

12 January 2022

Memorandum For: Division of Water Rights
846 North Main Street
P.O. Box 506
Cedar City, Utah 84721-0506

Subject: Comments on the development of a groundwater management plan for Parowan Valley

I attended last night's meeting which was supposed to elicit comments and ideas concerning a possible groundwater management plan for Parowan Valley. More significant than any of the ideas that were expressed was what was not expressed. To me, the elephant in the room was the USGS study that gave us a precise picture of the aquifer recharge vs the amount withdrawn from the aquifer. My quick calculation is that there is approximately a 30% difference in the inflow vs the withdrawal. This would account for the relatively rapid drop in the water levels in the aquifer. Another issue that was not addressed was ground subsidence. Will this eventually damage the aquifer?

Many comments were made concerning capture of winter water which is already being done or capture of flood or snowmelt overflows with the hope of getting that water into the aquifer. Good in theory however extremely difficult and expensive to do in practice. Obviously any water that makes it to the Little Salt Lake is lost through evaporation due to the clay under the lakebed. I applaud these efforts but think that they will do little to solve the problem due to expense, silt issues and the like.

I was a bit angry when some in the north end of the valley attempted to state that there was another aquifer in the north end and that they should be exempt from any cuts (no that wasn't specifically stated but that was the idea). When I grew up there were only 2 farms in the north end. Wally Limb & his brother who never irrigated as much as 20 acres and the Fentons (Bob and his son Pat) and their irrigation was about the same as Wally's. Now the central part of the aquifer is not getting anything from the north end as it once did because that water is being pumped before it can migrate to the south. I think that near 40% of the inflow into the aquifer comes from the north. The geology of the drainage to the north & east gives water from as far north and east as the Tusher foothills (down the Freemont Wash). On the west the north range contributes and on the east water enters from as far east as Bear Valley.

I was somewhat amused by the demand of one person who wanted to know the exact depth of the aquifer. I don't know what planet he was from as he evidently does not understand that it costs significant money to pump water. The deeper you go the more it costs to lift that water to the surface. The prices paid for the current crops that are grown in the valley minus the overhead determine the viability of the farm. If one does not make a profit the farm is bankrupt. Simple economics. The cost to pump water is a significant part of that overhead and profit margins are thin now.

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It is obvious from your data, that nearly 95% of all water rights in the valley are currently being used. This brings up another obvious conclusion. Water rights in the valley are and were oversubscribed by your office in the past. Whether this was due to lack of knowledge or failure to do due diligence (I think it was both) makes no difference at this point. The problem of over withdrawal from the aquifer must be solved before continued water withdrawal becomes prohibitively expensive. We are stuck between the proverbial rock & a hard place in this regard. Some water rights are going to have to be curtailed. Some people will be severely impacted. This needs to happen sooner than later. State law is very specific in this regard. First rights have priority. Unfortunately for some, these are the facts of the matter.

I do not envy you as you have the responsibility to get the inflow into the aquifer and the withdrawal from it into balance. I hope you can get that done before we are all out of business.

Sincerely,



Wayne H. Robinson