There is confusion over the 62,000 acre foot overdraw and how the 34,000 number according to the formula was reached. This needs to be explained plain as day.

The 1% reduction per year over the next ten years needs to be clarified as cumulative. I also think the 1% needs to be based off of the 62,000 acre foot and not the 34,000 acre foot. Every farmer I talked to was understanding it was 1% of 62,000 acre feet and confused over the 34,000 acre feet As one large farmer put it, a 340 acre foot reduction across the entire valley means that one pivot just needs to be taken out. Consequently, it doesn't seem reasonable to reduce 2 pivots across the entire valley.

Tier system

Are the actual numbers as such?

80% for 10-99 acres

83% for 100-150 acres

85% for 150+ acres

I saw someone put them at

10-50

50-100

100+

I think that the tier should be as follows

80%- 10-99 acres

85%- 100-200 acres

90% 200+ acres

Reasoning on Alfalfa example

4.67 acre feet would be a reduction, but if you factor in the formula of 85%, that would give a 150+ acre farm 5.49 acre feet of water, which most alfalfa growers would say they are currently using 5.25 acre feet of water. Seems weird to start off at a higher number than is needed.

I also think that type of irrigation delivery system should be taken into consideration when talking about the efficiency. A person who is using a pivot or solid set sprinklers has options to upgrade their efficiency to drip irrigation or micro sprinklers. However, when a farm is already using drip irrigation and has to reduce their water use, that means that they have to take out acreage. So the farms that are the most water efficient are actually being penalized when they should be rewarded for doing so.

Crop chart of acre feet per crop needs to be made correct by consulting UA or some USDA resource. The chart is also missing all the crops I grow, except watermelon. Needs to put onions, carrots, garlic, cantaloupe, canary melon, summer squash, winter squash, winter greens, beets, cabbage, broccoli, tomatoes, cucumbers, pumpkins among others. What happens if someone wants to grow a crop that's not on the list? Do they need to consult ADWR first?

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7-1001 Well Spacing Requirements- I'll be referring to non-exempt wells or irrigation wells.

There needs to be some protections that prevent the larger or more affluent to drill a well or deepen existing wells to a depth that will affect the water levels of other wells in their vicinity. The protocol of a hydrologic study is very vague and appears that it will never be called for when drilling a new well. Explain the wells team protocol! I think they need to be given more tools or guidance of when a study is to be done.

In a shallow static water area where most wells are 500' deep, if someone comes in and drills 1,000' deep, it will 100% affect everyone's wells in the area. There should be a requirement of a hydrologic study anytime that there is a desire to deepen a well or drill a new one more than a couple hundred feet deeper than others in the area.

Example. Farm up the road saw the AMA coming and drilled a 1,000' well in an area where the deepest wells around were 500' deep. Almost immediately, irrigation wells and domestic wells in the area started to have issues with water. The question is, did that farm already have sufficient water or was it trying to get more?

If farms have sufficient water or say up to 500 gallons/minute well and want to drill deeper to get more gallons per minute above that, then they need to do a hydrologic study before being granted permission.

Example. Farm up the road was a good farm and grew crops like cotton in the rotation because they didn't have enough water to do all alfalfa. New farmer with more money came in and decided they would drill more wells and deepen existent wells so that they would now have enough water to farm more water heavy crops. After doing so, other farms in the are have had declining water levels. Farms that are more affluent or have investor money behind them have virtual no limits to deepening or drilling wells, where smaller farms don't have the capital to do so. This should not be the case.

I understand that this is a tricky one, and I hesitate to write comments on this, but I feel this is the biggest problem beyond everything else discussed. People in our rural sector should know that we live in an area that having a well means that you'll have to spend money to work on it, or possibly deepen your well over your lifetime. However, if entity's are allowed to drill and deepen wells at will or as far as their checkbooks will allow them to, the regulation of water is only going to do so much is keeping the local population happy. There needs to be something to stop and look at how it's going to affect everyone in the immediate vicinity.

Once again, this last piece on well spacing needs to be discussed and ideas thrown out at what's reasonable and what's not. There may not be a reasonable solution, but I know that I need to bring it up! I may get stoned!

Aaron Cardona