

February 20, 2023

Attn: Parowan Valley GWMP
Utah Division of Water Rights
P.O. Box 146300
Salt Lake City, UT 84114-6300

Re: Response to Draft Groundwater Management Plan for Parowan Valley

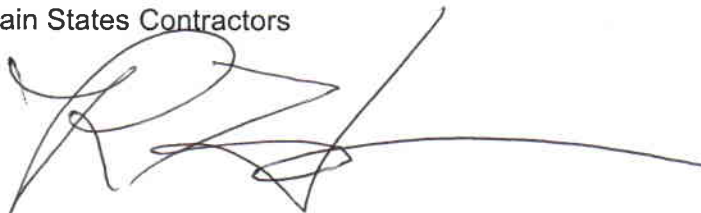
To whom it may concern,

We respectfully submit the following points of concern in regards to the Parowan Groundwater Management Plan.

- 1) The Parowan Valley Groundwater Management Plan fails to acknowledge a presentation made by Dr. Ryan Smith at the water meeting when the Parowan Valley Groundwater Management Plan (Draft) was presented. Dr. Smith stated in his presentation that safe yield could be achieved with an annual reduction in storage loss between 3,386 and 5,493 acre feet, without curtailing the additional 5,507 acre feet that your plan includes.
- 2) By including the additional 5,507 acre feet described in table 1 for scheduled curtailment, your plan has destroyed the perceived value of these water rights, even though, according to Dr. Smith's presentation, it is not likely they will need to be curtailed to reach safe yield. Unnecessarily designating these water rights for curtailment has damaged their inherent value. As a result, banks are unwilling to accept these water rights as collateral for potential loans. Additionally, farmers who have recently purchased these water rights, are now upside down in a loan to value ratio on their farms. We feel that your plan has created an unnecessary economic catastrophe for the owners of these water rights.
- 3) We have seen no attempt made by the water rights division to ensure that the stream flows coming down into the valley have not been negatively impacted by the over-forestation on the surrounding mountains. Some local residents feel that changes to the management of forestry in recent decades has resulted in more water being consumed by vegetation rather than coming down the streams in annual runoff, resulting in less recharge to the aquifer. If this is the case, water right owners in the valley should not bear the economic consequences of water right curtailment due to forestry management practices that are out of their control.

Respectfully,

Richard Hammon
Mountain States Contractors



RECEIVED

FEB 24 2023

WATER RIGHTS
SALT LAKE

ML

SCANNED MI