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Attn: Parowan Valley GWMP
Utah Division of Water Rights
PO Box 146300
Salt Lake City, Utah 84114-6300

RE: Comments from Parowan City in reference to the Draft Groundwater Management Plan presented by the State Engineer in the Public Hearing on January 9, 2023, held in Parowan Utah.

Parowan City recognizes that water is our most valuable natural resource and that smart conservation of our water in order to protect current and future generations is our collective responsibility. It is the obligation and burden of State and Local Governments to make the best decisions and policies in this pursuit. We must rise to the challenge of finding efficient, effective, and equitable solutions to our water problems. In the proposed curtailment in the current draft of the GWMP, Parowan City will lose approximately 1,090 of the City's 1,255 total underground water rights. This loss of 86% of our total underground water rights will be a major impact to current and future citizens of Parowan City. For this reason, Parowan City is fully committed to play an active role in figuring out solutions to the water problems facing our community. It is our goal to achieve safe yield of the aquifer in a timely matter, preferably without the need for the full curtailment stated in the draft GWMP.

Parowan City has already done much to lead out in this effort. We are actively engaged on multiple fronts to conserve water and protect our aquifer. We are engaged in the following voluntary efforts:

1. *Recent adoption of a tiered water billing schedule to incentivize conservation and penalize over-use.*
2. *Recent adoption of a new City Ordinance to require developers to dedicate viable wet water to the City with a priority date in alignment to the State's draft plan. This will limit growth to the sustainable safe yield limits of the aquifer. Iron County has a similar ordinance for development within the unincorporated county boundaries in the basin.*
3. *Recent implementation of new Metering software which allows for real time monitoring of water use at the end-user level. This allows the city to communicate live alerts for overuse and leakage detection to end users which will help to stop a problem before too much water is wasted.*
4. *New metering of a commercial water station which was previously unmetered.*
5. *Active planning in association with the Parowan Pumpers association for a major recharge project utilizing newly filed water rights in a City-owned and managed recharge pit.*
6. *Considering options for a future conservation project utilizing wastewater effluent from the municipal wastewater facility.*
7. *Considering incentivization programs for culinary customers to conserve water. Some best practices being considered are turf-buyback programs, conservation-minded water impact fee programs, and others.*

It is clear that Parowan City is dedicated to do everything we can to solve this water problem. However, we recognize that Parowan City cannot fix this problem alone. Municipal pumping of groundwater only accounts for roughly 25% of the water pumped in the valley. We strongly encourage and invite farmers,

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unincorporated county residents, Brian Head Town, Paragonah town, and other water users within the #73 Basin to collaborate in efforts to find additional voluntary arrangements to solve this problem.

The State Engineer has repeatedly said that their primary tool to fight overmining of the aquifer is to curtail water rights by priority date. This method may end up achieving the desired outcome, but it doesn't contemplate the negative externalities associated with its implementation. We believe it will create destructive economical side effects to individuals, industries, municipalities, and the local economy as a whole. For this reason, we implore the State Legislature to consider more creative solutions by giving the State engineer additional tools. Please consider the positive potential of aligning the incentives of the water users with the constitutional mandate of the State Engineer. When key stakeholder's interests and incentives are all aligned in the same direction, then real solutions will follow quickly. Our current laws don't encourage cooperation by the key stakeholders. This must change if we really want to fix this problem. During the timeframe of the public process on this draft plan, there have been many ideas brought forth, but most of them would need legislative action. Parowan City would be more than willing to participate in any discussions to make improvements to the State's laws and policies.

The State Engineer has responded to requests to provide a longer curtailment timeline, but we feel the allowance given was not enough to provide sufficient time to implement solutions and see the positive effects thereof. We ask the State to consider allowing for a longer timeline. Large capital projects like recharge basins need years to provide for financing, construction. Once built, the positive impacts on the aquifer can take many years to yield positive results.

Finally, Parowan City is cautiously optimistic that if this plan is adopted, it will exempt the City from the State's requirement to install individual meters on municipal Pressurized Irrigation customers within the City. This exemption is badly needed for Parowan City. While we believe in the need to accurately monitor all water diversion in the basin, we believe that the City's master meter on our Pressurized Irrigation system is sufficient to accomplish this goal. Due to the nature of the unique design of Parowan City's secondary water system, any water conserved within our P.I. system simply overflows back into the creek and is either used for irrigation by downstream farmers, or flows to the Little Salt Lake, where it is lost to evaporation. Additionally individual meters will quickly fail due to water quality issues with our source. If Parowan City were to be legally forced to implement individual secondary metering, we would be forced to abandon the secondary water system due to the financial constraints of maintenance. This catastrophic result would actually increase withdrawals on the aquifer by residents using our culinary system for yard irrigation. In the event this exemption were to be removed by any future legislation, Parowan City would be forced to take an adversarial position to the State's plan for managing water in the basin.

In summary, Parowan City supports finding an effective, equitable solution to manage the underground aquifer to achieve safe yield. We invite all stakeholders affected by this effort to join with us in finding voluntary efforts to fix our own problem in order to prevent damaging curtailments. We implore the State Legislature to partner with us to fix the current laws and to find equitable solutions which align stakeholders' interests and incentives. We also implore the State Legislature to resist a one-size-fits-all approach to the management of water within the State.



Dan Jessen,

Parowan City Manager