BINGHAM GROUNDWATER DISTRICT

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SEP 01 2016
DEPARTMENT OF WATER RESOURCES

P.O. BOX 1268
1725 Riverton Road
Blackfoot, Idaho 83221

Phone: (208)684-9634
email: binghamgwd@hotmail.com

Director Gary Spackman

Idaho Department of Water Resources

322 East Front St

P.O. 83720

Boise, ID 83720

Dear Director Spackman,

I am Craig Evans, Bingham Groundwater District Board Chairman, and am writing to bring up some issues that we have as a District with the proposed creation of a Groundwater Management Area (GWMA) in the Eastern Snake Plain Aquifer (ESPA) area.

1. The point made by the Department that the ESPA is declining despite all prior mitigation plans and therefore a GWMA must be created does not take into consideration that ALL previous mitigation plans were to provide "wet water" to seniors in answer to a call that they made and were never directed at aquifer levels until the SWC/IGWA agreement was signed last year and then approved as a mitigation plan. This current irrigation year is the first year actions are being made to increase aquifer levels . It has taken many years for the aquifer levels to respond to various changes in practices on the ESPA and to expect a quick response now to actions taken under the agreement is to expect something that cannot happen, give it a little time for this to happen. We have many in the District questioning why we should even be part of the SWC/IGWA settlement agreement if they will still be subject to curtailment through Groundwater Management Area.
2. While trying to increase aquifer levels seems a laudable goal, I am not sure that the Department has authority to mandate reductions in groundwater use in order to maintain an artificially increased aquifer level that was increased over the last of the 1800's and first half of the 1900's due to several activities at that time.
    a. Prior to the Winter Water Savings Agreement between the BOR and several irrigation entities to shore up water supplies to fill the Palisades dam (which filled first in 1957), water was run in canals in WD01 area for livestock watering totaling to an average of about 500,000 AF per year. This went to

recharge (or pre-charge it as the aquifer was increasing to a level it had never been before). The majority of this stock water was run in the canals in the lower ESPA area. Twin Falls Northside Canal said that they used to use a boxcar load of dynamite a year to keep the ice out of their canal then. This also helps to explain why the aquifer has dropped more from it's peak levels in the lower ESPA area that in the upper ESPA area.

b. Irrigation practices such as converting from surface irrigation to sprinkler irrigation resulted in about 1 million Acre Feet LESS being diverted out of the Water District 01 service area. This reduction resulted in this water not percolating into the aquifer.

3. The ESPA is often administered as a single homogeneous unit when reality shows a much different picture.
    a. As mentioned above about the differences in the early pre-charging of the ESPA between the upper and lower valley. This is shown in the Attachment 1 "well hydrographs" these two are examples of changes in irrigation practices in Egin Bench area where they "sub irrigated " with large quantities of water were put into ditches around the fields to bring the aquifer up under the crop. This practice was discontinued in the late '70's to 1980's and the aquifer there declined, but not due to excessive pumping, only changes of practices. Also shown on this attachment is the water level changes spring 1980 to spring 2013. Again much larger drops in the lower valley where the winter water flows were discontinued in 1957.
    b. Attachment 2. The "Water Past Milner" shows that much water is "escaping" the ESPA through Snake River flows which could and should be put out on the ESPA to keep the water here to replenish the aquifer.
    c. Attachment 3. "The Up Down Chart" verses the "King Hill Flows" shows the declines in the Snake River flows are NOT nearly the drop . Evidently the water is leaving the ESPA through an exit other than the "Thousand Springs" springs into the Snake River such as flows down the River its self.

These are some of the reasons that we believe that implementation of a Groundwater Management Area is ill advised at this time. Let's work on these other options other than the seemingly "nuclear option" of a Management area.

Respectfully submitted,

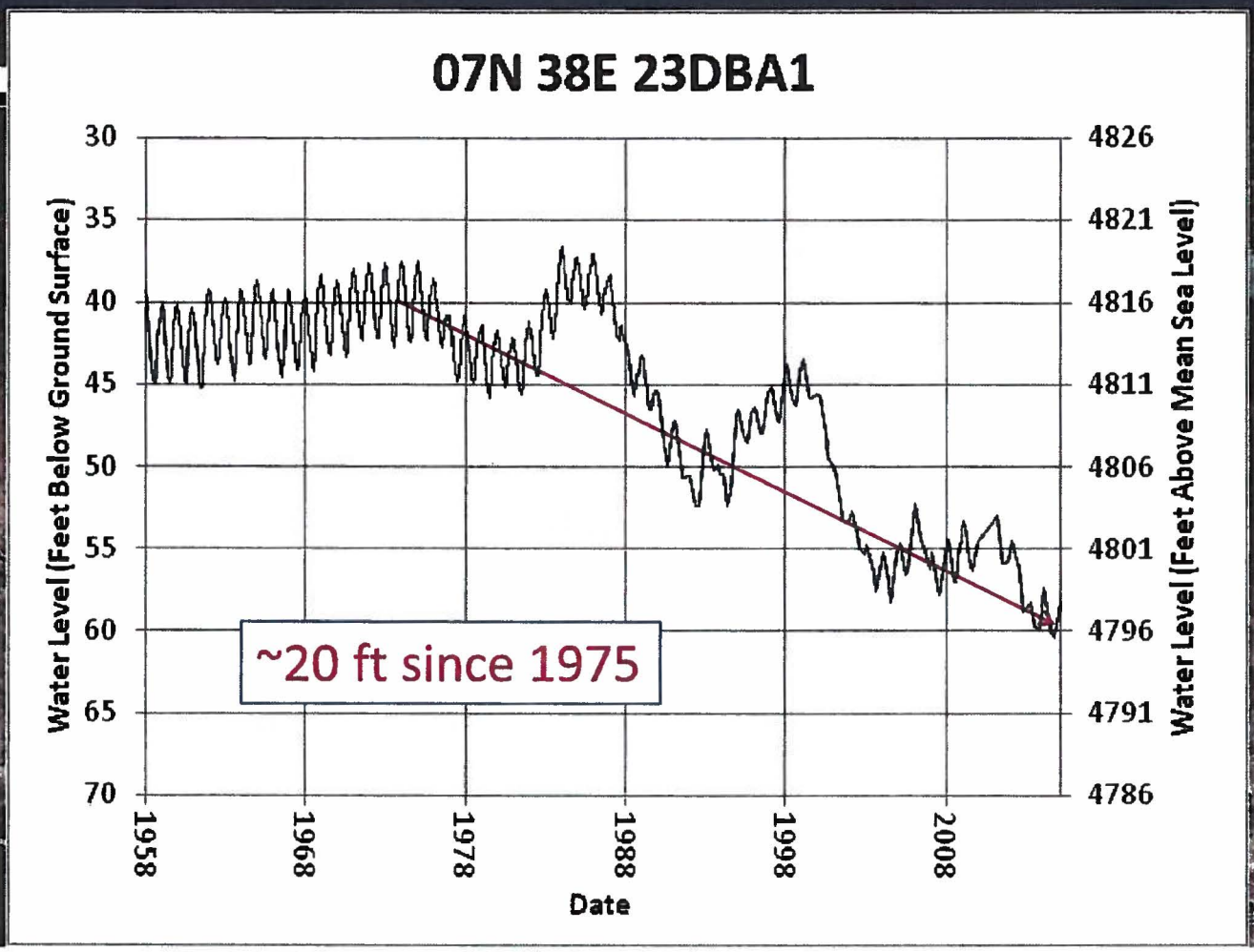
Craig B. Evans

Chairman, Bingham Groundwater District

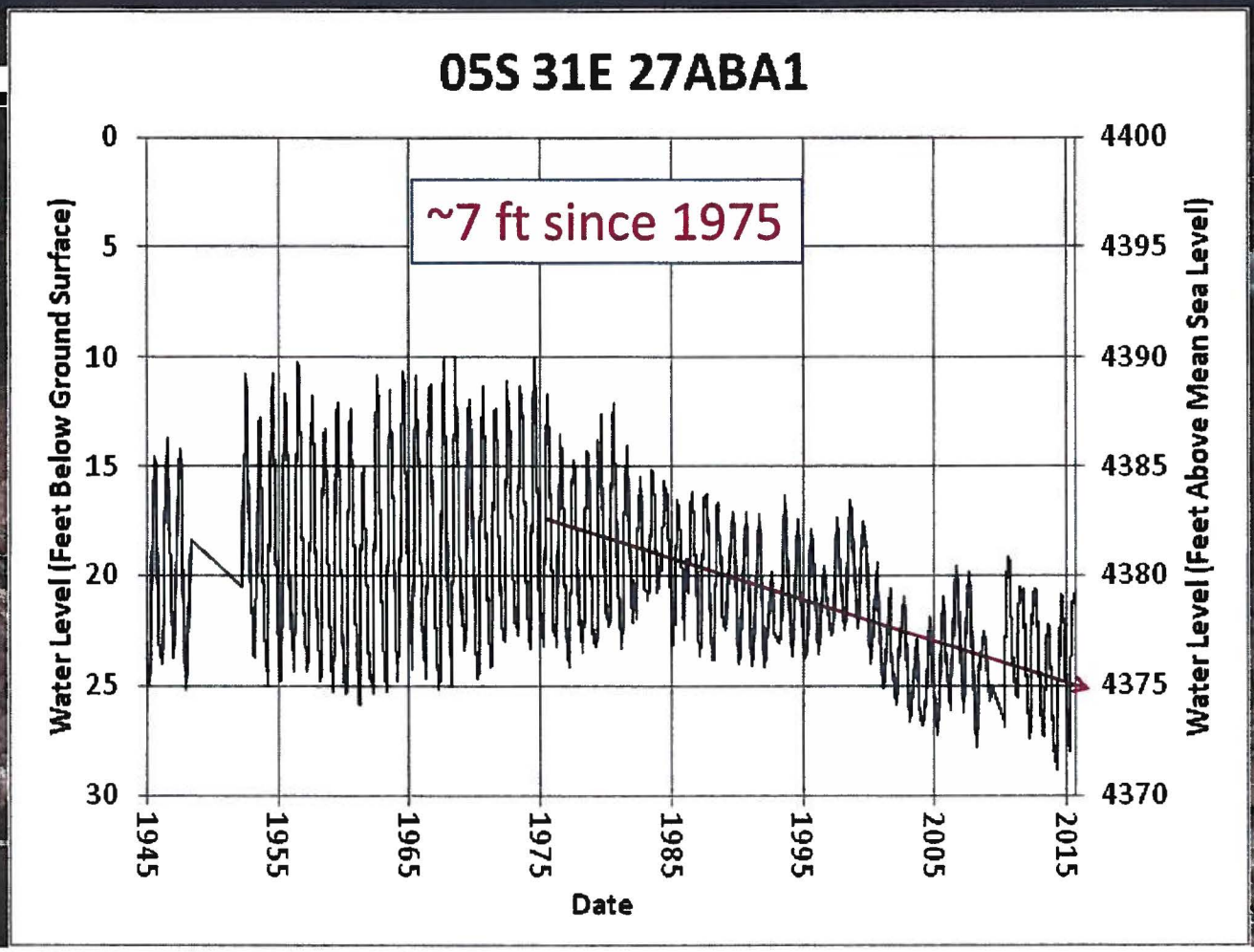
WATER PAST MILNER 1979 - 2014

YEAR	Idaho Power storage allocation below Milner (ac-ft)	Idaho Power Rental below Milner from Spaceholder Allocations (ac-ft)	Flow Augmentation Rental below Milner from Spaceholder Allocations (ac-ft)	Flow Augmentation Rental below Milner from USBR Uncontracted Space (ac-ft)	Flow Augmentation Rental below Milner from Powerhead Space (ac-ft)	Flow Augmentation Rental below Milner from Common Pool (ac-ft)	Idaho Power Rental below Milner from Common Pool (ac-ft)	Shoshone-Bannock Rental below Milner (ac-ft)	TOTAL STORAGE DELIVERED PAST MILNER (ac-ft)	TOTAL WATER PAST MILNER (ac-ft)	TOTAL EXCESS WATER PAST MILNER (ac-ft)
1979	45,000	60,000	0	0	0	0	0	0	105,000	2,290,879	2,185,879
1980	43,903	0	0	0	0	0	0	0	43,903	1,304,116	1,260,213
1981	43,832	125,000	0	0	0	0	0	0	168,832	1,530,847	1,362,015
1982	44,059	200,000	0	0	0	0	0	0	244,059	3,252,976	3,008,917
1983	44,044	350,000	0	0	0	0	0	0	394,044	5,978,444	5,584,400
1984	44,030	275,000	0	0	0	0	0	0	319,030	6,941,403	6,622,373
1985	43,881	350,000	0	0	0	0	0	0	393,881	4,147,764	3,753,883
1986	44,031	150,000	0	0	0	0	0	0	194,031	5,511,900	5,317,869
1987	43,491	150,000	0	0	0	0	0	0	193,491	2,022,061	1,828,570
1988	43,608	50,000	0	0	0	0	0	0	93,608	312,324	218,716
1989	43,609	100,000	0	0	0	0	0	0	143,609	366,769	223,160
1990	43,690	63,000	0	0	0	0	0	0	106,690	320,271	213,581
1991	43,672	99,000	0	0	0	0	0	0	142,672	298,001	155,329
1992	40,959	0	0	0	0	0	0	0	40,959	247,770	206,811
1993	44,060	65,000	0	97,428	109,219	0	0	0	315,707	754,404	438,697
1994	43,782	0	45,000	84,020	213,168	0	0	0	385,970	1,078,163	692,193
1995	43,885	0	232,858	30,147	0	0	0	0	306,890	1,263,527	956,637
1996	43,910	0	228,018	21,982	0	0	0	0	293,910	3,886,928	3,593,018
1997	43,983	0	202,314	22,186	0	0	0	0	268,483	7,122,273	6,853,790
1998	43,942	0	200,325	22,896	0	0	0	0	267,163	4,279,344	4,012,181
1999	43,608	55,387	148,397	22,896	0	0	0	38,000	308,288	4,546,599	4,238,311
2000	42,926	53,325	162,325	22,896	0	0	0	38,000	319,472	1,913,691	1,594,219
2001	43,550	0	0	4,717	0	0	0	35,955	84,222	279,216	194,994
2002	43,388	0	0	0	0	0	0	0	43,388	257,094	213,706
2003	42,918	0	0	0	0	0	0	0	42,918	224,219	181,301
2004	34,827	0	50,109	0	0	0	0	0	84,936	211,349	126,413
2005	43,175	0	0	16,037	24,950	150,000	0	0	234,162	397,960	163,798
2006	43,336	0	0	21,888	0	150,000	0	45,892	261,116	1,635,777	1,374,661
2007	43,306	0	0	20,470	91,189	0	0	42,108	197,073	717,201	520,128
2008	43,085	0	0	18,282	0	165,000	41,620	45,716	313,703	489,393	175,690
2009	43,704	0	0	22,600	0	180,000	0	45,716	292,020	1,908,081	1,616,061
2010	43,569	0	0	19,728	0	73,201	0	45,716	182,214	961,095	778,881
2011	43,805	15,000	0	22,652	0	185,000	35,000	45,716	347,173	4,439,167	4,091,994
2012	43,191	0	0	20,054	0	170,000	0	45,716	278,961	2,070,188	1,791,227
2013	39,350	0	0	11,785	83,100	60,000	4,039	11,429	209,703	349,679	139,976
2014	43,087	0	0	15,237	0	178,000	0	27,000	263,324	416,223	152,899
TOTAL	1,556,196	2,160,712	1,269,346	517,901	521,626	1,311,201	80,659	466,964	7,884,605	73,727,096	65,842,491
AVERAGE	43,228	60,020	35,260	14,386	14,490	36,422	2,241	12,971	219,017	2,047,975	1,828,958

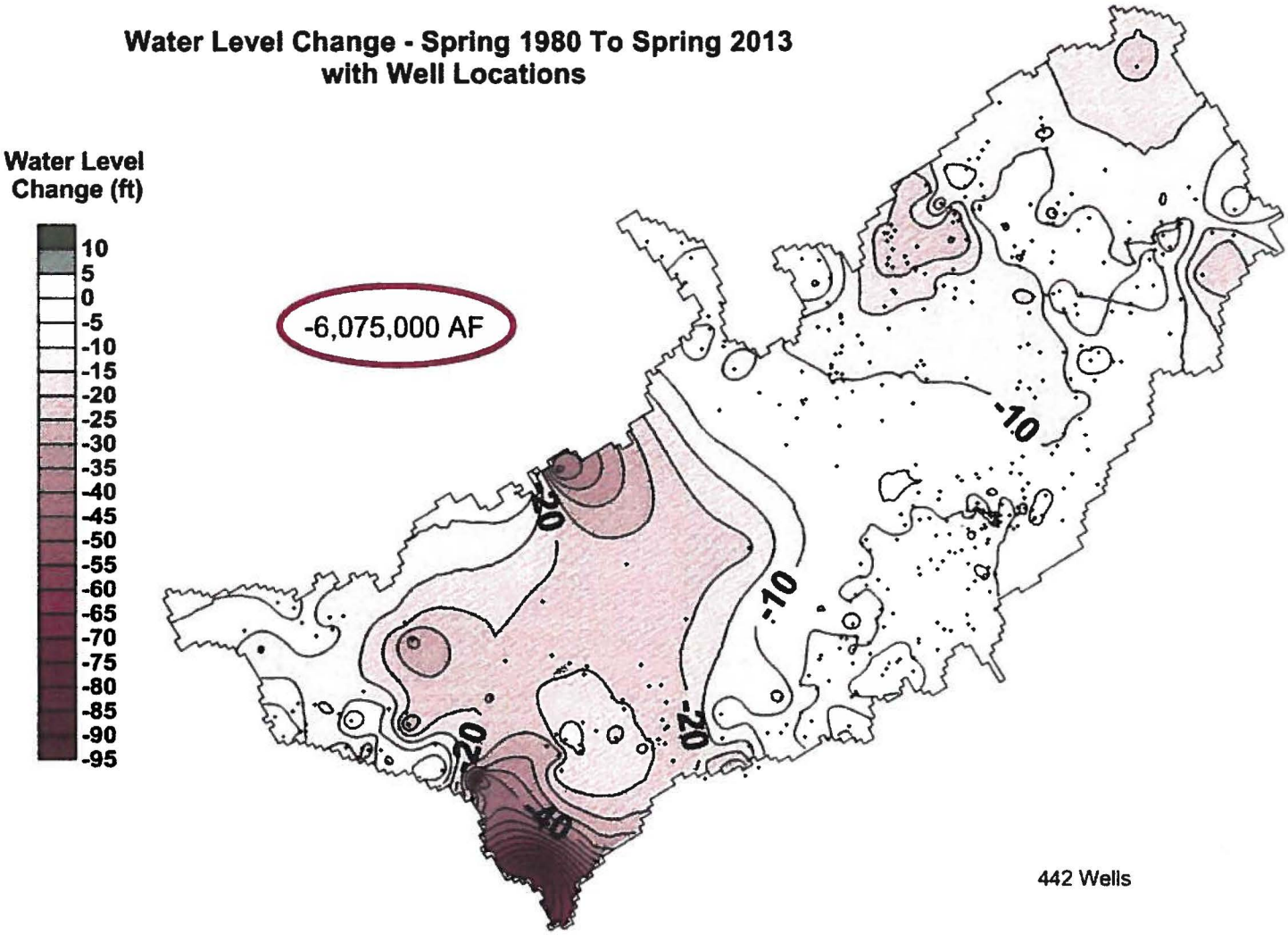
ESPA Water Levels



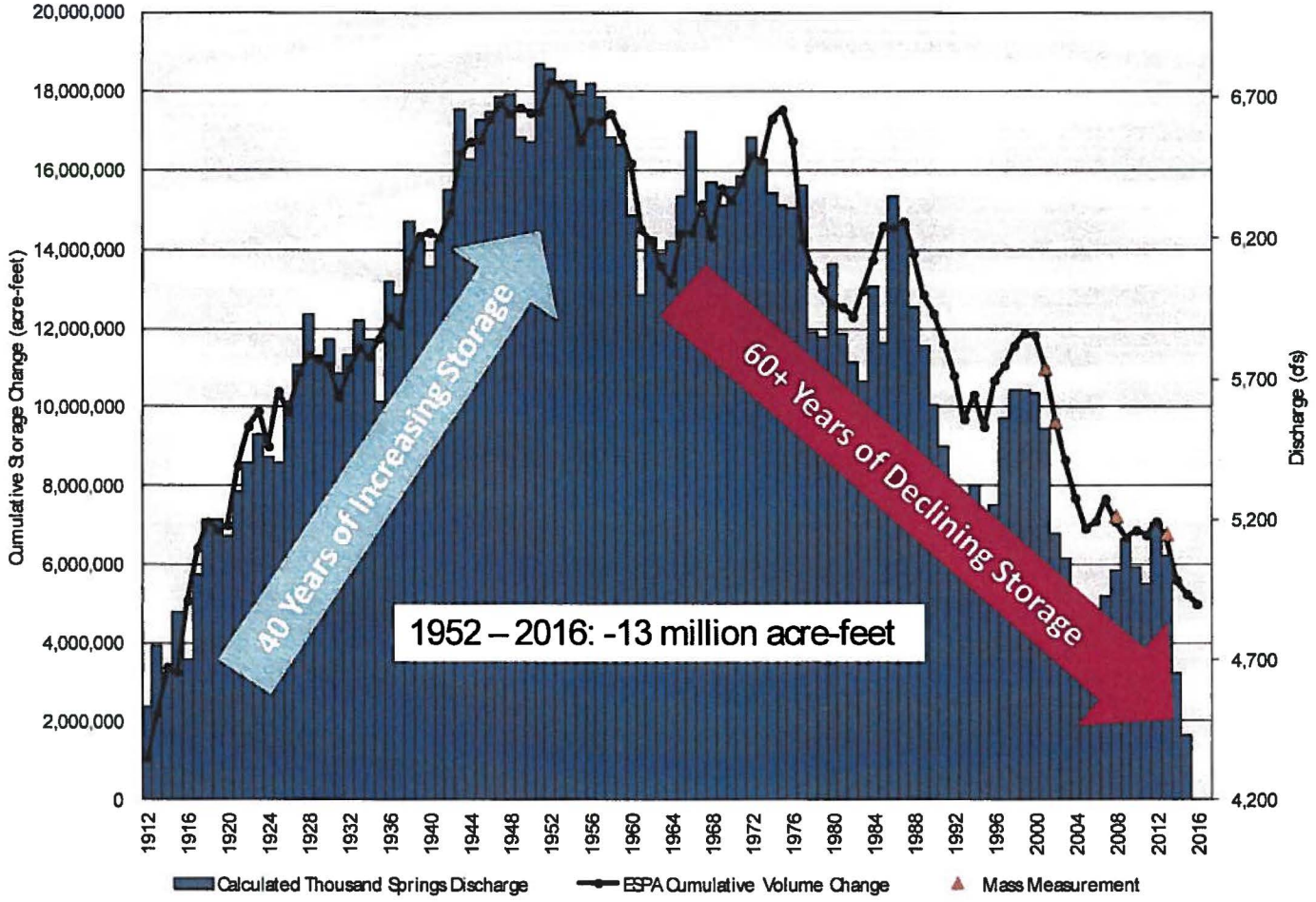
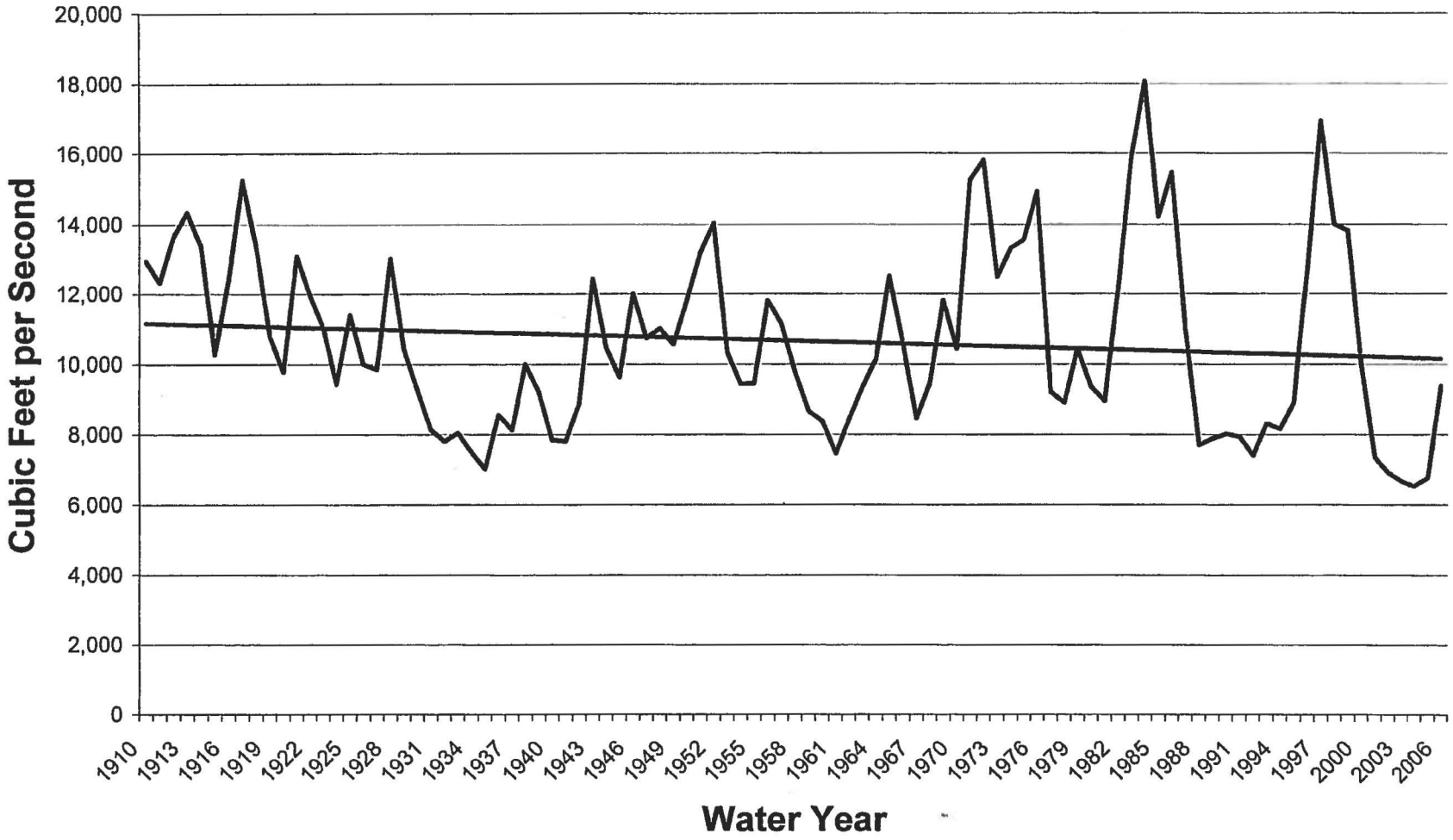
ESPA Water Levels



Water Level Change - Spring 1980 To Spring 2013 with Well Locations



What are the hydrologic trends?



Snake River at King Hill Annual Flows