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Re: Proposed Inclusion of a Portion of the Big Lost River, Basin 34,  
into ESPA

We are told that there is ground water that leaves Basin 34, also known as the Big Lost River Valley, and flows into the ESPA, but how much & how long it takes to reach the Twin Falls area is unknown. Estimates are inexact and can vary widely, regardless of what IDWR wants to believe. Often, the estimates of water contributed from Basin 34 are extrapolated using other areas that SEEM similar to ours. This is not an accurate means of estimating the contributions of this basin. IDWR is very aware of the singularly unique nature of the waters of the Big Lost River. That is why when the Snake River Basin Adjudication started, Basin 34 was the FIRST reporting area. IDWR reasoned that if they could settle the water rights in the Big Lost, the rest of the state would be a "piece of cake". Water users in the Big Lost River Valley have fought this exact battle with IDWR several times in the past & here we are again... Does the new leadership of IDWR think that the people that know this history have given up?

My father, Dave Nelson, along with myself & many others, spent many long hours and untold amounts of money dealing with water issues in & for the Big Lost River valley. He was involved in the drafting of the original conjunctive management rules for the State of Idaho. He was one of the people to whom IDWR made a PROMISE that the Big Lost River would never be included in the ESPA. I know that IDWR has made this promise numerous times, to rooms full of Big Lost River valley water users throughout the ensuing years because I have been at several of those meetings myself.

Additionally, IDWR has ALWAYS stated & required that the Big Lost River valley, from Willow Creek Summit to Arco, be administered as one basin. "There is no difference in water from above the Mackay Dam", we have been told by IDWR for decades. (That was another battle Dad fought for years.) I was in the meeting in which we were told, very emphatically, by the IDWR Director that the ONLY reason the ESPA model ONLY went to the Mackay Dam was "For convenience's sake". Once again IDWR wants to expand the borders of ESPA, & guess what? It will now include the Big Lost River valley, but only to the Mackay Dam. This effectively splits this basin. Something we have been told we could NEVER do & IDWR would never allow

The boundaries of the ESPA seem arbitrary & political. The people that are on the Modeling Committee have obviously represented and protected the interests of whomever or whatever organization they are aligned with. I have a very hard time believing ANYTHING coming out of the ESPA model. The so-called science seems very "iffy", especially when it comes to the Big Lost River. It is VERY suspicious to me that the Big & Little Wood valleys NEVER get considered as a part of the ESPA. This only confirms to me that IDWR & the ESPA model committee are not concerned, at all, about "science".

In the same meeting in which we were told the Big Lost River would never be in the ESPA & that IDWR only went to the Mackay Dam for convenience's sake, we were also told the PLUME under the INL Site was "STATIC" & did not move. That even though this PLUME, that had been created by injecting who knows what into the EASTERN SNAKE PLAIN AQUIFER, was in the AQUIFER, it was somehow magically locked up & did not move. Regardless of the fact that the ESPA model says ALL THE WATER IN ESPA FLOWS TOWARDS TWIN FALLS; flowing THROUGH & AROUND this PLUME, the PLUME itself DOES NOT move. This statement alone tells me that the ESPA model has MAJOR flaws & is politically motivated. IDWR & whomever is coming up with the data are trying to HAVE THEIR CAKE & EAT IT TOO!

The contribution of the Big Lost River (Basin 34) to the ESPA is negligible, at best. "Good" water years, (when calls are unlikely) are the only times that this basin may contribute to the ESPA. "Bad" water years, (when calls are likely) do not allow any water to leave this basin.

The hydrologic basis for the definition of the Area of Common Ground Water Supply is set forth in the Conjunctive Management Rules as: "The Eastern Snake Plain Aquifer supplies water TO and RECEIVES water FROM the Snake River". The Big Lost River Basin CANNOT receive water from the Snake River. We do not meet this criterion. If we do become part of the ESPA and are made subject to calls from the Twin Falls area, do we get to make calls ourselves? How will those be delivered?

Finally, I would like to say that the way in which IDWR continues to try to drag the Big Lost River & its people into the ESPA leaves a bad taste in my mouth and does nothing for my faith in the leaders of this state. The Big & Little Wood River Valleys never have to deal with ESPA even though they do actually flow into it SMACKS of political and/or monetary influence. IDWR uses a model that does not account for, nor even mention, movement of the PLUME under the INL Site. Yet, IDWR tells everyone they are using the most current & accurate science available, REALLY?

My father knew our Governor & his predecessor. I am sure he had numerous conversations about water in general & water in the Big Lost River in particular with both of them. The fact that Gov. Little was willing to allow IDWR to shut down the farmers of southeast Idaho, dry up hundreds of thousands of already planted acres & ruin the livelihood of this entire section of the state with what seemed like nary a concern does not make me feel he has any concern AT ALL for the people of the Big Lost River Valley. I also am concerned about the representation we are getting from our state legislators in this matter.

Sincerely, Holly Seefried

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cc

Sen. Christy Zito

Rep. Robert Beiswenger

Rep. Faye Thompson