

October 3, 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 subcommittee 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, 2025 – 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.
- Update calibration of the Big Wood River Groundwater Model (scheduled to be completed in 2026).
- Support the Camas Prairie Hydrologic Project (scheduled to be completed by the USGS in early 2027).
- Complete at least a prototype of the Water District 37 accounting model.
- 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?
- 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.

- Evaluate options for Water District 37 to report on groundwater diversions during the irrigation season. This may facilitate the use of pumping reductions as a management tool.
- 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 the development of additional opportunity for more “real time” adjustments to assist water users in making quicker management decisions.
- Explore options, including possible enforcement, for increasing participation by additional BWRGWMA water users in a longer-term management plan.

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” row when the Irrigation Season Water Supply Forecast exceeds 240/265 KAF. In wet years, there would be no requirement for fallowing (Section V.1.A), ground water season of use adjustments (Section V.1.B), and Snake River storage water delivery(Section V.1.D) baseline management actions. Note that the CIEF contributions (Section V.1.C), Stream Fow Target Section V.1.E), and Cloud Seeding (Section V.1.F) baseline management action requirements will remain as baseline actions, no matter what the Irrigation Season Water Supply Forecast predicts. This 240/265 KAF forecast value should be dependent upon the average of the April 1/June 1 NRCS and NWRFC forecasts being within 10% of each other, or both forecasts exceeding 240/265 KAF.
- Completely remove the fallowing requirement as a baseline management action (Section V.1.A).
- 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 \$10.00 per acre-foot contribution rate.
- 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 petition the USGS to increase monitoring, calibration, and maintenance of stream gauges, with a special emphasis placed the Sportsman’s gauge on Silver Creek.
- Modify the “Snake River Storge Delivery “(Section V.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 1,500 AF/yr. (1,755 AF/yr. total with 17% conveyance loss). Trigger “as needed” language.

- Include a new requirement for the Galena Ground Water District to contribute to the CIEF at a rate of \$10.00 per acre-foot (matching the Cities, Sun Valley Water & Sewer District, and Sun Valley Company contribution rate). 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) to allow for the increase in CIEF contribution rates to be adjusted for inflation (items 1, 2, 3, and new proposed Galena Ground Water District Contribution). How/rate?
- Modify the Conservation, Infrastructure, and Efficiency Fund (“CIEF”) (Section V.1.C.6) to allow the CIEF to create two accounts to separate contributions of IWRB funds from other funds. This will allow IWRB funds to be earmarked for projects and other CIEF funds to be designated for storage acquisition, cloud seeding, etc.

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,

Corey Allen, Sun Valley Company

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

Rod Hubsmith, American Falls Reservoir District 2 & BWLWWUA

Sharon Lee, Lakeside Industries/Wood River Ranch

Pat McMahon, Galena Ground Water District

Carl Pendleton, Big Wood Canal Company

Pat Purdy, Picabo Livestock Company

William Simon, Camas Prairie Water Users

Justin Stevenson, South Valley Ground Water District

Nick Westendorf, BWLWWUA

Brian Yeager, City of Hailey