

**From:** [Cheryl Morgan](#)  
**To:** [Sharon Scantlebury](#)  
**Cc:** [Cary Morgan](#)  
**Subject:** Input concerning the SAN SIMON VALLEY proposed INA  
**Date:** Wednesday, May 20, 2015 1:47:57 PM  
**Attachments:** [Input to the Proposed San Simon INA.docx](#)

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Dear MS Scantlebury,

IAW guidance from the meeting on the above topic on 16 May 2015, I am submitting my feedback and input. I and my husband currently own the Braidfoot allotment (Desert Star Ranch) , vicinity of Stein's Peak @ 10,000 acres). We have owned this property since 1994.

Thankyou

Respectfully submitted,  
Cheryl Morgan

Sent from Windows Mail

Dear ADWR:

I attended the meeting on 16 May 2015 about the INA. After hearing the large number of opinions, reviewing available water data, and being a part of the San Simon valley for almost 20 years, I am not in favor of the INA. However, I am concerned over the future availability of water in the valley, so I wish to state my opinion as follows:

- The Petitioners are disingenuous. The water quality and quantity has stabilized during the past 30-40 years, due to the departure of cotton farming, and the use of more efficient watering methods by the population of local ranchers/ farmers in the valley. The petitioners do not live in the valley for the most part, but are instead “carpet bagging” with orchards and vineyards, crops which are not efficiently watered, and require as much if not more water per plant than cotton. They are working to ensure their futures, at the expense of locals. Not only would the INA allow them to keep growing what they have planted, but because they setup more irrigated areas before they filed the petition, they will in fact increase the acreage they are growing on, since they grandfathered themselves in before filing.
- The petitioners have said publicly they are worried about the water levels and lack of water, but privately they have said to investors there is plenty of water. The petitioners have not made it clear what they really believe. Therefore, we must look at the facts which were supplied by several hydrologists’ including the ADWR. There does not appear to be any proof offered of drastic decreases in the water levels or quality which require this sudden petition to halt water use by anyone “new” to the area. There is for example no report that wells have gone dry, that deeper wells are being dug, that existing wells are being re-drilled, etc. Instead, during the meeting, there was a consistency in the reporting that showed water quality and quantity for the past 30 years has been holding steady. I feel the petitioners are dealing in bad faith.
- Local ranchers and farmers don’t have stock holder investment, they have family investment, This means they have a much higher desire to ensure the land survives to be handed to the next generation. By definition a generation is 30 years; therefore, for a generation they have been demonstrating and proving they are the best stewards of the land. You can also look at how they graze, cultivate and fertilize the land to ensure its continuity. In other words, they have not only been watching the water, they have been caring holistically for the San Simon Valley. What is the long term investment for the petitioners? Some of them are family farms, but the majority of this minority are not invested in the future of their families: should the San Simon Valley fail for any reason, they will simply move on. They have demonstrated this by stating: it’s just business.

**“Arizona grows the best pistachios in the world, but you won’t find them on supermarket shelves here in the U.S. “Arizona quality is so superior that Europeans pay a premium price,” says Dr. Bart Heuler, a grower from Irvine, Calif., who recently expanded into southeastern Arizona. “We can produce better quality pistachios, with higher production per acre, at a lower cost in Arizona. We have the water, the organization and the mechanization to make it work, and we’ll have the most productive trees in the world.” At 81, Dr. Bart Heuler keeps his finger on the pulse of the pistachio business. His family’s company, A&P Ranch grows more than 4,000 acres of pistachios and almonds in California. A retired dentist, Heuler and other ranchers formed a producer-owned cooperative, A&P Growers, to farm and process the nuts. Three years ago, A&P Growers bought out Pistachio Corporation of Arizona, which farmed and processed 1,000 acres of nuts near Bowie, a small town near the New**

**Mexico border. Heuler recently initiated the purchase of another 2,600 acres in the Bowie—San Simon area to be planted with high producing pistachio trees. The new orchards will take 10 years to reach full production. A&P Ranch will be one of three local farms using A&P Growers' services. "Do you know how much fun it is to create a viable, thriving industry in Arizona?" Heuler asks. In 2009, Arizona produced just one percent of the nation's pistachio crop, or four million out of 358 million pounds. Heuler plans to double Arizona 'Output. "The California industry's in crisis," Heuler says. "Hundreds of thousands of acres are being taken out of production in California as a result of the state's mismanagement of water. Arizona's the only place left to expand." Source: Farm Credit Services Southwest, 2010.**

While I disagree with the INA, I am concerned that the ADWR needs to do something to protect the valley. The drought has been in effect for at least a decade, and more investment by those who have little long term ties is not being regulated. I think the ADWR needs to deny the INA, BUT, to investigate how the large scale orchards and vineyards are using the water, and affecting the land by cultivating the desert. I think these businesses are using the largest wells, highest volume of water, and most large scale of cultivating methods, and it is THESE things which will have a negative impact. I would like to see the INA denied, and an in depth evaluation of the farming methods of the orchards and vineyards be pursued. Please note in the above article quoting Dr Hueler, "California is in a state of crisis due to water mismanagement". How did that occur: did it take place because pistachios require a lot of water to grow, and California is running out of water? Why is DR Hueler moving to the desert to grow crops? Why come to San Simon Valley, and how will he leave it?

According to the University of Georgia Study, Pecan trees can use as much as 350 gals per day of water. According to the Water Footprint Network's website, it takes 1300 gallons of water to produce a pound of pistachios. I think we should really know what the water usage is for the crops grown and proposed in San Simon. With the resources from the U of A and other Arizona schools, it should be possible to develop a crop comparison chart showing how much water any of the current crops grown in the valley are using, and see which is truly impacting the water quantity and quality.

Thank you

Sincerely,

Cheryl Morgan

Colonel, USA (ret)

Desert Star Ranch (Braidfoot Allotment)