

MEMORANDUM

DATE: April 27, 2015

TO: Water Right Files 37-8850 and 37-8857

FROM: Shelley W. Keen *SWK*

RE: Phone conversation with Attorney Jim Speck

This afternoon I returned a phone call to attorney Jim Speck, who wanted to discuss his April 24, 2015, letter regarding Permits 37-8850 and 37-8857. I explained to Mr. Speck that I plan to meet tomorrow with other IDWR staff members to discuss his proposal and, therefore, it would be premature for me to provide any specific response until then. I agreed to call Mr. Speck later in the week with more information.

In addition to discussing the extent to which IDWR can apply the benefits of the stub-in practice to the licensing review for these permits, Mr. Speck would also like IDWR to comment on the possibility of one or more additional permits being issued for these subdivisions. He recognizes that the subdivisions are within a moratorium area, and they may also be subject to the recent delivery calls submitted pursuant to the conjunctive management rules. Nevertheless, he thinks his client may want to seek additional permits if the licenses for 37-8850 and 37-8857 cannot cover the entire anticipated beneficial use, i.e. all the subdivision lots.