Good afternoon,

On behalf of the Arizona Farm Bureau, thank you for the opportunity to comment on the draft plans. From the outset, we want to thank the Department for the marked increase in stakeholder engagement that went into developing the 5MP. Your willingness to communicate and collaborate with stakeholders on the ground has made a positive difference on this plan. We sincerely appreciate this approach, and we look forward to continuing in this spirit of cooperation.

Upon reviewing the plans, we would like to flag a concern regarding the Department’s approval of a “substitute practice.” Originally, the agricultural stakeholder recommended that this review also include the Ag Water BMP Advisory Committee. However, the draft language relies solely on the Director to approve or disapprove a substitute practice. We believe it would be a mistake not to include a body made up of boots-on-the-ground water experts with actual experience using the practices that will be in question in determining whether they are effective to achieve comparable efficiencies to the practices specifically delineated in the worksheet. We would like to see language giving the BMP Advisory committee a role in approving those practices prior to the promulgation of the plan.

We look forward to offering additional input on the plans during the formal public comment period.

Sincerely,

Chelsea McGuire

Director of Government Relations

Arizona Farm Bureau Federation

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