

March 8, 2023

Teresa Wilhelmsen, State Engineer
Utah Division of Water Rights
P.O. Box 146300
Salt Lake City, UT 84114-6300

I am writing to comment on the proposed Parowan Valley underground management plan. I am President of Laubs Feeding and Cubing, Inc. We are the operating company for R&C, LLC and Laub Legacy, LLC water rights in Parowan Valley.

I appreciate your willingness to work with the parties on putting together this plan. I think that metering will help us in the Parowan Valley to be better stewards of the water rights we have as we work toward better optimization.

I would like to thank you for your support in getting changes to the regulations so the Parowan Valley Pumpers could get a recharge permit.

I think there needs to be 20 year intervals between the dates to cut water rights to give the next generation farmers and also the community to adjust to the economic impacts. When you think about the changes and advancements in technology and crop genetics to produce more product with less inputs that I have seen in my 60+ years on the farm, I think we can work together to mitigate this problem. I think we need to work on the plan so that all water right holders have an incentive to conserve water, not just the junior holders. That is a big problem with just using priority dates. It is not the best way in an underground water basin.

We need to have a program to buy out suspended water rights because you and I both know that those rights will never come into beneficial use again, In my opinion that is a TAKING of a personal property right by a government agency.

Last of all, I think the Buckhorn area north of the rest stop should be treated as its own water basin. For decades it has been treated as a separate water basin by your office and no water rights could be transferred in and out.

Thank you for hearing me out,



Craig Laub

435-463-5507

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