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## Douglas AMA 1st Management Plan comments

1 message

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Tricia Gerrodette [REDACTED] >

Wed, Nov 6, 2024 at 9:58 PM

To: docketsupervisor@azwater.gov, Sharon Scantlebury <:sscantlebury@azwater.gov>

I submit the following comments and questions about the Douglas AMA (DAMA) First Management Plan.

Cochise County is a mandatory adequacy jurisdiction county and the City of Douglas is subject to these mandatory adequacy requirements. But now the Douglas AMA imposes the assured water supply requirement. Can you explain how the mandatory adequacy requirements and the assured supply requirements interact? Which one is dominant? What are the differences?

It appears from the ADWR website that no water companies in the Douglas basin have qualified as having certificates or designations of adequate water supply or now an assured water supply. Has the City of Douglas put in an application for a certificate or designation?

For Section 5.2.1 regarding the rule changes needed to cover subsequent AMAs - when will the department initiate the rule changes to include content specific to the DAMA?

At today's public hearing on the DAMA First Management Plan, I appreciated the analogy of the big guys taking most of the candy from a trick-or-treat offering, leaving just leftovers for the general population. I think it's a great example of how big money and large growers have come into the Douglas (and Willcox) basins, extracting huge amounts of water (because they can) and harming the small growers and ranchers who have been in the valley for decades or generations. Their huge and deep wells have also harmed individual well owners, as is widely known.

This concept of taking what you can just because you can strikes against what I consider an American concept of fairness. The large well owners have caused the most harm and benefited the most and should be the ones to cut back the most. A grower like Ed Curry (in the Willcox Basin), who has actively worked to reduce his water use, acknowledging we live in a desert, should not have to cut back his water use at the same percentage as a massive water pumper who grows inappropriate water guzzling crops. The large pumpers should be required to reduce their water use at a higher percentage of cutback.

I recognize that this has been a challenging and new effort for ADWR and everyone is trying to figure out their new paths. But with an annual overdraft estimated at more than 45,000 AF, per Table 3, an annual reduction in the overdraft of 640 AF computes for me to less than 1.5% of the current overdraft. Am I understanding this correctly? If so, this seems to me a paltry effort that pretty clearly cannot achieve the goal of protecting the aquifer for the future and maintaining the general economy and welfare in the basin.

And I must object to the phrasing "reducing the **rate** of aquifer depletion by an amount...". The goal does not take into account the rate of depletion, as far as I can tell. Instead, the goal is to "reduce the aquifer depletion by an amount...." The rate of depletion is another measurement that I don't see addressed in the plan. And I don't think it's as relevant as the actual depletion. Have I missed a component of the plan that actually deals with the rate of depletion?

Thank you.

Patricia Gerrodette

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Not long ago, hurricanes, tornadoes, floods, drought, forest fires and earthquakes were referred to as "natural disasters" or "acts of God". Not any more. We have joined god as a major force causing these events. – David Suzuki