

Utah Division of Water Rights

Feb. 26, 2020

646 North Main Street

P O Box 506

Cedar City, UT 84721-056

To whom it may Concern,

After reviewing the information posted to the Utah Division of Water Rights, I would like to respond with 6 items of concern or comments based on my knowledge of the Cedar City Valley underground water. I am a relatively new owner of water rights in the area and consequently have limited knowledge regarding the historical and current water rights issues in the Cedar Valley. Therefore I offer these comments and concerns respectfully and sincerely.

Draft Cedar City Valley Ground Water Management Plan:

1. The management plan's primary objective is to ensure ground water withdrawals do not exceed safe yield. The primary tool to accomplish this is to enact the regulatory provision of state statute 73-5-15. While this step is required as part of the plan, it seems that it should be viewed as the absolute last means of accomplishing this objective. Any and all methods of groundwater management should be explored and employed as deemed appropriate. It would seem that over the past 3 or 4 years of study, many other alternatives have been explored so I may be covering items that have already been addressed in some manner. That said it seems that various conservation techniques, increased metering and measurements, transparent accounting of usage by municipalities, industrial, and commercial customers, and system audits should be aggressively studied and explored. I expect there has been a great deal of due diligence conducted in this area already, however I did not see these types of issues addressed in the plan. I would hope to see the types of issues listed above be viewed as the some of the potential first steps to employ in the accomplishment of the Plan's primary objective.
2. I would like to know if and how the Phase 1, 2... water rights owners are represented on the Commissioner Board(s) or other organizations involved with the development and subsequent implementation and administration of the Plan.
3. It seems prudent to seriously examine and vet the groundwater management proposals provided by Gary Player and Roice Nelson.
4. Consider scheduling Annual meetings to report to the various stakeholders, the Plan goals, metrics, results, and corrective action(s).
5. Continue to pursue the Voluntary Arrangements of supplying new recharge source, but also vigorously pursue means of "self" management that can potentially reduce the annual withdrawal rate. This may require re-thinking the use or requirement of metering additional users, if not all.
6. Consider providing a follow-up response to all comments offered and submitted.



Garth Larsen

RECEIVED

FEB 28 2020

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CEDAR CITY

SCANNED