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American Falls-Aberdeen GW District
Bingham GW District
Bonneville-Jefferson GW District
Jefferson-Clark GW District
Madison GW District
Magic Valley GW District
North Snake GW District
Southwest Irrigation District
Carey Valley GW District
Henry's Fork GW District
Busch Agricultural Resources, Inc.
Glambia Cheese
Suez Water Idaho
City of American Falls
City of Blackfoot
City of Chubbuck
City of Heyburn
City of Jerome
City of Rupert

August 21, 2019

Idaho Water Resource Board
Roger Chase, Chairman
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Dale Van Stone, Member
Jo Ann Cole-Hansen, Member
Brian Patton, Secretary
P.O. Box 83720
Boise, Idaho 83720-0098

Re: ESPA Camp Implementation Committee

Dear Chairman Chase and Board Members:

This letter is submitted by Idaho Ground Water Appropriators, Inc. (IGWA), acting for and on behalf of its members who include nine ground water districts, one irrigation district, and several cities and commercial and industrial enterprises. IGWA members collectively irrigate nearly one million acres from the Eastern Snake Plain Aquifer (ESPA) and use groundwater in other beneficial ways. The purpose of this letter is to provide comments in response to several letters

sent recently to the Idaho Water Resource Board in connection with the ESPA Comprehensive Aquifer Management Plan (CAMP).[1]

SUMMARY OF POSITION

IGWA commends the Board for its concerted effort to recover the ESPA. Managing the ESPA at a level that can sustain existing beneficial uses is indeed critical to the economy of the State of Idaho. IGWA looks forward to the 10-year review report requested by Speaker Bedke. We anticipate it will show significant gains in the recovery of the ESPA, yet much work left to be done to permanently stabilize the aquifer at an acceptable level.

IGWA submits that the request from Idaho Power and other surface water users to immediately resume work under the ESPA CAMP Implementation Committee is premature and unnecessary until the Board has completed its 10-year evaluation of CAMP and submitted an implementation report with planning recommendations to the Legislature and the Governor's Office and received further direction pertaining thereto.

If and when the Committee is resumed, IGWA and its members desire to be fully represented. The Committee must first and foremost represent the interests of users of the ESPA.

ESPA CAMP

As you know, the ESPA CAMP was adopted by the Board on January 29, 2009 and approved by the Idaho Legislature by House Bill no. 264 on April 23, 2009. The overarching goal of the Plan is to "*sustain the economic viability and social and environmental health of the Eastern Snake Plain by adaptively managing a balance between water use and supplies.*"[2] The Plan defines five objectives to achieve this goal:

1. Increase predictability for water users by managing for a reliable supply.
2. Create alternatives to administrative curtailment.
3. Manage overall demand for water within the Eastern Snake Plain for increased recharge to the Aquifer.
4. Increase recharge to the aquifer.
5. Reduce withdrawals from the Aquifer.

The Plan aims to achieve a net ESPA water budget change of 600,000 acre-feet annually by year 2030 through implementing a mix of management actions including aquifer recharge, ground water to surface water conversions, demand reduction, and weather modification. Specific goals are defined for the first 10 years of implementation (Phase 1) to achieve a water budget change of between 200,000 and 300,000 acre-feet, and funding participation targets are established for specific groups of water users.

IMPLEMENTATION COMMITTEE

The ESPA CAMP anticipates that adaptation may be needed to improve the performance of water management actions over time. It authorizes the Board to establish an Implementation

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[1] Letter from Speaker Scott Bedke dated May 8, 2019; letter from Idaho Power Company dated June 3, 2019; letter from A&B Irrigation District, Burley Irrigation District, North Side Canal Company, Twin Falls Canal Company, Clear Springs Foods, City of Twin Falls, Idaho Power, and Trout Unlimited dated July 19, 2019.
[2] 2009 ESPA CAMP – 1.0 Executive Summary, p. 4.

Committee to assist the Board as needed. The Committee serves "at the pleasure of the Board" and does not have decision-making authority ("the Board will make all final decisions concerning Plan project priorities, implementation, and funding"). When the Committee is utilized its purpose is "providing guidance and recommendations" to the Board.

Since the Committee exists at the pleasure of the Board, whether to reinstitute the Committee is a discretionary decision for the Board to make. Until the Board has completed its 10-year review of CAMP implementation, submitted appropriate planning recommendations to the Legislature and the Governor's Office and received back their directives, IGWA believes it is premature and unnecessary to reinstitute the Committee at this time.

IGWA also wishes to express concern about the Implementation Committee potentially creating conflict with or undermining ongoing efforts by the Board, IGWA and others which are making substantial progress towards achieving the overall CAMP goal of managing the balance between water use and supplies to sustain the economic viability and social and environmental health of the ESPA. That said, there remains much work to do to achieve this goal, and an Implementation Committee may be useful so long as it is clearly tasked with expanding and improving aquifer recovery actions to achieve the 600,000 acre-foot water budget change as set forth in the Plan.

RECOMMENDATION

As mentioned above, IGWA is grateful for the substantial efforts made by the Board and its staff to achieve the CAMP goals. The Board's development and expansion of groundwater recharge facilities is remarkable and will provide lasting benefits to the ESPA and the State of Idaho.

Looking forward, IGWA urges the Board to build upon this success by focusing effort and funding on ESPA CAMP goals for ground water to surface water conversion, demand reduction, and weather modification as set forth in Table 2 of the Plan.

As the Board is aware, IGWA has pursued its own actions to assist in recovering the ESPA, including reductions in groundwater diversions, recharge, and funding support to expand CREP enrollments. These activities have been privately pursued and funded by IGWA members and Districts, and should not detract from or diminish Board-driven actions under the ESPA CAMP. Until the ESPA has been stabilized at a level that the State determines is sufficient to sustain all existing water uses, Board-driven efforts to recover the aquifer must continue and expand with haste.

Should the Board reinstitute the Implementation Committee to assist with these efforts, IGWA requests that its members and other groundwater users be fully represented on the Committee.

Respectfully submitted,

TIM DEEG, President

cc: Sam Easton, Office of the Governor,
Pro Tem Brent Hill
Director Gary Spackman
Deputy Director Matt Weaver

Representative Marc Gibbs, Chairman, House Resources and Conservation Committee
Senator Lee Heider, Chairman, Senate Resources and Environment Committee
Senator Steve Bair, Chairman, Senate Finance Committee
Paul Arrington, Idaho Water Users Association
Steve Howser, President Idaho Water Users Association
Darrell Anderson, Idaho Power Company
Jeff Jermunson, Clear Springs Foods
Brian Patton, IWRB