RECEIVED
SEP 02 2016
DEPARTMENT OF
WATER RESOURCES

EASTERN IDAHO
WATER RIGHTS COALITION

EASTERN IDAHO WATER RIGHTS COALITION
P.O. Box 15 • St. Anthony, ID • 83445

Executive Committee:

Roger Warner,
President, Executive Director

Stan Clark
Past President

John Millar
City of Rexburg Public Works

Scott Bruce
Falls Water

Craig Evans
Bingham Ground Water District

Rebecca Casper
Mayor of Idaho Falls

Cortney Liddiard
CEO Ball Ventures

Dean Mortimer
State Senator

Jeff Raybould
Fremont Madison Irr. District
Idaho Water Board

Dave Richards
City of Idaho Falls Public Works

Randy Skidmore
Developer

Dale Swensen
Fremont Madison Irr. District

Richard Mangum
City of Blackfoot Public Works

SEPTEMBER 1, 2016

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

Dear Director Spackman,

The Coalition represents both surface water and ground water interests in the Snake River Valley. We received your July 7, 2016 letter which indicated that the Department "is considering creating a ground water management area for the Easter Snake Plain Aquifer (ESPA)," and invited "potentially affected water users to attend one or more (10) meetings scheduled across Eastern Idaho between July 25, 2016 and July 28, 2016." Many of our members were in attendance to those meetings. Following each meeting, those attending were encouraged to file written comments in addition to their oral comments. Hence, this letter is being sent in order to further those comments made at the various meetings and add some additional reasoning as to why we do not believe that there is a need to create the GWMA.

Our membership does not believe it necessary or appropriate to create the proposed GWMA for the ESPA at this time. Our reasons for this position are stated as follows:

1. The ink has barely dried on the crafted settlement agreement between IGWA and the Ground Water Districts. Many have gone to great expense in time, money and effort to put a plan in place for the next 5 years. To re-start the process would be both disruptive and unfair to all parties involved. The proposed GWMA gives an impression that the State of Idaho does not like the settlement and already wants to change it. Why not give it a chance to see if it will be effective and then decide?
2. As quoted in your notification letter, it states that "you" will decide whether or not to implement a GWMA. With such a significant challenge as the ESPA, do you really want to shoulder all of the responsibility in this regard? We don't feel that much power and authority should be vested in any one unelected person, but should be a public process like unto other public processes.
3. We feel that present day tools available to the Director are sufficient. Namely, current day case law and the legislatively approved Conjunctive Management Rules.
4. It was expressed that not all are participating in the IGWA/SWC

agreement that should be ("the missing 10 %"). However, those identified by the Director who were not participating in a mitigation plan were sent letters, individually contacted, and threatened with curtailment until they were accepted into or participated in an acceptable mitigation plan. We are unaware of any others that have not participated but should be.

5. Lastly but perhaps most significant, we feel a GWMA will make it more difficult if not impossible to sustain and economically grow our cities and communities. Effectively, the GWMA could be the proverbial, "No Vacancy" sign for doing business in eastern Idaho.

Thank you for considering the Coalition's comments. Members of the Coalition will continue to participate in actions to enhance water supplies in the Eastern Snake Plain Aquifer but for now feel that the Director should NOT designate the ESPA or its tributaries as a Ground Water Management Area.

With warm regards,

City of Idaho Falls
City of Rexburg
City of Blackfoot
City of Sugar City
City of Rigby
City of St. Anthony
Falls Water
Fremont Madison Irrigation District