



Management Plans - ADWR <managementplans@azwater.gov>

informal comments on Douglas AMA

1 message

David Robinson <d robinson@tucsonaudubon.org>
To: managementplans@azwater.gov

Thu, Apr 20, 2023 at 10:26 AM

To Whom It May Concern at the Arizona Dept. of Water,

Tucson Audubon Society was extremely pleased with the outcome of the public vote on establishing a new AMA in Douglas. Across Arizona, we must do far more to conserve our vital but dwindling water resources, to enable both wildlife and people to thrive in the coming years -- particularly in the face of climate change.

We are very concerned, however, about the proposed details for the Douglas AMA. Specifically:

The (proposed) management goal of the Douglas AMA is to support the general economy and welfare of communities in the basin by attempting to reduce the rate of aquifer depletion by 2035 and by further attempting to reduce the rate of aquifer depletion every 10 years thereafter.

This goal is not enforceable, since it refers to "attempting" to reduce the rate of aquifer depletion as opposed to *actually* reducing the rate of aquifer depletion. At the very least the word "attempting" should be removed. However, such a change in the language would still be far from sufficient. Managing the rate of aquifer depletion merely means that it can continue to be mined. This is not in any way comparable to "achieving safe yield," which is the management goal of several of the other AMAs.

Even the Pinal AMA, which has been managed as a "planned depletion" AMA, with a goal of "(preserving) the agricultural economy for as long as feasible, while considering the need to preserve groundwater for future non-irrigation uses," has a stronger goal than what is proposed here — and it has proven to be inadequate. New subdivision development in the Pinal AMA is currently on hold because the groundwater in storage is insufficient to meet assured water supply requirements.

We urge you to strengthen the language — and thus the goals and requirements — for the Douglas AMA prior to making the plans available for formal public comment.

With thanks for considering these informal comments,

David Robinson

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Pronouns: He/Him/His ([What's This?](#))