

**BIG WOOD RIVER GROUND WATER MANAGEMENT AREA PLAN COMMENTS
SUBMITTED ON BEHALF OF
CITY OF BELLEVUE, CITY OF HAILEY, CITY OF KETCHUM, SUN VALLEY COMPANY
FOR DISCUSSION PURPOSES**

5/10/2024

PLAN GOALS

1. Manage injurious groundwater depletions through curtailment, mitigation, or other equitable means.
 - a. Focus management actions on dry years to deliver seniors quantities they historically received in dry years.
 - b. Relief from management actions in good water years (e.g., farmers get relief from fallowing in good years), but funding of Conservation, Infrastructure and Efficiency Fund (“CIEF”) does not get relief in dry years.
2. Allow equitable participation in the plan through contributions to the CIEF by parties (such as Cities, the Sun Valley Company and other non-irrigation groundwater users, who have not otherwise opted into a ground water district) that are not reasonably able to reduce or mitigate for groundwater pumping (e.g., fallowing irrigated acres). Allow further participation through payments to Wood River Resource Conservation & Development for cloud seeding at \$3.60 per acre-foot of water pumped on a 5-year rolling average ending in the year prior to when the payment is due.
3. IDWR should engage non-participants (who are not otherwise exempt) to have them “opt-in” to some component of the Management Plan (e.g., having a plan approved by IDWR to mitigate for injurious depletions from groundwater pumping, joining a ground water district, or paying into CIEF), and IDWR will administer and curtail non-participants on a time-priority basis through the Watermaster for Water District No. 37.

CIEF GOALS

1. Efficiently deploy funding into projects that improve water delivery to senior surface water rights, with priority for projects showing greatest improvement-per-dollar.
2. Quantify water supply savings for infrastructure improvement projects, both at the project proposal stage and through annual reporting to the Advisory Committee after project completion.
3. Continue funding the CIEF at \$10 per acre-foot of annual pumping (based on 5-year rolling average ending in the year prior to when the payment is due), tied to inflation, with any further increases based on a rational basis.
4. CIEF Committee remains receptive to funding storage water rentals to address acute shortages, but secondary to water infrastructure improvement projects.
5. Include “off-ramp” from CIEF funding requirement if CIEF contributors can mitigate injurious groundwater depletions through a plan approved by IDWR.
6. Seek grant writing assistance from private organizations such as the Wood River Land Trust, Nature Conservancy, etc.
7. Seek grants and funding from the State of Idaho, the United States, and private organizations.
8. Market the CIEF program more broadly to the public.