

Edwards Greenhouses, 4106 Sand Creek, Boise, ID 83703

Mary and Rose Ryan, 4504 Foothill Drive, Boise, ID 83703

Terteling Entities, 3823 N. 36th, Boise, ID 83703

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WATER RESOURCES
WESTERN REGION

November 21, 2003

L. Glen Saxton
Administrator
Water Management Division
State of Idaho Department of Water Resources
1301 North Orchard Street
Boise, Idaho 83706

Subject: Water District 63-S Water Users Comments and Recommendation with Respect to the Continuation of the June 10, 1988 Moratorium on Further Development in the Boise Front Ground Water Management Area.

Dear Mr. Saxton:

Thank you for your notification and request for comments concerning the Idaho Department of Water Resources' (IDWR or Department) review of the Boise Front Groundwater Management Area's June 10, 1988 moratorium order. The District 63-S water users understand that the most recent 5-year continuation (1998) of the originally-imposed moratorium period on new low-temperature geothermal groundwater development has passed and that the IDWR must review and act on the expiring order. The District's water users appreciate the opportunity to submit the following comments and recommendation.

Over the last couple of years, several water rights applications have been before the Department concerning low-temperature geothermal water rights of the Boise Front Groundwater Management Area (BFGWMA). These include a transfer application by The Terteling Company in Water District 63-S and a Petition to Increase Withdrawals by the City of Boise in the Downtown/Table Rock area of Boise. Both of these actions resulted in contested cases. The broad interest and participation in these proceedings indicate that there is a great deal of concern about changes in appropriations of geothermal water among most geothermal water users across the Boise Front. Two recent reports emphasize the shortcomings of prior monitoring efforts and the importance of more accurate monitoring of the BFGWMA in the future in order to obtain better information regarding the long term impacts of withdrawals: "Semi-Annual Review of the Monitoring Data for the Boise Front Geothermal System, January-June, 2003" by Ken Neely, IDWR, September 26, 2003; and "Investigation of Hydrogeologic Conditions and Ground Water Flow in the Boise Front Geothermal Aquifer," by IWRI, October 2003.

For these reasons, the undersigned Water District 63-S low temperature geothermal groundwater users listed below recommend and request that the IDWR continue the 1988 moratorium order for a minimum of ten more years in order to be able to establish a better monitoring record and to be able to gage the impact of recent changes to the system. We further recommend and request that the order extending the moratorium recognizes and adopts the Boise Front Geothermal Aquifer Monitoring and Reporting Plan in the July 24, 2002 Stipulated Agreement entered into by the parties in the IDWR Matter of Petition for Order Authorizing Additional Use Under Existing Permits and Moratorium Order for Water Rights 63-9138 & 63-9139 in the Name of the City Of Boise. Although these recommendations do not represent a formal request on behalf of the Water District 63-S, because the District has not yet had an opportunity to meet on this issue, it does represent the majority of District 63-S low-temperature geothermal water users. Thank you for your consideration of these comments.

Edwards Greenhouse

Garnette K. Monnier

Terteling Entities

[Signature]

Mary and Rose Ryan

Rose Ryan

- c: Ken Neeley, District 63-S Watermaster
- Charles L. Honsinger, Ringert Clark Chartered
- Dana Hofstetter, Hofstetter Law Office
- Steve Lester, IDWR Western Regional Office