

## **MEMORANDUM**

**Date:** September 27, 2018  
**To:** Transfer 82620  
**From:** Michael Holliday  
**Re:** Review & Evaluation of Sufficiency of Information

Applicants seek to change the point of diversion for a 17.3 acre portion of right 34-13984 in anticipation of a future ownership change.

**Authority to File:**

Department records show the applicants as the current owners of the right being transferred, and Butte County taxlot data show them as the current owners of the proposed point of diversion.

**Water Right Validity:**

The right included in this transfer was decreed in the SRBA in 2002. Aerial imagery from 2009, 2011, and 2013 shows evidence of growing vegetation on the place of use. Evidence of irrigation is less obvious in other photos, but five consecutive years of non-use was not confirmed. Therefore, right 34-13984 appears to be a valid right.

**Injury to Other Water Rights:**

An ESPA model run is not required for this transfer because the current and proposed points of diversion are located in adjacent model cells. Other rights will not be injured by the proposed change because the quantity authorized to be diverted will not change as a result of the transfer. The application was advertised and no protests were filed. The Water District 34 Watermaster reviewed the application and did not oppose its approval.

**Enlargement of Use:**

The proposed change will not result in enlargement because the total acreage, diversion rate, and volume authorized for irrigation under the right will not increase.

**Local Public Interest:**

No issues identified.

**Beneficial Use / Conservation of Water Resources:**

No issues identified.

**Effect on Economy the Local Area:**

No issues identified.

**Effect on Agricultural Base of the Local Area:**

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.