

MEMORANDUM

Date: December 28, 2020

To: Transfer 84206

From: Adam Frederick

Re: Comment/Analysis

Comment/Analysis
12/28/2020

During review of this transfer it was determined errors occurred during a previous transfer, 78707 in 2013. Transfer 78707 proposed to add all of the City of Lewiston wells to all existing groundwater rights. Water Rights 85-4019 and 86-4032 were developed using a single well each which diverted water from the Wanapum Aquifer. All other rights held by the city were developed from the deeper Grande Ronde Aquifer. Separate aquifers are considered to be separate sources and thus cannot be transferred. Transfer 78707 was approved showing all wells being identified on all of the cities rights. The current transfer, 84206, proposed to add a new well to all of the City of Lewiston rights which would be drilled into the Grande Ronde Aquifer. Water Rights 85-4019 and 86-4032 will not be approved for the new City of Lewiston Well 7. Those rights originate from the Wanapum Aquifer and should not be approved for a well using the Grande Ronde Aquifer. Because Transfer 78707 was approved showing the cities previous 6 wells, the department will not remove them during this transfer.

1/6/2021

It was determined that Water Rights 85-4019 and 86-4032 would be excluded from adding well 7. Because no elements of 86-4032 were being changed, it was removed from the transfer. The transfer approval will not include 86-4032 and notice will be given on the approval cover letter.

There was a discrepancy with Water Right 85-4019 where the municipal diversion rate was listed as 2.3 cfs with the overall total diversion rate of 1.5 cfs. This appeared to a data entering error during SRBA and was decreed with those diversion rates. The City of Lewiston was asked if they would supply notice acknowledging the error and giving permission to correct it during this transfer process. The city supplied a letter from the mayor and city council giving IDWR approval to correct the municipal diversion rate to 1.5 cfs.