



State of Idaho

DEPARTMENT OF WATER RESOURCES

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BRAD LITTLE
Governor

GARY SPACKMAN
Director

July 1, 2021

Ryan Christensen
1747 Rich Road
Grace, ID 83241

RE: Application for Transfer 84789

Dear Mr. Christensen:

On March 10, 2021, you filed Application for Transfer 84789, proposing to change the point of diversion and place of use for a 20-acre portion of water right 13-7147. The 20-acre portion would be combined with water rights 13-2269 and 13-8054 to irrigate 263 acres within a 320-acre permissible place of use.

According to the application, the 20 acres to be moved will be dried up. The 20 acres to be moved, however, are rock piles currently located under two existing center pivots. If the acres are dried up, they cannot receive any water from the center pivots, regardless of whether the 20 acres are planted in crops or remain as rock piles. If the 20 acres continue to be irrigated, this would result in an enlargement of the water right 13-7147 and Application 84789 could not be approved.

The Department cannot allow a water user to transfer water rights off of acres beneath a center pivot unless there is persuasive evidence that the acres will no longer be irrigated. This letter is intended to be a formal request for specific information about how the 20 acres will be dried up. Please provide evidence that the center pivots in Section 28, T09S, R40E are currently automated and programmable to activate and deactivate individual sprinklers as the pivots go around. Further, please provide evidence that the irrigation systems in Section 28 are designed to handle the differences in pressure caused by turning off individual sprinklers. The east pivot, for example, will have areas where more than half of the quarter-mile pivot span will be shut off at one time to avoid irrigating the acres proposed to be dried up.

Finally, to ensure that the 20 acres are dried up as promised, if the transfer is approved you will be required to install a flow meter and data logger on each pivot in Section 28. The flow meters and data loggers will record the gallons per minute distributed by each pivot on a real-time basis. As the pivot crosses over areas that have been dried up, sprinklers will automatically be shut off and the gallons per minute supplied by the pivot will be reduced. The data loggers will preserve a record of the gallons per minute distributed by the pivots every 15 minutes. On or before December 15th every year, you will be required to submit a report of the diversion data collected for each pivot. The Department will then be able to confirm that the 20 acres remain dry.

Please provide the additional information (design specifications for automated, programmable pivots and design specifications for system pressure) within 60 days. If the additional information is not provided by the end of August 2021, the Department will complete its review of Application 84789 with the information in the application file. As noted above, there are significant enlargement concerns with your proposal to dry up acres under existing center pivots. Free to contact me if you have any questions.

Sincerely,



James Cefalo
208-525-7161