



United States Department of the Interior

BUREAU OF RECLAMATION
UPPER COLORADO REGION
UTAH PROJECTS OFFICE
P.O. BOX 51338
PROVO, UTAH 84605

JUL 03 1981

WATER RIGHTS
SALT LAKE

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IN REPLY
REF ID: A412

Robert L. Morgan, P.E.
State Engineer, Division of Water Rights
Attention: Investigations Section
1636 West North Temple, Room 200
Salt Lake City UT 84116

Subject: Distribution of Water Within the Utah Lake Drainage Basin (Water Rights)

Dear Mr. Morgan:

After attending the public hearing and reviewing the proposal regarding the above-referenced subject, comments and concerns are presented to your office as follows:

1. It is our understanding that the waters referred to under Part II (Utah Lake and Upstream Water Rights) refers to waters originating in the Utah Lake/Jordan River drainage, but does not include import water. If our understanding is in error, please notify us so that we can further review and comment on this issue.

2. The proposed distribution plan suggests that exchanges be exercised on a one-for-one basis in time and quantity. We are opposed to this concept for three reasons. First, there are times when replacement cannot occur at the same time as diversion due to space limitations of delivery facilities. For example, during peak usage in the irrigation season, Syar Tunnel will not have the capacity to carry replacement water to Utah Lake in exchange for water which may be stored in Jordanelle or Deer Creek reservoirs. Second, our commitment to deliver fish flows will be affected because some of the fishery water is delivered to Utah Lake in the winter in exchange for water stored earlier in the year. Third, there are many instances when it would be more prudent to allow exchanges to be made on a delayed-time basis. For example, if water can be maintained longer in Jordanelle and Strawberry Reservoirs, evaporation savings will "create" water that would be lost if that water was released to Utah Lake.

3. We believe that a credit system should be implemented that will allow compensation for such things as fish flows. For example, even when system storage is greater than the stated figures (on page 5 of your proposal) for any given month, fish releases must still be made. This, in essence, converts priority storage to system storage in Utah Lake. We believe that credit in Utah Lake should be given in such cases.

4. It is not clear from your proposal how evaporation savings from system storage held in upstream reservoirs will be handled. Benefits to Utah Lake should not occur to the detriment of upstream reservoirs. Further clarification on this point is needed for additional review and comment.

5. The proposed 5,000 acre-foot regulation pool in Jordanelle Reservoir may be a problem. To the best of our knowledge, this concept has not been presented to Reclamation prior to this review. We are uncertain about this space and how it will be managed so that it will not affect project water. This matter will require further discussion with your office.

We appreciate your efforts to improve the management of the Utah Lake system. We are desirous to assist your office in the formulation of a workable distribution system. We hope that these comments will be of value to you as this process continues. It appears that there are items (ours and others) that need clarification or modification. To accomplish this, we believe that all involved parties must work together in an effort to exchange ideas and understand the concerns of each other. We would also appreciate the opportunity to review your model and other studies from which your proposal is based.

Sincerely,



P. Kirt Carpenter
Projects Manager

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