**Utah Water Strategy – Suggested Comments**

As you’ll notice on the [Comment Form](http://envisionutah.org/public-comments-on-water-strategy-draft), there is a box for the section or page number, and another for each comment. It allows you to submit one comment at a time. Here are suggestions for some comments, along with the contents for the related section/page numbers. You can just copy and paste them, whichever ones you choose to submit, into the comment form. Of course, you can come up with your own comments, but time to digest the big document is short. Comments must be submitted by the end of this Monday, June 26th.

**Section and Page:** General comments

**Comment:**

**Overall quality of the paper:** Big improvement from previous versions. Great job.

**Leadership:** Terrific that the governor and the state is taking this action seriously. This is, however, only the first step. Planning and implementation of real improvement will require a lot of continuing support. Connection between this document and local implementation is critical and unclear.

**Public engagement:** It is ridiculous to give the public 10 days to review a 200 document that took 4 years to prepare. Without a Table of Contents and some internal navigation capability, reviewing and commenting on this document is very difficult. It hints that public comment is not taken seriously.

**Section and Page: Section 1 on Municipal Conservation, page 22-28**

**Comment**: It is appropriate that this section is first. It is by far the most important topic for our state to address. It has been getting more attention, but mostly in words rather than actions. Funding should follow this priority, and it has not.

**Section and Page: Section 2.4 on Regional and Interstate Rivers, page 30-31**

**Comment**: This section includes a sales pitch on two expensive, controversial projects: the Lake Powell Pipeline and the Bear River Project. While it is appropriate to discuss the concept of these big projects and their legislative status, it is inappropriate to discuss them specifically as if they have been determined to be affordable and sufficiently risk-free. They are fine to use as examples of the types of projects that should be considered, but they have had insufficient dialog on the facts, data and logic that form the basis for positions.

**Section and Page: Section 3 on Agriculture, page 36-47**

**Comment**: Agriculture uses the vast majority of water in the state. Conserving a small percentage would yield a big dividend. Our state’s agricultural irrigation practices are from the past, and our crop selection reflects an inappropriate choice for our climate. Major attention should be placed on agriculture policies in general and irrigation measurement and conservation policies specifically.

**Section and Page: Section 6, Planning and Funding page 62-70**

**Comment**: Planning has not been of the detail and quality that is required to achieve the desired results. Industry standard program and project management processes should be employed to define goals and objectives; to assign priorities, implementation sequences and budgets; and to define tasks, responsibilities and funding. Accountability to these plans should be established. Historically and currently, funding for new development projects dwarfs that for conservation. This should be reversed.

**Section and Page: Section 7, Climate, page 71-77**

**Comment**: Mitigation and adaption to changing climate will not be sufficient. Until our state recognizes the causes of climate change and begins to support solutions to it, our water situation will turn from concern to emergency. It is incredible that the state cannot recognize the clarity of the science when it comes to the causes of climate change. This must be remedied, starting with your team. If our state continues to support and encourage fossil fuel development, and continues to support the national policies that are misaligned with a climate solution, our water situation will become unsolvable. This is the most critical factor impacting our water strategy, yet you refuse to acknowledge it. It cannot be mitigated, and only a certain amount of adaptation can be applied. For sure, we should make those adaptive changes, which are primarily in the area conservation. You are letting an ideological political position dictate the strategy. Who do you trust for the science on climate change? Not NASA, NOAA, the National Academies of Science, industry, not your own state Climate Center? Science and technology are a key source of solutions to our water problems, yet you cannot recognize the scientific elephant about to crush us.

**Section and Page: Section 9 on Law and Policy, page 85-90**

**Comment:** The property tax line item for water should be eliminated. This tax hides the true cost of water and decouples the cost of water from its use. It is anti-conservation.

**Section and Page: Section 10 on Roles, page 91-96**

**Comment:** Clear assignment of responsibilities defined in clear plans is essential to the implementation of any strategy. Accountability to those assigned responsibilities is equally important. The traditional responsibilities in Utah for water has been focused on development of water resources rather than their conservation and management. This needs to change. Citizen involvement should be encouraged rather than left to a poor public commenting process. Communications needs major improvement. Citizens are concerned about conservation and the cost of big, risky development projects. Our poor data gathering capabilities need vast improvement. The implementation of plans in municipalities is critical, but there is little or no mention of how the planning and implementation are going to be accomplished at the local level. This is a critical weakness in the strategy. It is not at all clear how the state will work with local government agencies to implement the strategies.

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**As derived and abbreviated by CSU, for you reference, since the document didn’t have one.**

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