APR 1 0 2025

Idaho Department of Water Resources

c/o Brian Ragan PO Box 83720 Boise, Idaho 83720 4/2/2025

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To Director Mathew Weaver,

We are writing to strongly oppose the inclusion of groundwater from the Portneuf Tributary areas as contributors to the Snake River Aquifer. This proposal is premature and built on incomplete scientific evidence, raising serious concerns about its potential impact on our water management strategy.

Studies conducted in various parts of the country have demonstrated that groundwater moves at an exceptionally slow rate, often as little as a foot per year. On the usgs.gov website we read, "The movement of ground water normally occurs as slow seepage through the pore spaces between particles of unconsolidated earth materials or through networks of fractures and solution openings in consolidated rocks. A velocity of 1 foot per day or greater is a high rate of movement for ground water, and ground-water velocities can be as low as 1 foot per year or 1 foot per decade". This crucial finding highlights the need for similar rigorous scientific investigation in the Portneuf area to determine how groundwater behaves locally. Without clear, site-specific data proving that groundwater in this region flows toward the Snake River Aquifer in significant quantities, classifying it as a tributary is unfounded and irresponsible.

It is important to note that groundwater can flow in many different directions within the same drainage area. A clear example of this can be observed in the surface water of the Portneuf drainage area. Here, the Portneuf Marsh Valley Canal flows south from McCammon Idaho, while the Portneuf River flows north from McCammon. This contrast highlights the complex and variable nature of hydrological systems in this region, emphasizing the need for thorough consideration of such dynamics in any evaluation or decision-making process.

Moreover, the rate of groundwater movement in the Portneuf area remains poorly understood due to its complex geological conditions. Decision-makers cannot responsibly proceed without this critical information, as the inclusion could disrupt natural hydrological balances and harm farms that rely on the Portneuf drainage.

Adding to these concerns is the lack of reliable acre-foot measurements quantifying the actual contribution of the Portneuf drainage to the Snake River Aquifer. This gap in data underscores the recklessness of moving forward without proper research. Accurate and comprehensive measurements must be prioritized before any decisions are made.

This proposal dismisses the importance of scientific rigor and accountability in water resource management. We demand that all plans for inclusion be suspended until extensive and conclusive studies are conducted. Decisions of this magnitude must be informed by factual evidence, not assumptions or speculation. Failing to adhere to proper practices may affect the stability of water systems and impact communities and farms relying on these resources.

Another big concern came from a comment during the March 25 meeting, a gentleman shared his experience of attempting to transfer water from the Chesterfield, Idaho area to the Aberdeen, Idaho area. He mentioned that the Idaho Department of Water Resources (IDWR) had informed him that the groundwater from the Portneuf drainage did not flow through Inkom, Idaho and was distinct from the Snake River aquifer. If the Portneuf area is now considered a tributary, along with other tributaries, it could potentially open discussions to allow groundwater users to relocate wells anywhere on the Snake River Aquifer.

Designating the underground water in the Portneuf area as a tributary of the Snake River Aquifer could have serious negative impacts on local farmers, threatening their livelihoods and disrupting the agricultural systems that support our community. Furthermore, such a designation would not provide any clear benefits to the Snake River Aquifer itself, making this change both unnecessary and potentially harmful.

In short, this proposal to classify Portneuf groundwater as a tributary is misguided and premature. We urge decision-makers to reject it outright until thorough research provides a sound basis for such determinations.

Referenced:

https://pubs.usgs.gov/circ/circ1186/html/gen_facts.html#:~:text=A%20velocity%20of%201%20f oot,about%2016%20miles%20per%20day

Sincerely,

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