

CITY OF LOGAN, UTAH
CITY RESOLUTION NO. 16-15

A RESOLUTION TO INITIATE THE CREATION OF THE CACHE WATER DISTRICT

WHEREAS, Cache County is referred to herein as the “County”; and

WHEREAS, Amalga Town, Clarkston Town, Cornish Town, Hyde Park City, Hyrum City, Lewiston City, Logan City, Mendon City, Millville City, Newton Town, Nibley City, North Logan City, Paradise Town, Providence City, Richmond City, River Heights City, Smithfield City, Trenton Town, and Wellsville City, are referred to herein collectively as the “Municipalities”; and

WHEREAS, pursuant to the Bear River Development Act, Utah Code Ann. § 73-26-101, *et seq.* (the “Act”), the Utah Division of Water Resources is directed to develop the surface waters of the Bear River and its tributaries through the planning and construction of reservoirs and associated facilities that are authorized and funded by the Legislature; and

WHEREAS, water resources developed by the Division of Water Resources pursuant to the Act may be made available by contract exclusively to the existing water conservancy districts that serve Box Elder, Salt Lake, and Weber Counties, as well as to Cache County and any water conservancy district that may be formed in Cache County—by law, this developed water cannot be made directly available to municipalities in Cache County, and there is currently no water conservancy district in Cache County whose mission is to serve all of the municipalities and unincorporated areas within the County; and

WHEREAS, the creation of a water conservancy district in Cache County will allow for the full implementation of the Cache County Water Master Plan prepared by J-U-B Engineers, Inc. dated August 2013 and will allow the district to plan and manage a system that protects and conserves the County’s long-term agricultural, environmental, and municipal water interests with an emphasis on securing its Bear River allocation entitlements pursuant to the Act; and

WHEREAS, the County and some or all of the Municipalities desire to create a local district under the Water Conservancy District Act, Utah Code Ann. § 17B-2a-1001 *et seq.*, as provided in this Resolution, to plan for and facilitate the long-term conservation, development protection, distribution, management and stabilization of water rights and water resources for domestic, irrigation, power, manufacturing, municipal, recreation and other beneficial uses at a reasonable cost to meet the needs of the residents and growing population of Cache County and to provide any services enumerated in the Water Conservancy District Act; and

WHEREAS, once created, the local district will be governed by an eleven member board of trustees, ten of whom will be elected by the voters of Cache County; and

WHEREAS, to have a functioning board of trustees pending elections, the Cache County Council will appoint trustees who will serve until their successors are elected by the voters; and

WHEREAS, Cache County currently imposes a property tax that is budgeted and utilized for the development of water resources; and

WHEREAS, the proposed local district will have taxing authority, but will not implement that authority until a majority of the members of the board of trustees of the district are officials elected by the voters; and

WHEREAS, the Cache County Council intends to reduce the portion of the County-wide property tax that is utilized for water development by an amount equal to any property tax imposed by the new local district, which will result in a combined county and local district property tax rate that is revenue neutral and will not increase the property tax burden on any property for at least four (4) years; and

WHEREAS, Utah Code Ann. § 17B-1-203 provides that the process to create a local district may be initiated by a resolution adopted by the legislative body of each county whose unincorporated area includes and each municipality whose boundaries include any of the proposed local district; and

WHEREAS, the proposed local district will be created only after its creation has been approved by the voters residing within the district; and

WHEREAS, Logan City, being one of the Municipalities located within the boundaries of the proposed local district, desires to join with Cache County and other Municipalities in formally proposing the creation of the local district.

NOW THEREFORE, be it resolved and enacted by the Logan Municipal Council as follows:

1. In order to allow the citizens of Logan to vote on the creation of a water conservancy district, Logan City, concurrently with the County and other Municipalities, proposes the creation of a local district under the Water Conservancy District Act, Utah Code Ann. § 17B-2a-1001 *et seq.*, which will include all of the incorporated and unincorporated areas within the boundary of Cache County, Utah, as depicted in the map which is attached as Exhibit “A” to and incorporated as part of this Resolution, conditioned upon each Municipality located within the proposed boundary of the district passing a similar Resolution. If the legislative body of any Municipality fails to adopt a similar Resolution, that Municipality may be excluded from the district.
2. The district that is proposed to be created will be known as the “Cache Water District,” a water conservancy district located in a county of the third class.
3. The service proposed to be provided by the Cache Water District is the operation of a system, or one or more components of a system, for the collection, storage, retention, control, conservation, treatment, supplying, distribution, or reclamation of water, including storm, flood, irrigation, and culinary water, whether the system is operated on a wholesale or retail level or both, as provided in Utah Code Ann. § 17B-1-202(1)(a)(xii).
4. The type of specialized local district that is proposed to be created is a water conservancy district, as provided in the Water Conservancy District Act, Utah Code Ann. § 17B-2a-1001 *et seq.*
5. The anticipated method of paying the costs of providing the proposed service is through the collection of ad valorem property taxes, service fees and charges, and/or levied

assessments. It may be some time before the district will be able to provide water service and collect fees and charges for that service. Consequently, the district initially will be funded through Cache County, until the district establishes its own property tax assessment, at which time Cache County is to reduce its property tax rate by an equivalent amount as stated in the foregoing recitals.

6. The maximum property tax levy a water conservancy district can impose is 0.0001 per dollar before certain activities are commenced, 0.0002 per dollar after certain activities are commenced, and 0.0003 per dollar if an additional levy is necessary to pay maturing bonds or debts. The average home value in Cache County is \$201,182, but the fair market value of residential property is allowed an exemption equal to a 45% reduction in the value of the property for property tax purposes. Taking these factors into consideration, the estimated average annual financial impact on a household within the proposed district will be as follows: the tax on a \$201,182 residence would be \$11.07 using a tax rate of 0.0001, \$22.13 using a tax rate of 0.0002, and \$33.20 using a tax rate of 0.0003. However, for at least the first four (4) years after the creation of the District, the net financial impact on a household may be zero if Cache County reduces its property tax rate by an amount equal to the new rate assessed by the district. Service fees and levied assessments cannot be estimated, and will be charged based upon actual water deliveries or contractually agreed upon amounts.

7. The number of members of the board of trustees of the proposed water conservancy district, consistent with Utah Code Ann. § 17B-1-302(2), will be eleven. The board of trustees will consist of ten elected trustees and one appointed trustee who will be elected or appointed, respectively, pursuant to the procedures set forth in Utah Code Ann. Title 17B, Chapter 1, Part 3 and § 17B-2a-1005. Seven of the elected Trustees will be elected from districts, with one trustee to be elected to represent each of the seven Cache County Council districts, as those districts may be established and modified from time-to-time pursuant to applicable law. The three remaining elected trustees will be elected County-wide. The one Trustee who is appointed by the Cache County Council will, pursuant to Utah Code Ann. § 17B-2a-1005(2)(d), be a person who owns irrigation rights and uses those rights as part of that person's livelihood. Regarding the ten elected trustee positions, the initial trustees will be appointed by the Cache County Council pursuant to Utah Code Ann. §§ 17B-1-303 and 20A-1-512, with staggered terms and subsequent trustees to otherwise be elected as provided herein.

Approved and passed as of the date set forth below.

Dated: 4-19-16

LOGAN CITY

By: 
Herm Olsen, Council Chair

Attest:

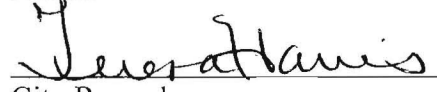

City Recorder

EXHIBIT “A”
Map Depicting the Boundaries of the
Cache Water District

(To be attached)

4853-1477-2527, v. 1

W. Bryan Dixon
10 Heritage Cove
Logan, UT 84321-3300
C: 435-760-0691
bdixon@xmission.com

April 5, 2016

Mayor Craig Petersen
City of Logan
290 North 100 West
Logan, UT 84321

Dear Mayor Petersen,

I have been following closely the discussions on formation of a water conservancy district for Cache Valley. I think it's a very good idea, especially as the organizing committee has adopted a more open approach supporting rational measures for the long view regarding water.

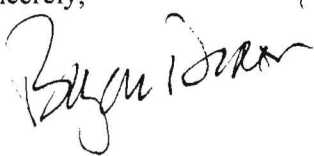
Part of this new approach is recognizing that any Bear River Project is not a goal in itself but one option for implementation of a larger policy. As such, development of surplus winter flows of Bear River water—if in fact there is a surplus—is not a given, but rather needs to be weighed against other options for providing needed water.

This evening, the Logan City Council will be presented with a draft resolution to put the formation of a Cache Water District on the November ballot. The organizing committee has removed explicit mention of Bear River development from their purpose and from a suggested municipal resolution. Mr. Kymber Housley told me that you requested that references to the Bear River Development Act be put back into Logan City's resolution.

I ask you to reconsider. Mention of Bear River development will only draw unnecessary flak and resistance. It is not, after all, a given. The attached letter from the Utah Division of Water Quality to the Utah Division of Water Resources raises serious doubts about the latter's conclusions in 1991 that there is developable water in the Bear River. Even if there is, the impacts on Great Salt Lake—economically and environmentally—could be severe, especially for Wasatch Front communities. And even the conservative costs projected by the Division of Water Resources would demand huge capital expenditures.

Bear River development is not an end in itself. The organizing committee is trying to establish an organization and process that takes a comprehensive and long term perspective on the challenge of water supply and quality, and then research and recommend strategies from a full suite of options. To explicitly include Bear River development in a resolution to form a Cache Water District is premature and distracting. We need to understand the problem and analyze alternatives, and then and only then, articulate projects.

Sincerely,





State of Utah

GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

Department of
Environmental Quality

Amanda Smith
Executive Director

DIVISION OF WATER QUALITY
Walter L. Baker, P.E.
Director

FILE COPY

DEC 15 2014

Eric Millis, Director
Division of Water Resources
1594 West North Temple, Suite 310
Salt Lake City, UT 84114

Document Date 12/15/2014



DWQ-2014-018259

Eric —

Dear ~~Mr. Millis~~,

The Division of Water Quality (DWQ) appreciates the opportunity to provide comments during the scoping stage of the Bear River Project. We found the exchange on October 31, 2014 to be the start of a productive dialogue with the Division of Water Resources (DWR) and we thank you for taking the time to meet with our staff. This letter provides more detail on some of the questions and comments that were raised during our meeting. DWQ understands that DWR has been mandated to develop the Bear River Compact allotment as specified in the Bear River Development Act of 1991. We hope that these comments are helpful in shaping the project and analyses as you move forward with developing project alternatives.

Understanding the Need

The efficacy of the project hinges on two fundamental assumptions: first, that water demand in 2035 will require development of 220,000 acre-feet of water and second, that this water is available to be developed. To fully understand these assumptions and to evaluate the potential impact on Bear River and Great Salt Lake aquatic life uses, DWQ requests an updated hydrologic analysis of the Bear River system including both total flow and flow variability. Such an analysis should include updated water demand and supply data including a quantitative analysis of return flows from current municipal and agricultural uses and with projected future land use changes.

We note that the last Bear River Plan was completed 10 years ago. The last available documentation on the Bear River project available online was prepared in 2005. Both of these documents rely on old data (1941 to 1990) to characterize water delivery to the Great Salt Lake and the water available for development. A simple comparison of flow at the USGS gage at Corrine shows that annual flow at this gage has decreased since 1990 by 26% from the assumed 1.2 million acre-feet per year to less than 883,000 acre-feet/year. Eliminating the top 10th percentile of flows to calculate a more reliable average flow gives a value of 750,000 acre-feet/year. Since 2000, the Bear River at Corrine has only exceeded 1.2 million acre-feet once

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(in 2011). DWQ is concerned that relying on the value of 1.2 million acre-feet for Great Salt Lake water delivery results in over predicting the actual water available for development (Figure 1). We also note that the low flow values in late summer have diminished since 1990 and that the peak flows, presumably the source of developed water, have also decreased substantially since 1990 (Figure 2). DWQ will be interested in both the total water developed as well as the effect that the development has on the annual hydrograph, with particular concern for the late summer (crucial low flows) and spring runoff periods (critical for wetland and Great Salt Lake ecosystem functions).

Other discrepancies in DWR publications should also be remedied. In the Bear River Plan (2004), the Executive Summary indicates that the Utah portion of the Bear River drainage yields 1,572,000 acre-feet whereas Chapter 2 (page 9) indicates a yield of 2,097,000 acre-feet. The difference between these two conflicting estimates is derived from estimated water loss associated with natural vegetation and amounts to twice the total amount of water that DWR seeks to develop. Considering the projected changes in evapotranspiration associated with natural vegetation along the Wasatch Front in the next 50 years, the assumed loss of water to this source is a very important aspect of the water balance (Bardsley et al. 2014; attached to this memo). **We encourage DWR to develop an updated Bear River Basin plan that reflects the most recent information on water demands, hydrology, and climate and includes a quantitative analysis of the Bear River Development project.**

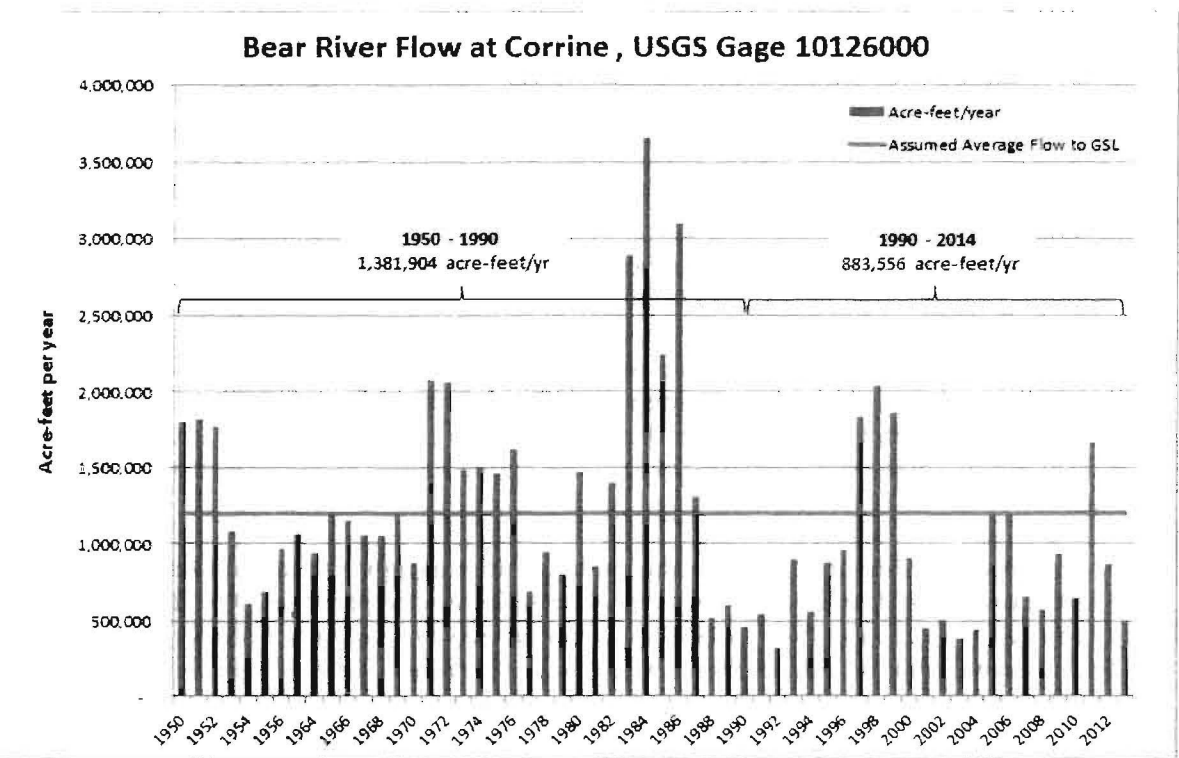


Figure 1. Bear River annual flow in acre-feet at Corrine (USGS Gage 10126000) from 1950 to 2014.

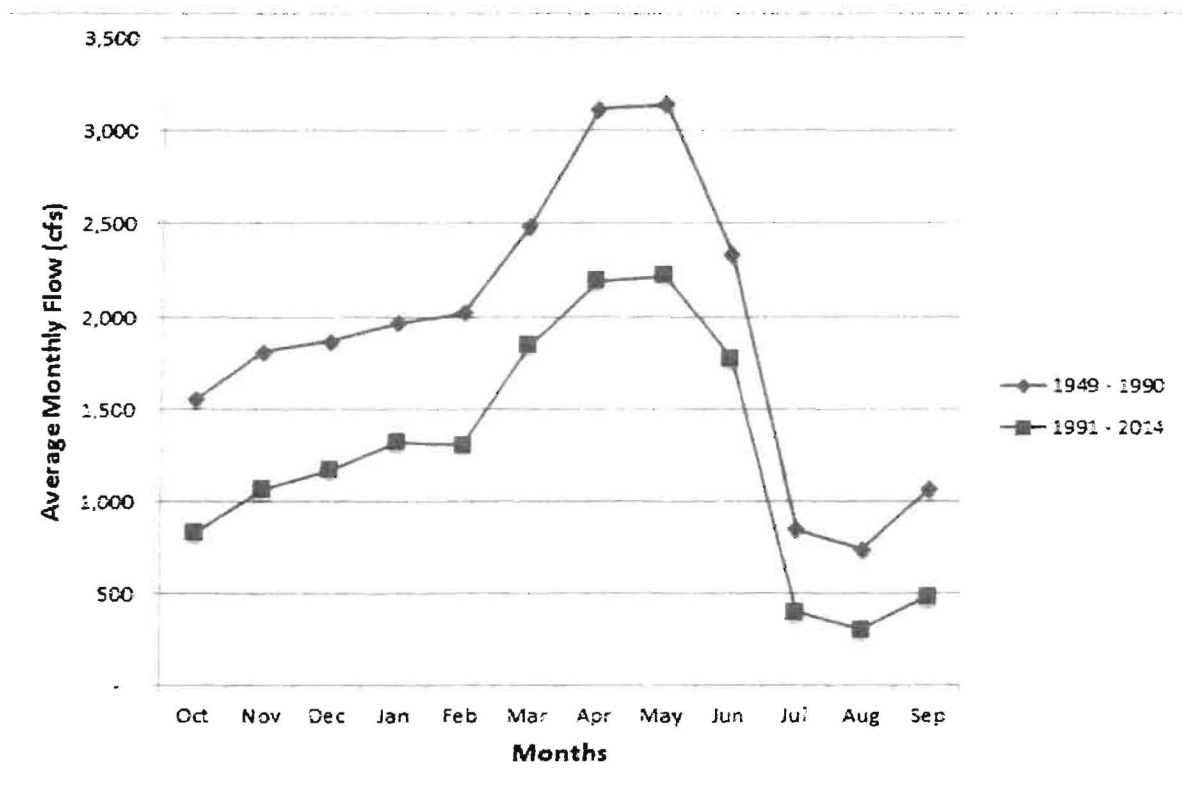


Figure 2. Comparison of annual hydrograph for Bear River at Corrine used in DWR planning documents (pre-1990) and current flows (1991 – 2004).

Possible Economic and Environmental Impacts to the Great Salt Lake

The Great Salt Lake contributes \$1.32 billion dollars in total economic output to the State of Utah based on mineral extraction, aquaculture and recreational uses, accounts for \$373 million dollars in total labor income, and provides 7,700 full and part time jobs (GSLAC 2012a). Reduced lake levels and changes in hydrologic patterns in Great Salt Lake tributaries have been identified as the greatest threats to the health of the Great Salt Lake system (GSLAC 2012b). Currently the lake level is near the historic low level of 4,193'. An additional drop in lake level could contribute to significant economic impacts on mineral extraction facilities. In addition, less water and the resultant higher salinity will change the ecology of GSL. Brine shrimp are the keystone species of the GSL ecosystem and are a primary source of food for millions of migrating waterbirds and shorebirds. Brine shrimp cysts are commercially harvested and used worldwide in the aquaculture industry. The project, as presented, could result in salinity too great to support a healthy long-term brine shrimp population. DWR has estimated the drop in lake level as a result of the Bear River Project to be six inches. Given the ramifications of a reduced lake level, **DWQ would like the opportunity to review the analytical assumptions and model that were used to develop this estimate.** We are willing to assign a DWQ staff member to work with DWR modelers in this review.

Further, the diversion of additional water coupled with continuing dry conditions would expose thousands of acres of lake bed that could exacerbate dust storms and become a public health

concern as was demonstrated by the dewatering of the Aral Sea and Owens Lake. The magnitude of mitigation costs associated with suppressing dust emissions is an important consideration and **we encourage DWR to engage with the Division of Air Quality regarding these potential effects.** These impacts need to be explored early in the planning stages of the project as they could inform development of alternatives prior to the NEPA process.

As DWR begins to evaluate the effects on Great Salt Lake, we encourage you to consult the *Great Salt Lake Comprehensive Management Plan* (UDFFSL 2013), recently completed by the Division of Forestry, Fire and State Lands including the lake level matrix (Appendix A) that details effects on ecological, recreation, and economic resources associated with lake level. **DWQ feels strongly that these effects be scoped and explored during the planning stages of the project and not postponed until the NEPA analysis.**

Evaporative Loss from Reservoirs

The USGS estimated in 1962 that 431,527 acre-feet of water is lost to evaporation from regulated reservoirs and lakes in the Utah portion of the Great Salt Lake basin (Meyers and Nordenson 1962). While most of this is from Utah Lake, 110,000 acre-feet evaporates from other storage reservoirs. Certainly, this loss has increased with increased temperatures and reservoir capacity since 1962. Alternatives that would recover some of this water through reduced reservoir surface area, use of aquifer storage, or other strategies should be explored before building additional reservoir capacity. The same report estimates that 23% of water stored in Utah reservoirs and regulated lakes is lost to evaporation each year, the highest among Western States. While this statistic is undoubtedly skewed by the shallowness of Utah Lake, statistics for other Western States range from 5 to 15 percent. **Evaporative loss from reservoirs, current and proposed, should be accounted for in an updated Bear River Basin Plan and in the hydrologic analyses of the proposed alternatives for development of additional capacity.**

Deepening Existing Reservoirs

During our meeting we briefly discussed the possibility of augmenting storage within Cutler and Willard Bay reservoirs as part of the water storage solution. DWR stated that dredging operations may be prohibitively expensive. However, given a total project cost of \$1.5 billion, DWQ believes that this possibility warrants further exploration as part of a more comprehensive management solution. Conditions within both reservoirs could generally be improved by deepening the reservoirs and costs associated with land acquisition and dam construction could be avoided.

Water Conservation

DWQ recognizes that DWR has set conservation goals for the municipal portion of water users throughout the State. While we think this goal could be more aggressive, we recognize that progress in this regard is ongoing. However, considering that agricultural users represent the largest fraction of total water use (consumptive and nonconsumptive use) in the Bear River basin (94%) and in the state as a whole (83%), we fail to understand why DWR has not launched water conservation goals for the agricultural sector. Conservation through improved irrigation technologies would be a win-win for water quality and in-stream flow, provided that the 'conserved' water could be left in the stream as environmental flows. The Bear River Basin (2004) plan briefly discusses agricultural water-use efficiency but does not present a rigorous analysis of how much water could be conserved and therefore 'developed' through agricultural

conservation practices. **We strongly encourage DWR to analyze the feasibility of agricultural water conservation to offset the need to develop at least a portion of the proposed 220,000 acre-feet of Bear River water.**

Decreased Discharge from Publicly Owed Treatment Works

As water becomes a more scarce and expensive resource in Utah, many municipalities are looking at the development of reuse projects to supply secondary water to help meet the needs of their growing communities. In addition, many communities are feeling the pressure of increased discharge standards requiring either treatment upgrades or alternative methods of disposal such as land application. These will only become more stringent in the future as DWQ adopts new water quality standards and dilution of discharged water is reduced due to lower instream flows. At this time many communities are already considering reuse projects and underway with land disposal projects. Many of these projects could reduce flows to Bear River and Great Salt Lake. The hydrologic analysis for the Bear River Project should include an examination of how much demand can be met with reuse projects including, at a minimum, a price comparison of reuse versus Bear River Development Water. In addition, analysis of ecosystem protection must include examination of changes in flow due to partial or complete removal of publicly owed treatment works discharge flows. DWQ understands that reuse projects in Utah are complex due to water rights and changing regulations. **While this will be a challenging issue to forecast, we recommend that DWR include reuse as part of a comprehensive water development plan for the Wasatch Front.**

Reserving Flows to Protect Ecosystems

DWQ believes that reserving some flow for purposes of protecting downstream aquatic resources in the Bear River system, the Bear River Migratory Bird Refuge, and the Great Salt Lake will need to be an integral part of any viable project. We encourage DWR to make these considerations a central part of the discussion early in the planning process. If our experience is any guide, many stakeholders, including DWQ, will be concerned about downstream impacts to aquatic life and recreation uses. Many of these concerns could be minimized provided that concern for these uses is an integral part of water resource management planning. The proposed projects could actually provide additional resilience to yearly or decadal changes in precipitation. However, this benefit will only be manifest with a broad and integrative resource management strategy.

Proposed Weber Bay (Willard Spur) Location

While we acknowledge that all sites have potential advantages and disadvantages, the proposed Weber Bay site is particularly problematic both politically and ecologically. Politically, the site is of high interest to many locals, especially duck hunters and the Utah Airboat Association. These groups are organized through the Great Salt Lake Alliance, a consortium of NGOs, who have frequently imposed legal challenges and political opposition to DWQ actions surrounding the lake. As you know, the site also lies within the Bear River Migratory Bird Refuge, which introduces federal rules and regulations. Further exploration of this site should be undertaken with an understanding that the site will likely be extraordinarily controversial and that stakeholders are likely to exercise legal challenges and political action in opposition to this site. **At a minimum, DWR would be well served by contacting engaged stakeholders to initiate dialogue and gauge reactions before too many additional resources are spent evaluating the Weber Bay site.**

In addition to political difficulties, the Weber Bay site may also be the most environmentally sensitive of all potential sites. DWQ recently completed exhaustive investigations of the area and documented a vibrant ecosystem that supports hundreds of thousands of birds. We are willing to share the results of these investigations, which should be integrated into your planning process and eventual NEPA analyses. At a minimum, DWR should be aware that 100% of the proposed site falls over jurisdictional wetlands, which will require considerable mitigation and close coordination with the US Army Corps of Engineers. Also, the health of this ecosystem is largely dependent on yearly hydrologic connection to Bear River Bay, which should be considered in the context of flow regulations for any upstream locations. Further, there would be an ongoing discharge of treated effluent directly to this proposed reservoir site from surrounding municipalities. Currently this discharge does not represent a threat to the ecosystem, largely because nutrients and other potential contaminants do not accumulate from year-to-year. This will not be the case if a reservoir was constructed because the protective natural flushing mechanism would be lost. Potential impacts to the Perry-Willard Water Reclamation Facility should be an integral part of further explorations of this location.

Water Treatment Costs: The need for consideration of upstream water quality concerns
DWQ appreciates DWR's acknowledgement of the need for improving upstream water quality in order to maintain the potential of Bear River water to meet culinary uses. DWQ agrees that this represents an opportunity to bring additional stakeholders to the table to help meet upstream water quality objectives. DWQ has developed total maximum daily load (TMDL) studies for the main stem of the Bear River, Cutler Reservoir, and several tributaries to the Bear River. Idaho and Wyoming have also developed TMDLs for the Bear River in their respective states. The proposed Bear River project expands the number of people who have a vested interest in meeting water quality goals. The lower Bear River TMDL is currently in revision and the potential ramifications of these projects, both positive and negative, should be considered. **We again emphasize the importance of close coordination between our agencies early in the planning process to facilitate dialogue among all vested stakeholders.**

404/401 Certifications

The Bear River Project will require DWQ to issue a 401 Certification that the proposed project will not violate water quality standards, which includes support of existing recreation and aquatic life uses. This certification is required before 404 Certifications can be issued by the US Army Corps of Engineers and EPA. Issuance of 401 Certifications typically involves specification of conditions, including mitigation, that must be implemented to avoid violations of water quality standards and impacts to designated beneficial uses. For projects of this magnitude, 401 considerations are complex because many different waters, with different background conditions and existing uses, are potentially affected. **Moving forward, DWQ encourages DWR to continue to directly involve our agency in as many planning processes as possible to ensure that this certification process progresses as smoothly as possible.**

Alternative Analyses

Our staff, and other stakeholders, have raised important questions that should be answered quantitatively using the best available hydrologic tools and water planning frameworks. Considering the controversial nature of this project and the cost of implementation, DWQ encourages DWR to provide answers to the questions raised as precisely and accurately as

possible. DWQ urges DWR to conduct a comprehensive basin-wide review that includes optimization and conservation strategies, in addition to expansion. This would include a scenario-driven hydrologic analysis and accompanying cost/benefit analysis that thoroughly evaluates downstream effects when water is optimized, conserved, and developed in the Bear River.

The Great Salt Lake Advisory Council recently secured \$400,000 for the development of an Integrated Water Resources Management model and planning tool that will be available to all state agencies to evaluate impacts of large scale changes in the Great Salt Lake basin on the lake and its surrounding wetlands. The project is being led by the Division of Forestry, Fire, and State Lands with active participation from DWQ, DWR, and the Division of Water Rights. This effort is the first step towards a more integrated approach to managing water resources in the largest and most populated basin in Utah. **We strongly encourage DWR to actively participate in the development of this tool so that it can be used to quantitatively answer many of the questions and concerns raised by stakeholders and agencies with respect to the Bear River Project.** There may be value in DWR funding additional capabilities for this tool to provide more detailed analytical capacity in the Bear River watershed. If DWR instead develops a separate tool for the hydrologic and ecological impact analysis, the value of the IWRM tool will be significantly diminished. Building on a tool developed for interagency planning is a much better use of the state's limited resources.

Summary

Again, we thank DWR for reaching out to DWQ staff and the Water Quality Board. This letter outlines DWQ's general comments on the proposed Bear River project including the need for additional planning and analysis, potential impacts to water quality and beneficial uses in the Bear River and Great Salt Lake, the value of interagency coordination, and alternatives to consider in a comprehensive water plan for the Wasatch Front. We hope that you will continue involving stakeholders through a formal process that includes solicitation of input on the purpose and need for development of additional Bear River water, alternatives development, impact analysis, and mitigation efforts. We encourage DWR to engage in a meaningful stakeholder, agency, and public involvement process prior to the NEPA process. We would welcome the opportunity to have a more in-depth discussion of our comments with you.

Sincerely,



Walter L. Baker, P.E.,
Director

U:\PERMITS\EGADDIS\Projects\Bear River Development

cc: Amanda Smith, DEQ

References

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<http://www.ffsl.utah.gov/images/state/lands/greatsaltlake/2010Plan/OnlineGSL-CMPandROD-March2013.pdf>

Benson Culinary Water Improvement District

April 4, 2016

Cache County Executive

Cache County Council
179 North Main
Logan, Utah 84321

Dear County Officials,

We support the creation of a Water Conservancy District in Cache County.

However, we do not support the creation of a Water Conservancy District which would be involved with retail water sales to individual consumers, or in the use of tax funds collected county wide to support or develop facilities and infrastructure for private developments outside municipal boundaries, as has been done in other conservancy districts (Bear River Water Conservancy District in Box Elder county, for example).

At the present time, the bylaws for the proposed Cache district states that the purpose of the district would be to provide for both wholesale AND retail water development.

We believe that the sole purpose for a water conservancy district should be to develop large water storage and wholesale distribution facilities and to provide water to municipalities, irrigation companies, and water districts, which own and operate their own distribution systems to deliver water to retail customers. Countywide tax funds should be used to benefit the entire county.

This is a serious issue. Please discuss it with your council. If we are going to have a water conservancy district, we should have one we can live with.

Thanks



Nick Galloway, Mgr.

Benson Culinary Water Improvement District