

Response to Arizona Farm Bureau Flyer against Sulphur Springs Valley AMAs

What the Arizona Farm Bureau Says

What Is an AMA?

- An Active Management Area (AMA) is an area within the state wherein the code recognizes that serious overdraft of the groundwater is occurring.
- AMAs are created to provide long-term management and conservation of an area's limited groundwater supply.
- While local steering committees can provide recommendations, AMAs are monitored and administered only by the Arizona Department of Water Resources. Once an AMA is implemented, it is deemed permanent and irrevocable.
- An AMA is meant to be a last-resort solution, NOT the first step in addressing water concerns.
- It is also designed for large cities where water usage exceeds all ag operations in our valley.

AMA Rules and Regulations

- Large municipal providers will be assigned an annual total Gallons Per Capita Per Day requirements.

What They Don't Say

What Is an AMA?

- Wells are going dry in the Sulphur Springs Valley. The water table in the Willcox area is dropping an average of 5-10 feet/year and 2-6 feet/year in the Douglas Basin.
- As a result of overpumping, the incidence of land subsidence and fissures in the Valley is the worst in the state.
- At present, the only “management” is by large industrial agriculture interests whose rates and amounts of pumping are unrestricted by law or regulation.
- The Sulphur Springs Valley AMAs would be written by ADWR to achieve a conservation goal with input from Valley residents and local officials and from an advisory committee appointed for each AMA by the Governor based on their knowledge of and experience in groundwater use, development and conservation.
- There has been *no* first step since it was first shown years ago that the Willcox Basin water table is dropping at an unsustainable rate. We *do* need a strong first step like an AMA.
- Four of the first five AMAs were adopted for urban areas but the Pinal AMA was adopted in and designed for a rural area.

AMA Rules and Regulations

- One large user in the Sulphur Springs Valley has been reported to be pumping as much water annually as the City of Tucson.

- Municipal water users have the option of adopting a Best Management Practices (BMP) program. BMPs do not set a quota on customers but encourage conservation by such means as low water use fixtures, landscaping, irrigation and recycling.
- An AMA in Cochise County will limit the production and output of a multitude of industries, including the agricultural, powerplant, and mining industries.
- Lack of water is limiting agricultural production *now*, and continuing overdraft will impact those industries even more in the foreseeable future.

Agriculture in Cochise County

- Agriculture accounted for 63.5% of Cochise County's GDP in 2020 (or \$3,319,450,000).
- According to the US Bureau of Economic Analysis, in 2020 GDP for agriculture in Cochise County was \$72 million, which is only 2% of the Private Industry total GDP of \$3.3 billion (*not* 63.5%), and even less (1.3%) of the overall county GDP of \$5.2 billion.
- If there is no water, there is no agriculture. A stable future economy depends on ending the overdraft and moving toward aquifer replenishment with a more diversified economic base that includes organic and low-water use crops, sustainable regenerative agricultural methods, and open space.
- In 2017, Cochise County Agriculture reported over 1,500 workers and totaled a payroll of \$15,128,000 for these workers.
- This is only \$10,085 per worker - barely enough to live on, let alone support a family. How many of these workers spend their money in the County? How many are part-time?
- Agriculture has the largest influence of private industry on Cochise County's economy.
- Much of that influence, often by large out-of-state corporations, has resulted in the continued failure of our elected officials to pass legislation to help rural Arizona conserve our groundwater.
- In 2011, the State Legislature passed legislation to take away Cochise County's authority to regulate dairies.

Agriculture in Cochise County

- Cochise County has more than twice the state's average number of ag-related jobs.

How Will an AMA Affect the Valley?

- AMAs increase government intervention on all wells and water usage, enforcing higher restrictions on water allocations and requires permits that are hard to obtain that will limit the growth of our communities.

- If an AMA is put in place, we will have no control over our water. The Arizona Department of Water Resources will be in full control.

- If this is true, it suggests again that we need a more diversified economic base, including agriculture that produces high-value low-water use crops and supports high wage levels.

How Will an AMA Affect the Valley?

- AMA rules apply only to “irrigation wells” (i.e., wells that pump 35 gal/minute or more). Wells that pump less than 35 gal/minute are exempt (except for a very small group of special cases).
- Usage by existing irrigation wells that have been irrigating in the past five years can be grandfathered into an AMA.
- Current unlimited use by Big Ag already drastically limits growth of our communities.
- As drilling of ever-deeper drilling of wells becomes more expensive, more residents, small farmers and small businesses will be driven to leave the Valley and new residents will be discouraged from moving here.
- Small and medium-sized farmers and residents have no control on water use *now*. Any big operator can move in and pump as much water as they want while smallholders' wells go dry.
- Deeper wells are expensive to drill and the power to pump deeper water affects every pumper's bottom line.
- Big companies will out-compete smaller operations when it comes to accessing deep water. The biggest straw wins.
- Without an AMA our water supply will continue to be controlled solely by large unregulated industrial farming operations which are the main cause of our current situation.

