

RECEIVED

FEB 24 2011

WATER RESOURCES  
WESTERN REGION

Mary Frisch  
155 S. Prong Horn Dr.  
Boise, ID 83716  
February 23, 2011

IDWR  
Western Region  
2735 Airport Way  
Boise, ID 83705

Re: Protest of Application Permit No(s). 63-33344

To Whom It May Concern:

I am writing this letter to protest the approval of application 63-33344. It is my understanding that several criteria are evaluated when reviewing a water rights application. These include but are not limited to addressing the question of whether or not the proposed water right would cause injury to existing/senior water rights users and ensuring, prior to approval, that the water supply is sufficient for the proposed uses or sufficient enough to at least provide for a margin of error given the ability of the aquifer to recharge.

At present there is a significant lack of scientific data regarding aquifer recharge/discharge, and characterization of the underlying geology influencing the flow of water in the area of the proposed development. In addition, the cumulative impacts of all of the developments being proposed along the I-84 corridor between Boise and Mountain Home do not seem to be well understood at this time. The proposed uses outlined in this and other applications for water rights to sustain large scale development in the area represent an unprecedented increase in the water use – unlike anything that has been seen in documented history.

While much weight has been given, by this and other applicants, to the trends indicating that the water levels in the Mayfield area are either stable or slightly increasing, the IDWR memo “Evaluation of SPF Report Entitled *Ground Water Supply Evaluation for the Mayfield Townsite Property*” dated February 10, 2009 indicates that the significance of this trend should not be overemphasized. Historically the aquifer in the area of concern has not been subjected to the significant withdrawal volumes like the ones being proposed and such a dramatic increase in ground water use may, as stated in the memo, have the potential to create a declining trend on the order of what has been seen in the Cinder Cone Butte Critical Ground Water Area.

It is further noted in the aforementioned memo that while 16 wells were evaluated for the Mayfield Townsite evaluation, only three of these wells had data up through 2007 and of these three, one showed declining levels. It is also stated that the approval of water right #63-32225 (for Mayfield Springs with points of diversion in Ada County and place of use (as I understand it) very close to the area in question) may have already caused the water

[Recipient Name]  
February 23, 2011  
Page 2

resource to be fully allocated and that further withdrawals may result in mining of the aquifer. In light of these concerns regarding the ability of the water resource to recharge sufficiently to sustain such large scale development, I feel that it would not be protective of the people already living there to approve this water rights application in an area where uncertainty is the only certainty that we have at this time regarding available water resources.

Thank you for your consideration in this matter.

Sincerely,

*Mary Frisch*

Mary Frisch

Enclosure – required \$25.00 fee.

No phone #  
found.

\$25 - received 2/24/2011 by: ~~DB~~ W039010