



United States
Department of
Agriculture

Forest
Service

Rocky Mountain
Research Station

2150 Centre Avenue
Building A, Suite 376
Fort Collins, CO 80526-1891

File Code: 2500-1

Date: DEC 18 2006

Jerry D. Olds
State Engineer
Utah Division of Water Rights
1594 West North Temple, Suite 220
P.O. Box 146300
Salt Lake City, UT 84114-6300

14-118
69-101

RECEIVED
DEC 18 2006
WATER RIGHTS
SALT LAKE

Dear Mr. Olds:

Iron County (Utah) Water Conservancy District has petitioned the Utah Division of Water Rights to obtain rights to water held in aquifers in Pine and Wah Wah Valleys located north and west of Cedar City, Utah. The petition seeks 15,000 and 12,000 acre feet of water from Pine Valley and Wah Wah Valley, respectively.

I request that the petition be denied because of the potential for severe and damaging consequences on current and future uses of the Desert Experimental Range (DER). This could negatively influence important long-term research dating back to 1935, as well as new ecological studies not yet implemented.

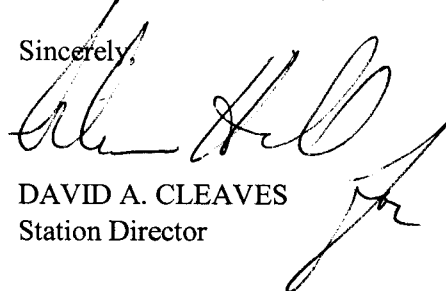
It appears likely that this kind of major, sustained extraction of water from local aquifers will have an adverse impact on water supplies that support the DER research program and traditional, permitted livestock grazing on surrounding Bureau of Land Management (BLM) and state lands. Possible impacts on springs which are critical water sources for wildlife and feral horse populations are unknown.

In 1933, 55,600 acres were set aside in Millard County, Utah for a Desert Range Experiment Station (later the DER), which is administered by the United States Department of Agriculture, Forest Service, Rocky Mountain Research Station. The DER lies primarily in Pine Valley (a small portion in Antelope Valley to the west) and is unique in the Great Basin as a site for long-term studies in cold desert ecology, with an emphasis on ecosystem response to disturbance. Approximately 200 head of cattle and 2,500 sheep graze at the DER between November and April each year.

Use of permanent research facilities and livestock grazing treatments at the DER are dependent upon water taken from a 628-ft deep well located near the DER headquarters. Authority for the extraction and use of said water is derived from Water Right 14-44, Claim No. U16472, filed February 4, 1938, for .022 cfs (approximately 10 gallons per minute). According to well log documents, water was first encountered at 480 ft.

Thank you for considering the denial of the petition.

Sincerely,



DAVID A. CLEAVES
Station Director

