RECEIVED
AUG 12 2016
DEPARTMENT OF
WATER RESOURCES

South Valley Ground Water District
P.O. Box 223
Bellevue, Idaho 83313

August 10, 2016

Director Gary Spackman
State of Idaho
Department of Water Resources
P.O. Box 83720
Boise, Idaho 83720-0098

Dear Director Spackman,

Thank you for coming to the Wood River Valley July 25th to speak to us about the possibility of including the tributaries in a Ground Water Management Area for the Eastern Snake Plain Aquifer. We understand that Idaho Statute 42-233b clearly allows you to designate a Ground Water Management Area in any basin you feel may be approaching the conditions of a critical ground water area. We are concerned however about the consequences of including the Wood River Basin in a Ground Water Management Area for the ESPA.

Here is a list of our concerns and questions:

1. We are concerned that including the Wood River Basin in this proposed Ground Water Management Area would adversely affect our ongoing efforts to resolve water delivery to the Big Wood and Little Wood Water Users' Association. As you know, many water users and people concerned about water within Basin #37 have been meeting for more than a year with a goal of resolving the surface water delivery problem south of the Timmerman Hills. Many of us have put a very significant amount of time and effort into trying to find a resolution. Inclusion in mitigation for the ESPA, it seems to us, would complicate and delay those negotiations at best and possibly reverse the progress we have made.

2. We have not received any information that explains that the Wood River Basin contributes a significant enough supply of water to warrant inclusion in this new Ground Water Management Area. We also know that the Wood River aquifer is very different from the ESPA aquifer. Our newly completed water model indicates that a 12% curtailment of pumped water across the valley would result in an increase of .3cfs in the underflow at Picabo after 25 years. Surface water leaving the valley would increase as well but without access to the ESPA model, we cannot predict how much surface water would make it to the ESPA. We understand the Department agrees that much of any increase in surface flows from curtailment is likely to be used by senior surface water users within our valley, confounding any effort to enhance the ESPA. As with your decision to exclude water users east of the Great Rift in the Rangen decision, we believe that the total contribution from the Big Wood aquifer is likely to be extremely small in the total scheme of the ESPA.

3. It is not at all clear to us how the proposed GWMA for the ESPA will be administered. Will the term sheet for the ESPA settlement be applied to a small tributary like the Wood River Basin? How would the Wood River Valley, which supplies a tiny proportion of the total water in the ESPA, have a voice in such a large Ground Water Management Area? How will the existing Wood River Ground Water Management Area, which is part of this new proposed area, be administered? Who will create the Ground Water Management Plan? Can such a large scale plan be tailored to the needs and realities of the Big Wood aquifer? If so how will that take place? If it is to be folded into the new GWMA for the ESPA, how will we resolve local issues such as surface water delivery to the BWLWWUA? Will the obligations be cumulative? Overlapping? Co-extensive? How will domestic and other DCMI uses be affected? Or is this entirely about agriculture?

If we had answers to these questions, and the others that were raised at the meeting in Hailey, we could provide more constructive input. We do not object to a comprehensive plan for the ESPA aquifer, but we believe that the Department's efforts would be better focused on the area that is better understood and described in the existing ESPA model and not expanded to the periphery like the Big Wood. Thank you for considering our concerns and questions.

Sincerely,

Sharon Lee
Chair

Jerry Bashaw
Director

Brett Stevenson
Director