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DEPARTMENT OF
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September 2, 2016

Director Gary Spackman
Idaho Department of Water Resources
322 East Front Street
P.O. Box 83720
Boise, Idaho 83720-0098

RE: Coalition of Cities Comments Concerning Creation of Ground Water Management Area

Dear Director Spackman:

I represent the Coalition of Cities ("COC"), composed of the Idaho municipalities of Bliss, Burley, Carey, Declo, Dietrich, Gooding, Hazelton, Heyburn, Jerome, Paul, Richfield, Rupert, Shoshone, and Wendell. The COC has participated in the second Rangen call, and most recently, in the Surface Water Coalition call with respect to the development of the 2016 mitigation plan for cities now in place. The COC has also participated in related litigation in District Court.

This letter provides comments of the COC concerning the IDWR proposal for the creation of a Ground Water Management Area ("GWMA") over the Eastern Snake River Plain Aquifer, and adjacent areas. I was present at the public meeting concerning the possible creation of the GWMA held in Jerome, on behalf of the COC, during which those present were advised of the ability to provide written comments to the GWMA proposal.

The COC has reviewed letters providing comments on the formation of the GWMA from the City of Pocatello, the City of Idaho Falls, and the Association of Idaho Cities, and shares their collective view that a GWMA should not be formed. The COC believes current mitigation plans should be given a chance to work, and has clearly shown its commitment to mitigation responsibilities by providing 10,000 acre feet of recharge to the ESPA over the last two years. This is especially significant given the very modest amount of pumping volume attributable to the COC.

The COC does not believe it necessary to repeat or rephrase the positions or observations of Pocatello, Idaho Falls, and the Association of Idaho Cities. However, the COC emphatically believes that if you determine to proceed with the formation of the GWMA, a full administrative hearing should be held before an authorizing order is entered. If, following the full administrative proceeding, you determine to enter an order

establishing the GWMA, the COC believes it mandatory that the order allow cities to propose their own mitigation or other measures to comply with the ground water management plan established under the GWMA, separate and independent from what is proposed by irrigators. Such a provision is critical to the immediate and long-term viability of cities. Many COC cities have recently experienced unprecedented economic growth to the immense benefit of the local area and the entire state. Additional economic growth opportunities are currently before COC cities, and will continue to arise. Jerome, Burley, Rupert, and other COC cities should not be put in a position to be unable to compete for or secure those economic development opportunities. That will be their unfortunate lot if the COC cities' current pumping levels, and the opportunity to increase those levels, is not preserved. Otherwise, additional economic growth and the ability to serve increasing human populations will come to an end.

Thank you for your consideration.

Respectfully Submitted,

Robert E. Williams

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