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DEPARTMENT OF
WATER RESOURCES

THE VOICE OF THE RIVER
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HENRY'S FORK
FOUNDATION

August 31, 2016

Gary Spackman, Director
Idaho Department of Water Resources
322 East Front St.
Boise, ID 83720

RE: Groundwater Management Area (GMWA) for Eastern Snake Plain Aquifer (ESPA)

Dear Mr. Spackman,

The Henry's Fork Foundation (HFF) is a 501(c)3 nonprofit organization based in Ashton, Idaho. Founded in 1984, the HFF is the only organization whose sole mission is to conserve, restore, and protect the unique fishery, wildlife, and aesthetic qualities of the Henry's Fork of the Snake River watershed. Pursuant to our mission, we attended one of your public meetings on a proposed GWMA for the ESPA, have reviewed relevant technical materials, and hereby provide brief input.

With respect to the two technical issues before you, we believe that 1) the hydrologic data strongly show that the groundwater supply in the ESPA is insufficient to meet current demand, and 2) the boundary of the proposed GWMA should encompass the entire surface and groundwater drainage of the Snake River upstream of King Hill, i.e., the "ridgetop-to-ridgetop" boundary.

We encourage formation of a GWMA for the ESPA for the reasons you have clearly communicated. Consistent with our organization's primary modes of operation, we encourage comprehensive, flexible, and science-based water management as a more sustainable alternative to solving problems than year-to-year curtailments and administrative actions. At the same time, we believe that hydrologic and water-rights accounting data show that the ESPA cannot be stabilized within a reasonable time frame if consumptive use within the upper Snake River Basin is not reduced, at least for a period of 5-10 years. We believe that flexible and creative leases, exchanges and other market-based actions would allow surface water saved by voluntary demand reduction in some areas to be used for managed recharge to mitigate the effects of groundwater pumping in others. Implementation of the "ridgetop-to-ridgetop" boundary would increase the flexibility and potential of such actions to stabilize the aquifer. If carefully implemented, leases and exchanges could benefit fish and wildlife in key subwatersheds, while providing economic and water-supply certainties for both surface-water users and groundwater users.

Therefore, we support creation of a GWMA on the ESPA and development of programs that will allow surface water saved through demand reduction to be used for managed aquifer recharge and mitigation.

Sincerely yours,

Brandon Hoffner
Executive Director

PO Box 550, Ashton, ID 83420 Tel: 208.652.3567 henrysfork.org