

## Skinner, Corey

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**From:** Cooper Brossy <cooper.brossy@gmail.com>  
**Sent:** Friday, March 8, 2024 8:52 PM  
**To:** Skinner, Corey; Keen, Shelley  
**Subject:** Re: Big Wood GWMA Advisory Committee Reminder  
**Attachments:** GWMP Rev Process BWLWWUA Suggestions\_03Mar2024.docx; GWMP Rev Process BWLWWUA Suggestions\_03Mar2024.pdf

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Hello Corey and Shelley,

I have attached a list of suggested Management Plan updates compiled by the BWLWWUA in both PDF and MSWord formats. I apologize for the tardy submission; an afternoon funeral today interrupted my effort to compile and reduce our suggestions. It took some effort to stuff them in a format that I hoped you could then easily review and synthesize with other submissions.

We did spend quite a bit of time trying to craft this language over the past days, but I am sure there could be improvements. Please reach out if you have any questions or need clarification on anything.

Thank you for your effort to facilitate revisions to the Management Plan.

Best Regards,  
Cooper

On Mon, Mar 4, 2024 at 9:41 AM Skinner, Corey <[Corey.Skinner@idwr.idaho.gov](mailto:Corey.Skinner@idwr.idaho.gov)> wrote:

Committee Members,

The next Big Wood GWMA Advisory Committee meeting is scheduled for March 20<sup>th</sup> at the Community Campus in Hailey. The meeting is scheduled to start at 10:00 a.m. Since the current BWRGWMA management plan expires on December 31, 2024, the Advisory Committee will review a list of questions to be considered as it evaluates possible adjustments or updates needed for an extended management plan. As you recall, the Director stated that he is anticipating a 10 – 15-year plan extension. A meeting agenda with remote meeting link will be distributed before the meeting.

This Friday, March 8<sup>th</sup> is the deadline for the submittal of questions/ideas for updating the plan. These can be submitted to Shelley Keen or myself. These submittals should be specific, and include the following components:

- Who is advocating for the update?
- What is the update and why is it needed? Be specific and as quantitative as possible.
- What section of the plan needs to be updated? Refer to plan heading level and page numbers.
- What data or information do we need to review or evaluate the proposed update?

Shelley and I will review the submittals on March 12<sup>th</sup> and organize them for distribution to the committee.

Corey Skinner

IDWR Southern Region Manager

**BWLWWUA Suggested Plan Updates for Consideration**

**March 8, 2024**

Item	What section of the plan?	Proposed Update (What is the update?)	Background and Context (Why is it needed? Be specific and as quantitative as possible.)	Process (What data or information do we need to review or evaluate the proposed update?)
1	Sect. IV	Are the common goals in the management plan understood by all participants? Are the goals accurately described in the management plan? Can the goals be met?	Mgmt Plan Section IV. states the main goal is “to manage the effects of ground water withdrawals on the aquifers from which the withdrawals are made and any other hydraulically connected sources of water.” The Plan then suggests that good management then leads to the following benefits: supporting the supply of water for senior surface water rights, supporting stream health, and improving and maintaining aquifer health, and safe harbor for those in compliance.  Note that “good management” also includes the benefit of supporting water supplies for junior groundwater rights holders and this is not currently acknowledged.	Advisory Committee should revisit Plan Section IV and review and discuss their respective Interests and Positions, as a first step to any Mgmt Plan updates.  (The proposed long length of the updated Plan should inspire us all to make sure we have a common understanding.)
2	Sect. V.1.D.	How can the responsibility for funding and procurement of storage water be streamlined?  Develop funding mechanisms for storage water to reduce risk and financial uncertainty for the GWDs and also build adequate funds.  Develop strategies, approaches, agreements, etc. to improve the reliable (secure) access to storage water and reduce the cost of that water.	While it is an important safeguard offering flexibility and a key component for success of the Mgmt Plan, Snake water is expensive (2x more than anticipated), has become politically unstable with an uncertain future, and has proven difficult to acquire.	Mgmt Plan participants need to review the current and future cost of storage water from the Snake and/or other sources and discuss a more equitable distribution of responsibility.  -CIEF holds funds in a separate account just for storage? -Annual contribution of money towards storage water, regardless of adequate vs dry water supply? (up to a max account balance?)  -Long term lease options with storage water suppliers?

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**March 8, 2024**

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3	Sect. IV. and V.1.E.	Revise the stream flow target at Station 10 on the LWR to accommodate senior surface rights who are not currently served by 32 cfs at Station 10.	<p>Not all senior natural stream flow rights on Silver Creek and the Little Wood are currently served by the Mgmt Plan. BWLWWUA prefers to maintain the traditional local source of water and reduce reliance on Snake River storage water.</p> <p>Increasing the stream flow target reduces the need for storage water.</p>	<p>The senior water rights not being served by 32 cfs flow at Sta 10 will be reviewed.</p>
4	Sect. V.1.D.	Set stream flow targets of total inflows to Magic Reservoir to reduce the volume of storage water needed for Big Wood Below Magic surface users.	<p>Senior natural stream flow rights below Magic Res need to be satisfied. BWLWWUA prefers to maintain the traditional local source of water and reduce reliance on Snake River storage water. While it is an important safeguard offering flexibility and a key component for success of the Mgmt Plan, storage water from the Snake is expensive (2x more than anticipated), has become politically unstable with an uncertain future, and has proven difficult to acquire.</p>	<p>Investigate the impacts and timing of groundwater withdrawals on Willow Creek, the lower Big Wood River, and Camas Creek.</p>
5	Sect. 2.A.	Review how consumptive use reductions that are set early in the season can be adjusted in the late season if water supply improves.	<p>Groundwater users want to utilize water in years of abundance. More adaptive and real-time management could enable this.</p>	<p>Create metrics and thresholds for adjustments in consumptive use of groundwater.</p>
6	Sect. V.1.B.	Develop mechanism for setting the end of the season for ground water diversion, in above average or exceptional water years.	<p>Groundwater users want more flexibility in their season ending date. More adaptive and real-time management could enable this.</p>	<p>Consider evaluating whether end-of-season shut off dates for GW diversion should be connected to BWCC delivery season?</p>

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7	Sect. VIII and V.2.A.	Allow for application of the results of the Camas Prairie Aquifer Study to the Mgmt Plan.	Camas Prairie Aquifer Study will not be complete before new Mgmt Plan term begins.	Advisory Committee should review the Camas Study's objectives and timeline.  Brainstorm an onboarding process and Mgmt Plan language.
8	Sect. VIII and V.2.A.	Ensure the Mgmt Plan is adaptable to incorporating and implementing improved groundwater and stream flow modelling in the future.	The streamflow forecast model of Kendra Kaiser may undergo peer-review in 2024 and may not be published until after a new management plan is approved by IDWR.  The BOR Basin Study was approved but the Advisory Committee has not been briefed on it.	Brainstorm an onboarding process and Mgmt Plan language.  What is the status of the BOR Basin Study? What is the intended outcome?
9	Sect. X	Incentivize groundwater diversions who are not currently participants in the current Mgmt Plan to participate.	Several thousand AF of GW withdrawals may exist without oversight and jeopardize the goals of the Plan.	Evaluate the impacts to aquifer and stream flows by groundwater diversions who are not compliant with the Mgmt Plan (i.e., those not enrolled in a GWD)?  More thorough review of year-end reporting on actions taken and their effectiveness.
10	Sect. IX; Sect V	What are the consequences to Mgmt Plan participants who are not in compliance with agreed-to management actions?	The three-year term of the Mgmt Plan could be considered a time of learning for all. Moving forward in a long-term plan, expectations for compliance should be higher.	Develop clear language regarding the consequences for non-compliance.
11	Sect. VIII.	The "Other Actions" section needs review and updating.	Some items in this list of actions and policies have been completed, while others are ongoing.  For example, "share, maintain and improve ground water and surface water monitoring networks" is underway but can be expanded.	We now have the technology and funding for deployment of near-real-time measuring devices across the watershed to generate data to better understand the interaction of groundwater pumping and aquifer health, and thus a more applicable gauge of the success of any management actions undertaken.
12	Sect. II, p.5; Appendix D	Can the Mgmt Plan revision process eliminate the use of multiple term sheets to satisfy the Plan participants?	Multiple term sheets were used to develop the current Mgmt Plan.	A single set of agreed-to conditions simplifies understanding and creates parity across the Mgmt Plan.