State of Utah Water Engineer

Comments regarding ground water management plan:

Dear Sir,

I attended the meeting held by your office on October 15, 2019, at Cedar City regarding the management plan for water right area 73. I have a number of concerns and some suggestions.

My first concern is that 30 days to receive public comment is unrealistic. Many water users, including myself, have other obligations so a 30-day period is not nearly enough time to consider the problem and give you a response to a problem of the significance the water management plan has. It was stated at the meeting that approximately 75% of the water usage in area 73 is for agricultural purposes and 25% for municipal and residential. Many of the water users in the agricultural section belong to various water companies which will be having meetings in the next few months to consider their management plans for the coming year. They should be given a chance to bring up your management plan at those meetings and make comments. Also, this is an exceedingly large and important decision which you obviously have been working on for years and 30 days for public comment seems extremely short.

Regarding the plan itself, it was indicated that water rights might be given to entities putting water in the ground that were about to go into Quichipa Lake and also Rush Lake. I have two concerns regarding this.

1) No ground water would normally flow to Quichipa from Coal Creek itself. The reason water flows to Quichipa is because of man-made channels. If the water being diverted to Quichipa were to go into its historical channel it would flow north through Cedar Valley and recharge the aquifer in the Enoch-Midvalley area.
2) Rush Lake is different than Quichipa; water does recharge into Rush Lake and does not simply sit on the surface and evaporate. When I was younger the white apparent alkali surface of Rush Lake was a green meadow. The springs which flowed from the ground covered a large area at certain times of the year and provided grazing. Water will still percolate into that soil. The clay areas scattered through the valley do not allow much percolation. However, there are large areas where the remains of old meadows still shows, meaning water used to irrigate these areas.

It was mentioned at the meeting that water being recharged in one area of area 73 would be allowed to be pumped from another area (water from Wah Wah Valley and Pine Valley be dumped in one part of area 73 – perhaps north and west – be allowed to be pumped from the south part). Water in this valley normally runs from south to north and moving underground takes years – not hours or days to reach another area.

<u>Regarding water being pumped by municipalities</u>

Municipalities pump water out of the ground in one place and transport it through pipelines to another place to use it. They then pump a large percent to another place and put it through a sewer treatment

plant. It is then in large part dumped onto the ground to recharge and farm that area. The water by this time is miles from where it was taken out of the ground. Agricultural users normally pump water out of the ground and put it back on the ground nearby. If municipalities were required to take the water at least from the sewer plant back to the location where it was pumped it would certainly help the aquifer in that area and reduce the devastating effect their pumping has on the original water users of that location.

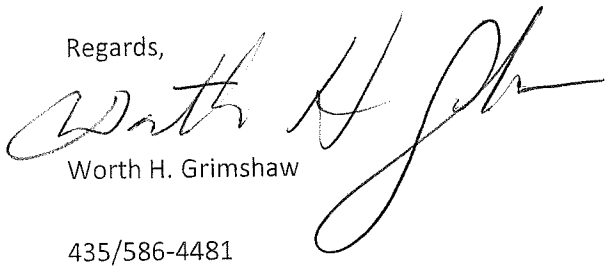
Our family has an 1851 water right from a spring but because of pumping upstream the springs which had flowed for presumably thousands of years began to dry up. This also happened to many water users, particularly in my realm of experience in the city of Enoch. Wetlands which were originally in the area and were the reason for the settlement of Enoch, dried up and now there is a fissure in the valley which was caused by the water being pumped out from under the ground and now the ground has collapsed. It is my understanding that when a new point of diversion adversely affects previous points of diversion that it should be discontinued so that the original points of diversion are able to maintain their water usage. All the springs in the Enoch area have stopped flowing and new wells have adversely impacted old ones.

I am sure I have many other concerns, but need more time to consider them. This is what I have time for now.

As a final point, small users do not have the capacity to continually deepen wells nor do they have the ability to afford law suits to try to bring about equity when compared to municipalities and large users. Yet it is my understanding that the State Engineers office is charged with the task of seeing that they are protected.

I appreciate your consideration in these matters. Please contact me if I can be of help in any way.

Regards,



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