

Jordan, Blake

From: Peppersack, Jeff
Sent: Wednesday, October 23, 2013 2:58 PM
To: Jordan, Blake
Cc: Cefalo, James
Subject: RE: Idaho Water Co. Application for transfer 29-2523.

Blake,

I agree, a separate aquifer would not be approvable. I was assuming a tributary aquifer. I think the question rises to the level of additional information required. The transfer memo suggests providing 30 days to respond – the application may be rejected if the response is not timely or is inadequate.

Jeff

From: Jordan, Blake
Sent: Wednesday, October 23, 2013 2:47 PM
To: Peppersack, Jeff
Cc: Cefalo, James
Subject: RE: Idaho Water Co. Application for transfer 29-2523.

Jeff,

In the transfer memo Pg 27 it indicates that an application for transfer proposing to change the point of diversion from one distinct aquifer to a totally different aquifer is not approvable. If this is the case then Idaho Water Co. has to first prove that the sources of ground water are the same and then provide an analysis simulating the potential impacts associated with the "from" well outside the model boundary.

The transfer application appears to be filled out correctly but if Idaho Water Co. needs to provide us with additional information I think we will return the application and let them resubmit. Does that sound appropriate?

Blake

From: Peppersack, Jeff
Sent: Wednesday, October 23, 2013 12:22 PM
To: Jordan, Blake
Subject: RE: Idaho Water Co. Application for transfer 29-2523.

Blake,

The reason I asked about the distance is to see if the closest cell is the appropriate analysis. Our policy has been that transfers between the ESPA modeled area and non-modeled tributary aquifers will require separate analysis by other acceptable methods unless the distance is less than 2 cells outside the modeled area. Further distances away from the modeled area will result in delays for impacts to reaches of the Snake River beyond what the model shows.

I don't see the prior transfers as an impediment if they were ultimately approved. The applicant will need to analyze the impacts associated with the "from" well outside the model and appropriate mitigation thresholds as discussed in the transfer memo.

Jeff

From: Jordan, Blake
Sent: Wednesday, October 23, 2013 11:00 AM

To: Peppersack, Jeff

Subject: Re: Idaho Water Co. Application for transfer 29-2523.

Jeff

Downey is approximately 36 miles south of the city of chubbuck. The from well is approximately 30 miles from the model boundary. The three transfers have been approved. One of the main issues the protestants had with transfers 78268 and 78274 dealt with modeling historic water use. I am not in the office at the moment or else I would go into more detail.

Sent from my Verizon Wireless 4G LTE DROID

"Peppersack, Jeff" <Jeff.Peppersack@idwr.idaho.gov> wrote:

Blake,

I haven't looked at the application, but from the description it sounds like the 2 ac-ft per trimester is met after mitigation by reduced pumping. Our current policy requires that if mitigation is necessary, the plan must fully mitigate for impacts. Other questions: how far is Downey from the model boundary? Was 4729 approved? What are/were the protest issues with 78268 and 78274, and have they been resolved?

Jeff

From: Jordan, Blake

Sent: Wednesday, October 23, 2013 9:33 AM

To: Weaver, Mathew; Peppersack, Jeff

Cc: Cefalo, James

Subject: Idaho Water Co. Application for transfer 29-2523.

Mat and Jeff,

Idaho Water Company submitted an application for transfer proposing to move ground water right 29-2523 (132 acres) which is located 2.5 miles NW of Downey Idaho to the City of Chubbuck municipal service area. This transfer proposal is similar to transfer 4729 which involved water right 29-7122 (Meadows Dryland Farms). Water right 29-7122 was recently involved in transfers 78268 and 78274 that was protested.

Idaho Water Co did conduct an ESPA analysis using the nearest active model cell for the "from well". According to their analysis impacts to the ESPA reaches are less than two acre-feet per trimester with an initial pumping reduction limited to 30% of the transferred volume during the first year after transfer.

With the history behind water right 29-7122 and the transfers that have occurred, is this transfer application something that is approvable?

I have attached a copy of the transfer application for you to look at. If needed we could set up a meeting to discuss this application by phone.

Thanks,

Blake

Jordan, Blake

From: Wylie, Allan
Sent: Monday, March 10, 2014 8:55 AM
To: Jordan, Blake
Cc: Vincent, Sean
Subject: RE: Hydrology pertaining to transfer 79001

Blake

I guess that the brief analysis I sent you was unsatisfactory. I didn't hear back from you so I deleted everything. Can you please send me bulleted list I sent you earlier and let me know what additional analysis you need?

Allan

From: Jordan, Blake
Sent: Monday, March 10, 2014 8:13 AM
To: Wylie, Allan
Subject: RE: Hydrology pertaining to transfer 79001

Hi Allen,

I was wondering if you have had the chance to revisit those questions?

Blake

From: Wylie, Allan
Sent: Friday, February 07, 2014 10:33 AM
To: Jordan, Blake
Subject: RE: Hydrology pertaining to transfer 79001

Jordan

My quick response to your questions. I have just received an urgent request I will have to address and probably won't be able to get back to this until Wed. Feel free to contact me whenever, I will get back with you when I can.

Allan

From: Jordan, Blake
Sent: Thursday, February 06, 2014 1:08 PM
To: Wylie, Allan
Cc: Cefalo, James
Subject: Hydrology pertaining to transfer 79001

Hi Allan,

James and myself have come up with some questions for you inquiring about the hydrology in the Downey area (upper Marsh Creek) to the Pocatello area aquifer. Idaho Water Company filed transfer 79001 proposing to move a ground water right from the Downey, ID area to the City of Chubbuck. A copy of the questions along with the transfer application, reports and other correspondence can be found under the (P:) drive.

(P:) bjordan/Transfer 79001 Idaho Water Co.

You can contact James or myself if you have questions about our questions.

Thanks,
Blake

- 1) Is ground water in the Downey area (upper Marsh Creek) tributary to the ESPA as ground water? If not, where does the ground water enter the surface water system?
 - a. I think upper Marsh Cr is tributary to the ESPA.
- 2) Is the Reach of the Portneuf River between the Portneuf gap and ESPA model cell SP0102121 (Including the stretch of river intersecting the cell) a losing reach or gaining reach? If it is a losing reach what percent of the flow in the river contributes to the aquifer?
 - a. The river is perched and confined to an artificial channel, some of which is actually concrete, most of the way between the Gap and the Interstate. It probably does lose, but probably not enough to matter.
- 3) Will transferring water right 29-2523 to the City of Chubbuck create additional impacts to the Snake River reaches that would exceed IDWR standards described in the transfer policy memorandum?
- 4) Is the analysis provided by the applicant titled (Tributary Aquifer Transient Impacts of Transfer 29-2523) valid?
- 5) Are the results from the applicant's analysis a "reasonable estimate of the time lag for hydrologic impacts to the aquifer systems associated with the change occurring outside the Active ESPA model"?
 - a. I think the applicant overestimated the lag time, but probably not by much.
- 6) If the unused water from the Downey area appears as surface water near Pocatello (as the applicant suggests), what is the expected impact to the Pocatello area aquifer?
 - a. The Portneuf River is perched over most of the LPRV Aquifer, it probably will not have much impact on the aquifer. The Portneuf will probably carry almost all of the additional water across to the interstate where it begins to gain water from the LPRV. Since it will be carrying more water, it will gain less water.

Jordan, Blake

From: Peppersack, Jeff
Sent: Friday, March 07, 2014 2:57 PM
To: Jordan, Blake
Subject: Del Kohtz Transfer for City of Chubbuck

Hi Blake,

Del Kohtz called and left a message inquiring about a transfer for City of Chubbuck. Prior to returning his message, I identified the transfer and scanned the file to see what the issues might be. Looks like the transfer is from outside the ESPA to the City of Chubbuck inside the ESPA. I saw that Jason had submitted an analysis to determine transient effects due to the location outside the ESPA.

I called Del in response to his inquiry and he said he was looking for an update on status because he learned that Hydrology Section was reviewing Jason's analysis. I think the Hydrology Section review is appropriate. As I reviewed the file, I noticed that the ESPA transfer spreadsheet analysis seemed to be targeting the 10% and 2 AF threshold after mitigation is implemented instead of our required analysis to first identify reaches requiring mitigation by modeling without any mitigation and then modeling with mitigation to ensure any reaches requiring mitigation are fully compensated (not just within the 10% or 2AF threshold). I just want to make sure Jason and others are submitting mitigation plans appropriately.

Jeff