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September 1, 2016

VIA HAND DELIVERY

Director Gary Spackman
Idaho Department of Water Resources
322 East Front Street
PO Box 83720
Boise, ID 83720-0098

Re: *City of Hailey's Comments Regarding Proposed ESPA GWMA*

Dear Director Spackman:

I am writing you on behalf of this firm's client, the City of Hailey. The City is aware that you are considering establishing a Ground Water Management Area ("GWMA") for the Eastern Snake Plain Aquifer ("ESPA" that would incorporate tributary basins, including the Big Wood River basin. The City has reviewed the Department's stated rationale for this considered action, and the comments submitted to you on this issue by the City of Bellevue and the City of Ketchum.

The City agrees with Bellevue and Ketchum that the proposed creation of an overarching GWMA is fraught with legal and technical problems that create additional uncertainty for all water users in the Big Wood. The City shares the concerns stated in Bellevue's and Ketchum's written comments and urges the Department not to establish an ESPA GWMA that would include the Big Wood River basin or impose other administrative or regulatory schemes that undercut the City's ability to develop, use, manage and mitigate its water rights in the best interests of its citizens.

Thank you for this opportunity to comment on this important issue.

Sincerely,

Michael C. Creamer

MCC:lah

cc: Fritz Haemmerle, Mayor
Ned Williamson, Esq.