

MA. Rigby

1 - Not reliable in Little Lost -

Reasoning: Uncertainty not tested - further from river = more uncertainty

A - The model cannot reliably simulate the timing or location of the effects of ground water pumping or curtailment occurring within the boundary extension.

B - The uncertainty gets greater the further away from the Eastern Snake Plain Aquifer (ESPA)

C - Until an appropriate uncertainty analysis has been performed on the current model, it should not be used as a tool to administer ground water rights in the expanded boundary respecting the Little Lost River.

2 - Futile call

Reasoning: too small amount of water and late effects with little or no benefits seen by downstream users

A - In fifteen years there would only be a gain of 10 cfs

In 150 years there would only be a gain of 21 cfs

Definition of futile call:

In reasonable time is the water going to benefit downstream users?

Just a waste of water with economic impact to the Little Lost farmers

3 - Arbitrary

Reasoning: Random

A - Include all or none.

B - By amending the boundary to just include the Little Lost/Big Lost/Rexburg bench/Oakley Fan is indiscriminant. This new boundary fails to incorporate other tributaries that are known to contribute just as much or more water to the Eastern Snake Plain Aquifer. (Raft River, Island Park, Willow Creek, Teton, Fairfield, Blackfoot, Ross Fork, Big Wood and Little wood, Birch Creek, Portneuf, Medicine Lodge, Beaver Creek, Camas Creek, Ashton, South Fork, South Fork Palisades, Goose Creek above dam, Lincoln Fork) There could be more than listed.

Therefore the boundary change should exclude the Lost Rivers aquifers, and, until beneficial use can be proven to occur in Snake River Springs resulting from curtailment of Lost Rivers water, we should never be considered for boundary inclusion.

Sincerely
Roger Toller
Watermaster District #34