

From: [Cooper Brossy](#)
To: [Keen, Shelley](#)
Cc: [nick@4lfarms.com](#); [kaysi10@live.com](#); [pendletonranch@hotmail.com](#)
Subject: Re: BWRGWMA Management Plan -- Draft Goals
Date: Thursday, June 6, 2024 8:59:59 AM
Attachments: [image001.jpg](#)

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Hi Shelley,

After thinking about the current goals language while bouncing around in the tractor and in talking to a couple other of our folks, I have a couple thoughts.

In the Primary Goals section, the last one refers to "strict priority basis". I think we've strayed from that to some degree with our current Management Actions toolkit that allows GWDs at least some continued CU in almost all cases, regardless of water supply. That phrase might not apply? Maybe it's more that we're "acknowledging time priority"?

There are a lot of items and diverse topics/actionable goals in the "additional goals" section and it may need some refinement and trimming. However, the value in my mind here is that there are specific items that the Director can point to when he asks if the Plan is working--i.e., "Are you meeting your goals?" Having specifics in the goals section also helps those folks who come along after us to understand our intentions in 2024 and develop a new Plan when it is their turn to do so.

I feel that the broad IC-based goal of Manage "the effects of ground water withdrawals on the aquifers from which the withdrawals are made and any other hydraulically connected sources of water." *Idaho Code § 42-233b*. is a necessary and good opening, but it needs some additional specifics to back it up. Without additional specifics the reader of the Plan won't really know if we are managing withdrawals in the context of reduction of phosphorus and nitrate nutrient loading in groundwater underneath CAFOs, or maintaining pressures on geothermal artesian wells in Bruneau or Banbury Hot Springs, or wanting strong discharges at Thousand Springs to raise fish and spin hydropower turbines.

If the goals section is simplified greatly to ultra high level content and this current specificity is lost, then some of these specifics may need to be converted to specific metrics that are matched with management actions (perhaps similar to how the Grand View-Bruneau Plan is?).

Goals work can be hard for all involved. However this goals language ends up, at least it has given all the user groups the chance to think about and share publicly what is important to them. Hopefully getting it out in the open guides the process some and reduces difficult discussions later.

Thanks for the chance to provide feedback.
Cooper

On Wed, Jun 5, 2024 at 8:53 AM Cooper Brossy <cooper.brossy@gmail.com> wrote:

Hi Shelley,

Thanks for compiling and synthesizing content from the Advisory Committee into the Plan. I appreciate the opportunity to provide feedback and yet I've not been able to make the time to consider the revisions until this moment—just too much on my plate right now.

Regarding Section II, it seems fine to me. One option would be to cut the sentence "By 1991, IDWR established a ground water management area for the Big Wood River drainage with an associated management policy for the subsequent appropriation of ground water rights." from its current location and move it down to the next paragraph below the table, making it the topic sentence of that paragraph that discusses the 1991 Policy. That would keep the MSF paragraph more focused on that topic, but this is minor details sort of stuff.

Regarding the goals, I am impressed that you were able to keep so much of the original language and I think the approach of Primary and Supporting goals is workable. I do think I need some more time to ruminate on them through today.

Thanks,
Cooper

On Thu, May 30, 2024 at 9:58 AM Keen, Shelley <Shelley.Keen@idwr.idaho.gov> wrote:

BWRGWMA Advisory Committee,

One of my assignments after our May 15 meeting was to update Section II (Background) of the plan to include the paragraph referencing minimum stream flow water rights. See the attachment with "Section II" in the document name.

Another assignment was to assemble your draft goal statements into Section IV (Management Plan Goals) and send it for your review before we meet in June. See the attachment with "Section IV" in the document name. In drafting the goals, I took considerable liberty with the language while trying to incorporate your fundamental concepts. I tried to stay high-level and conceptual. The details in some of your recommendations may need to be considered for other sections of the plan. If you want to propose edits, please get them to me by June 5 so I can consider them and get another update sent out before we meet in June.

As you can see from the two documents, I'm currently editing section by section. I'll merge them together into a single draft when we get more sections finished.

I have scheduled one subcommittee meeting – the flow targets and storage water group – for the morning of June 4. Corey and I will schedule times to meet with the other groups

as our schedules allow.

As always, please call if you have questions, suggestions, or concerns.

Shelley



Shelley Keen | Deputy Director

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