



October 3, 2017

Shelley Keen, Water Rights Section Manager
Idaho Department of Water Resources
322 E. Front St.
PO Box 83720
Boise, ID 83705

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DEPARTMENT OF
WATER RESOURCES

Subject: Petitions for Reconsideration - Permits 63-33210 & 63-33692

Dear Shelley,

On behalf of the City of Boise Parks and Recreation Department, please consider this letter as a petition for reconsideration for water right permits 63-33210 and 63-33692. The permits were issued Preliminary Orders on September 25, 2017. We wish the Department to reconsider the following elements of each draft license as specified below.

Permit 63-33210 (Peppermint Park)

In the beneficial use field report, SPF recommended licensing 0.45 cfs and 22.5 af maximum annual diversion volume for 5 acres of irrigation. In the licensing review, Dan Nelson found 5.8 acres irrigation, rather than 5 acres, and used this amount to justify our requested flow rate. However, the diversion volume listed in Condition 1 on the draft license reflects only 5 acres, listing a limit of 22.5 af annual maximum diversion volume (4.5 afa for 5 acres). To reflect Dan's acreage correction, we petition the Department to change Condition 1 to list 26.1 af as the maximum annual diversion volume limit for 5.8 acres rather than 22.5 af for 5 acres as currently listed.

Permit 63-33692 (Comba Park)

SPF recommended licensing a total of 0.08 cfs and 10.7 afa for municipal use to cover 2 acres of irrigation and a spray park. The recommended 10.7 afa accounted for 9.0 afa for irrigation (4.5 afa for 2 acres) and 1.7 afa for the spray park. The spray park volume was based on operation at 5 hours/day over a 10-hour period from Memorial Day through Labor Day (99 days) which equates to 3.3 af ($0.08 \text{ cfs} \times 99 \text{ days} \times 5 \text{ hrs}/24 \text{ hrs} \times 1.9835$). Based on system design and operation, SPF recommended only 50% of this amount, assuming half is reused in the irrigation system, with the remaining half discharged to City sewer. Currently, Condition 2 on the draft license limits combined annual diversion volume to 9.0 af. We petition the Department to include an additional 1.7 af to account for the spray park water discharged to City sewer. The City is currently optimizing the operation of the spray park reuse system to reduce or eliminate discharge to the City sewer. However, the volume recommended by the examiner reflects use during the permit development period.

As always, SPF appreciates the Department's attention to our concerns. Please call me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lori Graves".

Lori Graves
Water Rights Specialist

Cc: Dee Oldham – City of Boise

SPF file number: 389.0810