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October 8, 2025

VIA EMAIL

Mountain Home City Council
c/o Tiffany Belt
City Clerk's Office
tbelt@mountain-home.us

Mountain Home City Council
c/o Geoff Schroeder
MSBT Law
gas@msbtlaw.com

Re: Elmore County Snake River Water Permit

Dear Tiffany and Geoff:

I am writing to follow up with City of Mountain Home leadership regarding my letter of April 7, 2025 about Elmore County's then-pending water permit application from the Snake River. Please include this letter in the City Council members' packets for their next meeting.

By way of update, I am pleased to report that the Idaho Department of Water Resources (IDWR) formally approved the application to divert 20 cfs of Snake River water on September 12, 2025. I have enclosed a copy of the approved permit number 2-10535 for your reference.

As you will see, the permit authorizes diversions of water from the Snake River for two purposes—aquifer recharge and supplemental irrigation within the Mountain Home Irrigation District. As you will recall, the County's initial permit application also contemplated potential municipal use of water under the permit by the City of Mountain Home. Keri Hill, Terry Scanlan, and I attended City Council meetings on December 10, 2024 and February 25, 2025 to discuss that possibility. At the conclusion of that process, City Council provided the enclosed letter dated March 19, 2025 stating that, depending on cost, "the City would welcome opportunities to utilize Snake River water for municipal purposes in and around the City." The letter then proceeded to describe how the City could put the water to use, such as in pressurized irrigation systems for new subdivisions and by offsetting existing municipal groundwater irrigation in the central, eastern, and northern portions of the City.

Ultimately, however, IDWR did not approve the municipal component of the application. I have enclosed with this letter a copy of an internal IDWR memo explaining its reasoning. Even though the City's letter was signed by a majority of the City Council members, it appears IDWR significantly relied on a follow-up letter from Mayor Sykes that I have also enclosed with this letter.

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Despite having provided a letter in support of this permit application in 2017, the more recent letter states that "the City of Mountain Home does not have any future plans" to participate in the County's Snake River project and that it therefore "supersedes all my previous letters of support for Elmore County's water permit applications."

Based on the foregoing, Elmore County elected to accept the permit in its present form instead of challenging the denial of the municipal component. County representatives updated the Idaho Water Resource Board's finance committee regarding the Snake River project on September 9, 2025, and we expect to lodge a request with the Board to assist with an alternatives study for the project in the near future.

Elmore County has been working closely and cooperatively with the Idaho Water Resource Board and the Mountain Home Irrigation District to address the local groundwater deficit for several years. More recently, the County and the Mountain Home Air Force Base have also been in regular communication regarding water supply issues. If the City ever desires to join in these efforts, please contact Francene Payne with the Elmore County Clerk's office to schedule a meeting with the County Commissioners. We would welcome Mountain Home's perspective and input on these regional challenges.

Thank you for your attention to this matter.

Sincerely,

VARIN THOMAS LLC



Dylan B. Lawrence

Enclosures (4)

cc: Shelley Essl, Elmore County Clerk (*via email to sessl@elmorecounty.org*)
Keri Hill (*via email to keri.hill@panoramaenv.com*)
Terry Scanlan (*via email to Terry.Scanlan@hdrinc.com*)



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March 19, 2025

Dylan Lawrence
Varin Thomas LLC
242 N 8th Street, Suite 220
Boise, ID 83702-5892
via email to dylan@varinthomas.com

Subject: Response to IDWR Letter of 10/28/2024 Regarding Application 02-10535

Dear Dylan:

The City of Mountain Home appreciates having had the opportunity to discuss Elmore County's application for water right permit 02-10535 with you, Keri Hill, and Terry Scanlan at City Council meetings on December 7, 2024 and February 25, 2025. While the City provided a letter in support of that application when the County first filed it in 2017, that was some time ago, and none of the current City Council members were members at that time. These meetings have allowed the County to update and re-educate City leaders regarding the County's water right application and to discuss our concerns. As we expressed at the meetings, the City fully supports the County's efforts to bring more water to the local area, which can help stabilize aquifer water levels and sustain our community.

We understand that the County's application seeks 20 cfs of Snake River water for year-round groundwater recharge, year-round municipal use within the City of Mountain Home, and seasonal supplemental irrigation uses within Mountain Home Irrigation District. If the County is successful at obtaining water right permit approval, the City would welcome opportunities to utilize Snake River water for municipal purposes in and around the City. But, as stressed at our meetings, City participation in the project and use of the water will be contingent on costs. Thus, as the project develops, we look forward to learning more about up-to-date costs for project construction and operation. We are also interested in learning about identified funding opportunities, and based on our meetings, we understand the County has already been involved in extensive evaluation of such opportunities. Once actual costs are more fully defined, the City can evaluate whether to participate going forward. We are hopeful that the County can develop a cost-effective project that warrants City involvement.

We also understand that the Idaho Department of Water Resources (IDWR) requested additional information related to Elmore County's application for permit in a letter dated October 28, 2024. Specifically, IDWR's letter asked, how will the water be used for municipal purposes? Based in part on our recent discussions, this letter provides additional information to answer that question. Therefore, please feel free to include this letter in the County's response to IDWR.

If Snake River water were made available to the City of Mountain Home for municipal purposes, the water could be used in the following ways.

Pressurized Irrigation. First and foremost, Snake River water could be conveyed to new residential subdivisions in both the City and the County¹, to provide non-potable municipal pressurized irrigation supply to replace potable municipal and domestic groundwater supplies as irrigation sources. This makes the most sense and would be easily achievable for new developments where the City or County can mandate developer-funded installation of non-potable pressurized irrigation distribution systems

We understand that the County has provided IDWR with a conceptual design and cost estimate to bring the water from the River to the edge of the City at the intersection of Airbase Road (Highway 67) and S 18th W Street (Elmcrest Street or Highway 51). This location is ideal for supplying pressurized irrigation to the southwestern portion of the City. From this location, distribution piping can be extended south and east into the City, as appropriate, to provide pressurized irrigation in this area.

The County's conceptual design then conveys water north from Airbase Road along S 18th W Street (Elmcrest Street and NW Canal Road), under I84 to Beaman Street, then bifurcating with pipelines north to Canyon Creek for recharge and east to Mountain Home Reservoir for supplemental irrigation within the irrigation district. The S 18th W Street pipeline route provides opportunities for pressure irrigation supply to developing areas on the west and northwest sides of Mountain Home and the Beaman Street pipeline provides opportunities to supply County subdivisions north of I84.

Longer-term, there may also be opportunities to convey municipal water to the central, eastern and northern areas of the City through the Mountain Home Irrigation District gravity conveyance systems. The irrigation district currently delivers non-pressurized water through these areas. Both the NW Canal Road and Beaman Street sections of pipeline will cross or parallel irrigation district canals. If additional capacity in these irrigation district conveyance systems is available or can be developed, then it may be feasible to construct satellite pump stations from irrigation district canals to provide pressurized municipal irrigation to City or County subdivisions in these areas.

Maintenance and operation of individual pressurized irrigation systems will be the responsibility of the City, the County, or home owners associations, as appropriate. Distribution piping within the City limits, but outside of residential subdivisions, will likely be owned and maintained by the City. Distribution piping within individual subdivisions might be owned and maintained by either the City or the subdivision home owners association. There might also be an opportunity to create a municipal irrigation district. All of these details can be worked out during the project design and development process. Furthermore, it is likely that pressurized irrigation systems will be developed or expanded throughout the permit development period rather than all being constructed immediately upon water infrastructure reaching the City. This sequential

¹ We understand that a permit amendment may be required to supply municipal irrigation to subdivisions outside of the City boundary. We also understand that supplying water outside city limits is discretionary on the part of the city and may require agreements to annex in the future and upon contiguity, if approved at all.

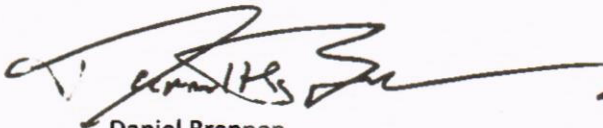
development will allow the City and County to determine the most appropriate assignment of responsibility for these portions of the overall project.

By shifting supply of irrigation from groundwater to surface water on some lands within the City, the City might defer spending on additional municipal supply wells currently needed to support growth.

Direct Municipal Use. At some time in the future, the City could also consider constructing a surface water treatment plant to treat Snake River water for potable municipal purposes to support future growth. Treatment for potable purposes is feasible (as demonstrated by the Mountain Home Air Force Base project currently under construction) but expensive. The City has not conducted a planning study to estimate the cost of a treatment system. Whether such a project, or even a study, will be implemented within the permit development period is unknown. But the ability for the City to have such an option is important as an available alternative to support future growth.

In summary, we want to reiterate that the City is supportive of the County's efforts to bolster the water supply in the Mountain Home area. The City will continue to cooperate in these efforts as the project evolves, and we look forward to finding out more about project costs so that we can determine if the City can commit to participation. In the meantime, we hope this information regarding how the City could utilize the municipal component of the application is helpful.

Sincerely,



Daniel Brennan
Councilmember



Scott Harjo
Councilmember



Jenny Wirkkala
Councilmember



Re: Application for Snake River Water Permit 02-10535

Date: 4/2/2025

Dear Cody Parker and Nick Miller,

The City of Mountain Home has followed the efforts of Elmore County to mitigate the 43,000 acre/ft declining aquifer. As outlined in Table 20, Ground Water Diversion Summary, Elmore County Water Supply Alternatives Study, dated February 28, 2017, conducted by SFP Water Engineering, LLC, Elmore County uses approximately 80,000 acre/ft annually. As of 2024, the City of Mountain Home uses approximately 4,775 acre/feet annually, less than 6% of aquifer total beneficial use.

The City of Mountain Home does rely on the regional aquifer as its water source. As aquifer recharge is a component of this project, there would be a small beneficial use by the City of Mountain Home. Even though the City of Mountain does not have any future plans to design, maintain, or fund a municipal use project utilizing water from the Elmore County's Snake River Project, the City supports the county's project. The approval of this application would be in the best interest for the entire region to sustain irrigated agriculture family farms, offsetting ranching livestock feed costs, and sustain economic impact to all of Elmore County communities and the State of Idaho.

This letter supersedes all my previous letters of support for Elmore County's water permit applications. If you have any questions pertaining to this letter, please contact me at (208)587-2104, Mayor@mountain-home.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Rich Sykes", with a stylized flourish at the end.

Rich Sykes
Mayor