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JUL 31 2009

WATER RESOURCES
WESTERN REGION

STATE OF IDAHO
DEPARTMENT OF WATER RESOURCES
BENEFICIAL USE FIELD REPORT

RECEIVED

AUG 07 2009

DEPARTMENT OF
WATER RESOURCES

A. GENERAL INFORMATION

Permit No. 63-32337

1. Owner: City of Nampa Phone No.: 208-466-6000

Current Address: 411 3rd St. S., Nampa, ID 83651

2. Accompanied by: Marcos Hernandez EXAM DATE: 6/24/2009

Address: Nampa City Water Works, 24 1st St. S., Nampa, ID 83651 Phone No. 208-941-0056

Relationship to Permit Holder: Water System Technician, System Manager

3. Source: Ground Water tributary to _____

B. OVERLAP REVIEW

1. Other water rights with the same place of use: See Attachment B

2. Other water rights with the same point of diversion: None

C. DIVERSION AND DELIVERY SYSTEM

1. Point(s) of Diversion:

Ident No.	Gov't Lot	1/4	1/4	1/4	Sec.	Twp.	Rge.	County	Method of Determination/Remarks
	2		SW	NW	30	3N	1W	Canyon	Exam, 2006 Aerial Photo

2. Place(s) of Use

Indicate Method of Determination Exam

TWP	RGE	SEC	NE				NW				SW				SE				Totals
			NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	

Municipal use within the service area
for the City of Nampa currently on
record with IDWR

3. **Delivery System Diagram:** Indicate all major components and distances between components. Indicate weir size/ditch size/pipe id as applicable. **See Attachment C**

Scale: 1" = _____

X Copy of USGS Quadrangle Attached Showing location(s) of point(s) of diversion and place(s) of use (required).

X Aerial Photo Attached (required for irrigation of 10+ acres)

X Photo of Diversion and System Attached

4.

Well or Diversion Identification No.*	Motor Make	Hp	Motor Serial No.	Pump Make	Pump Serial No. or Discharge Size
Happy Valley Well	General Electric	200	60158474	Fairbanks Morse 14F.4+ 4-stg, 10.875" trim	12-inch

*Code to correspond with No. on map and aerial photo

D. FLOW MEASUREMENTS

1.

Measurement Equipment	Type	Make	Model No.	Serial No.	Size	Calib. Date
Flowmeter	Ultra-Mag	McCrometer	UM06-12	UM20080304	12-inch	5/5/2008

2. **Measurements:** 2500 gpm @ 65.9 psi and 60 hz

E. NARRATIVE/REMARKS/COMMENTS

A 200-hp variable speed turbine well pump is installed in a 20-inch diameter well. The pump supplies water for municipal use within the City of Nampa's municipal irrigation water system. The well is completed to a depth of 420 feet, with 20-inch casing to 157 feet and 16-inch casing and well screen to 355. The pump is controlled based on discharge pressure, with a normal set-point pressure of 82 psi.

Included as Attachment F is a memo that describes the City of Nampa's municipal water needs and indicates how water diverted under this permit provides an additional increment of water beneficially used by the City to meet their ever-increasing municipal needs. This memo is submitted in compliance with Permit Condition No. 9.

Water bearing zone listed on the permit is 125 to 425 feet. Water-bearing zone actually developed was 270 to 355 feet (based on well driller's information).

Have conditions of permit approval been met? ☒ yes ☐ no

F. FLOW CALCULATIONS

Yes Additional Computation Sheets Attached

Measured Method:

(Pump Curve and Well log, Attachment B)

Pump Curve: 2250 gpm @ 265 feet TDH

Drillers Report: Static water level (13 feet) and specific capacity (69 gpm/ft)

Assumed Friction loss: 20 feet

Calculated discharge pressure = 86 psi

Therefore, well and pump can produce > 5.0 cfs at typical sprinkler pressure. This was confirmed by the field exam flow measurement (i.e., 2500 gpm at 66 psi).

Limit flow rate to permit maximum of 5.0 cfs

G. VOLUME CALCULATIONS

1. Volume Calculations for Irrigation:

$V_{I.R.} = (\text{Acres Irrigated}) \times (\text{Irrigation Requirement}) =$

$V_{D.R.} = [\text{Diversion Rate (cfs)}] \times (\text{Days in Irrigation Season}) \times 1.9835 =$

$V = \text{Smaller of } V_{I.R.} \text{ and } V_{D.R.} =$

2. Volume Calculations for Other Uses:

Not Applicable

H. RECOMMENDATIONS

1. Recommended Amounts

Beneficial Use	Period of Use		Rate of Diversion Q (cfs)	Annual Volume V (afa)
	From	To		
Municipal	1/1	12/31	5.0	
Total			5.0 cfs	

☐ Change P.D. as reflected above ☐ Add P.D. as reflected above ☒ None

☐ Change P.U. as reflected above ☐ Add P.U. as reflected above ☐ Other

I. AUTHENTICATION

Field Examiner's Name Terry M. Scanlan, P.E., Certified Water Right Examiner 10-129 Date _____

Field Examiner's Signature 

Reviewer _____ Date _____

SEAL



ATTACHMENT A

PERMIT RECORD AND PROOF OF BENEFICIAL USE

[Close](#)IDAHO DEPARTMENT OF WATER RESOURCES
Water Permit Report

6/14/2009

WATER RIGHT NO. 63-32337

Owner Type	Name and Address
Current Owner	CITY OF NAMPA 411 3RD ST S NAMPA, ID 83651 (208) 466-6000
Representative	J U B ENGINEERS INC ATTN: J MATT URANGA 250 S BEECHWOOD AVE STE 201 BOISE, ID 83709-0944 (208)376-7330

Priority Date: 12/12/2005

Status: Active

Source	Tributary
GROUND WATER	

Beneficial Use	From	To	Diversion Rate	Volume
MUNICIPAL	01/01	12/31	5 CFS	
Total Diversion			5 CFS	

Location of Point(s) of Diversion:

GROUND WATER|SWNW Lt 2|Sec. 30|Township 03N|Range 01W|CANYON County

Place(s) of use: [Large POU Info](#)

Conditions of Approval:

- 1.046 Right holder shall comply with the drilling permit requirements of Section 42-235, Idaho Code and applicable Well Construction Rules of the Department.
2. Water bearing zone to be appropriated is from 150 to 425 feet.
- 3.01M After specific notification by the Department, the right holder shall install a suitable measuring device or shall enter into an agreement with the Department to determine the amount of water diverted from power records and shall annually report the information to the Department.
- 4.26A Project construction shall commence within one year from the date of permit issuance and shall proceed diligently to completion unless it can be shown to the satisfaction of the Director of the Department of Water Resources that delays were due to circumstances over which the permit holder had no control.
- 5.124 Place of use is within the service area of the City of Nampa municipal water supply system as provided for under Idaho Law.
- 6.180 A map depicting the place of use boundary for this water right at the time of this approval is attached to this document for illustration purposes.
- 7.190 In connection with the proof of beneficial use submitted for this permit, the permit holder shall also submit a report showing the total annual volume, the maximum daily volume, and the maximum instantaneous rate of flow diverted from the point of diversion authorized for this permit during the development period. The report shall also show the maximum instantaneous rate of diversion, either measured or reasonably estimated by a qualified professional engineer, geologist, or certified water rights examiner, for the entire City of Nampa municipal water system. The report shall also describe and explain how water diverted under this permit provides an additional increment of beneficial use of water for the City of Nampa municipal water system as opposed to an alternative point of diversion for prior water rights already held and used by the City of Nampa for its municipal water system.
- 8.121 The Director retains jurisdiction to require the right holder to provide purchased or leased natural flow or stored water to offset depletion of Lower Snake River flows if needed for salmon migration purposes. The amount of water required to be released into the Snake River or a tributary, if needed for this purpose, will be determined by the Director based upon the reduction in flow caused by the use of water pursuant to this permit.

Dates:

Proof Due Date: 08/01/2009

Proof Made Date:

Approved Date: 08/25/2006

Moratorium Expiration Date:

Enlargement Use Priority Date:

Enlargement Statute Priority Date:

Application Received Date: 12/12/2005

Protest Deadline Date: 07/24/2006

Number of Protests: 0

Field Exam Date:

Date Sent to State Off:

Date Received at State Off:

Other Information:

State or Federal:

Owner Name Connector:

Water District Number:

Generic Max Rate per Acre:

Generic Max Volume per Acre:

Swan Falls Trust or Nontrust:

Swan Falls Dismissed:

DLE Act Number:

Cary Act Number:

Mitigation Plan: False

[Close](#)

STATE OF IDAHO
DEPARTMENT OF WATER RESOURCES
STATEMENT OF COMPLETION
FOR SUBMITTING PROOF OF BENEFICIAL USE

FOR OFFICE USE ONLY

Amt. of Fee \$: _____
Receipt No. _____
Receipt By: _____
Date Received: _____

The Idaho Department of Water Resources considers this form a statement by the permit holder(s) that development of a water right has been **completed** and that water has been applied to beneficial use to the extent described below. This form must be accompanied by an examination fee, when necessary, or by a completed Beneficial Use Field Report prepared by a certified water right examiner. Please refer to the instructions and fee schedule for this form. If ownership of the permit has changed, please contact any Department office or visit the Department's website at: www.idwr.idaho.gov for an Assignment of Permit form. If you wish to relinquish your permit because you have not established the authorized use of the water and are not applying for an extension, please notify the Department in writing.

1. Permit No. 63-32337 Telephone No. 208-466-6000

2. Name of Permit Holder(s): City of Nampa

3. Mailing Address: 411 3rd St. S. City Nampa

State ID Zip 83651 Email: _____

4. Source of Water: Ground Water If **GROUND WATER** (well), Date Drilled: mo. Jan / yr. 2007

Well Driller: Riverside Inc. Drilling Permit Number: No. 842487

5. Extent of use(s) completed (as authorized by the water right permit):

Domestic (No. of households): _____ Stockwater (No. and type of stock): _____

Irrigation (No. of acres): _____ Other: Municipal

6. Total rate of diversion or storage volume for which proof is submitted: 5.0 cfs OR _____ acre-feet.

7. Compliance with a Measuring Device requirement and/or other Conditions of Permit: *(Refer to the approval conditions on your permit and respond accordingly.)*

Measuring Device: Is a measuring device required?
If yes, has the measuring device been installed?

Yes ☐ or No ☒
Yes ☐ or No ☐

Conditions of Permit: Does your permit require you to submit additional information in connection with your proof of beneficial use? (If yes, please list the conditions below and provide documents if necessary.)

Summary of City's municipal water use Completed?

Yes ☒ or No ☐

Completed?

Yes ☐ or No ☐

8. Fee Enclosed: \$ n/a (See Fee Schedule on back of the instructions for filing proof of beneficial use. Proofs filed without an appropriate fee, will be considered incomplete.)

9. Person to contact to accompany the Department representative during field examination of the water system.

Name: _____ Telephone Number: _____

Mailing Address: _____ City _____

State _____ Zip _____ Email: _____

10. *The information given on this form is my true statement of the extent to which the above numbered permit has been developed and water has been diverted and applied to a beneficial use. I understand that any undeveloped portion of the permit is relinquished to the State of Idaho.*

Signature of permit holder: [Signature] Public Works Dir Date: 7/27/09
(include your title, if on behalf of company or organization)

ATTACHMENT B

OTHER RIGHTS

City of Nampa Non-Potable Water Rights (6/26/2009)

63-2449
63-2450
63-2484
63-2780
63-2787
63-2943
63-3257
63-5257
63-7003
63-7708
63-7954
63-8312
63-9853
63-9889
63-10211
63-11894
63-12322
63-31504
63-31949
63-31961
63-32179

ATTACHMENT C
WELL LOG AND PUMP CURVE

IDAHO DEPARTMENT OF WATER RESOURCES
WELL DRILLER'S REPORT

Office Use Only
Well ID No. 412698
Inspected by _____
Twp _____ Rge _____ Sec _____
1/4 _____ 1/4 _____ 1/4 _____
Lat: _____ Long: _____

1. WELL TAG NO. D 0047416
DRILLING PERMIT NO. 896743-842487
Water Right or Injection Well No. 63-32337

2. OWNER:
Name CITY OF NAMPA
Address 411 3RD STREET SOUTH
City NAMPA State ID Zip 83651

3. LOCATION OF WELL by legal description: WELL #15
You must provide address or Lot, Blk, Sub. or Directions to well.
Twp. 3 North ☒ or South ☐
Rge. 1 East ☐ or West ☒
Sec. 30 1/4 SW 1/4 NW 1/4
Gov't Lot 2 County CANYON
Lat: _____ Long: _____
Address of Well Site HAPPY VALLEY RD SOUTH OF
POWER LINE City NAMPA
(Give at least name of road + Distance to Road or Landmark)
Lt. _____ Blk. _____ Sub. Name _____

4. USE:
☐ Domestic ☒ Municipal ☐ Monitor ☐ Irrigation
☐ Thermal ☐ Injection ☐ Other _____

5. TYPE OF WORK check all that apply (Replacement etc.)
☒ New Well ☐ Modify ☐ Abandonment ☐ Other _____

6. DRILL METHOD:
☐ Air Rotary ☐ Cable ☐ Mud Rotary ☒ Other REVERSE

7. SEALING PROCEDURES

Seal Material	From	To	Weight / Volume	Seal Placement Method
BENTONITE	0	360	42,000	dry pour
BENTONITE	370	420	3,000	

Was drive shoe used? ☐ Y ☒ N Shoe Depth(s) _____
Was drive shoe seal tested? ☐ Y ☐ N How? _____

8. CASING/LINER: 20" X 16" RENNER @ 157' - 159'

Diameter	From	To	Gauge	Material	Casing	Liner	Welded	Threaded
20	+3	157	315	STEEL	☒	☐	☒	☐
16	159	270	315	STEEL	☒	☐	☒	☐
16	295	310	315	STEEL	☒	☐	☒	☐

Length of Headpipe _____ Length of Tailpipe 10'
Packer ☐ Y ☒ N Type _____

9. PERFORATIONS/SCREENS PACKER TYPE

Perforation Method _____
Screen Type & Method of Installation JOHNSON WIRE WRAP

From	To	Slot Size	Number	Diameter	Material	Casing	Liner
270	295	.030		16	S.S.	☒	☐
310	355	.030		16	S.S.	☒	☐

10. FILTER PACK

Filter Material	From	To	Weight / Volume	Placement Method
#8-12 SAND	260	370	36,000	dry pour

11. STATIC WATER LEVEL OR ARTESIAN PRESSURE:

13 ft. below ground Artesian pressure _____ lb.
Depth flow encountered _____ ft. Describe access port or control devices:
1 1/2" PIPE ON SIDE

12. WELL TESTS:

Yield gal/min.	Drawdown	Pumping Level	Time
2500 gpm	36	49	10 hrs

☒ Pump ☐ Bailor ☐ Air ☐ Flowing Artesian

Water Temp. _____ Bottom hole temp. _____

Water Quality test or comments: _____

Depth first Water Encounter _____

13. LITHOLOGIC LOG: (Describe repairs or abandonment)

Bore Dia.	From	To	Remarks: Lithology, Water Quality & Temperature	Water	Y	N
20.5	0	18	FILL DIRT			
	18	21	TOP SOIL			
	21	26	COARSE SAND			
	26	31	BROKEN LAVA, BURNT CLAY			
	31	53	SOLID BASALT			
	53	58	RED CINDERS, SANDSTONE			
	58	111	FINE-MED SAND, SOME GRAVEL			
	111	126	BRN CLAY			
	126	184	FINE-COARSE SAND w/CLAY LAYERS			
	184	196	BRN CLAY			
	196	204	FINE SAND			
	204	215	BRN CLAY			
	215	255	FINE-COARSE SAND			
	255	266	SAND, CLAY MIX			
	266	271	BRN CLAY			
	271	310	BRN CLAY w/SAND LAYERS			
	310	366	COARSE SAND			
	366	370	BRN CLAY			
	370	398	BRN CLAY			
	398	412	FINE SAND			
	412	420	BRN CLAY w/SAND LAYERS			

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WATER RESOURCES
WESTERN REGION

Completed Depth 365' (Measurable)
Date: Started 10-6-06 Completed 1-18-07

14. DRILLER'S CERTIFICATION

I/We certify that all minimum well construction standards were complied with at the time the rig was removed.

Company Name RIVERSTONE INC Firm No. 333
Principal Driller [Signature] Date 2-9-07
and [Signature]
Driller or Operator II [Signature] Date 2-9-07
Operator I [Signature] Date 2-9-07
Principal Driller and Rig Operator Required.
Operator II must have signature of Driller/Operator II.

Company: Layne of Idaho, Inc.

Name:

Date: 3/25/2008

**Pump:**

Size: 14F.4+ (4 stage)

Type: VERT. TURBINE

Synch speed: 1800 rpm

Curve: 9PC-119436

Specific Speeds:

Dimensions:

Vertical Turbine:

Speed: 1770 rpm

Dia: 10.875 in

Impeller:

Ns: —

Nss: —

Suction: 10 in

Discharge: 12 in

Bowl size: 14.3 in

Max lateral: 0.7 in

Thrust K factor: 15.9 lb/ft

Search Criteria:

Flow: 2250 US gpm

Head: 260 ft

Fluid:

Water

Density: 62.25 lb/ft³

Viscosity: 1.105 cP

NPSHr: —

Temperature: 60 °F

Vapor pressure: 0.2563 psi a

Atm pressure: 14.7 psi a

Motor:

Standard: NEMA

Enclosure: TEFC

Size: 200 hp

Speed: 1800

Frame: 447T

Sizing criteria: Max Power on Design Curve

Pump Limits:

Temperature: 150 °F

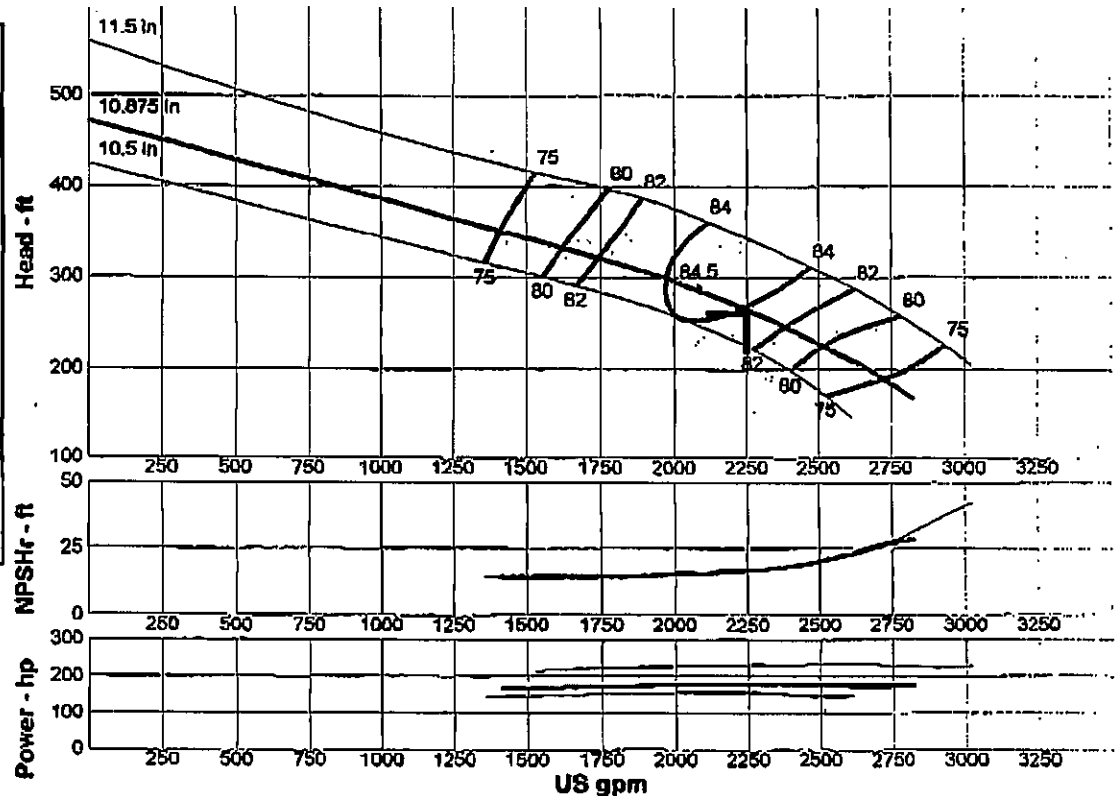
Pressure: 400 psi g

Sphere size: 1 in

Power: 781 hp

Eye area: —

Data Point	
Flow:	2250 US gpm
Head:	265 ft
Eff:	83.8%
Power:	179 hp
NPSHr:	16.7 ft
Design Curve	
Shutoff head:	471 ft
Shutoff dP:	204 psi
Min flow:	—
BEP:	84.5% @ 2089 US gpm
NOL power:	181 hp @ 2383 US gpm
Max Curve	
Max power:	232 hp @ 2628 US gpm



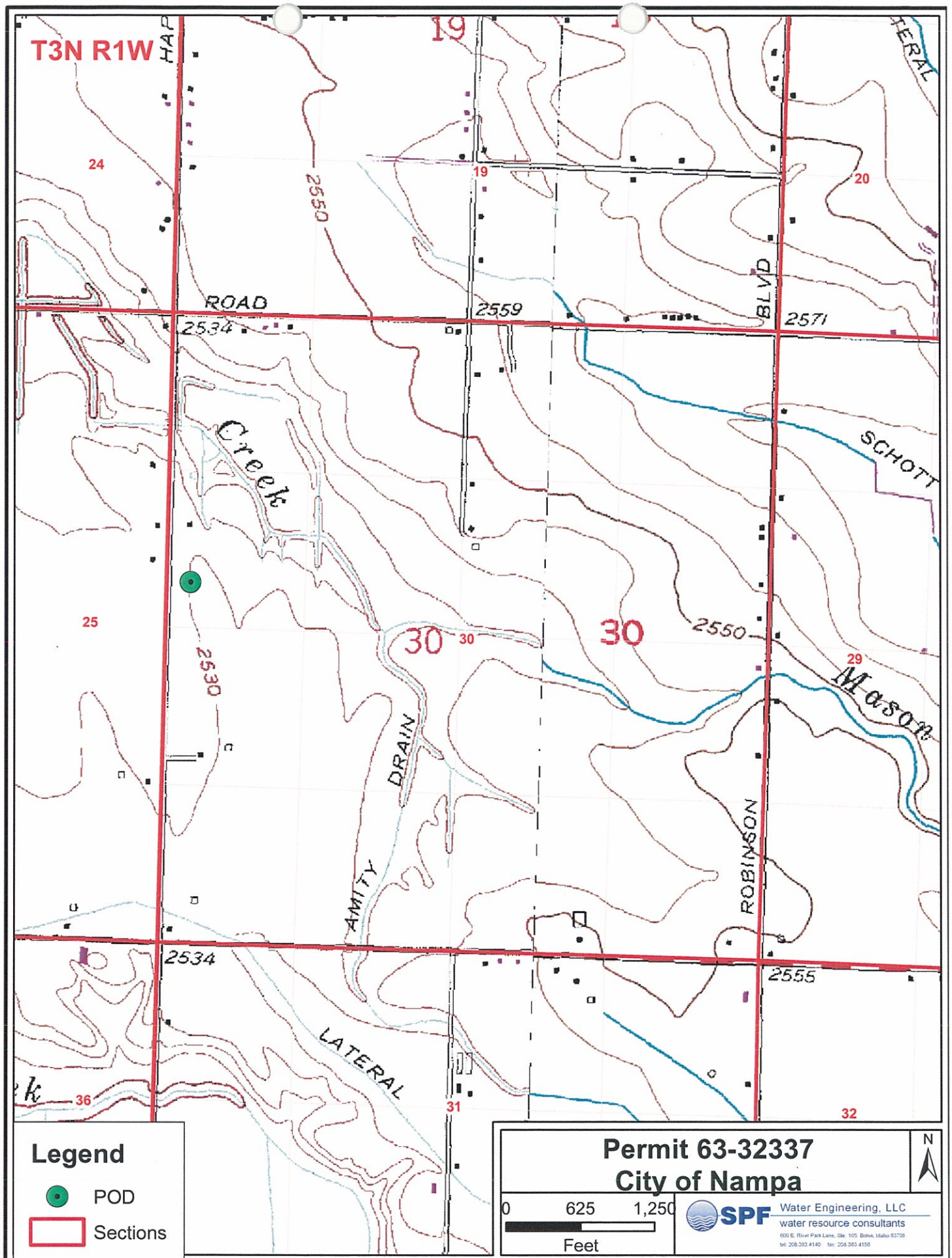
Curve efficiencies are typical. For guaranteed values, contact Fairbanks Morse or your local distributor. Las eficiencias en curvas son típicas. Para valores garantizados contacte a Fairbanks Morse o a su distribuidor local.

Performance Evaluation:

Flow US gpm	Speed rpm	Head ft	Efficiency %	Power hp	NPSHr ft
2700	1770	194	75.6	174	25.6
2250	1770	265	83.8	179	16.7
1800	1770	315	82.5	173	14.3
1350	1770	355	73.6	166	14
900	1770	—	—	—	—

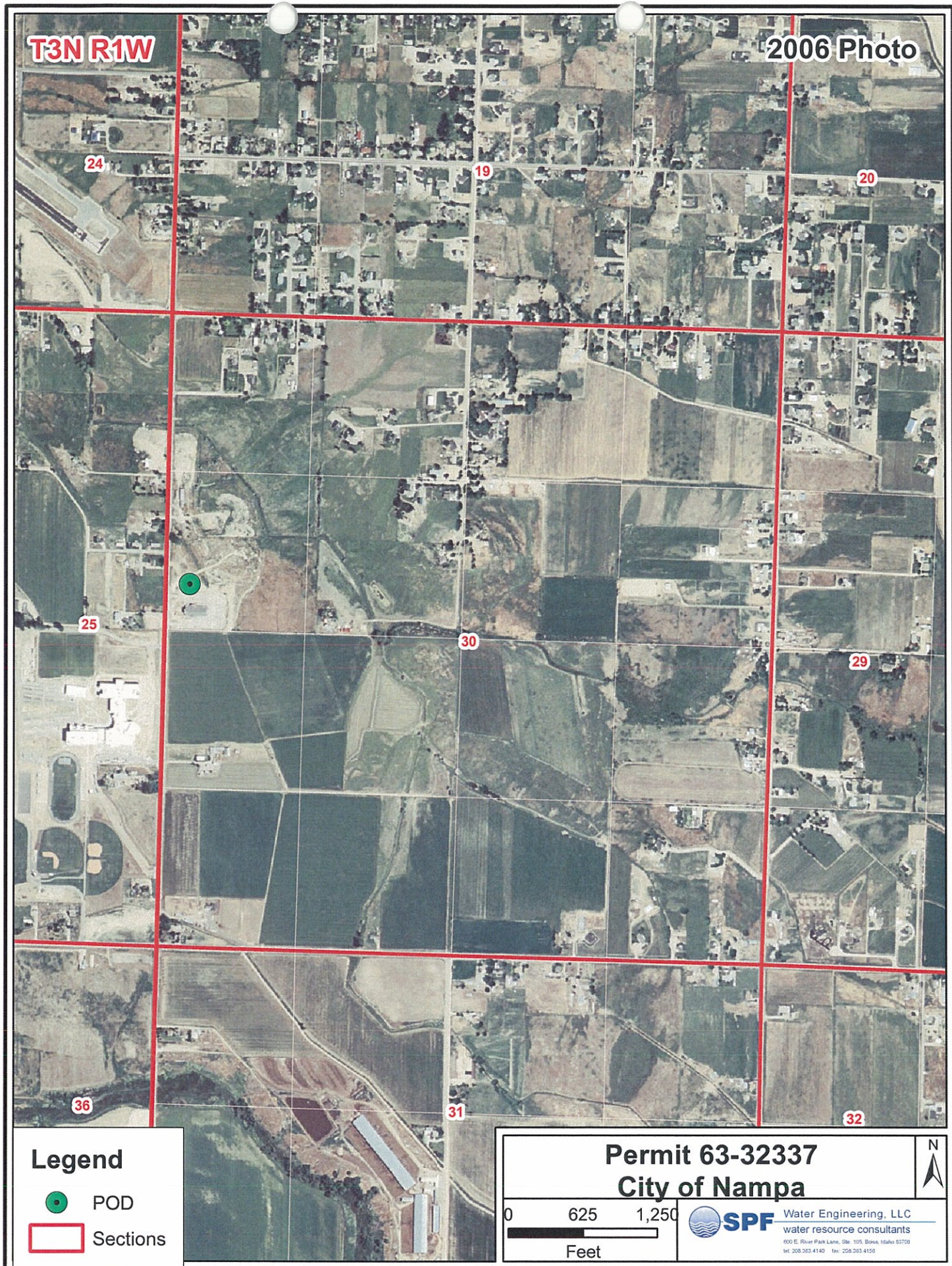


ATTACHMENT D
TOPO MAP AND 2006 AERIAL PHOTOS



T3N R1W

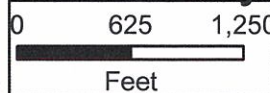
2006 Photo



Legend

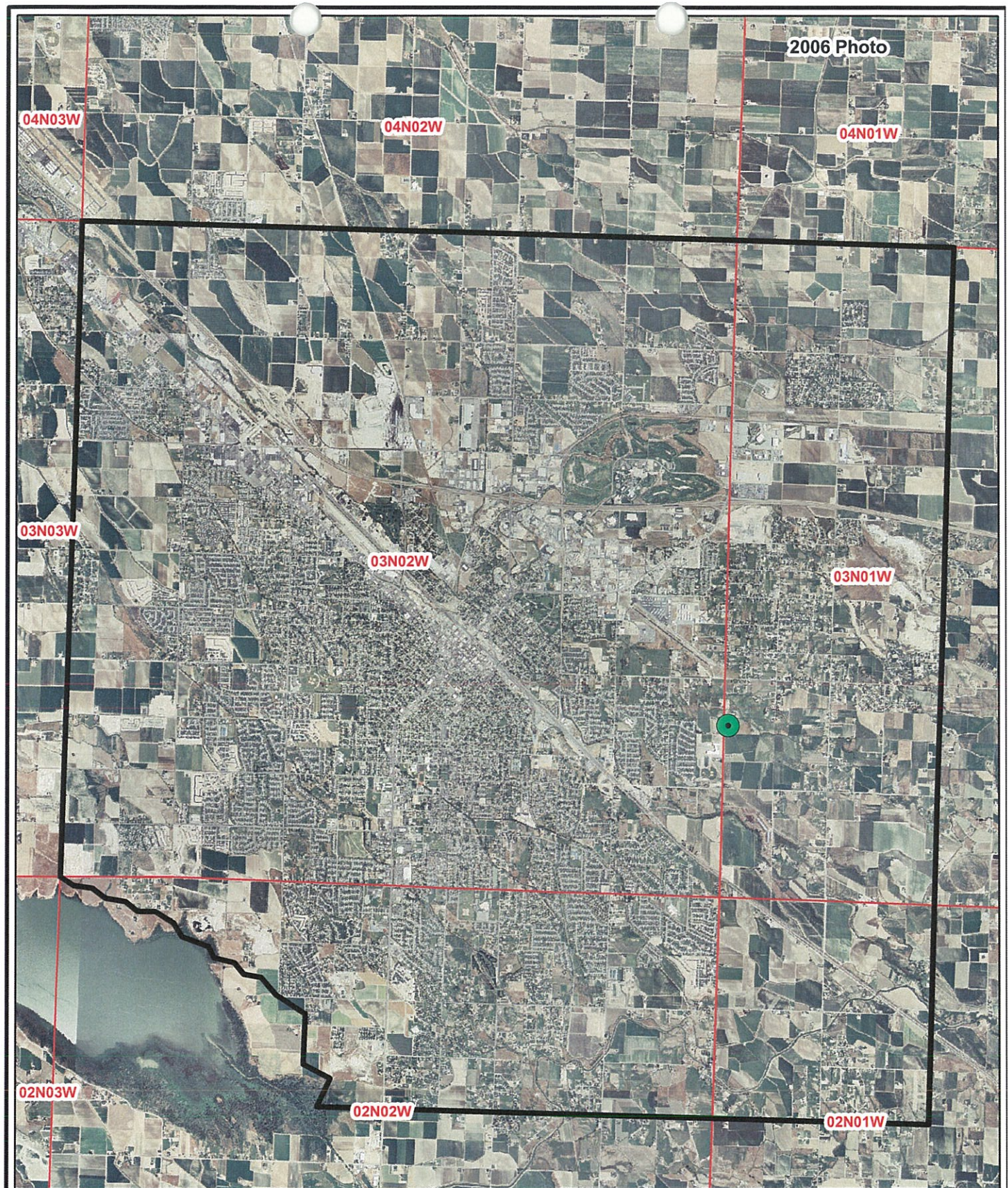
-  POD
-  Sections

Permit 63-32337
City of Nampa



 **Water Engineering, LLC**
water resource consultants
600 E. River Park Lane, Ste. 105, Boise, Idaho 83708
tel: 208.363.4140 fax: 208.363.4150





Legend

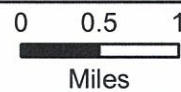


POD



Current GIS Shape for Nampa's Service Area

Permit 63-32337
City of Nampa



Water Engineering, LLC
water resource consultants
600 E. River Park Lane, Ste. 105, Boise, Idaho 83708
Tel. 208.383.4149 Fax. 208.383.4158

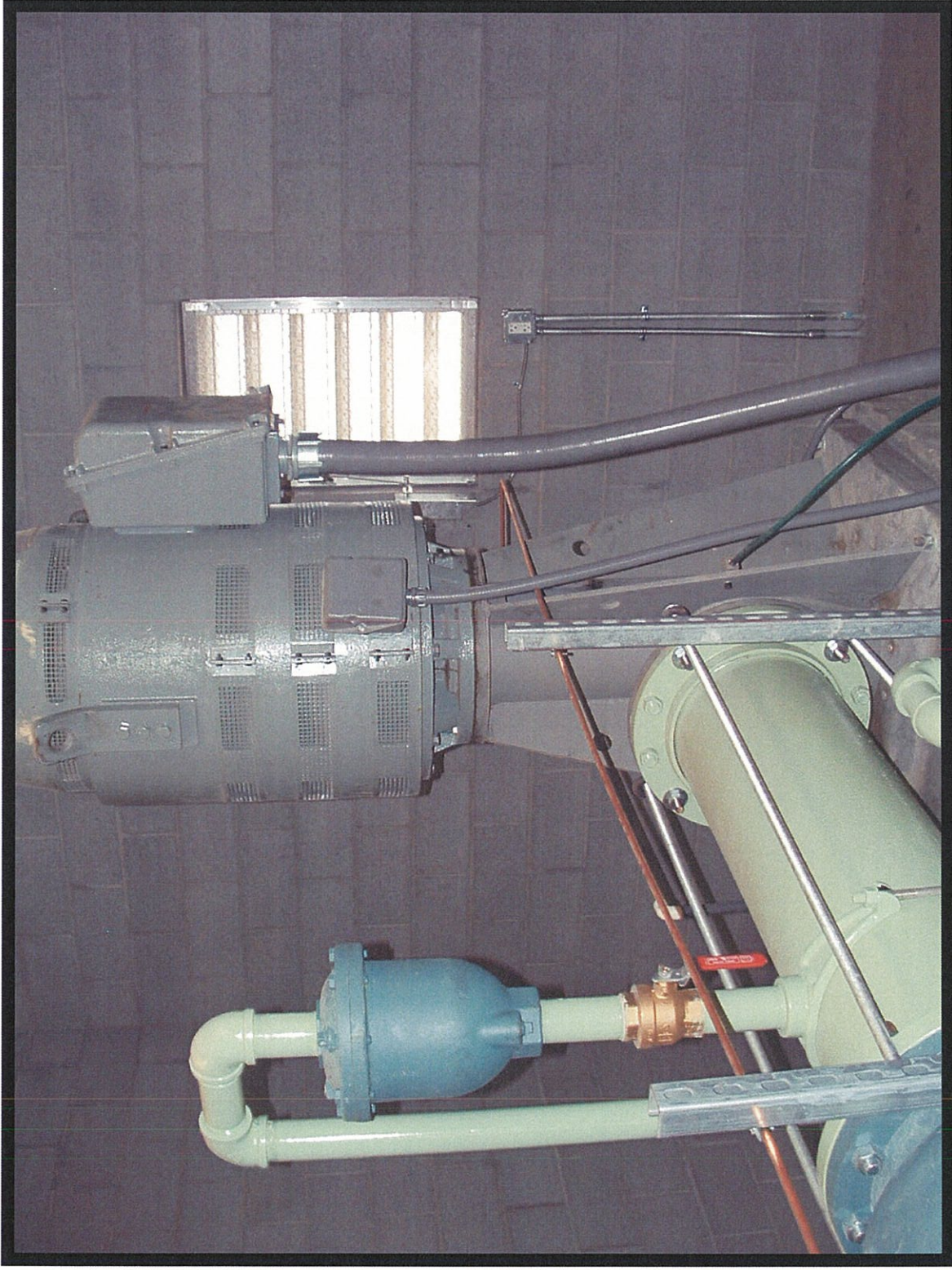


ATTACHMENT E
PHOTOS

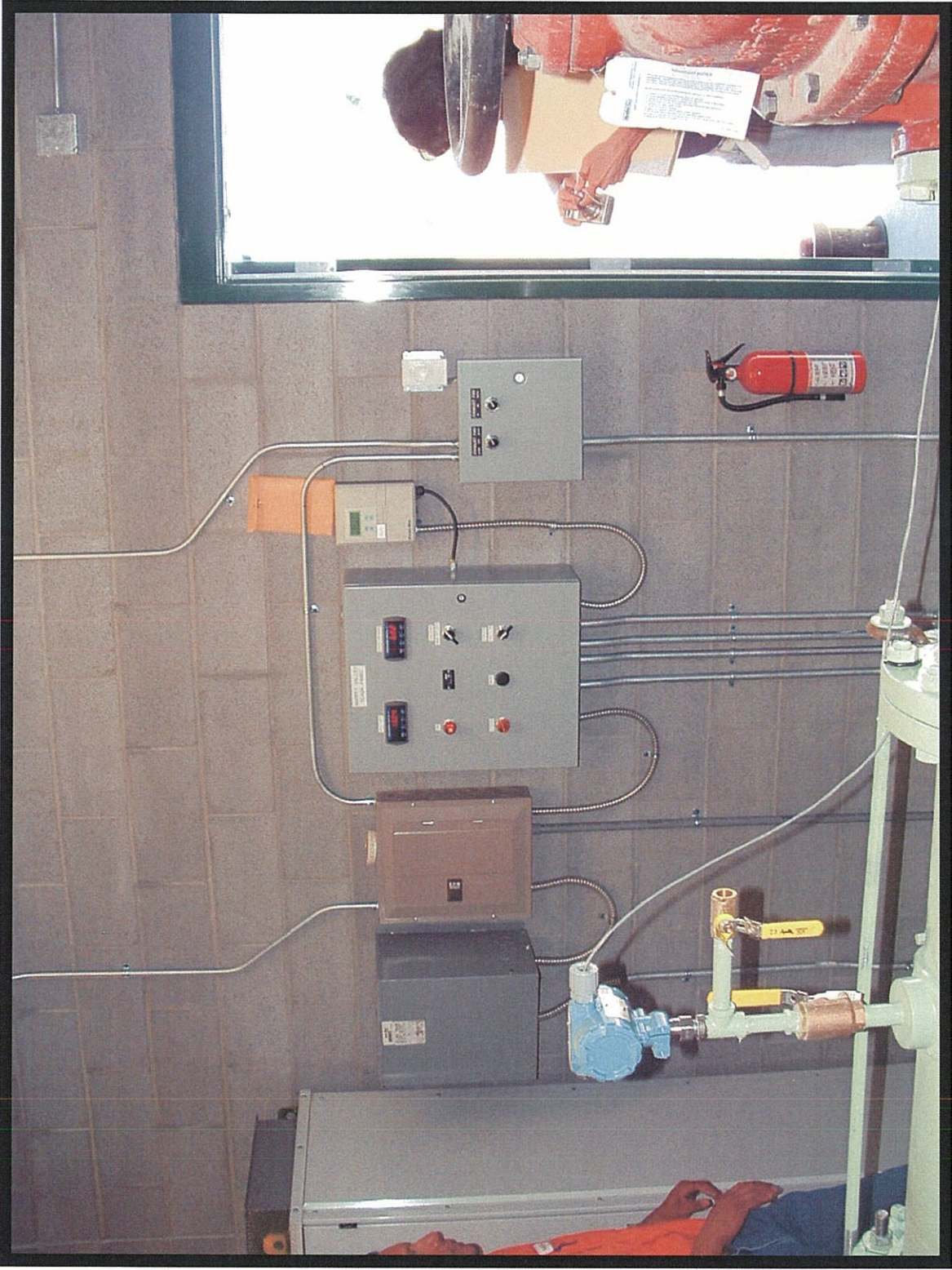
ATTACHMENT B
OTHER RIGHTS



Well and Pump House



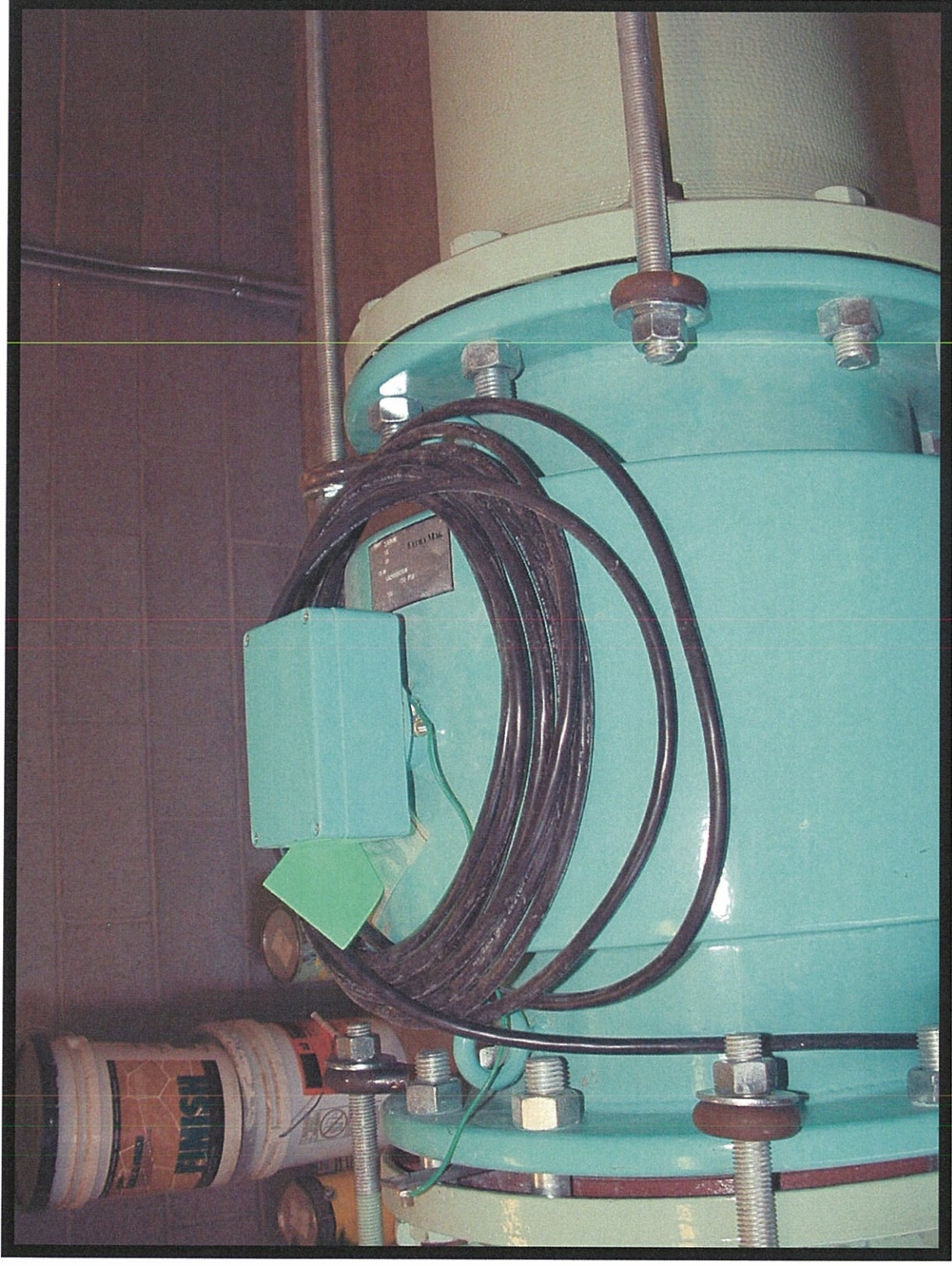
20-inch Well and 200-HP Turbine Pump



Controlling Works



Diversion Works



Flowmeter

ATTACHMENT F
MEMO REGARDING PERMIT CONDITION NO. 9

TECHNICAL MEMORANDUM

DATE: July 31, 2009
TO: Idaho Department of Water Resources
FROM: Terry Scanlan, P.E., P.G., CWRE 10-129
RE: 63-32337 (Happy Valley Well) – Permit Condition No. 9
JOB NO.: SPF 270.0070

This memo provides information requested under Condition No. 9 of Permit 63-32337. The condition is provided below for reference purposes.

In connection with the proof of beneficial use submitted for this permit, the permit holder shall also submit a report showing the total annual volume, the maximum daily volume, and the maximum instantaneous rate of flow diverted from the point of diversion authorized for this permit during the development period. The report shall also show the maximum instantaneous rate of diversion, either measured or reasonably estimated by a qualified professional engineer, geologist, or certified water rights examiner, for the entire City of Nampa municipal water system. The report shall also describe and explain how water diverted under this permit provides an additional increment of beneficial use of water for the City of Nampa municipal water system as opposed to an alternative point of diversion for prior water rights already held and used by the City of Nampa for its municipal water system.

Diversions from Authorized Point of Diversion. The authorized point of diversion under this permit was put into production in the 2009 irrigation season. As a result, a full irrigation season of water use has not occurred. Therefore, an annual volume is not available.

The maximum daily volume is unknown. The City does not record totalized flow on a daily basis.

The maximum instantaneous diversion rate is 2500 gpm (5.57 cfs) based on the peak flow rate measurement collected during the field exam on June 24, 2009.

Diversions from Entire City of Nampa Municipal Water System. The nominal capacity of the City of Nampa municipal irrigation system under normal operating conditions is estimated at 59.23 cfs. The estimate is based on 2007 capacities determined by JUB Engineers in their "Pressure Irrigation System Master Plan Update" dated October 2008, plus the diversion rate capacities at Vista Ridge Well (3.9 cfs) and Happy Valley Well (5.57 cfs) measured or calculated during field examinations in 2009 by SPF.

It should be recognized that the 59.23 cfs estimate likely underestimates the peak system capacity when the diversion points are operating as designed. The JUB estimates are nominal capacities at normal discharge pressures. Peak capacities, occurring during times of high demand and low system pressures, will be higher. Also, as with any water system, some of the pumps or wells have experienced declines in production due to pump wear or well rehabilitation. Several well pumps are currently producing less than their licensed or decreed capacities, indicating the need for rehabilitation. On-going maintenance activities by the City, such as well cleaning or pump rebuilding, will increase these capacities. Therefore, allowing for low system pressures during peak demands and normal capacity increases due to maintenance, the maximum instantaneous diversion capacity could easily be 25 percent higher than the 59.23 cfs estimate. Therefore, installed capacity, when properly operating during peak demand periods, is likely to be as high as 74 cfs. This estimate of capacity is further justified based on the irrigation demands described below.

Additional Beneficial Use Under this Permit. The authorized diversion rate from groundwater sources for the municipal pressure irrigation system, based on current licensed or decreed water rights, is 64.36 cfs. Permits 63-32337 (Happy Valley Well, 5.0 cfs) and 63-31949 (Vista Ridge, 3.4 cfs) increase this amount to 72.76 cfs.

The current City of Nampa municipal service area boundary is shown in Figure 1. The entire area is approximately 39,000 acres. Much of this land is not currently irrigated from the municipal system, but eventually will be in the future. If we assume that 50% of the area within the municipal service area will eventually be irrigated, the total irrigation demand (at 0.02 cfs per acre) could be as high as 390 cfs in the future.

Within the municipal service area boundary, the City is currently assessed for irrigation water provided by three entities: Pioneer Irrigation District, Boise-Kuna Irrigation District and Nampa & Meridian Irrigation District. The number of acres assessed in 2008 is summarized in Table 1; the total is 10,055.68 acres.

District	2008 Assessment (acres)
Boise-Kuna	287.61
Nampa & Meridian	7,113.93
Pioneer	2,654.14
Total	10,055.68

Table 1: 2008 Irrigation Assessments

If we assume that sufficient water to irrigate 10,055.68 acres should also be supplied by supplemental ground water (for those times when surface water is not deliverable), the total demand (at 0.02 cfs per acre) is approximately 201 cfs. Using this estimate of irrigation demand, it is obvious that the current installed supplemental irrigation capacity (as much as 74 cfs) and existing licensed or decreed water rights (64.36 cfs) are insufficient to meet peak irrigation

system demands from ground water sources. Therefore, the diversion authorized under permits 63-32337 and 63-31949 should be considered as additional increments of beneficial use for the City's municipal irrigation system.

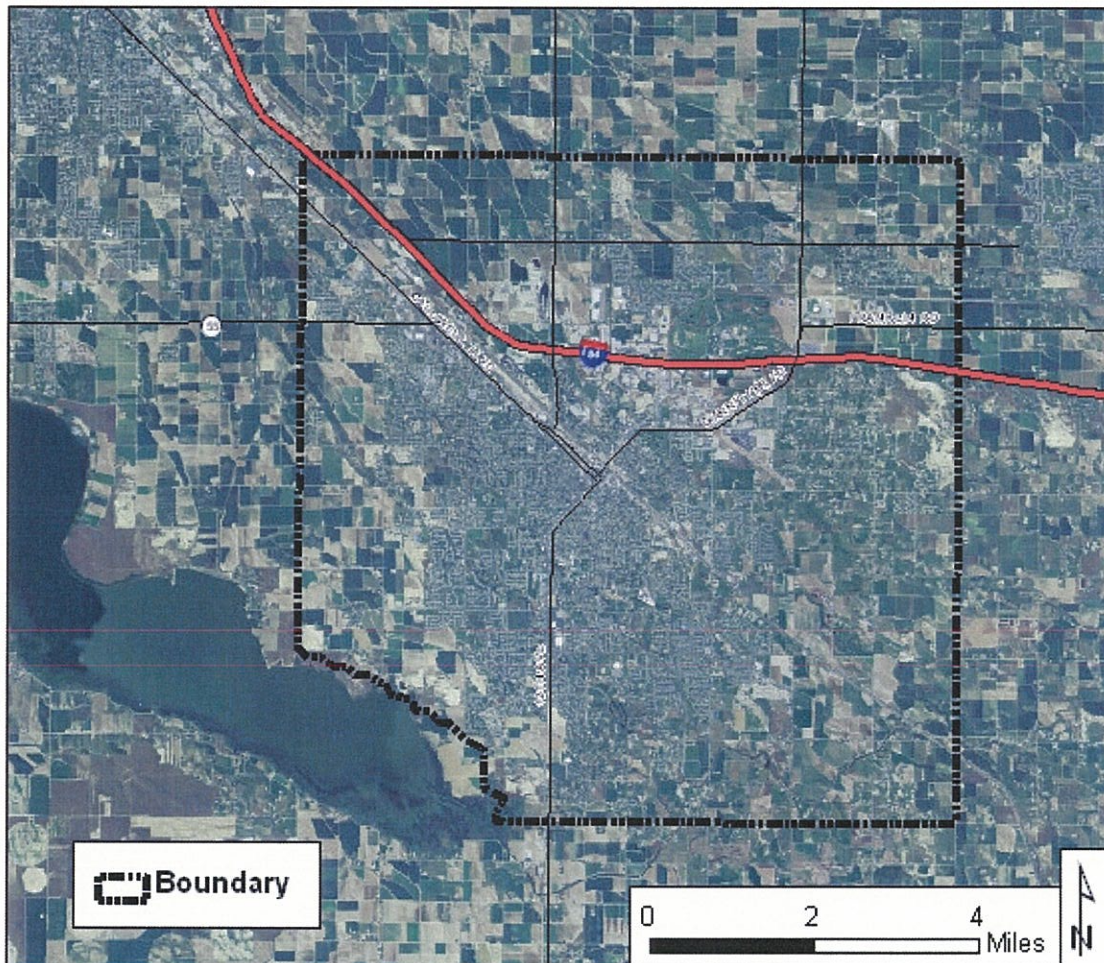


Figure 1: Municipal Service Area

Please note that it is the City's position that this and other permits it holds are for reasonably anticipated future needs and may be licensed on that basis. In this instance, however, there is no need for the Department to determine whether this permit was in fact issued for reasonably anticipated future needs (as opposed to short-term needs subject to "installed capacity" proof at the time of licensing). The reason the Department does not need to make this determination is that the City is able to demonstrate at this time that this permit, combined with its existing licenses and decrees, is required to support its current installed capacity. If, for any reason, the Department concludes that this proof is inadequate for that purpose, the City would be pleased to provide additional documentation as required to document reasonably anticipated future needs over its planning horizon and to demonstrate that it satisfies the "capacity of the system" rule for licensing of rights held for reasonably anticipated future needs.