

CUSTER COUNTY COMMISSIONERS

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As duly elected representatives of Custer County, Idaho, we the Board of Commissioners submit the following comments in regard to the Expansion of the Eastern Snake Plain Aquifer Area. Custer County Commissioners are charged with the health, safety, and welfare of the citizens of Custer County. No other agency is responsible for the people. We submit this rebuttal to the proposed inclusion of the Big Lost River drainage in the Eastern Idaho Snake Plain as a tributary basin. We believe the decision is being advanced without sufficient consideration of the environmental, geographical and historical factors that define the Big Lost River system.

Hydrological Characteristics

The Big Lost River drainage has unique hydrological and geographical traits. Water from this drainage has never flowed above ground to the Snake River, but instead seeps into the ground. This water may or may not eventually reach the aquifer deep beneath the surface. This water traveling underground can take hundreds of years to reach its destination. According to Ackerman's report, the Big Lost River water may take up to 250 years to reach areas such as the Idaho National engineering Laboratory (INEL). We feel that Basin 34 is a separate aquifer not a tributary, as no proof of connection has been given. Information is available that there are three different berms underground that affect the underground Big Lost River waters. (Re: Steve Smith, former Commissioner)

Historical Context and Scientific Data

Essential historical context regarding water flow, drought patterns and land use specific to the Big Lost River drainage was not presented at the hearing. Your decision does not appear to be based on facts, and without utilizing scientific backing your actions are going to create unnecessary hardships. We do not want this to cause any farmers and ranchers in Custer County to lose their land and homes. Water curtailment within Custer County will directly affect the small tax base of this area.

Drought Impact

The Big Lost River is reliant upon annual snowpack in the mountains, which dictates both surface and subsurface water flow. Big Lost River experiences conditions that are not comparable to those in the Snake Plain, and these differences need to be acknowledged in any water mitigation or management strategy. This region serves rural irrigators as well as small communities and your decision will affect everyone. The wells/pumpers that are in Basin 34 (Big Lost River) are monitored with meters, yet the wells/pumpers in southern Idaho do not all have flow meters installed.

Time Line

A concrete time is needed as well as a defined schedule for execution. Planning efforts require transparency, structure and accountability, which were missing from the presentation. We feel it is premature to move forward in making decisions affecting the Big Lost River basin without additional factual information

Conclusion

Your hearing presentation has formed the basis for your proposed expansion plan, and as such it is very important to note what is left out or erroneous. We urge you to complete a more comprehensive evaluation, grounded in scientific and factual evidence. The small amount of consumptive use within the Big Lost River (2%) does not justify the proposed major disruptive changes in management methods for residents of this drainage. Curtailment of water use within the Big Lost River when the final destination of these waters is still an unknown is not acceptable. The Custer County Board of Commissioners stand ready to defend the health, safety and welfare of the citizens of this county.



Randy Corgatelli, Commissioner Chairman

Dated: April 7, 2025