

October 30, 2024

Mathew Weaver, Director  
Idaho Department of Water Resources  
322 E Front Street, Suite 648  
Boise, ID 83702

RE: Recommendation for Three Year Extension of BWRGWMA Management Plan

Dear Director Weaver:

In the fall of 2020, the Department of Water Resources (“IDWR”) formed the Big Wood River Ground Water Management Area (“BWRGWMA”) Advisory Committee (“Advisory Committee”) to advise the Director of IDWR in developing a management plan for the BWRGWMA. In May of 2022, IDWR approved a three-year management plan, which expires on December 31, 2024. In February of this year, you asked the Advisory Committee to advise IDWR on the development of a new or updated management plan for the period beginning January 1, 2025.

Since February, the Advisory Committee has met ten times. In addition, select members of the committee have met in several discussion group meetings to consider specific management plan topics. Having deliberated carefully, the Advisory Committee believes that developing a broadly supported, long-term management plan is dependent on several actions that will be or can be achieved within three years from now. Therefore, we respectfully recommend that you extend the existing management plan for an additional three years -- from January 1, 2025, through December 31, 2027 – to make time for accomplishing the following items:

- Develop and evaluate the April 1 Allotment (“A1A”) Model for Consumptive Use Allotment Estimations to determine if it can be the basis for a longer-term management plan. (The BWRGWMA technical working group has begun this project.)
- Update calibration of the Big Wood River Groundwater Model. (IDWR and the Wood River Valley Model Technical Advisory Committee have scheduled this project to be completed in 2026.)
- Support the Camas Prairie Hydrologic Project. (The USGS has scheduled this project to be completed by the USGS in early 2027.)
- Complete at least a prototype of the Water District 37 accounting model. (IDWR has begun this project.)

- Prepare a report evaluating the 32 cfs four-day moving average streamflow target from May 1 through September 30 at Station 10 on the Little Wood River near Richfield. What is the justification for the streamflow target, and who benefits? (This project may be a collaboration among IDWR, Water District 37, the BWLWWUA, and the BWRGWMA technical working group.)
- Prepare a report evaluating a possible 53 cfs total inflow target (comprised of the sum of flows at Camas Creek, Willow Creek, and Stanton Crossing gauges) into Magic Reservoir. What is the justification for the streamflow target, how can it be maintained, and who benefits? (This project may be a collaboration among IDWR, Water District 37, the BWLWWUA, and the BWRGWMA technical working group.)
- Prepare a report on the effects of administering water rights consistent with Tim Luke’s April 27, 2021, memo *Delivery of Water Rights in Water District 37 from the Big Wood and Little Wood Rivers having the BOR-AFRD2-BWCC Exchange Condition*. This report would enable the Advisory Committee and IDWR to assess the need for, and amount of, stream flow targets and Snake River storage water acquisition and deliveries as elements of a future management plan. (Water District 37 will take the lead role for this project.)
- Evaluate options for Water Districts 37 and 37B to report groundwater diversions during the irrigation season. This may facilitate the use of pumping reductions as a management tool. (Water Districts 37, 37B, and South Valley Ground Water District may collaborate on this project.)
- Evaluate options for improving and increasing monitoring and reporting of surface water flow and diversions. This would include exploring options for improving existing monitoring sites, developing additional monitoring locations, and exploring technological advances in data collection and reporting, such as SCADA. This will allow for more “real time” adjustments to assist water users in making quicker management decisions. (The BWRGWMA technical working group envisions this project being part of the A1A project discussed above.)
- Explore options, including possible enforcement, for increasing participation by additional BWRGWMA water users in a longer-term management plan. (This project will likely be a collaboration among the Advisory Committee, IDWR, and Water Districts 37 and 37B.)
- Investigate and evaluate the correlation between depth-to groundwater and stream flows as a predictive tool, especially with respect to in-season flows and application to groundwater season of use. (The BWRGWMA technical working group has begun this project.)

Meanwhile, the Advisory Committee also respectfully requests the following adjustments to the current management plan as part of the proposed three-year extension.

- Modify “Table 1”, Section V.2 (page11) to include a “Wet” Irrigation Season Water Supply row when the Irrigation Season Water Supply Forecast exceeds 270 KAF or exceeds 240 KAF with at

least 90 KAF of carryover storage in Magic Reservoir on January 1. In “Wet” years, there would be no requirement for fallowing (Section V.1.A) as a baseline management action. The “June 1 Forecast Column” would be changed to a “Status of Baseline Management Action” column. A representation of the proposed “Table 1”, Section V.2 is shown below...

<i>Table 1: Recommended forecast water supply tiers and additional management actions</i>			
Irrigation Season Water Supply	Avg. of Apr-Sep Volume Forecasts (KAF)	Recommended Additional GWCU Reduction (AF) Based on April 1 Forecast	Status of Baseline Actions*
Wet	≥270 -or- <270 but ≥240 with ≥90KAF Magic Res carryover on Jan 1	-	Snake Storage: Not likely needed Fallowing: Eliminated Season of Use: Retained (reduction required)
Adequate	≥210 but < “Wet”	-	All Retained (required)
Dry	≥155 but <210	1,275	All Retained (required)
Very Dry	≥100 but <155	11,260	All Retained (required)
Extremely Dry	<100	17,016	All Retained (required)
*Storage water as needed for the Big Wood below Magic users since Magic Res carryover does not benefit them.			

- Modify the fallowing requirement as a baseline management action (Section V.1.A) as follows:

Item 1. Within SVGWD at least 1,000 acres/yr.

Item 2. GGWD will fallow at least 200 acres within its district boundary &/or outside its district boundary but within the BWRGWMA west of Highway 75.

- Modify the Ground Water Irrigation Season of Use Limits as a baseline management action (Section V.1.B) as follows:

Ground water users will not irrigate before May 1 or after September 15. Exceptions to the September 15 shut off date may be:

1. Irrigation to permit harvest of potatoes
2. Irrigation to sustain market garden and commercial nursery operations
3. Cover crop irrigation to permit certification of organic operations
4. Irrigation of perennial grass pastureland
5. Irrigation of public space for community events and of athletic fields for teams still in season

- Modify the CIEF contribution by the Cities, Sun Valley Water & Sewer District, and Sun Valley Company (Section V.1.C.1) by increasing the \$10.00 per acre-foot contribution rate to a \$20.00 per acre-foot contribution rate.
- Modify the cloud seeding contribution by the Cities, Sun Valley Water & Sewer District, and Sun Valley Company (Section V.1.F) from \$3.60 per acre-foot to \$ 5.00 per acre-foot. Of the \$5.00 per acre-foot designated for cloud seeding operations, \$2.50 is for annual operations and \$2.50 is for additional cloud seeding infrastructure.
- Modify Sections V.C and V.D to remove responsibility for acquiring storage water from Galena Ground Water District and assign the duty for acquiring storage water to the CIEF Committee using CIEF funds.
- Modify the “Other Actions” (Section VIII) to remove the moratorium petition item, add three-year action items from the list above (if not already listed), and add the following item:
  - The Parties agree to discuss with the USGS options to increase monitoring, calibration, and maintenance of stream gauges within Water Districts 37 & 37B, with a special emphasis placed on the Sportsman’s gauge on Silver Creek.
- Modify the “Snake River Storage Delivery “ (Section V.1.D.) to adjust the amount required to be delivered to the Little Wood River from 1,500 AF/yr. (1,755 AF/yr. total with 17% conveyance loss) to “up to 3,500 AF/yr. (4,095 AF/yr. total with 17% conveyance loss) on an as needed basis.” Adjust the amount to be delivered to the Big Wood River from 913 AF/yr. (1,100 AF/yr. total with 17% conveyance loss) to “up to 913 AF/yr. (1,100 AF/yr. total with 17% conveyance loss) on an as needed basis.” A copy of the proposed changes to Section V.1.D is included with this letter.
- Include a new requirement for the Galena Ground Water District to contribute to the CIEF at a rate of \$25.00 per acre-foot to be specifically earmarked for storage water acquisition. It is suggested that this new requirement be added in the Conservation, Infrastructure, and Efficiency Fund (“CIEF”) (Section V.1.C) portion of the plan.
- Modify the Conservation, Infrastructure, and Efficiency Fund (“CIEF”) (Section V.1.C.6.) to allow the CIEF to create separate accounts for storage acquisition, cloud seeding, and projects.
- Modify Section V.1.D to direct the CIEF to acquire all Snake River storage water for delivery to the Little Wood River and Big Wood River.
- Incorporate the language agreed upon during the June 13, 2024, Advisory Committee meeting addressing the development of minimum stream flow rights into the background discussion (Section II.) of the plan. A copy of the proposed changes to Section II is included with this letter.
- Incorporate the Goals and Strategies language agreed upon during the September 18, 2024, Advisory Committee meeting into the Management Plan Goals Section (Section IV) of the plan. A copy of the proposed changes to Section IV is included with this letter.

- Move all annual reporting requirement references to a new section in the plan and adjust reporting dates to February 15<sup>th</sup> of the next year.
- Modify the CIEF contribution by the Water District 37B Ground Water Association (Section V.1.C.2) by increasing the annual \$10,000.00 contribution to an annual \$20,000.00 contribution. Of the \$20,000.00 contribution, \$10,000.00 will be designated specifically for cloud seeding operations.

Section VII (page 12) of the current BWRGWMA plan states, “The Management Plan may be extended beyond December 31, 2024, by written consent of all the Parties and with approval by IDWR.” Approval of a three-year extension of the BWRGWMA Management Plan, with the recommended adjustments, would allow the Advisory Committee to further explore options for a better long-term (10 to 15 year) management plan and provide continuity from December 31, 2024. The Advisory Committee respectively recommends an extension of the current plan, subject to the items outlined in this letter. Thank you for the opportunity to participate in these important deliberations.

Sincerely,

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Corey Allen, Sun Valley Company

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Cooper Brossy, Big & Little Wood Water Users Association (BWLWWUA)

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Rod Hubsmith, American Falls Reservoir District 2 & BWLWWUA

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Pat McMahon, Galena Ground Water District

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Carl Pendleton, Big Wood Canal Company

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Pat Purdy, Picabo Livestock Company

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William Simon, Camas Prairie Water Users

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Justin Stevenson, South Valley Ground Water District

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Nick Westendorf, BWLWWUA

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Brian Yeager, City of Hailey