

April 29, 2008

Jerry Olds
Utah Division of Water Rights
1594 W. North Temple, Suite 200
PO Box 146300
Salt Lake City, UT. 84114-6300

Dear Mr. Olds,

I am submitting these comments in response to the last public meeting held in Enterprise, Utah on January 10, 2008. First, the assumptions used in the economic analysis presented were flawed and grossly inadequate and did not begin to address the economic impacts of water use cuts to individuals, the local community, the counties and the State. The report did not include accurate numbers for yields, market values of crops, and labor related costs. The report also did not take into account the value of the water rights. Currently the value for brush ground without water rights is \$100-\$500 per acre and developed farm land with water rights is valued at \$4000-\$8000 per acre.

Second, the time line presented for water use cuts is too short in light of the circumstances in the Beryl Enterprise area and should be extended to help meet the economic impacts. The plan should use the intended flexibility that was built into the legislation, which allows for economic impacts to be addressed through gradual implementation. Gradual in geological terms could be considered 500 years or more.

The water users in the Beryl Enterprise water basin continue to be proactive and have developed several ideas for a water management plan. Most recently they have drafted a conceptual plan that meets the need of the water law legislation to achieve safe yield over a 180 year period, which is well within the definition of gradual in geological terms. I support this conceptual plan as a water user and urge you to continue to work with the water users to refine and adopt a plan along these lines.

I hope these comments will help the process move forward.

Sincerely,



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