



Arizona Farm Bureau Federation

325 S. Higley Rd, Suite 210
Gilbert, AZ 85296

September 30, 2022

Dear Ms. Scantlebury,

On behalf of more than 2,300 farm and ranch members across the state, Arizona Farm Bureau appreciates the opportunity to comment on the Arizona Department of Water Resources' (the Department) request for input on whether it should undertake procedures to designate an irrigation non-expansion area (INA) in the Hualapai Basin. We strongly urge the Department not to use its limited resources to undertake INA designation procedures in a basin that has a provable, safe, and adequate supply of water for current levels of agricultural pumping.

Basin Conditions Do Not Warrant an INA

Under A.R.S. § 45-432, a subsequent INA is appropriate only when the groundwater in the basin is insufficient to "provide a reasonably safe supply for irrigation of the cultivated lands in the area at the current rates of withdrawal." The farmers on the ground in the Hualapai Basin can attest that the water supplies in the basin are reasonably safe to support current agricultural production. Across the basin, farmers report that well levels are remaining static, or even seeing increases, as compared to the groundwater levels present when these wells were drilled (some of them many decades ago). The Department's own preliminary data showed that if current rates of pumping continue for the next 100 years, only 17 percent of agricultural wells will be at a depth-to-water ratio of 750 feet – well above the 1200 foot level that is usually considered a critically low depth. While drought has certainly played a part in the basin, it is clear that these aquifers are healthy and able to support the critical agricultural industry on which Mohave county relies. The Department need not expend the time to determine whether an INA is warranted when all indications imply it is not.

Moreover, though future projected irrigated acres are not appropriate considerations for determining whether an INA is warranted, it is worth noting that the Hualapai Basin water supply is adequate even if farms in the basin were to expand to their full build-out potential. Not all acres owned by farm interests are farmable, and those that are farmable are being cultivated in extremely efficient ways. Farm interests at the September 20 hearing indicated that their investments in technology and precision agriculture meant that their trees use 63 percent less water than industry standards for that crop (and result in 46 percent additional tree growth). Both anecdotal and modeling-based data indicate that irrigated agriculture is not at risk of having insufficient groundwater to support it.

Questions for the Department

Based on the Department's presentation of preliminary hydrologic data, we have several questions for clarification.

First, the Department has undertaken INA designation procedures for the Hualapai basin twice before. Both times, the Department concluded that the data was insufficient to warrant the creation of an INA. Presumably, the Department still has access to the information on which it relied to make those determinations. How does the preliminary data presented this month compare to the information compiled by the Department in those prior attempts? This question is particularly relevant to the present inquiry; if the preliminary data is comparable in terms of what it indicates about the health of the Hualapai basin, undertaking yet another attempt at an INA designation is an unwise use of the Department's limited resources.

Second, the Department's presentation relied on the results of a model. Three possible data sets were referenced for this model: the 2013 USGS study, the 2019 study from New World Engineering, and the 2021 USGS study. We request more detailed information regarding what data ultimately informed the Department's model. If the Department chooses to proceed with the designation procedures, the full data set must be released to stakeholders to help inform their comments regarding whether the INA is warranted under the statutory provisions.

Conclusion

Understandably, our farm and ranch members perceive the efforts to designate an INA as a direct assault on the agricultural industry in Mohave County. Driving agriculture out of the basin is unwise and not in the best interests of the county. While it is true that agriculture uses a significant amount of groundwater, water use is not water waste. Farming and ranching are significant economic drivers in Mohave County. The industry employs dozens of people and supports significant other economic activity including trucking, hospitality, sales, and engineering. Farmers and ranchers are engaged citizens who give back to their community by supporting youth programs and charitable organizations. Agriculture is indispensable in Mohave County and across the state. We urge the Department not to participate in a process that could cripple the success of this critical industry.

Given that, we appreciate that ADWR has taken the time and effort to bring water users into this conversation early. Our farm and ranch members were very happy to provide in-person comments during the meeting earlier this month, and are glad to see the Department's dedication to considering community input prior to proceeding with INA designation procedures.

The data does not support imposing an INA in the Hualapai Basin. For the benefit of the entire county, we urge the Department not to engage in this process any further.

Sincerely,



Chelsea McGuire
Government Relations Director
Arizona Farm Bureau Federation