

WATER DISTRICT 37B GROUND WATER ASSOCIATION
PROPOSED GROUND WATER MANAGEMENT PLAN “TERM SHEET”

11/22/2021

The Water District 37B Ground Water Association (comprised of Camas Prairie farmers—collectively, the “Association”), though not geographically part of or otherwise party to the 2021 IDWR contested case proceeding *In the Matter of Basin 37 Administrative Proceeding* (Docket No. AA-WRA-2021-001) (the “Proceeding”) and, therefore, not part of Director Spackman’s July 3, 2021 correspondence addressed to Governor Little and House Speaker Bedke setting a December 1, 2021 deadline for submission of a proposed groundwater management plan in lieu of resuming “the Basin 37 Proceeding that is currently pending before the Director,” voluntarily submits the following groundwater management plan commitment proposals in light of the Association’s location within the larger Big Wood River Ground Water Management Area (“BWGWMA”). *Order* (Jun. 28, 1991).

The Association’s position will be explained in greater substance and detail in subsequent correspondence submitted by it on or before December 1, 2021. However, the Association voluntarily advances the following commitments in the interim despite the facts that:

- (a) meaningful review and discussion of the Camas Prairie Basin aquifer system has been essentially non-existent during these advisory and technical workgroup meetings (focusing instead on groundwater and surface water interconnections in the Silver Creek drainage consistent with the defined scope and thrust of the Proceeding); and
- (b) inclusion of the vast majority of the Camas Prairie Basin within the BWGWMA is questionable at best because it is based on limited, outdated, and increasingly faulty technical data. In fact, data collected and analyzed from 2015 to date demonstrates that ground water contributes little-to-no water volume to surface flows in Camas Creek and Magic Reservoir downstream, which reservoir is filled almost entirely (96%) from the surface water spring runoff from the Soldier Mountains on the north side of the basin.

Nevertheless, in the spirit of good faith cooperation, and subject to and consistent with the supplemental explanatory correspondence forthcoming on or before December 1, 2021, the Association commits to the following actions in future drought years until such time as its membership is no longer part of the BWGWMA:

- Delaying the beginning of irrigation groundwater pumping until May 1 and concluding irrigation pumping by September 15 (the authorized irrigation season of use is generally April 15 to October 31—though some groundwater right seasons of use extend from March 15 thru November 15). This season of use reduction will restrict alfalfa

production to two cuttings only and affect/restrict barley and other crop plantings/rotations as well;

- The Association will contribute \$10,000 to cloud-seeding efforts in the Big Wood River Basin (this financial commitment doubles the existing \$5,000 annual contribution of Water District 37B, resulting in an overall contribution of \$15,000 by the District and the Association for cloud-seeding efforts that provide no benefit to the Camas Creek drainage); and
- The Association commits to continue funding, in whole or in part (including thru cost-share and grant opportunities), its own continuing scientific review and research of the Camas Prairie Basin aquifer system on top of approximately \$150,000 already spent by the Association to date. Studies, research, and reports to include:
 - (a) analyzing and estimating currently ungauged streamflow into Magic Reservoir from, among others, Rock Creek, Poison Creek, Camp Creek, Spring Creek, and Lava Creek;
 - (b) evaluating and refining LIDAR data to determine existing/current true water storage capacity of Magic Reservoir after roughly a century of infill and sedimentation;
 - (c) performing statistical (including regression) analysis of historic streamflow pre- and post-groundwater development in the Camas Basin;
 - (d) analyzing and reporting on continuous groundwater level monitoring in Camas Prairie Basin wells from September 2015 to present;
 - (e) performing statistical analysis of historical filling/storage volumes of Magic Reservoir comparing pre- and post-groundwater development periods in the Camas Basin;
 - (f) performing, analyzing, interpreting, and reporting conductivity and temperature sampling (including geochemistry analysis) to determine groundwater source contributions, if any, to Lower Camas Creek;
 - (g) conducting and reporting streamflow measurements in Lower Camas Creek (from 1 mile above the confluence of Willow Creek to the Camas Creek confluence with the Big Wood River) with associated interpretation and conclusionary reports;

- (h) designing, conducting, analyzing, and reporting on multi-well aquifer testing of Camas Basin sub-aquifers; and
- (i) Reviewing in depth, interpreting, and reporting on all previous scientific research and papers pertaining to the Camas Rift Basin Aquifer to dispel concepts that have been proven false over time, and to build on concepts that continue to be supported by recent studies.

The Association will compile and report all data it amasses to IDWR so that sound, modern technical data and conclusions inform any ongoing Association member participation within the larger boundaries of the BWGWMA and groundwater management within the same. These technical study/data development commitments are significant in light of the fact that the Big Wood River Basin has benefitted from several years and several millions of dollars of study and groundwater model development while the Camas Prairie Basin, by comparison, has received almost no Legislative funding and/or hydrologic/hydrogeologic study beyond the efforts of the Association member farmers and their hydrogeological consultants—even though the Camas Prairie Rift is a ground water basin in its own right (not a simple tributary stream of the Big Wood River) and, indeed, a much more complex ground water system than that of the Big Wood.