

From: [Cheryl Morgan](#)
To: [Sharon Scantlebury](#)
Cc: [Cary Morgan](#)
Subject: CORRECTION to C Morgan Second Input to the Proposed INA for San Simon Valley
Date: Saturday, June 06, 2015 10:56:21 AM
Attachments: [Second Input to INA For San Simon Valley.odt](#)

My apologies: Please use this version.

Dear Ma'am and Sir:

Attached is my second input to the proposed INA for San Simon Valley. Based on the increased time, and the initial set of responses, I had an additional series of questions and input regarding the imposition of the INA. Currently, I do not see that the data support introducing an INA for the Valley.

Thankyou again for your time and consideration.

Sincerely,
Cheryl Morgan
Colonel, US (Ret)
Desert Star Ranch (Braidfoot Allotment)

Sent from Windows Mail

6 June 2015

Dear ADWR:

With the notification that the decision on the INA would take longer than initially stated, I am concerned over why this has come up as an issue. Although more people who have not been heard will get time to provide their input, does the time extension also because there has been a lack of oversight of water use in the San Simon Valley (SSV). As I understand the law, it seems to me that the decision to finalize the status of an INA is based upon empirical water data which should already exist, since the initial petition should have been based on hard data that there is a problem with the water quality and/or availability. How did the petitioners who stated they need an INA determine this? This begs the question: what is the data the petitioners used and what has the state been doing to monitor water in the SSV all along. Do we not already have information on the following?

- (1) How many wells are there in the San Simon Valley (SSV) area which is under this INA proposal?
 - a. To what depth was each well drilled? How does that compare to the actual depth of the water in the well?
 - b. How old is each well?
 - c. What is the GPM, or if that is not how it is measured, what is the determination of the output of each well?
 - d. What is the status of each well (active, inactive, capped, etc?) Who is the registered owner? (corporation or family)
 - e. What is the historical change over the past 30 years in each well's quality and quantity of available water?
 - f. What is the historical change over the past 30 years in each well's usage (i.e. change in purpose of the water, cattle, cotton, alfalfa, orchard vineyards, domestic, etc?)
- (2) What is the historical rate of well drilling over the past 30 years (increases, decreases) and what is that rate's relationship to economic or climactic factors)
- (3) How many dry or re-drilled wells have there been over the past 30 years?
- (4) What have been the changes to the types of agriculture over the past 30 years (i.e. shift from types of crops, total acreage involved, and usage)
- (5) What is the scientifically determined rate of water usage for the various types of crops which have been grown in the SSV over the past 30 years?
- (6) The only users involved in this issue thus far named seem to be those involved in agriculture and ranching. What is the impact of water quantity and quality by other businesses such as golf courses, housing developments, business parks, energy plants?
- (7) During the last 30 years, what has been the average precipitation in the SSV and how has that changed from the previous 30 years.

The empirical data above should give a good foundation of factors to assess if the SSV water situation has improved, or declined and the reasons for the changes. If for example, wells had been primarily sustaining alfalfa and cattle over the past 30 years, and only recently has water quantity and quality declined, it should be easier to analyze and pinpoint the specific reasons for that. If water has improved and sustained, and you observe this has been due to the changing demands (crops, population), then that should as well provide solid statistical data for analysis to determine why. The ADWR presentation at the meeting, described some historical data points, but it was not clear how many wells were included in the data collection, and what the overall analysis was of all the factors of what the current water situation is. AS well, what is the cause and effect of how we arrived at today's actual water situation either good or bad: the cause and effect, so that a solution or recommendation can be based on that.

Based on the analysis of the changes and the reasons for them, the next step would seem to be answering the questions of "what is the projected water status, quantity and quality in the SSV for the next 30 years at 5 year intervals". If the analysis is **negative**, what are **recommended solutions** based on the reason for the negative quality and quantity of water for the SSV? There needs to be a **sequencing issue** here, and not a sudden declaration by some SSV groups that water is a problem and the only solution is an INA. What is being done elsewhere in Arizona? Recently, there has been a study done on the cotton growing in central Arizona and its impact on water. Many factors were laid out including subsidies, and water infrastructure, and costs from the CAP. There was a lot of consideration given to how to correct the issue. It seem there is only one alternative for SSV. Has data been collected only to support a forgone conclusion: INA or nothing?

Another issue I would like to raise, is what is the actual state approved criteria for declaring a water shortage, how will it be enforced and monitored? Santa Cruz County had imposed a no well drilling standard for years; yet many ranchers there are appalled at the number of wells being drilled based on legalities that are inherent in the no well drilling laws. I am concerned not only over the solution, but that the solution has many loopholes which will negate its effectiveness even if it is monitored.

In summary, when you make the final decision on the INA status for SSV, I would like to know how the data supported that decision, including the data used, the source of the data and who did the analysis of the data acquired. If my questions are not part of how the state makes this decision, I would like to understand , by seeing it published, the ADWR's methodology for its decision, and **the way ahead to sustain or improve the water in the San Simon Valley**. Families will live here for years to come, and deserve to know that the best way forward was decided by using an understandable method applied across the board of SSV groups.

Thank you

Sincerely,

Cheryl Morgan

Colonel, USA (ret)

Desert Star Ranch (Braidfoot Allotment)

ADDENDUM TO ABOVE:

AS I PREPARED MY SECOND INPUT, ADWR POSTED SEVERAL MORE DATA POINTS WHICH DREW THE INITIAL CONCLUSION THAT BETWEEN 2007 AND 2015 THERE WAS A NEGLIGIBLE CHANGE IN THE WATER LEVELS. **THIS BEGS THE QUESTION FOR THE INA PETITIONERS: WHAT ARE YOU TALKING ABOUT?**