[redacted]
Howe, ID 83244
June 13, 2014

RECEIVED
JUN 13 2014
DEPARTMENT OF
WATER RESOURCES

Idaho Department of Water Resources
PO Box 83720
Boise, ID 83720-6700

Dear Director,

In the matter of the proposed rule change for conjunctive use rules for the East Snake Plain Aquifer (ESPA). I am concerned about adding the lands outside of the area of common ground water supply. This area may and probably does contribute water to the ESPA, but as the water pumped in these areas can be from higher elevations than the ESPA they have no way to make calls on junior users in the common ground water supply.

I also see a discrepancy by only adding, at this time, those areas that are easily measured. In particular the Big Lost below the Mackay Dam and the Little Lost below the river gauge. This seems to be singling them out for being more accurate with their water. The Big Wood and Little Wood Basins also contribute to the ESPA in the same manor, but are not being proposed to be added at this time. If it is necessary for all water sheds that contribute to the ESPA be included in the ESPAM 2.1 for mitigation and other purposes, the areas outside the common ground water supply should all be added at the same time.

Therefore, of the three options described at the Arco meeting, the only option that is fair and equitable to all the tributary basins is waiting until such time that they can all be added simultaneously. By doing this, there are less opportunities of the action being perceived as showing favoritism of one basin over another. Thank you for the opportunity to comment on this matter.

Sincerely,

David R. Callister