



Management Plans - ADWR &lt;managementplans@azwater.gov&gt;

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**Riverview's Thoughts on the Douglas AMA**

2 messages

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**Rudy Schmidt** <rudy.schmidt@riverviewllp.com>

Wed, Jan 18, 2023 at 2:25 PM

To: "managementplans@azwater.gov" &lt;managementplans@azwater.gov&gt;

Cc: "nlmast@azwater.gov" &lt;nlmast@azwater.gov&gt;, Christoph Werner &lt;christoph.werner@riverviewllp.com&gt;

**We believe the management goal of the Douglas AMA should be to preserve existing agricultural economies in the AMA for as long as feasible, consistent with the necessity to preserve future water supplies for non-irrigation uses. This would be consistent with the statutory management goal of the Pinal AMA. Given that economies of the Douglas AMA and Pinal AMA are both heavily agricultural, we believe it would be appropriate for the management goals to be similar.**

We would like to see the AMA goal be set for a 50-year period to allow time for technological advancement, development of drought-resistant crop varieties, and for intentional, paced adaptation. Water allocation should start at five acre feet/acre (to preserve existing agricultural economies: nuts and double-cropped land) and be decreased as appropriate during the lifetime of the AMA.

The ability to leave acres out of production to move their allocated water to other acres will allow steady decrease in water usage. The ability to buy water rights from other land owners who take land out of production should also be included (similar to mineral rights).

A clause to stop all agricultural irrigation when the static aquifer level reaches a certain point would also be a helpful fail-safe lever that could be pulled if the recharge isn't as robust as it is expected to be.

We would like to see the AMA strategies and tactics reviewed every 10 years and feel the first ten years should be used to:

- Build the baseline by monitoring all irrigation wells with flowmeters,
- Establish grandfathered total water rights, and
- Construct a rural water system for non-irrigation uses, which would most-effectively ensure the physical, legal, and continuous availability of water to all non-irrigation users.

Thank you for your consideration,  
The Riverview Team

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## **Rudy Schmidt**

Personal Identifying Information

Willcox AZ, 85643

Personal Identifying Information

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Rudy Schmidt <rudy.schmidt@riverviewllp.com>

Fri, Feb 10, 2023 at 8:53 AM

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

Cc: "nlmast@azwater.gov" <nlmast@azwater.gov>, Christoph Werner <christoph.werner@riverviewllp.com>, Brady Jansen <brady.jansen@riverviewllp.com>, Micah Fehr <micah.fehr@riverviewllp.com>, Kevin Wulf <kevin.wulf@riverviewllp.com>

### **New, more specific goal**

**We believe the management goal of the Douglas AMA should be to preserve existing agricultural economies in the AMA for as long as feasible, consistent with the necessity to preserve future water supplies for non-irrigation uses. This would be consistent with the statutory management goal of the Pinal AMA. Given that economies of the Douglas AMA and Pinal AMA are both heavily agricultural, we believe it would be appropriate for the management goals to be similar.**

We would like to see the AMA goal be met within a 50-year period to allow time for technological advancement, development of drought-resistant crop varieties, and for intentional, paced adaptation. Water allocation should start at five acre feet/acre (to preserve existing agricultural economies: nuts and double-cropped land) and be decreased as appropriate during the lifetime of the AMA.

This could look like:

2025 - 5 acre feet

2035 - 4.5 acre feet

2045 - 4 acre feet

2055 - 3.5 acre feet

2065 - 3 acre feet

2075 - 2.5 acre feet

The ability to leave acres out of production to move their allocated water to other acres will allow steady decrease in water usage. The ability to buy water rights from other land owners who take land out of production should be included (similar to mineral rights).

We would like to see the AMA strategies and tactics reviewed every 10 years and feel the first ten years should be used to:

- Build the baseline by monitoring all irrigation wells with flowmeters
- Establish grandfathered total water rights
- Construct a rural water system for non-irrigation uses, which would most-effectively ensure the physical, legal, and continuous availability of water to all non-irrigation users.

Thank you for your consideration,  
The Riverview Team

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