

**From:** [Sharon Lee](#)  
**To:** [Keen, Shelley](#); [Skinner, Corey](#)  
**Subject:** Thoughts on Sections II and IV of the GWMA Plan  
**Date:** Tuesday, June 4, 2024 1:38:12 PM  
**Attachments:** [Minimum Stream Flow Edits.docx](#)  
[Management Plan Goals Edits.docx](#)

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Dear Shelley and Corey,

Thank you for your work editing Sections II and IV of the Plan. The ground water districts have met and discussed your changes and would like to submit the following edits and thoughts:

1. In order for any plan to be effective it must be focused and clear. Each element must contribute to the desired outcome. Goals should be few (2-3) and clearly distinguished from recommended actions.
2. This is a water delivery plan. And as such it must focus on the delivery of water as negotiated and agreed upon by the Advisory Committee and approved by the Director. Many of the goals not concerned with water delivery will result as benefits of adequate management of the withdrawals from the aquifer that this plan is designed to address.

In the words of Pat Purdy however, "If you load too many things onto this airplane, it won't take off."

With these thoughts in mind, we are suggesting the following edits as shown in the attached pages:

#### Minimum Stream Flow

1. Move the sentence beginning "By 1991, IDWR established a ground water management area. . ." to the beginning of the paragraph below Table 1 now starting with "The primary management strategy. . ." This keeps all the language about the 1991 moratorium together.
2. Add a sentence at the end of that same paragraph acknowledging that Allan Wylie's study shows that since 1991 ground water levels have been stable to recovering.
3. The minimum stream flow rights are now decreed.
4. Delete the two sentences just above Table 1 beginning with "Consistent with the prior appropriations doctrine. . ." and ending with "development of ground water rights. We view this as commentary rather than historical fact.
5. Finally move Table 1 to Appendix G in an effort to keep this document focused. Can you please tell us the function of the Permit Date column?

#### Management Plan Goals

1. Delete the second goal as it is a reiteration of the first.
2. Shorten the third goal, ending it after "conjunctive administration of water resources". If we are here to administer rights "on a strict priority basis" there is no need for a Ground Water Management Area Plan.
3. Move the fifth bullet point to become the third goal and expand it to include all ground water users.
4. Delete the remaining bullet points. The bullet referring to "Develop and sustain aquifer

conditions. . ." is repetitive of portions of other goals and seems to be based on the assumption that the Wood River Aquifer has the same characteristics as the ESPA. The remaining bullets are actions rather than goals and are referenced in other places in the plan.

We hope our edits will be taken in the spirit in which they are offered. Streamlining and focusing this plan will make it clearer and gives it a much better chance for success.

Justin Stevenson  
Pat Purdy  
Pat McMahon  
Sharon Lee