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DEPT. OF WATER RESOURCES
SOUTHERN REGION

June 26, 2009

Ms. Jeanie Robertson
Idaho Department of Water Resources
1341 Fillmore Street, Suite 200
Twin Falls, Idaho 83301

RE: Application for Permit 37-22431 for Municipal Purposes

Dear Ms. Robertson:

This letter and attached information are in reply to your letter dated May 28, 2009 in regards to the Cities application for a new water right. You described four areas of concern in regards to the application that we have addressed in the following manner:

1. The Trend in the City is to use Groundwater over Surface Water for Irrigation Uses.

The City does have 125.46 shares of irrigation water rights from the Big Wood Canal Company and the American Falls Reservoir District. These shares are used to supply surface irrigation water to the City lots through an existing ditch system. Section 2.3.4 of the Water System Master Plan has been revised to reflect that there is an existing irrigation water system and that new developments will be required to provide irrigation water through a separate delivery system.

2. City Personnel Project a Steady 2% Growth Rate over the next 20 Years

The city's historical population growth is shown in Table 4-1 of the Water System Master Plan. The updated figure for the estimated 2007 population provided by the U.S. Census Bureau is 419. This is lower than the projected population in Table 4-1 of 430 but still an increase from the 2000 census. The City still feels like a 2% per year growth is realistic based on the interest of developing lots by developers and the number of lots that are currently available. The City currently holds water rights that total 861.7 gallons per minute (gpm) (1.92 cfs). The current maximum day demand is estimated to be 1156 gpm which is 294.3 gpm more than the current water right. The demand figures for Glanbia in the Water System Master Plan have been revised (See 3 below) and the estimated maximum day demand in 2028 is 1,369 gpm. This would leave the City 507.3 gpm short based on the current water rights. To meet the current maximum day demand with the existing well #3 off line the City needs a well with the capacity of 696 gpm as a backup. If the City obtains a water right of 700 gpm for the new well and adds additional water rights of 298.3 gpm on the existing wells to match there current capacity, the total new water right would be for 998.3 gpm (2.22 cfs).



Engineers Surveyors Planners

3. Industrial Use at Glanbia Exceeds what a New Permit can provide to the City.

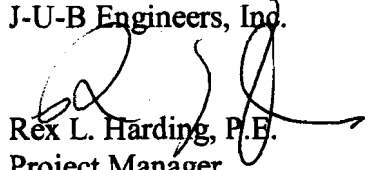
The projected water need for Glanbia was based upon the demand trend for the last 7 years. The Glanbia plant did expand process capacity in that time period. We had further discussions with Glanbia personnel and there are no plans for major expansion within the next 20 years. Therefore the projected increased water use for Glanbia was revised to an increase of 0.5% per year. That would be a total increased maximum day demand of 210 gpm (0.47 cfs) in 2028. The total water right needed in 2028 to meet the maximum day demand for Glanbia is estimated to be 2.15 cfs which exceeds the Cities current water rights of 1.92 cfs. The City could dedicate its current water rights for Glanbia's use, however that would require all the domestic uses be under the new water right and more susceptible to water calls.

4. Current Demand Exceeds Current Water Rights

The additional water rights necessary to meet the estimated 2009 maximum day demand are $2.57 - 1.92 = 0.65$ cfs (292 gpm). As discussed in 2. above, the City feels the projected 2.00% growth rate is the RAFN. If the current water rights are dedicated to industrial use as outlined in 3., the total water rights required in 2028 for domestic use only is 0.89 cfs. (401 gpm).

We understand that the Amended Moratorium Order does not allow any new water rights to be used for uses other than domestic. To be in compliance with DEQ requirements, the City must have capacity to provide the maximum day demand with one the largest sources off line. To meet this requirement for the current maximum day demand of 1156 gpm, a new well with a capacity of 696 gpm will be required. If the current water rights are dedicated for industrial use and the new water rights provide for the estimated domestic use in 2028, the total rights needed at this time would be 2.81 cfs. If the City ran both 700 gpm wells at the same time for emergency needs, they would be pumping 3.12 cfs and be exceeding their water right. The new water right should be at least 1.19 cfs to allow the operation of both 700 gpm wells at the same time without exceeding their water right. Therefore the City requests that the water right application be amended to 1.19 cfs to provide for the future domestic needs and allow for flexibility of operations.

Sincerely,
J-U-B Engineers, Inc.


Rex L. Harding, P.E.
Project Manager

