

To: Hal Anderson and Rick Raymondi, IDWR	
From: John Koreny, HDR Engineering, Inc. Chuck Brockway, Brockway Engineering, Inc. Jon Bowling, Idaho Power Co. David Blew, Idaho Power Co. Willem Schreüder, Principia Mathematica	Project: ESHMC
CC: Director Dave Tuthill, IDWR Jonathan Bartsch, CDR Associates, Inc.	
Date: September 17, 2007	Job No: 59848

RE: ESHMC REVIEW OF STRAWMAN PROPOSAL

Dear Hal and Rick-

At the last ESHMC meeting on September 11, 2007, the Committee was asked about the potential to provide input on the “Strawman Proposal”. At the meeting, IDWR representatives indicated that the Comprehensive Aquifer Management Plan (CAMP) committee desired more information regarding the technical aspects of the Strawman Proposal. You asked for input from ESHMC members on this proposal.

We are concerned about getting the ESHMC involved in an evaluation of the Strawman Proposal.. The reasons are: 1) we are not sure whether the ESHMC can address many of the non-hydrologic issues (such as feasibility of implementation, economics, water policy, etc.) that really drive whether or not the Strawman Proposal can be implemented and produce the desired results and, 2) this type of evaluation puts the ESHMC in the position of providing technical comments on a potential approach to be used to settle the ESPA water conflicts that has not been agreed to by all affected parties.

The CAMP committee needs to understand that only some of the practices in the Strawman can be evaluated using the ESPAM ground water model, which is the primary focus of the ESHMC. These management practices represent only a portion of the stated 600,000 to 900,000 acre-foot change in the ESPA water budget. Additionally, our analysis of the Strawman shows there is not 600,000 to 900,000 acre-foot change in the water budget as stated. Instead, a portion of the stated change in the water budget appears to be a shift or reallocation of water. There is little doubt that modeling some components of the Strawman would show benefit to the aquifer and spring discharge tributary to the Snake River. However, with no specificity on where and when these changes would occur the effort would only provide a vague overview of what would happened if “X” acre-feet were added to the aquifer. The modeling effort would not result in a true technical review of the Strawman. Our concern is that some members of the CAMP committee may view the modeling results as a technical endorsement of the Strawman Proposal without a technical evaluation of the feasibility of the proposal components.

A technical evaluation of the Strawman Proposal will require answering the kinds of questions listed below. This list of questions is based on the “Framework Targets” listed on page 3 to 6 of the 9/15/04 draft distributed at the last ESHMC meeting.

- What are the feasible alternatives for large-scale aquifer recharge. Where can recharge be accomplished? What is the timing and seasonal distribution of aquifer recharge? Where do the water rights come from for this solution? What is the technical method for implementation? What are the costs? What are the benefits for specific senior water right holders?
- Where would the storage or natural flow rights acquired from others be located? How much supply or water rights would need to be purchased? Where? What would this water be used for? If for a mitigation bank- how would it operate? Would water purchased below Milner help the problem?
- What has been the success in using CREP to reduce demand in the aquifer? What is the projected success under reasonably-expected future conditions?
- Part A.2. describes a 100,000 acre-feet reduction in ground water depletions. How many acres have been converted to date? Have the GWDs been successful in securing water for these acres? When will canal capacity become a limiting factor for converting acreage?
- What should a future monitoring program include to evaluate success of implementation?

There are many other questions like this that would need to be asked. The ESHMC works best when a clearly identified technical question is before the group that does not have major policy, implementation or economic questions to answer. To date, scenarios that the ESHMC has provided input to IDWR have not required the type of water planning evaluations (involving siting criteria, technical implementation, cost, policy, water law and beneficiaries analysis) that a technical evaluation of the Strawman Proposal will require. Getting the ESHMC involved in the Strawman Proposal analysis involves the Committee in many issues that are not related to ground water modeling or hydrologic analysis. If the ESHMC does get involved without understanding and evaluating all of the non-hydrologic issues, then we run the risk of providing a narrow opinion that is mis-informed and does not address the real questions on implementation, costs and benefits that will be the drivers behind whether the Strawman Proposal can be effective.

If IDWR decides to pursue this course, we recommend that the ESHMC’s technical evaluations be limited to a very narrow set of questions with a pre-defined set of alternatives. The drivers regarding implementation, economics and benefits for these alternatives need to be established by others.