

MEMORANDUM

TO: Files 25-14240, 25-14242, 25-14243 & 25-14340
Comore Development Inc

FROM: Pam Skaggs 

SUBJECT: Extension of Time to Avoid Forfeiture Applications

DATE: 11-29-2013

Review of these water rights finds that they provide an irrigation component of a subdivision development that has not reached full build-out. The applications were submitted by the right holder's attorney and signed by an officer of the corporation.

These rights were included in Transfers 74088 & 72674 that fulfilled a requirement of a protest agreement for associated water right permits 25-14166 and 25-14167 to provide mitigation for the consumptive portions of the permits. Other conditions of these rights limit use to developed lots within the subdivision. Discussions with the attorney note that while these rights appear to be protected as part of a mitigation plan, the right holder wants an extension for these rights during ongoing development in the subdivision. James Cefalo at Eastern Region agreed that while he didn't think it was necessary, he had no concerns about granting the extensions.