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**BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO**

IN THE MATTER OF BASIN 37
ADMINISTRATIVE PROCEEDING

Docket No. AA-WRA-2021-001

**IGWA’S RESPONSE TO THE
GROUND WATER DISTRICTS’
AMENDED MITIGATION PLAN**

Idaho Ground Water Appropriators, Inc. (“IGWA”) submits this response to *South Valley Ground Water District and Galena Ground Water District’s Revised and Amended Proposed Mitigation Plan* filed July 7, 2021, in this matter. As explained below, IGWA does not oppose the amended mitigation plan as short-term solution for the 2021 irrigation season; however, IGWA reserves the right to oppose any mitigation plan that proposes similar mitigation activities after the 2021 irrigation season.


IGWA commends the parties to this matter and other stakeholders for their effort to cooperatively develop a mitigation plan for the 2021 irrigation season that minimizes adverse impacts on Idaho’s agricultural economy. IGWA does not wish to undermine such efforts; therefore, IGWA does not object to the mitigation plan as a short-term solution for the 2021 irrigation season only.

However, IGWA does have concerns with certain mitigation activities in the mitigation plan. For instance, the plan proposes to use Snake River storage water to mitigate out-of-basin groundwater pumping. Also, the plan proposes to pump groundwater from the Wood River Basin Aquifer to supplement surface water flows in Silver Creek. Because the Wood River Basin Aquifer is tributary to the Eastern Snake Plain Aquifer (“ESPA”), such pumping will reduce the amount of tributary underflow to the ESPA and undermine efforts by IGWA and the State of Idaho to recover the ESPA and to improve spring flows and Snake River reach gains from the ESPA.

Therefore, IGWA does not object to the amended mitigation plan as a short-term solution for the 2021 irrigation season only, while reserving the right to object to any future mitigation plan that proposes similar mitigation activities after the 2021 irrigation season.

DATED this 9th day of July, 2021.

RACINE OLSON, PLLP

By: 

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CERTIFICATE OF MAILING

I certify that on this 9th day of July, 2021, the foregoing document was served on the following persons in the manner indicated.



Signature of person mailing form

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