

## Survey of public comments regarding the Douglas AMA Draft Management Goal:

### For Local Autonomy - 19 Farmers/Ranchers, 7 Residents (60th percentile)

"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."

"...the Department needs to increase its public outreach and education efforts to ensure that water users and landowners in the Douglas AMA are informed and are provided a meaningful opportunity to help shape the management goal for the AMA."

"The AMA was voted into existence by the residents of the Douglas Basin, therefore it is our right to create, craft, and change the structure as we see fit."

### For Safe Yield Goal - 32 Residents (77th percentile)

"To maintain current groundwater levels, and to mitigate ground subsidence, earth fissures, and related property and infrastructure damage."

"We need to start the difficult process of developing water management goals and policies that stabilize our water levels and protect our local farmers and residents."

"The management goal we wish is for groundwater draws to be equalized with recharge rates..."

"... the goal must be: no more water out than goes in."

### For Stabilized Water Tables Goal - 26 Residents (60th percentile)

"We must make sure that our groundwater is managed in a way which keeps local agriculture sustainable, and this means stable water levels..."

### For Planned Depletion Goal - 2 Non-Basin Entities, 4 Farmers (16th percentile)

"Given the lack of alternative water supplies within the Douglas AMA, the management goal and any future conservation measures adopted by ADWR should explicitly allow for continued groundwater mining (i.e., groundwater level declines) at rates consistent with the stated management goals."

"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."

### Against Planned Depletion Goal - 27 Residents (66th percentile)

"Planned depletion," "slower rate of withdrawal" or other halfway (or greenwash) measures are not acceptable."

"The residents of the Douglas basin did not vote for an AMA because we would like to die a slightly slower death — we want to preserve our way of life for our future generations."

### For "locals first" water rights policies - 19 Farmers/Ranchers, 27 Residents (68th percentile)

"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."

"...and prioritizing water rights for locals who live and farm here, over those for invasive operations owned by absentee investors."

"...entities are extracting our natural resources, converting those resources into profit, and then moving that profit away from Arizona. Our Douglas AMA policies must uphold the legal mandate (ARS §45-401) to address how this critical issue is impacting our local economy and the welfare of our citizens."

### For sustaining long-term/generational farming in our area - 27 Farmers/Ranchers, 28 Residents (99th percentile)

"...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."

"We are truly rooted in our communities' legacy as an agricultural economy and are committed to its continued existence."

"As lifelong residents of the community, we see the necessity to preserve our livelihoods, which are the backbone of the local economy, as well as our most precious resource, water, so that our children and future generations will be able to continue our legacy."

"More specifically, any management goal adopted by ADWR must expressly preserve and protect continued access to groundwater for irrigation and other agricultural uses."

"A management goal that fails to protect long-term access to adequate supplies of groundwater for irrigation and other agricultural uses would have a devastating impact on the economies in these areas."

"The goal of the Douglas AMA should be straightforward: to assure the long-term sustainability of the aquifer for the long-term viability of the rural, small farm and ranch economy and lifestyle."

**Against an urbanized future (maintain rural lifestyle) - 19 Farmers/ranchers, 27 Residents (88th percentile)**

"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..."  
"...limits on groundwater extraction for commercial and residential development..."

**For water-use cutbacks - 8 Farmers, 1 Non-Basin Entity (33rd percentile)**

"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 management goal of the Douglas AMA is to preserve existing agricultural economies of the basin by incrementally reducing water use up to 25% over 25 years to approach long-term water sustainability."

**For a 50-year goal time frame - 1 Non-Basin Entity (11th percentile)**

"We would like to see the AMA goal be set for a 50-year period"

**For a 25-year goal time frame - 10 Farmers, 1 Resident (49th percentile)**

"The management goal of the Douglas AMA is to preserve existing agricultural economies of the basin by incrementally reducing water use up to 25% over 25 years to approach long-term water sustainability."

**For a 20-year goal time frame - 9 Residents (33rd percentile)**

"The management goal we wish is for; groundwater draws to be equalized with recharge rates by 2043..."

"Groundwater draws should be limited and balanced with aquifer recharge rates within 20 years (or something reasonable)."

**For a reasonable/feasible goal time frame (for safe yield / stabilized water levels) - 10 Residents (44th percentile)**

"No more out than in, and planning measures to achieve that goal in as short a time as feasible."

"Groundwater draws should be limited and balanced with aquifer recharge rates within 20 years (or something reasonable)."

"...within a timeframe that protects residents and gives farmers enough time to adapt to less water use."

**For 10-year management plans/reviews - 1 Non-Basin Entity (11th percentile)**

"We would like to see the AMA strategies and tactics reviewed every 10 years..."

**For 5-year management plans/reviews - 10 Farmers (44th percentile)**

"We suggest that we should convene every five years to reevaluate this conservation approach, in the case that our water conditions improve as a result of recharge and water reductions."

**For 2-year management plans/reviews - 8 Residents (22nd percentile)**

"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."

**For lower fees for smaller farmers (based on income) - 32 Residents (77th percentile)**

"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."

"Rather than a rigid fee schedule, fees should be set on a sliding scale that recognizes differing economic capabilities of small operations and mega corporations."

"A sliding scale or subsidy program is absolutely necessary."

**Equitable assessment of "substantial capital investment" - 19 Farmers/Ranchers, 28 Residents (93rd percentile)**

"...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."

"...the criteria for what constitutes "substantial capital investment" must be flexible and equitable...."

"Similarly, we hope you'll guide the ADWR to have a common sense approach in their determinations for "substantial capital investments" as they pertain to grandfathered rights. A substantial investment by a family farmer is not the same as a substantial investment from a national corporation."

*(Percentiles calculated with 18 items and 64 total commenters.)*

Quotes are from comments submitted to ADWR by local residents. Most are here: <https://new.azwater.gov/ama/douglas-ama>