

Wood River Land Trust  
119 E. Bullion Street  
Hailey, ID 83333

The Nature Conservancy  
116 N. 1<sup>st</sup> Avenue  
Hailey, ID 83333

Trout Unlimited  
910 W. Main Street #342  
Boise, ID 83702

Silver Creek Alliance  
P.O. Box 663  
Picabo, ID 83348

February 25, 2022

RE: Big Wood Basin Groundwater Management Plan Public Comments

To Whom It May Concern, including the Idaho Department of Water Resources and Big Wood Ground Water Management Area Advisory Committee:

The Nature Conservancy, Wood River Land Trust, Trout Unlimited, and the Silver Creek Alliance commend the Big Wood Groundwater Management Advisory Committee for their efforts in developing the proposed Big Wood Basin Groundwater Management Plan. The complexity of the hydrologic system and the timeframe in which the plan was to be developed has made for a challenging process. While the organizations represented in this letter support the objectives of the plan towards creating a more sustainable system, there are several comments and recommendations that we hope the Idaho Department of Water Resources and Big Wood Ground Water Management Area Advisory Committee will consider in finalizing the plan. These recommendations seek to balance the needs of water users, while also ensuring that the Management Plan encourages the health and sustainability of the watershed's valuable ecosystems, now and into the future.

Recommendations:

Conservation, Infrastructure and Efficiency Fund

The Non-Government Organizations (NGOs) represented in this letter have sought to be active participants throughout the planning process. Although not represented on the Advisory Committee, we have continued to engage individuals, organizations, and the Department to express our interest in

creating a management plan that achieves a sustainable aquifer and watershed system for irrigators, communities, and the environment. In both the draft plan and in the term sheet drafted by cities, Sun Valley Water & Sewer District, and Sun Valley Company, it is stated in section 1C:

*CIEF Committee will investigate and engage in potential cost share opportunities...through grants with assistance from non-governmental organizations*

The term sheet state in Section 6:

*Cities, SVWSD, and SVC will schedule a meeting with local environmental groups within 60 days of a full GWMA Plan being approved by the Director to investigate potential additional water conservation measures that could be implemented.*

The organizations of this letter request that as part of the formation of the CIEF Committee, that a representative from one of our organizations be included. All of the organizations listed in this letter have demonstrated over the years a commitment to working collaboratively through individual projects as well as the formation and facilitation of the Wood River Water Collaborative. By having representation on the CIEF Committee, conservation NGOs will have a greater ability to coordinate committee projects and funding with those carried out by our respective organizations and the Wood River Water Collaborative. We recommend holding the meeting between the Cities, SVGWD, and SVC so that all parties pursuant to the Management Plan can attend and with IDWR representation, such as during a Wood River Water Collaborative meeting or other appropriate venue.

#### Monitoring and Data Management

A key to any groundwater management plan's ability to determine the effectiveness of its strategies is adequate monitoring and evaluation. A considerable amount of the BWRGW plan's elements are based on the modeling and data of multiple sources, both within IDWR and outside of the agency. Therefore, a monitoring and data management section should be included in the plan. Such a section should describe the sources and models used to develop the plan, annual monitoring that will occur as part of the plan, as well as any data gaps or monitoring needs moving forward. We recommend that IDWR work to house and update the data compilation and analysis performed by Ecosystem Sciences Foundation and funded through the Wood River Water Collaborative so that it informs future data analysis and management decisions.

#### Recognition of Minimum In-stream Flow Water Rights

A primary goal of the management plan is to maintain a 32cfs four-day moving average streamflow target from May 1 through September 30 at Station 10. This flow target was determined based on historical data and estimated modeling and according to the plan's text is *intended to support delivery of senior surface water rights and both stream and aquifer health*. A more direct flow target for stream and aquifer health is provided by the minimum streamflow rights established for Silver Creek and Wood Rivers as described in the 2010 Final Order to Appropriate by the Idaho Water Resources Board. These rights were established to provide minimum flows necessary for fish populations within these river systems and support by information provided by Idaho Department of Fish and Game. The organization of this letter have made multiple comments to this issue and have received no feedback as to why the Department is not at a minimum recognizing State held minimum streamflow rights as a target metric for stream and aquifer health. We recommend the consideration of additional streamflow targets on the Big Wood, Little Wood, and Silver Creek and mechanisms to dedicate water towards those

streamflow targets. These mechanisms have provided useful in meeting stream and aquifer health goals in other basins in Idaho.

Adaptive Management

We recommend that the plan speak in more detail as to an adaptive management process for the parties beyond the three-year term of the current plan. The current plan is built upon a number of assumptions both in terms of the dynamics of the hydrologic system itself as well as the effectiveness of the strategies to be implemented. An adaptive management section should be closely linked with the monitoring and data management section in order to determine the process by which the effectiveness of the plan's strategies. Such a section will be helpful to the members of the advisory committee and participants of the plan at the end of the three-year term and avoid duplication of efforts in the future.

Thank you for providing a public comment period and we hope the Department and Advisory Committee will consider the above recommendations.

Sincerely,

Keri York  
Lands Program Director  
Wood River Land Trust

Greg Loomis  
Executive Director  
Silver Creek Alliance

Kira Finkler  
Director, Idaho Water Project  
Trout Unlimited

Neil Crescenti  
Agriculture Program Manager  
The Nature Conservancy – Idaho Chapter