

## MEMORANDUM

TO: Big Wood River GWMA Advisory Committee Members  
FROM: Brian Yeager, member  
DATE: November 3, 2021  
RE: Draft October 2021 GWMA Management plans

Before getting into the draft GWMA management plans submitted last week by the Ground Water Districts (GWDs) and Big Wood Little Wood Water Users Association (BWLWWUA), I first want to make a comment about my role on this Advisory Committee. I get the sense that some of you may view me as a spokesman for all of the cities in the upper Big Wood River Valley. For example, the GWDs draft management plan says I “represent . . . Wood River Valley municipalities.” But I do not. As you all know, I am public works director for the City of Hailey. I have no authority to speak for any other city.

That said, the City of Hailey has been communicating with the other cities and Sun Valley Company, and collectively we are working on a “supplement” to the draft management plans being worked out between the GWDs and BWLWWUA that would address issues related to our groundwater use. That supplement is not yet ready for distribution, but suffice it to say that the cities understand their need to participate in a basin-wide solution to surface and groundwater conflicts. The comments below are offered for discussion purposes and not as an “offer” or “proposal” by the City of Hailey or any other city.

The Director’s order this past June suggested that the groundwater pumping in the upper Big Wood River Valley does not materially impact flows in Silver Creek or the Little Wood. Because much of the discussion in these committee meetings has focused on Silver Creek and the Little Wood, it has been difficult to anticipate what might be expected of the cities in developing the management plan.

The draft management plans submitted by the GWDs and BWLWWUA last week suggest that upper Big Wood River Valley cities are expected to contribute toward reaching management goals by: (1) participating in measures “to avoid overtaxing the resource” (BWLWWUA draft, p. 4); (2) funding improvements in water delivery systems to improve efficiency (BWLWWUA draft, p. 5; GWD draft, p. 11); and (3) use of existing irrigation rights or mitigation for new irrigation/consumptive uses (GWD draft, p.11). These proposals must be considered in light of municipalities’ special circumstances.

For example, Hailey has approximately 4,000 service connections, the vast majority of which are residential households with indoor potable uses and 1/2 acre or less of irrigation. If these were individual domestic wells diverting under Idaho Code § 42-111, it appears that they would not be subject to the management plan or responsible for mitigating any water use.

This creates the perverse incentive for cities such as Hailey to promote individual exempt domestic wells rather than require (as Hailey does) that new users tie-in to the municipal system. It probably is not in dispute that serving these uses through a municipal system (or common subdivision well) is preferred to allowing individual wells. This seems to be recognized in Section 3.3.8 of the GWD’s draft plan, which “encourages” irrigation water rights and common

wells for irrigation. But why would a city require this when it (or its residents) could be required to mitigate while, on the other hand, they would not have to mitigate for exempt domestic wells?

Such an incentive should be avoided so municipalities continue to promote use of municipal supply systems instead of exempt domestic wells. The best potential to limit water use by city residents is through rates, but that only is possible if those residents are tied into the municipal system. Tiered rate structures discourage high water use—a method that has kept Hailey’s ground water pumping in check, particularly as compared to what could occur if virtually unregulated domestic wells proliferated instead. According to the Wood River Valley groundwater model v.1.1, Hailey pumped an average of approximately 2,079 AF per year between 1995 and 2014, which is significantly less than the maximum possible annual diversions of 13,000 gallons per day for 4,000 exempt domestic uses (approx. 58,000 AF) that would be authorized under Section 42-111.

In short, municipalities such as Hailey already are helping to manage the basin’s water resources by requiring connection to the municipal systems and instituting tiered rate structures, odd/even day and timing restrictions, maximum lot size targets, and development-specific conservation requirements. It seems appropriate to examine municipalities’ contribution to the GWMA management plan in light of this, and the fact that municipal consumptive use is a small fraction of the basin’s overall demand.

The City of Hailey recognizes that, as a groundwater user and member of the community, it has a role in addressing impacts of groundwater pumping on surface water use. Hailey intends to continue with the water conservation measures it already has in place. In addition, some of the tools identified in the GWD’s and BLLWWUA’s draft plans are worth considering, including participating in groundwater recharge efforts and helping to fund cloud seeding, the purchase of replacement water (e.g., Snake River storage) in dry years, infrastructure improvements to increase surface water delivery efficiency, and fallowing of irrigated lands. In addition, municipalities can work to implement additional water conservation measures (particularly in dry years) and ordinances, including a moratorium on new water rights without mitigation. Of course, Hailey cannot commit to any particular measure until the details are known. Hailey is committed to continue working with IDWR, the members of this Advisory Committee, and the other cities to develop those measures.