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June 22, 2007

Mr. Michael R. Styler, Executive Director
Utah Department of Natural Resources
1594 West North Temple, Suite 5610
P.O. Box 145610
Salt Lake City, Utah 84114

Dear Mr. Styler,

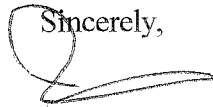
I am an attorney and real estate developer. I am writing to voice my concern about the current state of water policy and transactions in Utah. Undue friction in Utah's water commerce impacts Utahns, including developers, builders, and ultimately homebuyers. The current state of water policy is causing problems throughout the housing industry. Undue influences in Utah's water industry have degraded water rights which dramatically increase risks and costs for Utah builders and families. I urge you to restore the 90 year old irrigation rights. All water users including irrigation shareholders need the right to directly file applications for non-use, temporary, and permanent change applications without the current water politics of boards and board members who are city employees.

Where the Board of Water Resources grants and loans public tax payer dollars, good water citizenship by applicants should be a policy and condition for quality for public funds. The state through its various water related entities should discourage water hoarding, water monopoly, water wasting, and the water politics which is a cost driver on Utah's home builders and families.

Compliance with Court Orders to Adjudicate Salt Lake Area 57 would moderate the current water monopoly to accommodate water and reduce friction in Utah's water commerce which increase home building and maintenance costs. The unequal treatment of cities further erodes the public's trust in state government. A city which hoards privileged, given grants and subsidized state loans by-passes the same court order used to firmly adjudicate a city which providently manages its water resource. Non-compliance of Court Orders by State Officials erodes the public's trust in the justice system. A free water market is essential to a healthy Utah economy.

I also urge you to consider pre-adjudication actions to moderate monopoly that could be effected immediately, including the prompt rejection of pending 184,000 acre-feet of applications to appropriate more water in Area 57, rejecting applications for extensions by those excessive amounts of water than they need at build out, and conditioning Board of Water Resource grants and loans upon good water citizenship.

Thanks you for your consideration of the issues raised in this letter.

Sincerely,


Jason Ivins

Attorney at Law.