

WASATCH COUNTY, STATE OF UTAH

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BOARD OF COUNTY COMMISSIONERS

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T. LAREN PROVOST

June 28, 1991

TO: Robert Morgan
Utah State Engineer

FROM: Cal Muir, President
Wasatch County Water Users Association

SUBJECT: Comments on Utah Lake Distribution Plan



Our Association has been meeting and discussing your proposed Utah Lake Distribution Plan with the Summit County Water Users and find we have common concerns and objectives. Please accept this memo as coming from both associations and send your reply in care of the address on the letterhead of this memo.

Your comment that this proposal is a complex issue and requires an understanding of the water rights and water supply conditions on a number of major systems is a correct but disheartening understatement. The justification that it is needed in order to be fair in the administration of available water is questionable from our viewpoint. It may help to mention that fair administration of any problem or situation has its basis in one set of simple and evenly administered set of rules and regulations. Combining a large number of problems and situations into larger more complex issues only reduces the chances for solutions and the compromise necessary for solutions.

Water rights on the Provo River were issued and have been administered for 140 years on a small district level. That system has been very successful because as a rule irrigation companies have controlled and utilized the small side drainages themselves, while the river waters have been administered by the commissioners. That system is simple, understandable and accepted by everyone involved. People like it because they understand how they and everyone else fit into the overall system.

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Combining several river systems into the Utah Lake drainage for administration will only spread misunderstanding and suspicion. The timing of the proposal will compound the problems. People in this area are very suspicious of the CUP project, downstream water users, and proposals for change.

Questions about Jordanelle water supply, river adjudication and non-use downstream have gone unanswered. It is time that someone spent some time with water users to explain how all the pieces in this puzzle fit together. The people who are requesting decisions on Utah Lake should be identified and their reasons should be explained.

It is very important that we be kept informed by your office so that we have an opportunity to participate fully in your decision making process. We want to know about and have a chance to respond to any action which will impact, diminish or in any way limit or effect the water rights developed over the past 135 years. The uncertainty surrounding your office's consideration of reduced duties, restricted winter rights and the implementation of a valley wide sprinkler system need to be openly discussed with the water users. If major changes are in the wind, why wait to exchange ideas about the impacts of these decisions and their associated problems? We welcome frank and open discussions with your office and suggest they begin immediately.

Water use and conservation practices should be an important part of any future changes in the concept of beneficial use. Farmers have got to offset lower duties with conservation practices to hold their relative position in the river system. Duty changes without freedom for water conservation practices are unacceptable. Public ownership of water that remains unused for long periods of time is also questionable.

Water conservation has to be a basin-wide practice. Encouragement of water use and conservation practices to meet beneficial use requirements should begin at the bottom of the drainage and move up-stream to avoid mismanagement and non-use. This problem is compounded by high evaporation losses and water quality on Utah Lake. Utah Lake is a barrier to ever obtaining decent overall water use efficiencies. Water management that avoids excessive evaporation losses should rightly be a policy. Storage in Utah Lake should be treated as the last resort.

Utah Lake and Great Salt Lake evaporation losses consume well over half of the total water resource in their drainages. When one considers the benefits against the losses, it seems like a terrible price to pay. When you look at the benefits and problems with the lakes, compared with the other water use in the drainage, you soon discover that evaporation losses are a management problem that must be dealt with affirmatively. The water management goal for the Jordan River drainage should be to minimize the flows in the Great Salt Lake.

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The use of Utah Lake for storage in combination with outflows to Great Salt Lake create a water management nightmare. Evaporation losses associated with Utah Lake storage and outflows to Great Lake excess total water divisions for all uses in Salt Lake County. Losses equal consumptive use even when precipitation is included as part of the water resource. The point is that Utah Lake is a poor and outdated storage facility and that water management is "free and loose" on the Jordan River. These conditions give our water users heartburn when they think about an order to send their water downstream to reinforce Jordan River water rights. In practice you will need to take 3.0 ac. ft. of water from farmers in our area to provide 1.0 ac. ft. of irrigation water to Jordan River water users. This could only be justified using "tunnel vision".

The Central Utah Project Completion Act is now before Congress. Within the Bill, there are several studies that Congress has directed the CUWCD to do. The Wasatch County irrigation efficiency improvements study is one of those studies. The Bill provides money for the Central Utah Water Conservancy District to conduct, within 18 months from the day of enactment of the act, a feasibility study and EIS to evaluate increased efficiency, enhance beneficial uses, and achieve greater water conservation within Wasatch County, to the extent practicable without interference with downstream water rights. All of the studies included in the Bill will in some way impact the Utah Lake drainage. We think it would be wise to delay a decision about implementing the Utah Lake Distribution Plan until results from these studies are available.

We very much appreciate the opportunity to comment on your proposal.

cc:

Midway Irrigation Company	David H. Epperson
Wasatch Irrigation Company	Ed Ure
Spring Creek Irrigation Company	Deloy Bisil
Timpanogos Irrigation Company	Robert Mathis, County Planner
North Fields Irrigation Company	Steve Hansen, County Attorney
Extension Irrigation Company	David Wilson
Lakecreek Irrigation Company	George Holmes
Centercreek Irrigation Company	John Chidester, Attorney
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