

OPEN MEETING AGENDA ITEM SW-20379A-05-0489
Betty Camargo W-20380A-05-0490



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Arizona Corporation Commission

From: Jan Emming [janemming@citlink.net]
Sent: Wednesday, December 17, 2008 12:42 PM
To: Mayes-WebEmail; Mundell-Web; Gleason-WebEmail; Hatch-WebEmail; Pierce-Web
Subject: Perkins/Rhodes CC&N, and new water data in Sacramento Basin

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Wednesday, December 17, 2008

Re: Rhodes Homes/Perkins Mountain Water Companies and Certificates of Convenience and Necessity

To the Honorable Members of the Arizona Corporation Commission:

I understand that the ACC is due to make some decisions starting Dec 18, 2008 regarding the issuance of a CC&N for Nevada developer Rhodes Homes and two corporate entities under the names of Perkins Mountain Water and Perkins Mountain Wastewater Companies. I hope that the Commissioners will factor important new data from the Northwest Arizona Watershed Council into their decision-making processes. I believe that several other people have already submitted this information to you, so I will forego attaching it to this message.

Anyone who has lived in or near Golden Valley in Mohave County and paid any attention to the local water situation is well aware of the deep and relatively scarce water supplies of the region. Golden Valley residents must frequently haul their water miles away from deep community wells because individual wells are far too expensive to drill, and/or might end up being dry anyway. Yet to listen to the developers, real estate folks, and largely pro-growth-at-whatever-cost local elected officials one might get the impression that there is a veritable ocean of fresh water just below the creosote bushes. A more accurate, impartial, data-supported stance supported by "ground truth" from existing water users is that it is more like an ancient shallow lake down there.... a lake whose surface lies deep underground, and which has already been drawn down without replenishment across significant areas of its extent.

Golden Valley lies above the northern portion of the Sacramento Aquifer, and is the location of the Pravada development by Rhodes, which would entail at least 25,000 homes plus additional businesses forming a completely new city. The northern portion of the Sacramento Aquifer is the most heavily impacted by development to date, and probably has the least water, ironically.

It is one thing for an aquifer to support existing development (even for decades into the future), and quite another for it to support planned growth that is five to ten times the current population. I cannot think of a single arid-land aquifer anywhere in the world that has undergone overpumping due to development that has been able to support continued growth for more than a few decades before entering serious decline, ranging from lowering water quality and pollution to severe land subsidence and an unaffordable deepening of the water table. These effects make previously viable activities economically impossible while simultaneously incurring huge unforeseen costs in other arenas.

The City of Tucson in the 1960s and 1970s is probably the most salient Arizona example of growth far outstripping aquifer supply. Serious supply problems loomed alongside major costs associated with depletion. Fortunately for Tucson and Pima County, the Central Arizona

Project Canal was completed in time to support exorbitant continued growth for another two decades. But things are different today. Given the complete and total allocation of Colorado River Water supplies, there will be no CAP bailout for the massive projects planned for Mohave County by Rhodes Homes should overdevelopment occur here.

It doesn't require much foresight to predict ghost-town status and enormous social, economic, and ecological problems for Pravada and much of Mohave County when the water runs low and declines in quality in another couple of decades. Far from being the problem of "someone else", this will almost surely be the problem of current residents and their children. *It is not* a distant, nebulous future issue, but one that will arise within most of our immediate lifetimes. We must act with foresight and intellect today to avert the obvious problems associated with inappropriate and unsustainable development tomorrow.

The massive planned Rhodes developments are not realistically accounting for current water demands, historical patterns, or likely future outcomes, let alone using current data from impartial sources. It is my view that they should be scaled back drastically, if approved at all given Jim Rhodes' many questionable activities, and his documented and proven illegal and unethical behaviors.

Please consider these long-term impacts very carefully alongside the water use information being brought to light by the Northwest Arizona Watershed Council before issuing Rhodes/Perkins any CC&Ns.

Thank you for your diligence. I deeply appreciate the important work the ACC does.

Most sincerely,

Mr. Jan Emming

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