



J. R. Simplot Company  
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*Sent via E-mail*

May 30, 2023

IDWR Rules Review Officer  
[rulesinfor@idwr.idaho.gov](mailto:rulesinfor@idwr.idaho.gov)

**RE: Written Comments for Negotiated Rulemaking; IDAPA 37.03.08; Rules 30, 40.05.h, 45.02-03**

To Whom it May Concern:

Please accept the comments below on behalf of J. R. Simplot Company for the above-referenced matter. The comments relate to the document entitled Preliminary Draft Rule (Strawmanv1.0) with Redline – April 10, 2023.

**Rule 40.05.h.ii and vii; Processing Applications, Additional Information Requirements.**

In respect to subsection (ii), we would request the requirement to provide crop rotation information be deleted. What purpose is this information used for? Does the Director intend to regulate the type of crop an applicant can raise? What would happen if a crop type changed during or after application processing due to economic conditions? In respect to subsection (vii), what is the purpose of the applicant providing the "location and acreage of other irrigated lands owned, leased, or rented by the applicant"? What is this information used for?

Thank you for the opportunity to provide these comments. If you have any questions, please feel free to reach out to me.

Sincerely,

Rebecca Voss  
Corporate and Real Estate Transactions Counsel

Cc: Vic Conrad via e-mail ([vic.conrad@simplot.com](mailto:vic.conrad@simplot.com))

