

Skinner, Corey

From: Keri York <keri@woodriverlandtrust.org>
Sent: Friday, March 8, 2024 3:29 PM
To: Keen, Shelley; Skinner, Corey
Cc: Neil Crescenti; Erika Phillips; kira.finkler@tu.org; Greg Loomis
Subject: Management Plan update questions
Attachments: BWGMA Plan Update Recommendations_V2.pdf

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Hello Shelley and Corey,

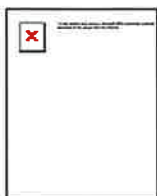
Thank you for receiving questions regarding updates to the Management Plan. Our questions are compiled in the attached letter, and we look forward to hearing the Department's response.

Regards,
Keri

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Recipient of the 2021 National Land Trust Excellence Award

March 8, 2024

Dear Idaho Department of Water Resources and the Big Wood GWMA Advisory Committee,

The Wood River Land Trust, Trout Unlimited, and The Nature Conservancy appreciate you accepting questions regarding updates to the Management Plan. Our organizations 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 aquatic and riparian ecosystems, now and into the future.

Section II. Background

The background references the Management Plan and Term sheet as '...describing various management actions intended to "inform the development of a ground water management plan pursuant to Idaho Code § 42-233b, support the delivery of water to senior surface water rights, support stream health, and improve and maintain aquifer health,'" however, background information, goals, and actions supporting stream health are lacking throughout the Management Plan. *We are wondering if the background section could describe and list the minimum streamflow rights established for the Big and Little 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.

Section IV. Management Plan Goals

As referenced above, flow targets and minimum streamflow rights were established to maintain sufficient instream flows are critical to healthy aquatic and riparian ecosystems that support fish, wildlife, and plants. *We are wondering if the Department would add a Management Plan goal supporting sufficient instream or natural stream flows in the Big Wood River, Little Wood River, and Silver Creek to sustain recreational and agricultural based economies, communities, thriving fisheries, and the overall health of the Wood River watershed's ecosystems.*

Section V.1.A. Baseline Management Actions – Fallowed Acres within the Ground Water Districts

The section of the management plan states that "Ground water users will accomplish the following actions every year regardless of the water supply conditions in the BWRGWMA". However, the management plan has neither an enforcement clause nor provides groundwater users alternative actions should the baseline actions not be met. In both 2022 and 2023 the baseline requirement of 1500 fallowed acres by the South Valley Groundwater District nor the 200 acres by the Galena Groundwater District were met. In neither instance did IDWR take corrective action nor did IDWR provide groundwater districts alternatives to the following provisions. *We are wondering, if the conditions of the Management Plan are not going to be enforced, how is the intent of the Management Plan upheld?*

Section V.1.E. Stream Flow Targets

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 is intended to support delivery of senior surface water rights and both stream and aquifer health. We support the delivery of natural flow water as measured at Station 10 and request the creation of additional target flows within the Big Wood, Little Wood, and Silver Creek system that would meet both agricultural water needs and environmental flows. *We are wondering if IDWR and the advisory committee would establish a minimum of one additional target flow on the Little Wood/Silver Creek, a minimum of one target flow on the Big Wood, one target flow on Willow Creek, and one flow target on Camas Creek.*

In establishing suitable flow targets we recommend utilizing the diversion rates of the Big Wood and Silver Creek minimum stream flow water rights as suitable flow targets, as they represent the minimum flow suitable for healthy stream ecosystems and the fishery. If these minimum stream flows can't be met, we ask the Technical Advisory Committee to work with the Idaho Dept. of Fish and Game to determine appropriate target flows that support healthy fisheries and aquatic life.

These minimum stream flow water rights are:

No. 37-7727 (99 cfs year-round, Grove/Stalker confluence to Picabo bridge)

No. 37-7728 (74 cfs year-round, Picabo bridge to Highway 93 bridge)

No. 37-7739 (74 cfs year-round, Highway 93 bridge to Little Wood River)

No. 37-7849 (39 cfs year-round, Little Wood to Station 10)

No. 37-8258 (200 cfs 3/1-8/31 and 150 cfs 9/1-2/28, SNRA to Warm Springs Creek)

No. 37-7919 (70 cfs year-round, Warm Springs Creek to D45 canal)

No. 37-8307 (119 cfs year-round, Warm Springs Creek to D45 canal)

No. 37-22262 (60 cfs year-round at Stanton Crossing). Although this right is junior to most water rights being considered, it represents a minimum flow into Magic that would support cold-stream aquatic life and the fishery.

Further, as referenced in the 2010 order, we are wondering if IDWR could re-establish the instream flow enhancement program established under Idaho Code Section 42-1508, which provided the foundation for the Big and Little Wood in-stream flow rights and the process by which these rights could be met through the donation of private surface rights and leasing of surface waters from the water supply bank. This program offers the opportunity to meet the target flows of the management and meet the objective of supporting stream health. Such a program could be managed and support by the CEIF, which had surplus funding in both 2022 and 2023.

Section VII. Adaptive Management Policies

The following recommendations were submitted to the Department on March 23, 2022 and reiterated here. *We are wondering if the Department would consider 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.

Specifically, we are wondering if the following language could be included in the Management Plan:

1. By December 1 of each year of the plan, The Advisory Committee's Technical Working Group will meet to review and analyze monitoring data and implementation information to make recommendations on adjustments to the Plan's mitigation actions or measures.
2. The Advisory Committee will meet annually to review information and recommendations presented by the Technical Working Group and may put forth any mutually agreed upon amendments to the Management Plan to IDWR for approval prior to April 1st.

Appendix A to BWRGWMA Advisory Committee Groundwater Management Plan Term Sheet (Cities/SVWSD/SVC Term Sheet Re: Big Wood River GWMA Management Plan)

Per the Cities/SVWSD/SVC Term Sheet (Appendix A), the Cities, SVWSD, and SVC were directed to '...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.' That meeting took place on April 13, 2023 and included representatives from Wood River Land Trust, Trout Unlimited, The Nature Conservancy, SVC, SVWSD, the Cities as represented by the City of Hailey, Idaho Dept. of Water Resources, and representatives from BWLWWUA.

As a result of that meeting, we are wondering if the following could be included in the Management Plan:

1. Adoption of Wood River Valley Water Conservation Guidelines and Enforcement: in 2018, Wood River Land Trust worked with a group of representatives from Blaine County, City of Bellevue, the City of Hailey, the City of Ketchum, the City of Sun Valley, industry representatives, local non-profits, and citizens from the community to produce a list of best practices and guidelines for establishing and maintaining landscaping while conserving water resources. We recommend the adoption of these practices and guidelines for all new developments within the Wood River Valley. We further recommend that each jurisdiction enforce its own standards for residential and municipal irrigation, including days of the week and times of day.

2. All landscaping irrigation would be limited to dates consistent with those of groundwater users, per the GWMA term sheet (May 1 - Sept. 15) and residential irrigation standards (i.e. watering on specific dates and times) would be enforced through fines or other methods.
3. Reductions in demand and consumptive use on parks, open space parcels, and golf courses within the Cities, SVCo, and SVWSD, and irrigated areas owned or managed by the Cities, SVCo, SVWSD, and the Blaine County School District.
4. All new and replacement municipal wastewater and subdivision irrigation systems would utilize graywater for landscaping irrigation.

Thank you for providing the opportunity to participate with updates to the Management Plan. We hope the Department and Advisory Committee will consider the above questions and recommendations.

Sincerely,

Wood River Land Trust, Trout Unlimited, and The Nature Conservancy