



JEREMY R. COOK
jrc@pkhlawyers.com

PARSONS KINGHORN HARRIS
A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW
111 East Broadway, 11th Floor
Salt Lake City, Utah 84111
Phone 801 363 4300
Fax 801 363 4378
www.pkhlawyers.com

August 9, 2013

Via LMI Runner

Kent L. Jones, P.E.
Utah State Engineer
Utah Division of Water Rights
1594 West North Temple, #220
P.O. Box 146300
Salt Lake City, Utah 84116-6300

Re: Eagle Mountain City Comments to Draft Cedar Valley and Northern Utah Valley Groundwater Management Plan

Dear Mr. Jones:

Eagle Mountain City, through counsel, respectfully submits the following comments to the Draft Cedar Valley and Northern Utah Valley Groundwater Management Plan, dated July 9, 2013 (the "Draft Plan").

1. Page 6 of the Draft Plan indicates 20,000 acre-feet of potential use in area 54 East and a current actual use in area 54 East of 1,000 acre feet.¹ However, the Draft Plan does not provide any explanation or analysis of the 20,000 acre-feet of potential use in area 54 East. Accordingly, Eagle Mountain City is concerned that the Draft Plan does not provide sufficient information to evaluate the potential impact of transfers from area 54 East into area 54 West.

2. Eagle Mountain City owns and operates wells in both area 54 West and area 54 East, and operates a municipal water system that allows for the transfer of water between different areas in the City. Accordingly, Eagle Mountain City supports modifications to the existing Cedar Valley Ground-Water Policy to allow limited transfers from area 54 East to area 54 West.

3. Eagle Mountain City anticipates that population within the municipal boundaries of Eagle Mountain City will continue to grow and that the majority of the future growth will occur

¹ The actual use of 1,000 acre-feet in area 54 East appears to be low based upon Eagle Mountain City's use within area 54 East.

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within Area 54 West. Based on current population projections of 149,900 by year 2050, there is not sufficient recharge in area 54 West to provide municipal water for such growth. Therefore, in order to protect the public health and safety and promote efficient use of the State's water resources, Eagle Mountain City recommends that the Draft Plan restrict all future transfers from area 54 East to Area 54 West to municipal use by a public water supply entity with the principal place of use of the water within area 54 West.

4. Eagle Mountain City opposes completely rescinding the 1995 Cedar Valley Policy limiting the movement of water from area 54 East to area 54 West.

Very truly yours,

PARSONS KINGHORN HARRIS
A Professional Corporation

A handwritten signature in black ink, appearing to read 'Jeremy R. Cook', written over a horizontal line.

Jeremy R. Cook

JRC/jld
Cc: Ifo Pili, City Administrator