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Subject: Public comment on proposed San Simon Valley Sub Basin INA
Date: Friday, July 17, 2015 11:54:57 PM

Comment on the proposed designation of the San Simon Valley Sub-basin as an irrigation non-expansion area ("INA")

The information presented by the Arizona Department of Water Resources (ADWR) on the ADWR website and at the public meeting are completely insufficient to support a designation of an INA in the San Simon Valley Sub Basin for the following reasons.

While the basic criterion for designation of an INA is: "There is insufficient groundwater to provide a reasonably safe supply for irrigation of the cultivated lands in the area at the current rates of withdrawal", the question arises as to what constitutes a reasonably safe supply of water for irrigation. However the statute doesn't define "reasonably safe supply of water for irrigation"

Thus it appears that the ADWR groundwater flow model projections that are presented on the ADWR website are based on the requirements of an "assured water supply" as defined in ARS 45-576, which requires that proposals to subdivide lands in an Active Management Area (AMA) include assurance that there will be "an assured water supply" for the subdivision for at least 100 years.

According to ARS 576 (J)(1), The definition of "assured water supply" is, in pertinent part: "Sufficient groundwater... of adequate quality will be continuously available to satisfy the water needs of the proposed use for at least one hundred years". Furthermore, "sufficient groundwater" is defined to mean: "that the proposed groundwater withdrawals that the applicant will cause over a period of one hundred years will be of adequate quality and will not exceed, in combination with other withdrawals from land in the replenishment district, a depth to water of one thousand feet or the depth of the bottom of the aquifer, whichever is less.

Since an AMA is more restrictive than an INA regarding water use, if the San Simon Valley Sub Basin can meet the AMA requirements for an "assured water supply" at current levels of irrigation, it would certainly follow that the San Simon Valley Sub Basin would have a "reasonably safe supply of water for irrigation" at the current rates of withdrawal.

Examination of the ADWR groundwater flow model projections show that, after 100 years at the current withdrawal rates, the projected depth to water for deep agricultural wells in the San Simon Valley Sub-basin in 2115 would be substantially less than 1000 feet. These results meet the ARS 45-576 criteria for an AMA for 100 years supply of water from wells that do not exceed the depth of 1000 feet or the depth of the bottom of the aquifer.

Therefore, the San Simon Valley Sub Basin, at current withdrawal rates meets the requirements for an "assured water supply" and hence for a "reasonably safe supply of water for irrigation at the current rates of withdrawal".

Therefore there is no basis for designating the San Simon Valley Sub Basin as an INA.

Thank you

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