

To: Bryan Torgerson
SITLA Resource Specialist

Re: Proposed lease of SITLA parcel located in Castle Valley/project 82263

May 24, 2022

Bryan,

The Town of Castle Valley received your letter addressed to the Grand County Commission and Southeastern Utah Association of Governments on 5/18/2022, forwarded to the Town by a County Commissioner. This was six days after the letter was dated, leaving only a few days for us to comment. Though the parcel in question is not located in the Town of Castle Valley municipal boundary, it is located in our watershed, and we appreciate an opportunity to comment on the project as well. Given the lack of information about the proposed residential lease, we feel SITLA should extend the comment period to local governments and interested parties until after the advertisement period is over and the chosen applicant is disclosed to the public. We understand that your process does not allow for full disclosure of project details until that time. Our preliminary comments will reflect that lack of information.

The Town of Castle Valley has invested considerable effort into the study of our watershed and aquifers and has been working with Utah Division of Water Rights to close the aquifer to any further appropriations. Also, the DWRi is currently limiting appropriations in this watershed area. For instance, only small domestic type applications can be filed. This would be sufficient water for 1 home, 10 head of livestock and 1 acre of irrigation. Further, the Utah Division of Water Rights does have specific restrictions in some areas that are located near the SITLA parcel, like Willow Basin, that further limit appropriation depending on water availability.

We request that any application you consider not exceed two domestic use filings. Existing senior water rights in the valley should be considered before any new development is accepted, including the Castle Valley Academy, the Castle Valley Irrigation Company and the Town of Castle Valley. Any development in the geographic area of Castle Valley has the potential to threaten the watershed and our EPA certified sole source aquifer. Also, the Colorado River Basin is closed to new large appropriations.

In addition to our concerns about the watershed, the wildlife in this area needs to be considered. This area is a seasonal migration route as well as a year-round habitat for mule deer, elk and bear. The potential for habitat on surrounding US Forest Service land has been degraded by fire mitigation work and by the long term "Extreme Drought" in which we find ourselves.

The fire danger associated with additional development also needs to be considered. Any development in this area would strain the resources of the all-volunteer Castle Valley Fire District. Response time to any fire incident would be more than 20 minutes and would likely to be more than an hour for Moab City and Forest Service fire department responses. EMT response would be of a similar timeframe.

When full details are released, we will encourage the Utah Division of Water Rights, Forest Service, Bureau of Land Management, Rocky Mountain Power, Utah Open Lands and other stakeholders in the area to comment on this project. Many of the Castle Valley residents who worked on the land swap/land appropriation project around the Castleton Tower and Parriott Mesa in 2000 are still living in the valley and would be interested in participating in the outcome of this project.

In order to understand this project better, we would like an explanation of the parameters of “leasing” SITLA land vs. “purchasing” SITLA land. Thank you for confirming that SITLA will abide by Grand County’s zoning decisions on this application, as was stated on the phone call between Mayor Jazmine Duncan and yourself. We kindly request that confirmation in writing.

We appreciate your notifying us in writing as soon as the application advertisement period begins and when it will end so we can work further with you, the Grand County Planning Department and other stakeholders in the area.

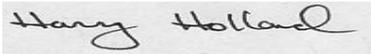
Thank you for taking our comments,

The Town of Castle Valley



Jazmine Duncan, Mayor

Council Members:



Harry Holland



Pamela Gibson



Tory Hill



Robert O'Brien

CC Grand County Commission

Grand County Planning and Zoning