Karl

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MAR 18 2004
Department of Water Resources

VERNON RAVENSCROFT

1328-B Shoestring Road
Bliss, Idaho 83314

(208) 837-4936

Mr. Karl J. Dreher
Director Idaho Dept. of Water Resources
1301 North Orchard St.
P.O. Box 83720
Boise, Idaho 83720-0098

March 16, 2004

Dear Mr. Dreher,

By this letter I confirm that Bryan Ravenscroft, by provisions of my Last Will and Testament is the designated successor to all of my property which is located south of the Shoestring Road in section 32, T6S- R14E and the appurtenant water right #37-7343.

This property is located in water district 37 and was recently annexed by your action into the North Side Ground Water District. We approved of this annexation because we actively support the management changes, recharge efforts and any other constructive activities, which can potentially improve and/or restore the levels of our aquifer resource.

Sincerely,

Vernon Ravenscroft

Vernon Ravenscroft

BRYAN RAVENSCROFT
1328 A SHOESTRING ROAD
BLISS, IDAHO 83314
208-837-4802

Mr. Karl J. Dreher
Director Idaho Dept. Of Water Resources
1301 North Orchard St.
P.O. Box 83720
Boise Idaho 83720-0098

March 16, 2004

Dear Mr. Dreher,

This letter is provided in behalf of Vernon Ravenscroft owner of water right 37-7343 and myself as the designated successor to this right.

We contest the actions you took on February 25, 2004 regarding water rights No. 36-15501, 36-02551 and 36-07694 as they pertain to us and our water right 37-7343.

We con test your action on three grounds:

1. We are located in the western portion of basin 37. All documentation from USGS water supply paper 1654 plate 4 onward shows that our water cannot be delivered to Rangen. This impossibility of delivery excludes us from Rangen call because we are not "interfering with and impacting (Rangen) water rights."
2. All spring water rights in the Hagerman Valley should be based on the historic water flows from 1880 to 1910. It is well documented that increases in flows and water rights granted on those increases come from canal water usage on the plateau above the aquifer. These canal-induced increases should be declared to be canal wastewater and not natural groundwater as your department is doing. Waste water rights as you know are not guaranteed to be delivered and can be reduced or eliminated by more efficient upstream use of the canal companies and their shareholders. Hagerman Valley spring flows are to this day above the 1880 to 1910 natural flow, so no impairment can be shown.
3. In other areas of the state, when drought reduces surface or groundwater levels, the State of Idaho position has been (i.e. around Arco) that the water right owners had to go after their water by drilling wells and/or deepening their existing wells. They could still have their water, but the elevation of it was not guaranteed, nor was the economic viability of pumping it out at that level. This same policy has been applied to individual magic valley pumpers whose wells have dried up. This precedent is particularly applicable to the Rangen rights because this water is produced primary from a man made tunnel and not from a natural spring. This precedent setting situation indicates that the Hagerman Valley spring owners must drill wells to get their water until recharge efforts and weather changes refill the aquifer to former elevations. The state is not being consistent in their application of water law in Idaho.

Sincerely,

Bryan Ravenscroft

Bryan Ravenscroft