

**Patrick L. Painter**

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December 1, 2014

The Honorable Kent L. Jones, Utah State Engineer

The Honorable Teresa Wilhelmsen, Utah Lake Drainage Engineer

Utah Division of Water Rights

1594 West North Temple, Suite 220

Salt Lake City, UT 84114

Hi Kent and Teresa,

Thank you for the opportunity to comment on a proposed study for the Goshen Valley area.

Six or seven decades ago a group of men possessing great foresight proposed bringing Colorado River water across the state to serve the Wasatch Front as far south as Juab County. One of those individuals was a family friend and Nephi Mayor, Dr. Preston L. Jones. Dr. Jones was also a member of the Utah Power and Water board and served a term as Chairman of that body. As you well know, that board has grown into the Water Resources Board and serves countless communities and water users in the state to this very day. The vision of Dr. Jones cannot be underestimated but the sad fact and reality is in spite of his unbelievable efforts to bring CUP water to Juab County, the Federal Government failed to keep its end of the bargain and the 40,000 acre feet of water promised to Juab County has been diverted northward to Utah and Salt Lake counties.

Juab County is on the cusp of a growth curve that could resemble in percentage terms that of its northern neighbor, Utah County which grew from roughly 300,000 people just twenty years ago to over 500,000 resident today. Juab County is helped by the fact that is in a non-attainment area for air quality standards that Salt Lake and Utah counties don't enjoy and as such, various business interests are looking our way to establish their enterprises here. The Governor's Office of Economic Development has helped locate folks like Barnes Bullets, Owens Corning Insulation, and Howelings Tomato Greenhouse We are grateful for them and it is my understanding that many more are looking this way as well.

With the inevitable growth that will occur here and the changes in the use of water that will be required for business and industry and residential uses, our county needs to be able to use all of the existing water rights held by water users in Juab County for the growth demands that are upon us. The waters that come from the front and back sides of Mt. Nebo are an irreplaceable gift from the heavens that have been put to use here in Juab County over the last 150 years. We need a common sense approach from the State Engineer's office to be able to fully maximize the existing water rights in the county. In 1995, the State Engineer's office put a moratorium on new appropriations here presumably to protect the existing water rights already here. The fact that CUP water will likely never be delivered here and that one-third of the waters that run from Juab County into Utah Lake evaporate into thin air benefitting no one would beg for a reasonable policy that future change applications for Juab County water right holders would be to exploit every drop, both on a yield/ duty basis and depletion basis from the pristine and robust aquifers we have been blessed with. It makes the most sense to maximize the clean waters we have here in this county rather than watch our crystal clear resource run past us to mix with Utah Lake water and then try to find the financial resources to fund both delivery and treatment systems to get M&I quality water back here when it already exists.

Utah didn't come by being the top ranked state in the nation by accident. Prior and present Governors and Legislatures going many years back understood the importance of growing our economy to provide our citizens, (and their many offspring) a terrific climate to cultivate our growing demand for good jobs and industry. But it doesn't stop there. We need to exploit our water resources to the fullest, even more so in our rural counties like Juab that undoubtedly will grow now and in the future.

I believe the State Engineer's office understands the situation we have in Juab County with not receiving our allocation of CUP water and has considered that in past change applications and encourage you to continue that policy and commend you for that effort. For the most part, (excepting the sad and surprising Nephi City case in 1989) the folks in Juab County feel well served and well treated by your office and appreciate your carrying out your duties the way you do.

Thank you for allowing me to comment.

Wishing you a Merry Christmas and a Happy and prosperous New Year!

Best,

