

Groundwater Management Plan Committee Cedar Valley, Iron County  
88 E. Fiddlers Canyon Rd. Ste. A  
Cedar City, UT 84721  
(435) 865-9901

Committee Members

Joe Melling - Chair	Brent Hunter	Spencer Jones	Paul Bittmenn
Paul Cozzens	Paul Nelson	Ramon Prestwich	Rob Dotson
Reed Erickson	Paul Monroe - Secretary		

July 12, 2018

Kent Jones P.E.  
Utah State Engineer  
P.O. Box 146300  
Salt Lake City, UT 84114

RE: PROPOSED POLICY CHANGES WATER RIGHT AREA #73

After reviewing the proposed policy changes for water right area #73 in our meeting dated June 19, 2018. This committee has the following recommendations:

1. Subarea Boundary Changes
  - a. The committee agrees with the State Engineer with the following boundary changes:
    - i. Moving water rights out of critical areas such as the area south of highway 56 north and restricting the movement in reverse is a good idea.
    - ii. A changed water right may be transferred into a critical area if it is replacing a junior water right curtailed by priority regulation.
    - iii. The movement of the 56 boundary to follow the Northwestern alignment along Iron Springs road.
  - b. The committee believes further information and study needs to be considered before implementing an Enoch Boundary.
2. Terminus Lakes
  - a. The committee agree that the State Engineer should follow statute in putting waters of the State to beneficial use. Waters that end up in the terminus lakes which do not provide benefit to the local aquifer or other beneficial uses should be appropriated.
3. Surface to Groundwater Changes
  - a. The Committee agrees that applications to move existing surface water rights to groundwater source should only be approved "for the quantity of water shown by the applicant to be reliably available at the surface source. Otherwise, these applications will be rejected unless:

- i. The well is for the recovery of water from an approved Aquifer Storage and Recovery (ASR) Project; or
  - ii. The existing Surface source on the water right is sufficiently isolated such that there is a functional mechanism to abandon the historic point of diversion for the benefit of the local aquifer without expansion of existing rights.”
- b. The committee believes there needs to be further consideration within the changes suggested above:
  - i. The State Engineer should require the applicant show the last 5 year running average flow of the surface source before consideration of an approval.
  - ii. There should be further discussions on the recovery of an ASR project and how that relates to senior water rights and a junior water right curtailed by priority regulation.



Paul Monroe  
Secretary GMP Committee,  
Cedar Valley, Iron County, Utah.