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DEPARTMENT OF  
WATER RESOURCES

From: Upper Big Lost River Ground Water Association  
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April 20<sup>th</sup>, 2017

To: Director Gary Spackman  
Idaho Dept. of Water Resources  
322 East Front Street  
P. O. Box 83720  
Boise, Idaho 83720-0098

Re: Petition to Designate Big Lost River Basin as a Critical Ground Water Management Area or Ground Water Management Area

This opposition to the designation of the Big Lost River Basin as a Critical Ground Water Management Area or Ground Water Management Area was prepared and is respectfully presented to the Director of the Idaho Department of Water Resources by the Upper Big Lost River Ground Water Association LLC (UBLRGWA).

The Upper Big Lost River Ground Water Association was conceived and registered with the State of Idaho by members who were formerly constituents of the Big Lost River Ground Water District. The Association was formed with the mission and goals in line with the Ground Water District, Irrigation District and other entities, but with a commitment within its by-laws of policies and approach allowing equal representation amongst members, minimal infrastructure, and appropriate taxation to achieve its function.

In principle, the Association agrees with the Ground Water District and others to oppose the petition currently under consideration to make the Big Lost River Basin (WD34) a Critical Management Area. The Association members feel the petition to designate the Basin a Critical Management Area is based on an emotional response and lacks sufficient empirical data on which to base a decision. The petition does bring to the forefront obvious public concern regarding the water resource situation in the basin.

The Association is concerned that the IDWR letter announcing the prehearing for consideration of designation of a Critical Ground Water Area now includes an additional petition to designate the Basin as a Ground Water Management Area as an alternative to the Critical Ground Water Area petition. The Association hereby petitions the Director to delay the decision of designating WD 34 Basin *any* Management Area. The petition to designate the Basin as a Ground Water Management Area has only been submitted to avoid having the Basin Designated as a Critical Water Management Area. The Association feels the parties can, in a collaborative manner, develop a plan to manage the resource without the bureaucratic burden of an additional Management Area designation.

The Association endorses a collaborative approach to the water resource issues in the Big Lost River Basin involving all responsible water management entities and individual water users as the best methodology to developing a plan to manage, stabilize, and improve the water resource, but with the collaboration effort lead by an independent arbitrator, or committee, thereby eliminating any single entity from controlling the outcome for vested interests. The Association promotes the collective effort of all involved and affected to aggregate accurate data, to work collaboratively and to develop a plan which best serves *all* interests. The Association requests the Director to allow those interested, involved and affected to develop a timeline, which will outline the deliverables with calculated timeframes in which to deliver specific components of data and factual variables to be considered in developing a plan or grounded decisions.

The Association has appointed member Rick Mauthe to represent the Association as a speaker at the upcoming prehearing conference to be held May 3, 2017.

Respectfully submitted on behalf of all members of the Upper Big Lost River Ground Water Association.

Cole Erb  
President  
UBLRGWA

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