



James Reese &lt;jreese@utah.gov&gt;

---

**Fwd: Cedar Valley, Iron County Groundwater Management Plan**

1 message

---

**waterrights DNR** <waterrights@utah.gov>  
To: James Reese <jreese@utah.gov>

Mon, Jan 9, 2017 at 2:28 PM

----- Forwarded message -----

From: **waterrights DNR** <waterrights@utah.gov>  
Date: Mon, Jan 9, 2017 at 1:00 PM  
Subject: Fwd: Cedar Valley, Iron County Groundwater Management Plan  
To: [wrt.general@gmail.com](mailto:wrt.general@gmail.com)

----- Forwarded message -----

From: **Kit Wareham** <[wkit@cedarcity.org](mailto:wkit@cedarcity.org)>  
Date: Mon, Jan 9, 2017 at 10:39 AM  
Subject: Cedar Valley, Iron County Groundwater Management Plan  
To: "[waterrights@utah.gov](mailto:waterrights@utah.gov)" <[waterrights@utah.gov](mailto:waterrights@utah.gov)>  
Cc: Paul Bittmenn <[paulb@cedarcity.org](mailto:paulb@cedarcity.org)>, Jonathan Stathis <[jstathis@cedarcity.org](mailto:jstathis@cedarcity.org)>, "Paul Cozzens ([paul@cozzenscabinets.com](mailto:paul@cozzenscabinets.com))" <[paul@cozzenscabinets.com](mailto:paul@cozzenscabinets.com)>, "[pmonroe@cicwcd.org](mailto:pmonroe@cicwcd.org)" <[pmonroe@cicwcd.org](mailto:pmonroe@cicwcd.org)>, Maile Wilson <[mayorwilson@cedarcity.org](mailto:mayorwilson@cedarcity.org)>

**Cedar Valley, Iron County Groundwater Management Plan – comments**

Mr. Kent L. Jones- Utah Division of Water Rights

Dear Kent:

First of all Cedar City and I want to express our appreciation to you and your staff for addressing the continual decline of the aquifer level in our Valley. I don't need to tell you how important it is to us to have this problem resolved. As the process moves forward I am sure our City elected officials and well as our City staff will have many questions and hopefully as many suggestions for resolving the problem. As to not overwhelm you with the all the questions and suggestions at once, we will relay the questions and suggestions as they arise. Hopefully you will give serious consideration the our questions and suggestions. With the seriousness of the problem that exists I think we all need to "think out of the box" a little in order to resolve the serious problem and we have.

Below is our first set of questions. It is our hope that the answers to these questions be a start to producing some amount of solutions to the problem.

I look forward to your response.

Sincerely,

Kit Wareham, P.E.

City Engineer- Cedar City

In the response letter from the Division of Water Rights dated July 11, 2016, the answer to question #24 states that there are about 5,000 acres that have both surface and groundwater irrigation rights. The Division's response states that "many water users with supplemental groundwater have an incentive to divert groundwater regardless of whether surface water is available to them." The response goes on to say that: "This probably leads to inefficient use of surface water." Cedar City would like to make the argument that not only does this cause inefficient use of surface water, but it also causes more groundwater to be withdrawn from the aquifer than is allowed.

Our questions regarding this issue, are follows:

1. What are the rules regarding the use of supplemental water rights? It is our understanding that the surface rights must be used before the underground rights.
2. What is the Division of Water Rights doing to enforce the rules regarding supplemental water rights?
3. Why are the supplemental water rights not being more strictly enforced to require that the surface rights be used before underground rights?
4. How does the Division of Water Rights justify allowing these supplemental groundwater rights to continue to be used when the state is no longer in 1930's drought conditions?
5. What could the Division of Water Rights do to educate water users regarding the proper use of supplemental water rights and require more accurate reporting of water use?
6. How much groundwater depletion could be reduced in the aquifer if the rules regarding supplemental water rights were strictly enforced?

**Thanks, Kit**

Kit Wareham, P.E.

Cedar City Engineer

1/9/2017

State of Utah Mail - Fwd: Cedar Valley, Iron County Groundwater Management Plan

10 North Main Street

Cedar City, Utah 84720

Office: [\(435\)865-5119](tel:(435)865-5119)

Mobile: [\(435\)233-0080](tel:(435)233-0080)

Fax: [\(435\)586-2949](tel:(435)586-2949)

E-mail: [wkit@cedarcity.org](mailto:wkit@cedarcity.org)

--

Ambur Mathews  
Department of Natural Resources  
Water Rights  
[801-538-7240](tel:801-538-7240)

--

Ambur Mathews  
Department of Natural Resources  
Water Rights  
[801-538-7240](tel:801-538-7240)