

David R. Callister  
1454 W 3700 N  
Howe, ID 83244  
208-767-3010

Idaho Department of Water Resources  
Attn: Renea Ridgeway  
208-287-6700

To Whom it may Concern,

Thank you for the step back in the process of changing rule 50 to allow more public input. As President of the Lost Rivers Farm Bureau, I represent over 100 farm families in the Big and Little Lost River Valleys. I would like to comment on the following petition:

**BEFORE THE DEPARTMENT OF WATER RESOURCES  
OF THE STATE OF IDAHO**

IN THE MATTER OF PETITION TO AMEND	)	
RULE 50.01 OF THE CONJUNCTIVE	)	<b>Docket No.</b>
MANAGEMENT RULES (37.03.11)	)	
	)	<b>CLEAR SPRINGS FOODS, INC.'S</b>
	)	<b>PETITION TO AMEND RULE 50</b>
	)	

I have the following concerns:

1. Districts 33 and 34 had no representation in the modeling committee.
2. I am left with the impression that there was an attempt to put one over on us. By this I mean the Public Notice was given on a website that while open to the general public is not trafficked much.
3. I am unclear of the ramifications of the rule change. Is this a attempt to tax me (pay for mitigation) or is someone trying to shut off my water?
4. After visiting with some Hydrologists and other more familiar with the Modeling Committee, it is my understanding the model lines where moved to the Mackay Dam in the Big Lost and the Blaine Canal diversion in the Little Lost for ease of surface water measurement. Why should the boundary of the common water in the aquifer (Rule 50) be changed to reflect a model input value?

5. In order to be considered part of the common water in the Eastern Snake Plain Aquifer (ESPA) the area must give water to and be able to take water from the Snake River. The water table in the Big and Little Lost valleys is above the level of the common water. We may be able to contribute water to the ESPA, but we can not take water from it.
6. If we are to be considered part of the ESPA because we can contribute to it. Why aren't the Big Wood, Little Wood, Birch Creek, Camas Creek, Teton River and Blackfoot River included also?
7. In listening at the meetings I have attended. I get the feeling that we are getting the horse before the cart. This is a computer model, has it been run? What are the impacts on the trim lines if the new model is run? Why haven't we seen a map showing the new trim lines?
8. I am confused by the "science." As a child I was told the water at Thousand Springs was from the Lost Rivers sinks. Later I was told that was a myth, because dyes had been placed in the water that never made it to Thousand Springs. Now I am being told the dyes were a myth. Which is it? What facts or new knowledge is being used to back this up?
9. The INL claims the ground water under the site is perched. That the radioactive plume isn't moving. If this is the case how does water get from the Little Lost Valley to the Snake River? The INL site completely blocks our valley's opening to the desert.
10. The Big Lost River used to sink at the mouth of the Little Lost Valley. The INL now sinks any water leaving the Big Lost Valley before it can cross to the Little Lost. Is this because water at the old sink would move the radioactive plume? If this is the case then do we want more water leaving the Little Lost? I am still confused about the how this concern impacts the previous concern (#6). Which is true?
11. While some farms in the Little Lost use ground water as their only source of irrigation water, many of the farms use surface water as the main source of irrigation and when the river becomes "lost" in the late summer they use ground water to finish the crop. Will the model treat supplemental wells different than source wells?
12. I am concerned when I hear that the Model treats the aquifer as homogenous while there is evidence of perched areas and other barriers throughout the aquifer. How does this play out for a well a 100 miles away from the call and a 100 miles north of the river compared to a well that is 100 away from the call and a mile away from the river?
13. I have been made to feel that because I am a water user (farmer) that I am too dense to understand the complexities of the aquifer. Yet there hasn't been very much effort to explain to lay people the "science" behind the model. And after listening to the descriptions of the way decisions were made in the committee there is as much politics as science in the decisions.

Because of these concerns, I believe the best course of action at this point to reject the petition from Clear Springs. The next best course of action would be to exclude the Big and Little Lost Rivers from the area of common water (Rule 50). Thank you for the opportunity to give input.

Sincerely,

A handwritten signature in cursive script that reads "David R. Callister". The signature is written in dark ink and is positioned above the typed name.

David R. Callister  
President Lost Rivers Farm Bureau