

Rush Valley Water Conservancy District  
P.O. Box 299  
Rush Valley, Utah 84069  
12/5/2018

State of Utah  
Division of Water Rights  
P.O. Box 146300  
Salt Lake City, Utah 84114-6300

RE: Rush Valley Groundwater Policy Proposed Changes

On behalf of the Rush Valley Water Conservancy District (RVWCD) we would like to thank the staff of the Division of Water Rights for their time in coming out to the Tooele City Hall on November 8<sup>th</sup>. We thank you for your presentation and taking questions and comments from those in attendance.

We feel the proposed change which would divide the Rush Valley basin into three separate areas is good start to better manage water appropriations throughout the valley. However, the RVWCD still has concerns regarding the proposed changes to water appropriation policy for the Rush Valley northern basin.

We have struggled with the results of the 2011 United States Geological Survey study since it was published. In our opinion some of the data in the report is inaccurately portrayed. We feel the estimated well withdrawal of 2,000 acre feet is greatly under calculated. Many in attendance at the meeting also agreed that this estimated withdrawal is inaccurate. One local farmer stated that he, himself, almost withdraws this value. Until an accurate and up-to-date estimate of well withdrawals and recharge within the basin are established, any increase in appropriations are unwarranted.

We have just ended a historically dry water year in the Rush Valley area which has been compounded by numerous years of drought. The possibility that the recharge values are close to those which were estimated in the 2011 study are not likely. Many of the culinary wells in the town of Rush Valley are shallow wells. The impact of increased withdrawal will inevitably be evident in these shallow wells. The notion that it will be the owner of these shallow water rights to drill deeper to obtain water is not acceptable. Many of these shallow water right owners will not be financially capable to drill deeper to obtain water at depth.

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In recent months there have been several wells drilled in the Northern basin. Water quality in some of these wells were questionable and there were difficulties in getting them passed as culinary wells.

Residents of Rush Valley have stated that the water level in many wells has decreased over the years. This is evident by A42952 which was recently drilled at a depth of 200' and was a dry well.

The water table has dropped to such an extent the meadow area east of Rush Valley is no longer a meadow. The drop in the water table has caused the native meadow grass to die out and now salt grass is becoming the predominate vegetation.

Another concern we have is the brackish water movement. There has not been any study or evidence to conclude that increase withdrawal will not cause brackish water movement in the aquifer. If additional withdrawal could cause the brackish water to move throughout the aquifer the water quality for the entire basin could be at risk.

The RVWCD feels that it would be unwise at this time to make any changes to the current water appropriation policy based on inaccurate data. At this time we request to leave the State Engineer's ground water appropriation policy for the Rush Valley area unchanged.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kyle Russell', written in a cursive style.

Kyle Russell Chairman  
Rush Valley Water Conservancy District