Gmail

Docket Supervisor - ADWR <docketsupervisor@azwater.gov>

DAMA Comments First Management Plan 11.6.24

1 message

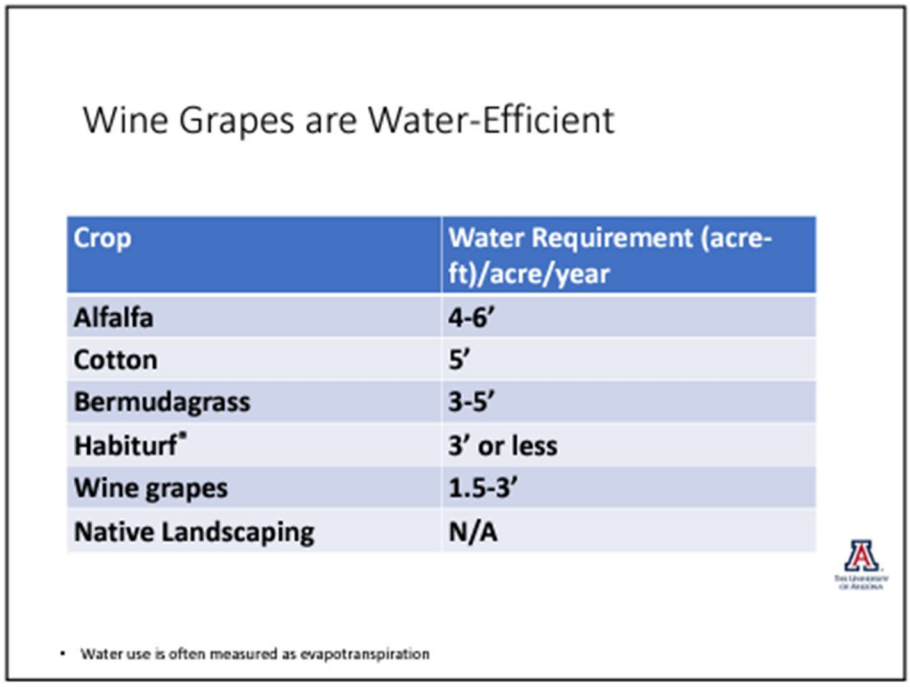
Jackie Watkins [redacted] Wed, Nov 6, 2024 at 8:17 PM

To: "docketsupervisor@azwater.gov" <docketsupervisor@azwater.gov>

Good evening Sharon, attached are my comments on the First Management Plan for the Douglas AMA. Thanks Jackie Watkins

DAMA First Management Plan Comments 11.6.24.pdf
294K

1. Page 13, Management Goal, suggest a graduated goal. Start with the proposed 1% per year for the first 5 years then increase 0.5% cumulative for the next 5 years so that by year 10 the reduction is 5% in year 10. This would then be 11,200 AF reduction for year 1 thru 10.
2. I think there is a typo in Table 2 on page 22. The stormwater infiltration for 2022 shows 59 AF. In 2022 the area of Elfrida was declared a Local Emergency due to Monsoon Flooding. Rucker Creek flowing into Whitewater Draw flooded for days with standing water flooding homes for more than 2 weeks. Then Table 3 has 22,170 AF supply for 2022.
3. 1.1.1 states about 25,000 population for DAMA and 2.2.1 has estimated 23,852 people live in DAMA.
4. 2.2.2.3 I don't think there is a cement and limestone processing mine that is still active in DAMA.
5. 3.3.2 Surface Water. Whitewater Draw watershed is HUC 15080301 and per USGS is 1,023 square miles. So the DAMA watershed is 1,023sm but and the DAMA groundwater basin is 950 sm.
6. Chapter 4 Agriculture in simple terms means the water duty will be calculated from Appendix A4 and will take the highest water use crop grown on the IGFR acre during the preceding 5 years before the AMA (August 30, 2017 – August 30, 2022) . Then the final calculation of maximum allotted AF to be used depends on farm size and set irrigation efficiency per table on page 44. So this isn't dependent on what was grown the most nor quantity of water reported to ADWR for the INA.
7. Page 59, Appendix A. List Grapes at 3.23 AF/Acre and that is higher than corn, wheat and barley. Below is a slide from last year from the UA on wine grape cultivation.



8. 4.2.1.1 Flexibility Accounts. Can you please clarify ARS 45-467 (O)(2)&(3). Is there a map showing the groundwater subbasins? Is there a maximum distance between the farms? Is there a limit of how many AF can be conveyed/sold in a year? So a farmer could buy another farm that is within the same subbasin, fallow/retire that farm thus creating flexibility account savings and use those AF on one farm.
9. Chapter 5. Do new subdivision require an assured water supply if they will be supplied by a private water company or municipal provider?
10. 6.2.6 Cattle Feedlot. Water requirements depend on the ambient temperature and weight of cow. I think the drinking water is 20 gpd plus dust control and such so the total operation for feedlot is 35 gpd.

Table 1. Estimated daily water intake (gallons per head per day) for beef cows based on temperature and level of production.

	Growing Cattle			Finishing Cattle			Pregnant Cows		Lactating Cows	Mature Bulls	
Temp.	400 lb	600 lb	800 lb	600 lb	800 lb	1,000 lb	900 lb	1,110 lb	900 lb	1,400 lb	1,600 lb
40	4.0	5.3	6.3	6.0	7.3	8.7	6.7	6.0	11.4	8.0	8.7
50	4.3	5.8	6.8	6.5	7.9	9.4	7.2	6.5	12.6	8.6	9.4
60	5.0	6.6	7.9	7.4	9.1	10.8	8.3	7.4	14.5	9.9	10.8
70	5.8	7.8	9.2	8.7	10.7	12.6	9.7	8.7	16.9	11.7	12.6
80	6.7	8.9	10.6	10.0	12.3	14.5			17.9	13.4	14.5
90	9.5	12.7	15.0	14.3	17.4	20.6			16.2	19.0	20.6

“ Adapted from Nutrient Requirements of Beef Cattle: Eighth Revised Edition: Updated 2016, 2016, NRC

11. Page 38, *6-1001*. 2. Cattle Feedlot operation. Needs some clarification that ‘feeds’ does not include grazing or pasturing. You could have more than 100 head of cattle in a very small area that is controlled by electric fence under a MIG (Managed Intense Grazing) operation that should not be considered a ‘feedlot operation