio of applications received by their size – the largest share of applicants is for farms below 100 acres who may have more financial difficulty bringing their crops to a higher efficiency. However, the majority of the irrigated acreage is owned by large farm applicants who may have more financial means to meet the 85 percent efficiency. Additionally, due to their larger size, the efficiency requirements assigned to the higher tiers will lead to the greatest reductions in groundwater withdrawals. To appropriately address these realities, the Department has developed the following irrigation efficiency tiers:

- 10-99 (acres) - 80%
- 100-499 (acres) - 83%
- 500+ (acres) - 85%

Consumptive use numbers were also brought into question, specifically with pecans with groundcover compared to those with groundcover. There was an error with those calculations, which was fixed in the proposed final 1MP. As a

consequence of recalculating those numbers, the overall average of each consumptive use number also changed for each crop listed in the MP.

To account for the potential need for future additions to the consumptive use numbers, the Department added an addendum beneath the consumptive use numbers within the proposed final 1MP. The addendum is as follows:

“The Director may add additional crops to the list of DAMA Consumptive Use and Other Needs Requirements by Crop set forth in above by posting the modified list of consumptive use and other needs requirements by crop on the Department’s website and filing the modified list within the Department’s Active Management Area office. Any agricultural water user whose allotment is calculated based on the additional crops will be provided notice of that allotment and will have the opportunity to apply for a variance or administrative review.”

The Department also made a change to the rate of reduction listed in the goal in response to a large volume of informal comments suggesting this be done. The GUAC members were especially important in this consideration. As such, the goal of reduction was increased to 640 acre-feet per year, instead of the original 340 acre-feet per year. This increase in reduction puts the goal in line with a 1% decrease in annual overdraft each year, for a 10% decrease over 10 years.