Members of the public were invited to submit comments related to the Water Utility Resource Management Plan. Comments were collected from January 2023 through June 4, 2023. Approximately 25 written comments were received from seven individuals. All comments received have been made part of the project record. Many of the comments were similar in nature or covered similar topics. In this case, a single question is listed that captures the meaning of several questions. A single response is also provided.

**WATER SUPPLY AND DEMAND**

Will conserved water and/or future water sources be used for development?

- It is likely that some conserved water and future source projects will be used for development. This will be dependent on each community’s ordinances, land plan, zoning, master planning, etc.

Will the WURMP include tourism demand and demand for water committed to known developments.

- The estimated amount of water to be used by approved and not yet completed developments is included in the estimated future usage. The growth of tourism was projected at the same rate as the other developments into the future.

How are the volumes for future conservation, gray water reuse, and outdoor watering restrictions calculated?

- The estimates shown in public meetings are estimates of the volume of conservation that could be achieved through a variety of methods and are based on conserving a percentage of future water needs. The WURMP assumes these volumes will be achieved over the next 100 years. All assumptions will be discussed in the study report.

How is climate change accounted for in the WURMP? What data sources are used?

- The impacts of climate change on both supply and demand are uncertain. The WURMP acknowledges this uncertainty, but does not estimate future water loss due to climate change. If source supplies decline in the future, demands can be curtailed (through conservation and outdoor watering restrictions) to match supply, or more of the alternative sources can be utilized. While many climate models agree that temperatures are expected to increase and storms are expected to become more intense, the future trend for average annual precipitation is less clear. For example, the EPA’s Climate Resilience Evaluation and Awareness Tool (CREAT) projections show a central tendency towards slightly more average annual precipitation in the Moab area, though other models exist which project either drier or wetter future conditions.

- The WURMP is intended to be a high level and long-range outlook. The Plan will be updated regularly, likely every 5-10 years. Modeling and estimates/projections in the Plan will be adjusted as growth occurs and environmental conditions change.
Is the Glen Canyon aquifer and/or the Valley Fill aquifer at safe yield? Have declines in the aquifer occurred? Will additional groundwater usage be allowed in the SJSVSSD boundary?

The WURMP is not a detailed groundwater study and doesn’t evaluate the safe yield of the aquifers. The Coalition members are seeking funding for opportunities to expand groundwater monitoring and to evaluate the aquifers. Each of the water suppliers will develop a plan to handle drought situations. It is anticipated that water demand and growth will be monitored over time so that there is no period without adequate water supply.

The conditions imposed on SJSVSSD in the Order of the State Engineer have been accounted for and will be discussed in the study report.

Will the Colorado River be reliable if used for supply? Will water rights be curtailed?

As a physical source of water, the Colorado River at Moab will be reliable and available during the planning period. Water will exist in the Colorado River at Moab. The WURMP understands that the Colorado River may be over appropriated throughout its service areas.

Junior water rights on the Colorado River are a concern in that if they are used as a basis of supply, the supply may be curtailed in favor of more senior rights. If the Colorado River is used as a source, reliance on senior water rights is preferred if they are available.

PROJECTS

Are there any reservoirs planned for the future?

There have been limited discussions about reservoirs. From the data we currently have, it doesn’t appear that there is enough available additional water or a great location for a large new reservoir. This is a question recommended for additional study. Previous studies have evaluated the possibility of expanding Ken’s Lake, which could support extending the GWSSA secondary pressurized irrigation system throughout the GWSSA service area and possibly into the City of Moab and/or the SJSVSSD area.

What capital facility projects will be required to use the future water sources, and what are the costs associated with these projects? When will these projects be required? Which projects will be recommended?

The study provides several alternatives which will provide additional wet water when implemented. Prioritization of these alternatives has not occurred yet but will be based on public feedback, cost/benefit analysis, reliability of supply, etc.

One goal of the WURMP is to communicate estimated cost and time to complete for the various potential sources. This has not been completed yet. Another goal of the WURMP is to evaluate the merits of the possible solutions based on the available data and recommend which sources should be considered for development.
to communities which source to use; rather, a goal is to present the benefits, impacts, and costs of the potential solutions as well as gather public input.

What are the effects of each project on the environment, including wetlands, the watershed, aquifers, the brine layer, etc.?

The report will outline a range of solutions and present possible broad impacts of each solution, but is not intended to be a full environmental impacts evaluation. Additional detailed evaluation of the benefits and effects of each solution will occur as these projects are considered for implementation.

Administrative

Is Moab Irrigation Company (MIC) included in the WURMP?

The WURMP coalition reached out the MIC during the process and invited them to meetings. HAL staff had a conversation with one of the MIC administrators and GWWSA has provided coordination on behalf of MIC.

Who represents SJSVSSD in the coalition?

A board member of the District participates in the coalition and the San Juan County Administrator also helps represent the interests of the District.

When will the coalition take action?

The WURMP will provide a list of potential sources and projects. Once the plan is completed, the member communities will evaluate priorities and budgets and determine how best to proceed.

The WURMP is biased and needs more public input.

The WURMP seeks to look at every source holistically and without bias. Project benefits and disadvantages have been evaluated. Consultants have been retained to provide specific expertise and make recommendations. Public input has been requested and the coalition seeks more input through additional public meetings.

GENERAL

Numbers given in the WURMP should be shown as ranges and rounded. The WURMP should not show maximum water available or maximum possible demand reductions.

The WURMP source capacity values presented early on have been adjusted based on further data review. We agree that redundancy is necessary in water systems, and it should not be assumed that the maximum amount of water is available at all times. The WUMRP is a high-level planning effort and all values given in public presentations are estimates and may be updated as more information becomes available.

Assumptions and sources of data should be included in the study.

The report will include all assumptions and sources.