



Management Plans - ADWR <managementplans@azwater.gov>

Comments re Douglas AMA Management Goal & Plan

1 message

Sharon Rock

Personal Identifying Information

Sat, Jan 14, 2023 at 9:40 PM

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

Greetings,

I'm a resident within the Douglas AMA and I attended the first AMA Goal Setting Meeting on January 5, 2023. I'm writing to give you my thoughts regarding the implementation of the Douglas AMA. This is a complex subject. And I don't pretend to be an expert. I've used a prepared outline, but I've made several changes. Please read with care.

My wishes are to protect residents and the small and moderately-sized local growers, while incentivizing much more conservative groundwater practices by large users. These recommendations should also help to protect current homes, businesses, and infrastructure from damage through subsidence and earth fissures.

-- GRANDFATHERED GROUNDWATER RIGHTS APPLICATION FEES:

ADWR is currently requiring initial application fee deposits of \$500 and \$1,000 (depending on complexity). And the entire application process may cost the applicant as much as \$10,000 (for very complex applications).

These fees are prohibitive to some small growers and irrigation rights holders. We ask that application fees be based on income, rather than these high fixed-rate fees.

We wish to waive application fees for irrigation rights holders who can demonstrate financial hardship.

-- RECOMMENDED DOUGLAS AMA GOALS:

To create a sustainable water economy by 2030 where inflow to the aquifer is on average equal to the outflow. (Perhaps five-year rolling averages could be used to determine equilibrium.) This would likely also mitigate ground subsidence, earth fissures, and related property and infrastructure damage.

-- MANAGEMENT PLAN:

Following are some key points we'd like to see implemented through the Douglas AMA Management Plan.

1.) Capped groundwater withdraw allotments (groundwater "duties," based on historical use over the past five years) for growers whose annual groundwater use is more than 200 acre-feet.*

[*200 acre-feet is approximately two-and-a-half times the annual groundwater use reported by a highly respected local family farm for 2021. Many local growers (including nut growers) can survive and thrive on 200 acre-feet per year. Larger industrial-scale growers, however, typically report 300 to 400 acre-feet of groundwater withdraw annually, per irrigation pivot-- and most of these industrial-scale growers use many pivots.]

2.) Impose maximum groundwater withdraw fees allowable under the law for growers whose annual groundwater use is more than 200 acre-feet. Groundwater withdraw fees collected by ADWR are to be used for paying for low-income grandfather application fees, enforcement, and monitoring of the Douglas AMA.

3.) Prohibit full exemptions of groundwater allotment and withdraw fees for growers using best management practices. Instead, reward reductions in groundwater withdraw fees commensurate with reduction in groundwater use through best management practices.

For example: if a grower reduces their non-exempt groundwater use by ten percent through implementation of best management practices, they will be granted a ten-percent reduction in groundwater withdraw fees for that reporting period.

This will not affect growers who use 200 acre-feet of groundwater per year or less, as they will not be subject to allotments or groundwater withdraw fees.

4.) Reduce water allotments incrementally (for growers using more than 200 acre-feet per year) through the course of the Douglas AMA's management periods.

5.) Exemptions (from metering, allotments, and fees) shall be granted to non-exempt wells serving 10-acres or less, provided that groundwater withdrawn is used solely for the irrigation of the land the right is appurtenant to.

6.) Exempt wells (producing less than 35 gallons per minute) may be used to irrigate up to ten acres of land, rather than the current limitation of two acres.

7.) Initially every year for two years, and then every two years, ADWR must perform, and publish, an assessment of the hydrological conditions, rates of groundwater withdraw, and groundwater levels within the Douglas AMA, with a particular focus on areas of concern, such as the Elfrida Subsidence Area.

If, pursuant to these assessments, groundwater levels continue to drop, and/or subsidence and/or earth fissures continue to occur, or be worsening, the agency shall conduct a review of groundwater withdraws in the area of concern to determine whether to implement:

-- A.) reductions in groundwater use allotments for irrigation rights-holders (who use more than 200 acre-feet of groundwater annually) and/or

-- B.) required greater implementation of groundwater use best management practices and groundwater use monitoring for irrigation rights-holders (who use more than 200 acre-feet of groundwater annually) within the area of the concern.

Again, I'm not a hydrologist. So I don't know what's realistic. But the goal is not to penalize low-income, small to moderate-sized growers, while curtailing current water use by the large water users. It's also to prohibit all new wells or increases in allotments, unless the water table is proven to be consistently rising over five or ten year rolling average periods. Most immediately, however, the outflow and inflow of the aquifer needs to achieve equilibrium, ideally before current wells of small to moderately-sized users run dry at their current depths.

Sincerely,
Sharon Rock
Bisbee, AZ