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From: **Ronald Rayner** <[frrfarm@gmail.com](mailto:frrfarm@gmail.com)>

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Subject: 4th MP

To: <[ehenenson@azwater.gov](mailto:ehenenson@azwater.gov)>

First concern: requirement to line canals. In my area, two systems come to mind, Arlington and Buckeye Water Conservation & Drainage District. Both are in the "waterlogged" area and have little risk of water loss from the canals due to little migration of water to soils that are already saturated. I have no idea if their losses or unaccounted for water exceed 10%, but to force them to line the canals would be a financial disaster.

Second concern: when deciding to reduce the top 25% of water duties, that will most likely include water duties that qualified for an extra factor due to limiting soils and/or poor quality water or that the historical use prior to 1980 did include a lot of alfalfa. Currently, alfalfa is the most profitable crop due to demand from dairies, so a greater acreage is planted today. Any water duty reduction could force fallowing of expensive land. If that is the objective of the DWR, they should look at the original provision to "buy out" irrigation rights, rather than forcing farmers off their land by not allowing enough water use to grow the crops in demand.

Third concern: under the Ag Best Management Practices program page 4-35, BMP2.2 uniform slope systems without tailwater reuse, this presumes water runs off this system in great enough quantities to allow reuse. If a border flood system is operated properly, it can be very efficient, by using short set times and changing water before it runs off. BMP 2.7 could be used in place of 2.2 if the slope limitation was .5 /100 ft slope, not total slope.

Fourth concern: BMP 4.2 Crop residue management. Residue should be left on the soil surface or incorporated to a shallow depth to increase soil nutrients etc ..... This change will reflect current conservation tillage principles.

Let me know if you have any questions.

Ron Rayner

Sent from my iPhone