

MEMORANDUM

Date: July 3, 2019
To: Transfer 83290
From: James Cefalo
Re: Review & Evaluation of Sufficiency of Information

This transfer proposes to add a point of diversion to the City of Ammon's municipal system. Currently the City has ten interconnected wells on its system. The City would like to drill a new well on the south side of its delivery area. All ten of the City's existing wells are listed on all eighteen of the City's ground water rights. The new well will be included on all of the City's rights. Even though the Application states that the new well will only divert 2,600 gpm (5.8 cfs), the City paid the filing fee for the full rate authorized by the City's eighteen rights (30.53 cfs). Therefore, the approval will not contain any rate limit for the new well.

Authority to File: City of Ammon is the owner of record for all of the water rights included in the application. Application was filed and signed by Rob Harris, who represents the city in water right matters.

Water Right Validity: Water rights are valid. Rights were decreed in 2002 or 2005 or were licensed in the 1990s. Based on measurement records, the City has diverted water for municipal purposes continuously since those dates.

Injury to Other Water Rights: No issues identified. Application included an analysis using the Department's transfer tool for the ESPA model. Because the City has ten existing wells, the Applicant used a weighted centroid approach for determining the FROM cell for the model. This same cell (R75, C163) also contains the city well located farthest from the proposed point of diversion. Therefore, the modeling would have been identical even if the City evaluated the worst case scenario. The City ran the model based on a volume of 1,396 af per trimester (the volume produced by pumping 5.8 cfs continuously for an entire year). I prepared a model analysis to check the city's numbers. Because the City is not proposing a volume or rate limit at the new well, I decided to run the model analysis using the full volume authorized by the City's rights. Ten of the City's eighteen rights are limited to the irrigation season and carry volume limits, the remaining rights have no volume limit. In total, the City could divert 20,676 af per year (6,890 af/trimester). Even with the full authorized volume, the transfer does not generate a mitigation requirement under the Department's transfer tool.

Application was advertised state wide and no protests were filed against application. Watermaster for WD 120 does not oppose the application. A previous application filed by the City was protested and resulted in certain conditions being added to the water rights. These injury prevention conditions were carried forward on the current approval document.

Enlargement of Use: No issues identified. Some additive combined limit conditions were removed from the rights to simplify the rights. Conditions related to previously approved offsetting transfer packages were also removed from the rights.

Local Public interest: No issues identified.

Beneficial Use/Conservation of Water Resources: No issues identified.

Review of the application finds there is no clear inconsistency with criteria set forth in Section 42-222 Idaho Code preventing processing of this application.

One-Way Analysis of Independent Transfers

Application for Transfer 83290 (City of Ammon):

WR No.	Div. Rate (CFS)	Con. Vol. (AFA)	No. of Irr. Acres	Priority Date	POD Location	Dedicated Vol. AFA/ AFT		Model Node
Transfer 1: Proposed Steady State Impacts following Transfer								
???	???	275.6	68.9	1/1/1960	8S26E-3	275.6	91.9	SP082075
???	???	275.6	68.9	1/1/1960	8S26E-3	275.6	91.9	SP068066
Transfer 1: Worst Case Transient State Impacts following Transfer								
???	???	275.6	68.9	1/1/1960	8S26E-3	275.6	91.9	SP082075
???	???	275.6	68.9	1/1/1960	8S26E-3	275.6	91.9	SP068066

Impact by Reach (AF/Annum)											
Ashton to Rexburg	Heise to Shelley	Shelley to Nr Bickft	Nr Bickft To Neeley	Neeley to Minidoka	Dev. Wbl. To Buhl	Buhl to Kspr	Kspr	Kspr to Malad	Malad	Malad to Bancroft	
187.40	2870.24	1355.64	2310.92	13.56	43.15	49.06	21.79	13.74	12.58	0.78	
185.29	2,728.61	1,471.29	2,337.25	13.71	43.62	49.59	22.02	13.89	12.71	0.79	
187.40	2,870.24	1,355.64	2,310.92	13.56	43.15	49.06	21.79	13.74	12.58	0.78	
185.57	2,868.39	1,471.29	2,337.25	13.71	43.62	49.59	22.02	13.89	12.71	0.79	

Steady State Analysis	Mitigation Check 1 - >10% of Historical:	-1.1%	-4.9%	8.5%	1.1%	1.1%	1.1%	1.1%	1.1%	1.1%	1.1%
	Mitigation Check 2: > 6 AF/A:	-2.1	-141.6	115.7	26.3	0.1	0.5	0.2	0.1	0.1	0.0
	Mitigation Check 3 - >10% of Total:	2.7%	39.7%	21.4%	34.0%	0.2%	0.6%	0.7%	0.3%	0.2%	0.0%
	Mitigation Required?:	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO
	Mitigation Vol. Req'd (ac-ft):	-2.1	-141.6	115.7	26.3	0.1	0.5	0.2	0.1	0.1	0.0
Transient State Analysis	Mitigation Check 1 - >10% of Historical:	-1.0%	-0.1%	8.5%	1.1%	1.1%	1.1%	1.1%	1.1%	1.1%	1.1%
	Mitigation Check 2: > 6 AF/A:	-1.8	-1.8	115.7	26.3	0.1	0.5	0.5	0.2	0.1	0.0
	Mitigation Required?:	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO
	Mitigation Vol. Req'd (ac-ft):	-1.8	-1.8	115.7	26.3	0.1	0.5	0.5	0.2	0.1	0.0

Read Me