



State of Idaho

DEPARTMENT OF WATER RESOURCES

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C.L. "BUTCH" OTTER  
Governor

GARY SPACKMAN  
Director

August 30, 2018

SCHIESS & ASSOCIATES  
ATTN PAUL SCORESBY  
7103 S 45<sup>TH</sup> W  
IDAHO FALLS ID 83402

RE: Field exam report for water right permit 21-13209

Dear Mr. Scoresby:

I have reviewed the field exam you supplied for water right permit 21-13209. Unfortunately, there are few issues that I will need to have clarified before I can move forward with licensing this water right. The issues are as follows:

To measure the flow rate, you referred to a calibrated electromagnetic flow meter. However, you did not provide any pictures of the meter reading taken, who calibrated the flow meter, or field notes discussing the location and measurement taken. The Idaho Administrative Code Beneficial Use Examination Rules, IDAPA 37.03.02.040.03 states the following:

**03. Measurements.** Water measurements may be made by vessel, weir, meter, rated flume, reservoir capacity table or other standard method of measurement acceptable to the Director. The field report shall describe the method used in making the measurement, the date when made, the name of the person making the measurement, the legal description of the location where the measurement was taken and shall include sufficient information, including current meter notes, rating tables, and/or calibration information to enable the Director to check the quantity of water measured in each case.

As you can see from the IDAPA rule shown above, we need some type of verification of the measurement. We do generally accept photos of an installed device, calibration notes, historic meter readings, or your field notes providing how you determined the flow rate from the measurement. The photos you supplied do show the location of the flow meter, but it did not show the meter readout showing the 96 gpm you measured.

To check your measurement, I performed a theoretical calculation based on the 96 gpm with a 5 Hp pump at 54 psi, and the pumping water level required to meet the 96 gpm flow rate would be approximately 20 feet. The static water level in this well is only 19 feet, and the pump is set at approximately 98 feet suggesting a drawdown in the well of approximately 80 feet. It doesn't appear as though the measurement that you took was done under normal operating conditions. Please provide information that clarifies and confirms the flow measurement you took during your field visit.

You provided assumptions on the volumes for the various water uses in your field report, but neglected to provide any information to verify those assumptions. The Idaho Administrative Code Beneficial Use Examination Rules, IDAPA 37.03.02.035.01.j states in part the following:

....For each use of water the examiner shall report an annual diversion volume based on actual beneficial use during the development period for the permit. The method of determining the annual diversion volume shall be shown. The annual diversion volume shall account for seasonal variations in factors affecting water use, including seasonal variations in water availability....

The Idaho Administrative Code Beneficial Use Examination Rules, IDAPA 37.03.02.035.01.l also states the following:

Information shall be submitted concerning the beneficial use that has been made of the water unless the purpose of use is for irrigation. For example, for stockwater use, the number and type of stock watered shall be provided. Similar indications of the extent of beneficial use shall be provided for all other non-irrigation uses

And -- The Idaho Administrative Code Beneficial Use Examination Rules, IDAPA 37.03.02.035.01.m also states the following:

Information on the period during each year that the water is used shall be described for each use.

You gave a volume for each cabin of 0.6 af, which is the volume allocated for a single family domestic home for in-house use only. However, the application for permit and the permit clearly state that these are rental cabins that are subject to seasonal variations in usage of the cabin. The application for permit states that "12-15 nightly vacation cabins to be used majority of the summer and a small use in the winter." Therefore, we cannot accept a standard year round use for an in-house home use when several of the cabins may be empty during a portion of the year.

I have included a copy of the Department's "Non-Irrigation Water Requirement" table used for performing field exams on these types of establishments. As you can see, the cottages with season occupancy allows up to 50 gallons per day per resident. We would need something that provides a similar analysis of the daily and annual water use for these cabins. You can also use the "Non-Irrigation Water Requirement" table or something similar to determine the amount of water use of the shop garage and office/shop based on the workers using those facilities.

The Idaho Beneficial Use Examination Rules 37.03.02.035.02.c states that we can give a certified water right examiner an additional 30 days to supply additional information to clarify the field exam report as stated below.

If the Director determines that a field report prepared by a certified water right examiner is acceptable but that additional information is needed to clarify the field report, he will notify the examiner in writing of the information required. If the additional information is not submitted within thirty (30) days or within the time specified in the written notice, the priority date of the permit will be advanced one (1) day for each day the information submittal is late. Failure to submit the required information within one (1) year of the date of the department's request is cause for the Director to take action to cancel the permit.

Therefore, please supply the above information by September 30, 2018. If you have any questions, please don't hesitate to contact me.

Respectfully,



Daniel Nelson

Staff Hydrologist

Idaho Department of Water Resources

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Enclosure: Non-Irrigation Water Requirements Table