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Attention: Nathan Moses, Southwest Regional Office

Subject: Cedar Valley, Iron County - Groundwater Management Plan comments

The current groundwater mining situation, with the related twin problem of surface fissuring, currently occurring in the Cedar Valley, Iron County aquifer (Aquifer) has the potential for significant economic loss to both public infrastructure and private property. This pressing problem is a direct result from historical water policy in the Aquifer and must become a key driver in the consideration, development, and timing of future water policy for the Aquifer.

The potential for significant economic loss from surface fissuring to both public infrastructure and private property touches a much broader class then merely water right owners. Therefore, the Groundwater Management Plan (GMP) process for the Aquifer must carefully consider adopting a much shorter implementation timeframe than the neighboring Beryl Junction Ground Water Management Plan (40 years for a 10% reduction, then 10% reduction per year until 31,000 acre-feet of cumulative depletion is achieved).

The work completed by Hurlow (2002) and the related geological mapping work for the Aquifer also performed by the UGS would allow for the identification of the fine-grained silt soils that could be overlaid in GIS layers with the Aquifer level drawdown areas presented at the January 7, 2016 meeting. This identification of fine-grained silt soils combined with Aquifer level drawdown areas could be combined to identify targeted management areas subject to the greatest risk of surface subsidence and potential for significant economic loss from subsidence (note: surface subsidence results from the dewatering and compaction of fine-grained silt soils in the Aquifer, Knudsen, Inkenbrandt, Lund, Lowe, and Bowman (2014)). The minimal objective of bringing the "overall" Aquifer into hydrological balance as in the Beryl Junction Ground Water Management Plan may still result in localized subsidence areas, with resultant economic loss, in the Aquifer unless these potential areas are carefully identified and monitored in the GMP process.

Bringing outside water resources to augment the Aquifer from either the West Desert or the Lake Powell Pipeline was mentioned at the January 7, 2016 meeting. The CICWCD's West Desert water filings have been obtained and defended (5 lawsuits) with taxpayer funds. I personally feel that taxpayer equity requires that there should be some consideration given in the GMP process to the distributional benefits of this outside water source to mitigate the economic loss from

water right curtailment resulting from GMP implementation. Also, considering the significant cumulative economic loss (both private and public) from adoption of such a sweeping GMP for the Aquifer, should there be some benefit-cost reconsideration of the political decision to withdraw from the Lake Powell Pipeline? Is the Lake-Powell option for the Aquifer even still open?

Thanks for posting the GMP process on www.waterrights.utah.gov and keeping the public informed on this open public process.

Respectfully submitted,
R Scott Wilson,
Iron County Property Owner

References

The geology of Cedar Valley, Iron County, Utah, and its relation to ground-water conditions. Hurlow (2002)

Hydrology and Simulation of Ground-Water Flow in Cedar Valley, Iron County, Utah. Brooks and Mason (2005)

Investigation of land subsidence and earth fissures in Cedar Valley, Iron County, Utah. Knudsen, Inkenbrandt, Lund, Lowe, and Bowman (2014)

Beryl Enterprise Groundwater Management Plan Adoption Date: December 21, 2012