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July 16, 2009

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Re: *Implementation of Non-Stayed Portion of Ground Water Districts'  
Snake River Farm Replacement Plan for 2009 and 2010*

Dear Acting Director Spackman:

This is intended to supplement my July 9, 2009 letter of response to the Director regarding the above matter.

Further comment may be appropriate on concerns of Clear Springs and the Department that the Groundwater Districts' 2009 Plan involves slightly less converted acreage than initially estimated. The actual difference in modeled benefit to Clear Springs from this reduction in acreage is minuscule, and probably not measurable. This is because: (1) the benefits of conversion are diffuse and only a small portion will accrue to Snake River Farms, and (2) in the submitted 2009 Plan, the over-the-rim wells will continue to be pumped (absent the Stay Order) so there will be no change in pumping stress on the aquifer as there is with our other conversions. If the wells are pumped, the conversion benefit derives only from recharge associated with delivery and application losses.

With the Stay Order, the over-the-rim wells are not being pumped and the benefit to Snake River Farm can be estimated in a manner similar to our other conversions. As long as the wells aren't pumped, Snake River Farms gets the full conversion benefit of the foregone aquifer stress in addition to the recharge of excess applied surface water. The resulting benefit to Snake

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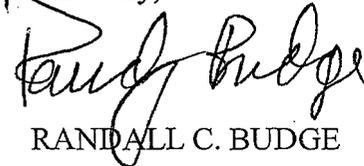
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River Farm, while still quite small, is likely to be 2-3 times larger than would be the conversion benefit if the over-the-rim wells were being pumped.

So even with the small acreage shortfall, Snake River Farms derives a greater benefit from conversion under the Stayed plan than it would have had the Groundwater Districts proceeded with the full 2009 Plan including pumping over-the-rim.

It should be noted that the 2009 Plan did not attempt to calculate the recharge benefit of surface water delivery and application to the conversion acres. Should the Department attempt to make precise calculations of the impact of the reduced conversion acres, I believe it would be appropriate to take into consideration the factors discussed above.

Sincerely,



RANDALL C. BUDGE

RCB:rr

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