

MEMORANDUM

Date: August 26, 2011
To: File
From: Nick Van Dyke
Re: Analysis of Transfer 73718, John Reitsma

Narrative: This transfer was filed as a follow up to transfer 73717, also acting on right 47-8011A. Right 47-8011A was licensed as a supplemental groundwater irrigation right. The intent of 73718 is to remove the remaining irrigation portion (115.9 acres) of 47-8011A from the NE $\frac{1}{4}$ of Section 13 T12S R16E and move it to adjacent ground in W $\frac{1}{2}$ of the NW and NE $\frac{1}{4}$ SW $\frac{1}{4}$ of the same section/township/range. The transfer also proposes to convert the right from a supplemental irrigation right to a primary irrigation right. Authorized acres will be reduced from 115.9 to 83.3.

Note Part 1.B. on the amended application received an update to some parts. See revised copy (with green highlights) received with 8/26/2011 email from Greg Sullivan of Brockway Engineering.

Authority to File: John Reitsma is the owner on record for 47-8011A and signed the application. Greg Sullivan of Brockway Engineering is listed as an authorized representative.

Water Right Validity: 47-8011A was licensed 8/26/2005. 2009 aerial imagery shows the place of use as irrigated. No evidence of forfeiture.

Injury to Other Water Rights: None anticipated. There will be no hydrologic change. The right will continue to be diverted from the same points of diversion.

Enlargement of Use: None anticipated. An extensive analysis was conducted during the review of transfer 73717 to determine how much the right historically contributed as a "primary" right within the comingled irrigation system with Salmon River Canal Company surface water. A factor of 72% groundwater was calculated to be considered "primary." See transfer review memo for 73717 for further information on how this was calculated. To allow 47-8011A to be used as a primary irrigation right, as 73718 proposes, acres will be reduced to 83.3 from 115.9 ($115.9 * 0.72$) = 83.5. Applicant submitted application with an acreage amount of 83.3. Rate per acre is increased, but below the 0.02 inch/acre threshold.

Local Public Interest: No issues identified. Due to no hydrologic impact, and the change in place of use being very minimal in distance, application was not advertised.

Beneficial Use/Conservation of Water Resources: No issues identified. Review of the application finds there is not clear inconsistency with criteria set forth in Section 42-222 Idaho Code preventing processing of this application.