

Saxton, Craig

From: Saxton, Craig
Sent: Friday, June 03, 2011 3:24 PM
To: 'Keith C. Wilson'
Subject: RE: Permit 22-7814 Field Exam
Attachments: Draft License 22-7814.pdf

Hey Keith,

We are about ready to issue a license for 22-7814, but I wanted to contact you to explain a couple of things on the license before it is issued so no one is surprised.

I have attached a DRAFT copy of the license. The main thing I wanted to address is the diversion rate and volume for the municipal use. The key here is we had to issue the license based on the extent of development during the authorized development period which ended **October 1, 2005**, and that because at that time, the permit holder was not the City of Driggs, a diversion volume had to be included.

Rate:

You will see that the draft limits the diversion rate for municipal use to 0.65 cfs. Using 2004 aerial photography and documents in the file, I reached the 0.65 cfs by figuring instantaneous diversion rate for fixtures in 15, 4-plex apartment buildings and 5 domestic/office buildings.

Typical instantaneous diversion rate per fixture for public buildings with 0-50 fixtures is 0.5 GPM. Each 4 plex unit was estimated to have 28 fixtures:

$(0.5 \text{ gpm})(28 \text{ fixtures})(15 \text{ units}) = 210 \text{ gpm (0.47 cfs)}$
Add 15% to that number if the units include laundry facility

$(0.47 \text{ cfs})(1.15) = 0.54 \text{ cfs}$

Per chart for Maximum instantaneous water requirements for domestic use:

5 domestic uses = 0.11 cfs

Total Instantaneous diversion rate = **0.65 cfs**

Volume:

Our guidance is to add a volume onto this municipal right because during the development period, this water right wasn't integrated or owned by the City of Driggs:

Page 6 of Licensing Memo No. 1 provides:

"When licensing a permit for municipal use for a municipal provider that does not serve an incorporated city, the extent of beneficial use established under a non-RAFN permit should be described with both a rate of flow and a volume limitation."

So the calculation was made by figuring standard internal volume for 65 domestic uses (60 apartments and 5 office/homes). $65 \text{ domestic uses} * 0.60 \text{ AFA} = 39 \text{ AFA}$.

Then, using ArcMap, I calculated 3.8 acres of irrigation. The permit is conditioned to limit irrigation to that occurring under a domestic type use:

"Irrigation of large projects such as parks, golf course, or sports activities, lands is not authorized under this right."

Therefore any volume associated with the irrigation portion has to be based on the assumption that these are ½ acre parcels in association with a domestic use where 0.6 AF per domestic use is authorized.

$3.8 \text{ acres} / 0.5 \text{ acres} * 0.6 \text{ AFA per external domestic use} = 4.6 \text{ AFA}$

So we have a total volume of **43.6 AFA**

I wanted to give you a chance to look things over and then drop me a line if you have questions or concerns. If there is additional information I need to take into account then I would rather do it before the license is issued.

Let me know what you think.

Thanks,

Craig Saxton

craig.saxton@idwr.idaho.gov

208.287.4916

From: Keith C. Wilson [mailto:]

Sent: Monday, March 28, 2011 3:11 PM

To: Keen, Shelley

Cc: Kristin Moore

Subject: Permit 22-7814 Field Exam

Shelley,

We sent in the field exam for Permit 22-7814 on Dec 22, 2010. In review of the Department's database "**Details**" we see only the exam received date: "**Date Received at State Off: 12/27/2010**"

The last entry in the "**Other Documents**" is "**Emails Permit Place of Use**" with a document date of "**11/7/2010**"

In our cover letter we had requested that the permit be licensed as soon as possible so that transfers could be filed.

Is there any assistance we could give the department so that the permit can be licensed?

I appreciate any assistance that you can provide.

Keith C. Wilson

Senior Water Rights Analyst

kwilson@rockymountainenvironmental.com

From: Keen, Shelley [mailto:Shelley.Keen@idwr.idaho.gov]

Sent: Sunday, November 07, 2010 2:56 PM

To: Keith C. Wilson

Subject: RE: Permit 22-7814 Place of Use

Keith,

I think the change in place of use from the Valley Centre Subdivision to the City of Driggs could be accomplished through a licensing amendment if the system has already been integrated into the city's general distribution system. If the systems are separate, the place of use should reflect the extent of the Valley Centre system. Either way, the description will be a general description rather than a listing of 40-acre tracts.

The field report should show the additional increment of beneficial use established in connection with the permit by the time proof of beneficial use was submitted. Most likely, that will be the extent of development within Valley Centre Subdivision. Even if Valley Centre Subdivision's water system were integrated into the larger municipal system prior to submitting proof, it would likely be difficult to attribute development outside Valley Centre to this right and not to other municipal water rights.

As always, call or email if you want to discuss it a bit more.

Sincerely,

Shelley Keen
Idaho Department of Water Resources
P.O. Box 83720
Boise, ID 83720-0098
(208) 287-4947
shelley.keen@idwr.idaho.gov

From: Keith C. Wilson [mailto:kwilson@rockymountainenvironmental.com]
Sent: Thursday, November 04, 2010 12:42 PM
To: Keen, Shelley
Subject: Permit 22-7814 Place of Use

Shelley,

I'm assisting in completing the licensing field exam for the City of Driggs Permit 22-7814, and I need your words of wisdom.

The Application for Permit for 22-7814 has as the place of use both:

1. SENW & NESW Sec 23, T05N, R45E, *and*
2. Within the City Limits of Driggs

The Approved Permit (22-7814) has the following:

1. "Place(s) of use: *No POU found for this right*"

And the following condition:

2. "*Place of use is known as the Valley Centre Subdivision.*"

Can the place of use be listed as the Service Area and/or the City limits of the City of Driggs municipal water system, or will the place of use have to be only the legal description of the subdivision?

If the place of use can be within the City of Driggs, can the other points of diversion for the city be added with a licensing amendment?

Your assistance would be greatly appreciated.

Thanks,

Keith C. Wilson
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