

Memorandum

To: Debbi Judd & WR File #22-13717

From: Manuel Rauhut

Date: 11/6/2020

RE: Review of condition on permit related to reporting requirements

On November 2, 2020, IDWR received proof of beneficial use and a water right report from Robert Heuseveldt, the City of Victor's (City) City Engineer. The permit included the following condition:

"In connection with the proof of beneficial use submitted for this permit, the permit holder shall also submit a report showing the total annual volume, the maximum daily volume, and the maximum instantaneous rate of flow diverted from the point of diversion authorized for this permit during the development period. The report shall also show the maximum instantaneous rate of diversion, either measured or reasonably estimated by a qualified professional engineer, geologist, or certified water rights examiner, for the entire City of Victor municipal water system. The report shall also describe and explain how water diverted under this permit provides an additional increment of beneficial use of water for the City of Victor municipal water system as opposed to an alternative point of diversion for prior water rights already held and used by the City of Victor for its municipal water system."

Review:

- **Annual volume:** one full year of data is provided in the report. No other annual volumes because the North Well (POD for this permit) wasn't incorporated into the system until August 2019.
- **Maximum daily volume:** Provided (674,483 gallons on August 19, 2020)
- **Maximum instantaneous rate of flow:** IDWR measured the maximum instantaneous rate of flow in conjunction with 22-13265. The permit holder does not have a flow meter that shows the instantaneous rate, but given that IDWR measured the flow rate during the development period of this permit, we know that at least 5.65 cfs have been diverted through this POD. The City Engineer also provides a reasonable estimate of the instantaneous rate the city would use based on different scenarios within their water system.
- **Additional increment of beneficial use:** The City Engineer provides reasoning and an estimate of the additional increment of beneficial use. My review was not sufficiently in depth to determine if the amount specified (2.29 cfs) is appropriate, but the information does meet the intent of the condition.

Conclusion:

- The City of Victor complied with the condition quoted above. Based on the fact that a field exam for this POD has already been performed in May 2020 I recommend assigning the licensing review to the same staff member and it may not require a field exam.