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Department of Water Resources
Adjudication Bureau

Movant's Name: Idaho Conservation League, Idaho Rivers
United, Idaho Wildlife Federation, and
Northwest Resource Information Center

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IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA) Sub-case Nos. 36-02080
) and 36-15127
Case No. 39576)
_____)

AFFIDAVIT OF MARTI BRIDGES

State of Idaho)
)
County of Ada)

MARTI BRIDGES, being duly sworn, does depose, state and aver
as follows:

1. I am a member of Idaho Rivers United (IRU), and am IRU's
Water Policy Director. I have extensive education and experience
in water policy issues in Idaho and the Northwest generally,
including such issues as minimum instream flows, consumptive use of
water by various crops, conjunctive administration of ground and
surface water, protection of riverine and aquatic ecology, and
others. I also am an active recreational user of water throughout
the state, including in the middle reach of the Snake River.

2. Among others, I am a member of the Pacific Northwest Water Spreading Task Force, formed by the Bureau of Reclamation to determine possible policy changes to eliminate unauthorized and potentially illegal uses of Bureau water. In that position, and in my position as IRU's Water Policy Director, I have had substantial experience in issues involving Bureau of Reclamation water projects and uses of Bureau water, including "water spreading." "Water spreading" is a term which generally refers to illegal or unauthorized use of Bureau project water, including use outside district boundaries, use of uncontracted water, unapproved changes in places or seasons of use, "water stacking," and others.

3. Idaho Rivers United has individual and group members from throughout the state, including members who live and work in the area of the Snake Plain Aquifer and the middle reach of the Snake River; and members who recreate, enjoy and/or depend for their livelihood on water and water flows in the middle Snake River. Both I, IRU members, and IRU generally are impacted by water uses that impact the quantity and quality of water in the Snake Plain Aquifer and in the middle Snake River.

4. Although the geohydrology is not completely understood, it is well-known that ground water pumping in the Snake Plain Aquifer and the areas surrounding the middle Snake River has direct, and sometimes nearly immediate, effects on water quantity, water flows and even water quality in the Snake River, because of the hydrological interrelationship between ground and surface water, the impact of withdrawals upon the aquifer, effects of recharge and

return flows, and others.

5. I have reviewed the water right recommendations made by the director of Idaho Department of Water Resources for water rights 36-02080 and 36-15127. These are rights claimed by the Bureau of Reclamation which, in combination with several other smaller rights, are recommended for a total diversion rate of 1100 cfs, annual diversion volume of 265,221.2 AF, and an annual consumptive use volume of 198,915.9 AF. Diversions would be made from approximately 177 groundwater wells in the Snake Plain Aquifer. The recommended season of use for this right is April 1-October 31.

6. Diversions at the rate of 1100 cfs from this number of ground wells undoubtedly has an impact on such matters as aquifer levels, aquifer recharge, and discharges into the middle Snake River; and hence on water quality and water quantities in the middle Snake.

7. The "remarks" sections in the director's report for Basin 36 reveal that these rights have been recommended as "expansions" under Idaho Code 42-1416(2); and as "accomplished changes" in both points of diversion and places of use, pursuant to Idaho Code 42-1416A. Documents filed by A&B Irrigation District in connection with these rights also indicate that these changes and expansions are the result of "spreading," i.e., use of water outside Bureau district boundaries or other unauthorized uses.

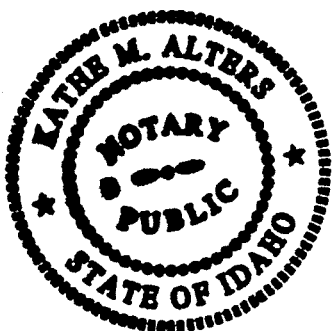
8. Illegal or unauthorized water spreading in connection with Bureau districts is, in my opinion, a significant problem in Idaho

and throughout the Northwest. It is an issue that IRU and its members are deeply concerned about and involved in. There are numerous reasons for such concerns, including the impacts of water spreading on aquifer levels, discharges to the Snake and other rivers, and overall riverine and ecological health.

I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge, information, and belief. Executed at Boise, Idaho this 25th day of February __, 1994.

Marti Bridges
Marti Bridges

Subscribed and sworn to before me this 25th day of February, 1994.



Kathie Alters
Notary Public for Idaho
Residing at: Boise

My Commission expires: 2/23/2000