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ARIZONA DEPARTMENT
OF WATER RESOURCES

December 20, 2022

Re: Draft Douglas AMA Management Goal

Dear Mr. Buschatzke, Ms. Mast, Mr. Miller, Ms. Benally, and Mr. Dieckhoff:

We are farmers, ranchers, and residents in the Douglas Basin of Cochise County, and many of our families have lived and worked in this valley for generations. We have come together as a community to identify what we believe to be essential values of the basin, which we ask that Arizona Department of Water Resources (ADWR) sincerely consider in its development of a draft Active Management Area (AMA) management goal and, later, management plan. We recognize that our livelihoods require a secure and sustainable water supply, and we are committed to working together and with ADWR to ensure our water is regulated and managed in such a way that our agriculture-based communities are able to thrive for generations to come.

First, we ask that the AMA management goal and plan support the well-being and economic stability of communities throughout the basin, which are strongly centered on family farms and ranches and the small businesses that service those operations. We are hopeful that an AMA can be structured to support locally-owned farms and ranches, which often do not have the same resources as the large, out-of-state operations now growing in our basin. Locally-based irrigators have a strong incentive to conserve water, if given the opportunity and support.

In particular, when assessing “substantial capital investment” toward future irrigation, we believe that ADWR’s determinations should be relative to the owners’ financial situation – not fixed criteria that are applied to all irrigators. Many local farmers have invested substantially in their acres with INA irrigation authority but have not done so in the last twelve months, due to financial limitations or otherwise; we ask that ADWR allow production on these historic acres and prevent landowners from losing the value of their investment. Additionally, we ask that the same personal consideration be given when assigning irrigation grandfathered groundwater rights and designing conservation strategies. We find it important to recognize that several of the water conservation and efficiency best practices noted in the management plans of other AMAs (e.g., conversion to drip or center pivot irrigation) are already being implemented on farms across the Douglas Basin – much has been conserved to date, and is being efficiently managed today.

Agriculture and rural living are central to our heritage, lifestyle, and economy – and we deeply want those opportunities available to the next generation. We strongly request that the AMA management goal and plan not encourage the urbanization of our rural lands or the development of our natural resources for the benefit of outside interests, and that regulatory requirements not make local agriculture prohibitive for current or future producers.

We ask that updates from ADWR regarding the AMA process (e.g., announcements of draft goal, plan, and public hearings) be frequent and easily accessible; more than notices in the local paper, we request that ADWR communicate directly with basin water users, such as through an email listserv. We aim to stay informed and would like to be as engaged as possible in the process – including in the appointment of Groundwater Users Advisory Council (GUAC) members. We ask that the Director petition the

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Via Mail and Email: tbuschatzke@azwater.gov; nlmast@azwater.gov;
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