Gary Spackman, Director  
Idaho Department of Water Resources  
P.O. Box 83720  
Boise, Idaho 83720-0098

Re: Adoption of ESPAM Version 2.0

Dear Director Spackman:

We understand that the Eastern Snake Plain Hydrology Committee (Committee) has been asked to issue a joint statement endorsing the release and use of Version 2.0 of the Eastern Snake Plain Aquifer Model (ESPAM2). We also understand that the Committee has had some difficulty arriving at a consensus statement, primarily because of concerns by some members that such a statement may be later construed as an opinion or policy position that ESPAM2 is appropriate for any and all hydrologic analyses that the Department or some other user may identify. As is clear from our previous communications to you regarding matters of model application, we feel strongly that the Committee should not be placed in the position of recommending policy positions and that such recommendations are more appropriately made by water user stakeholders on the ESPA.

We recognize the significant efforts and resources that have been devoted to improving the ESPAM, and that it is necessary to bring this phase of model improvement to closure. However, we also believe that despite these improvements ESPAM2 remains a regional groundwater model with limitations in its applicability and uncertainty in its predictions. These limitations and uncertainties stem from a variety of sources, including its simplified conceptual representation of a complex aquifer and the accuracy of its input data and assumptions. The application of the model must recognize these limitations and uncertainties, especially if it is used as a basis for administrative curtailment that is wholly certain for the curtailed water right.
We urge you to weigh these considerations carefully in the Department’s application of ESPAM2, and to recognize the limitations and uncertainties in the model by adopting appropriate bounds on its use.

-Sincerely,

[Signature]

RANDALL C. BUDGE

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