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DEPARTMENT OF
WATER RESOURCES

GALENA GROUND WATER DISTRICT
P.O. BOX 2761
SUN VALLEY, IDAHO 83340

September 6, 2016

VIA EMAIL ONLY

Mr. Gary Spackman
Director of Idaho Department Water Resources
P.O. Box 83720
Boise, ID 83720-0098
gary.spackman@idwr.idaho.gov

Gary:

Thank you for allowing us the opportunity to submit our thoughts and concerns about the possibility of including the Wood River tributaries in a Ground Water Management Area ("GWMA") for the Eastern Snake Plain Aquifer. On behalf of the Galena Ground Water District ("Galena GWD"), we understand that Idaho Code § 42-233b grants you the authority to designate a Groundwater Management Area when you determine that an area is approaching the conditions of a critical ground water area. However, similar to the South Valley Ground Water District and the Cities of Ketchum and Bellevue, we believe that including the Wood River Basin in a GWMA for the ESPA will have far more consequences than benefits.

For instance, the Wood River acquifer is not only different than the ESPA acquifer but it is also an insignificant contributor to the ESPA acquifer. Even with a 12% curtailment across the Wood River Valley, the recently completed water model does not anticipate an increase of more than 0.3 cfs after 25 years. Without any data to show or explain how the Wood River Basin contributes a significant water supply, your suggested approach is likely to produce a very small result with a large and, likely, negative effect. Not only are we concerned that including the Wood River Basin in a GWMA will have a negative impact on our ongoing negotiations with the Big Wood and Little Wood Water Users' Associations, which have been taking place for over a year, but it could quite possibly derail any chance of actually reaching a settlement.

Instead of including the Galena GWD, it would be helpful if the Department of Water Resources provided us the framework and tools to effectively manage our water resources locally so that they may be properly tailored to our needs. The proposed implementation of the Wood River Basin into the GWMA has many uncertainties such as who will be responsible for creating the Ground Water Management plan and administering it, whether it will be tailored specifically to the Big Wood acquifer and, if so, what timeframe we should expect as well as how you propose to resolve local issues. Without providing specifics on how to handle the foregoing, it seems that unintended inefficiencies will be created which will not only complicate

management efforts but would be a waste of resources. We would be happy to meet with you to discuss possible solutions and ways to move forward on these issues.

Thank you in advance for your consideration of the foregoing and we look forward to working with you in creating an effective management of our water resources.

Sincerely,

Pat McMahon, President

Karl Nichols, Treasurer

Judd McMahan, Secretary