



State of Idaho

DEPARTMENT OF WATER RESOURCES

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BRAD LITTLE
Governor

GARY SPACKMAN
Director

April 20, 2021

THE VALLEY CLUB INC
PO BOX 252
SUN VALLEY, ID 83353

RE: 2020 Annual Report for Water Rights 37-494, 37-495, 37-577BU, 37-577BV, 37-833K

Water Right Holder:

This letter is in response to the 2020 Aquifer Recharge Annual Water Use Report ("Report") submitted to the Idaho Department of Water Resources ("the Department") dated December 30, 2020. The Department has reviewed the information in the annual report detailing daily infiltration volumes utilizing water authorized by water rights 37-494, 37-495, 37-577BU, 37-577BV, and 37-833K. It is reported that 5.3 acre-feet ("AF") of water was infiltrated prior to June 1, 2020, 5.7 AF infiltrated during June 2020, and 2.8 AF infiltrated during July 2020. The total water infiltrated during the 2020 season is reported as 13.8 AF.

Condition seven (water rights 37-494, 37-495, 37-577BU, and 37-577BV) and condition ten (water right 37-833K) states:

"Rights 37-494, 37-495, 37-577BU, 37-577BV, and 37-833K are limited to a combined diversion rate of 0.59 cfs and a combined diversion volume of 12.8 acre-feet for ground water recharge between March 15 and October 31 each year. No more than 5.1 acre-feet of ground water recharge shall occur prior to June 1 each year."

The 2020 reported volume total exceeds the limited combined diversion volume for ground water recharge of 12.8 AF for water rights 37-494, 37-495, 37-577BU, 37-577BV and 37-833K by 1.0 AF (approximately 8% of the total annual allotted volume).

The reported total infiltration volumes attributed to ground water recharge at The Valley Club Inc.'s recharge site from 2014 to 2020 (data obtained from reviewing previous year's annual report submittals) are as follows:

Water rights 37-494, 37-495, 37-577BU, 37-577BV and 37-833 K				
Volume Infiltrated for Ground Water Recharge in Acre-Feet				
Year	**Pre June 1st Totals	Pre June 1st Percent Exceedance	*Total Annual Volume	Total Annual Volume Percent Exceedance
2014	0		13.1	2%
2015	3.6		15.5	21%
2016	6.5	27%	13.1	2%
2017	3.6		13	2%
2018	5.1		13	2%
2019	2.2		13.7	7%
2020	5.3	4%	13.8	8%
*Limited Combined Diversion Volume for ground water recharge annually is 12.8 AF				
**Limited Pre June 1st volume is 5.1 AF				

It appears that the combined diversion volume limitation for ground water recharge of 12.8 AF for the above mentioned water rights has been exceeded each year dating back to 2014. In 2016 and 2020, more than 5.1 AF of ground water recharge occurred prior to June 1st.

The Department sent a letter on July 9, 2020, in response to the 2019 Annual Report for Water Rights 37-494, 37-495, 37-577BU, 37-577BV, and 37-833K dated January 20, 2020, recommending that conditions of approval for the above mentioned water rights be reviewed with expectations of future annual report submittals demonstrating compliance with the above mentioned condition.

In reviewing the 2020 Report it appears that some of the reported data are observed values and some are calculated. It may aid the Department's annual review if with future reports that some context be given with regards to how the data is collected and reported, and any explanation as to why exceedances may be occurring.

The Department understands that the letter sent on July 9, 2020, was likely received after infiltration had ceased for the 2020 season, and asks that the 2021 annual report and all subsequent annual reports reflect compliance with the conditions of approval for Water Rights 37-494, 37-495, 37-577BU, 37-577BV, and 37-833K.

Please contact me at ashley.ritter@idwr.idaho.gov or (208) 287-4907 if you have any questions regarding this matter.

Sincerely,



Ashley Ritter
Associate Engineer

Enclosure

2020 aquifer recharge annual water use report

CC: Zach Latham- Brockway Engineering
Kevin Lakey- Water District 37