Thomas J. Budge (ISB# 7465)
Elisheva M. Patterson (ISB#11746)
RACINE OLSON, PLLP
201 E. Center St. / P.O. Box 1391
Pocatello, Idaho 83204
(208) 232-6101 – phone
(208) 232-6109 – fax
tj@racineolson.com
elisheva@racineolson.com

Attorneys for Idaho Ground Water Appropriators, Inc. (IGWA)

STATE OF IDAHO

DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF THE MITIGATION PLAN FILED BY FALLS IRRIGATION DISTRICT FOR THE DISTRIBUTION OF WATER TO WATER RIGHTS HELD BY THE SURFACE WATER COALITION	Docket No. CM-MP-2024-002 **DECLARATION OF JAXON HIGGS**

I, Jaxon Higgs, declare the following:

1. I am over the age of 18 and competent to testify. If called upon to testify, I could testify to the following, all of which are within my own personal knowledge or based upon my professional judgment.

2. I am a licensed professional Geologist in the State of Idaho. I have a bachelor's degree in Geology from Brigham Young University Idaho and a master's degree in Hydrology from the University of Idaho.

3. I am the principal owner and operator of Water Well Consultants ("WWC"), an Idaho corporation with its principal address at 355 W. 500 S., Burley, Idaho 83318. WWC provides a variety of hydrogeologic services in southern Idaho related to aquifer management and water conservation. Contracted duties include, but are not limited to, monitoring of aquifer health, usage measurement and reporting, and management of aquifer recharge programs.

4. I am a consultant for Idaho Ground Water Appropriators, Inc. ("IGWA"). In that capacity, I provide technical assistance on a variety of matters, including groundwater modelling and other issues related to the Surface Water Coalition ("SWC") delivery call.

5. Between 2010 and 2014, Falls Irrigation District's ("FID") average groundwater diversion volume was 7,467.1 acre-feet. FID diversion volumes were derived from the Idaho Department of Water Resources' Water Measurement Information System (WMIS) and records I received from Fall Irrigation District.

6. To determine the impact to the Near Blackfoot to Minidoka Reach of the Snake River I used IDWR's Eastern Snake Plain Aquifer Model (ESPAM) version 2.2 steady state response function, provided by IDWR via their website, and FID's average groundwater diversion volume of 7,467.1. The ESPAM predicts that approximately 75%, or 5,592.5 acre feet, of FID's groundwater diversions would accumulate in the Near Blackfoot to Minidoka Reach of the Snake River at steady state.

I declare under the penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct.

DATED this 11th day of September, 2025.

By: Jaxon Higgs
Jaxon Higgs

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of September, 2025, I cause the foregoing document to be served on the persons below via the method below:

Thomas J. Budge

Gerald F. Schroeder, Hearing Officer Garrick Baxter IDAHO DEPT. OF WATER RESOURCES Gerald_23107@msn.com garrick.baxter@idwr.idaho.gov file@idwr.idaho.gov	Email
John K. Simpson IDAH2, PLLC jks@idahowaters.com jlw@idahowaters.com	Email
Travis Thompson Norm Semanko Abby Bitzenburg PARSONS BEHLE & LATIMER tthompson@parsonsbehle.com nsemanko@parsonsbehle.com abitzenburg@parsonsbehle.com	Email