

To: File 63-32835 (City of Nampa)
From: Manuel Rauhut
Re: Beneficial Use and RAFN Review
Date: 5/16/2017

Overview:

In a letter, dated November 21, 2016, to the City of Nampa's attorney Christopher Meyer IDWR outlined the following necessary RAFN information that are required as part of the proof of beneficial use statement :

- A revised description of the City's service area
- A revised planning horizon
- An updated analysis of reasonably anticipated future needs, including a gap analysis comparing an updated summary of all the water rights belonging to the City to the updated estimate of reasonably anticipated future needs

These requested items are in accordance with Idaho Code §42-217. The City of Nampa attorney, Christopher Meyer (Givens Pursley, LLP) acknowledged IDWR's request, on December 8, 2016. On February 21, 2017 SPF Water Engineering (SPF) submitted a response by email to the November 21, 2016 letter from IDWR.

The SPF letter includes the following information:

- Overview of the two systems to deliver municipal water supply to its citizens
 - Formerly a separate potable water and irrigation water system that is now interconnected at several locations.
- 2030 Peak Hour/Max Hour Demand for RAFN
- Gap analysis (water needs vs water rights)
 - Potable +Intertie Demand: 51.85 cfs (existing Water Rights: 51.30 cfs; 0.55 cfs difference)
 - Potable +Irrigation Demands: 248.84 cfs (existing Water Rights: 126.84 cfs; 121.25 cfs difference)

RAFN Review:

The SPF email containing the information summarized above does not appear to be intended as a comprehensive response to the requests outlined in the November 21, 2016 letter from IDWR, but rather a brief summary of the City of Nampa's potable and non-potable supply system and a request to meet with IDWR and the City of Nampa's attorney, Chris Meyer.

Items requested by IDWR that are not addressed in the email:

- **A revised description of the City's service area.**
SPF did not include a figure or any type of description of the service area. It is unclear whether

the service area changed since the application was first filed and how combining the potable water supply and the irrigation water distribution system may affect the service area.

- **A revised planning horizon**

The original planning horizon at the time the application was filed was 21 years (2009-2030). The 2017 SPF email specifies 2030 as the continued planning horizon, but does not provide any justification for that date. SPF references a “water master plans” (Master Water Plan?), completed by Keller and Associates in 2014. It would be helpful to attach that report or at least the relevant sections regarding projected demands and how they were derived.

Combining the potable water supply with the irrigation water supply drastically changes the calculations demand and the shortfall. The calculated shortfall of water if you combine the potable water supply with the irrigation water supply is 121.25 cfs. The 5 cfs under this permit would account for only 4.1% of the water needed to fill the gap.

- **An updated analysis of reasonably anticipated future needs, including a gap analysis comparing an updated summary of all the water rights belonging to the City to the updated estimate of reasonably anticipated future needs.**

SPF included the results of their gap analysis, but did not provide any supporting documentation how future demand is calculated and which water rights were included.

Conclusions:

Since the permit application was first filed on August 18, 2007, it appears that City of Nampa’s potable and non-potable (irrigation) water supply system has been modified. The SPF report regarding the City of Nampa’s Potable Water Supply, Water Rights, and Future Demands dated July 28, 2009 did not discuss an interconnected potable and non-potable water system. This issue was not raised during the entire application processing system. The original permit provided no information how this POD would be integrated into the City’s municipal water supply system, but based on the volume requested (5.0 cfs) it is clear that it was not intended to be used for non-potable (irrigation) use. Based on the information SPF supplied to date, it appears that the water right under this permit (63-32835) is being developed, but has deviated significantly from its original intent as an addition to their potable drinking water supply.

IDWR Options Moving Forward

- Notify the City of Nampa that they didn’t meet the requirements of their permit so that the permit lapsed.
- Void the permit because based on the information provided, the nature of the proposed system is significantly different than the proposed system described in the initial application. Note, based on information in the file the current and original system aren’t well described.
- Request a comprehensive RAFN from SPF that satisfies Idaho Code §42-202B.
- Meet with the City of Nampa, their attorney, and SPF to learn more about the overall system and lay out a plan forward.