

MEMORANDUM

Date: September 14, 2005
To: Transfer 69309
From: Pamela Skaggs
Re: Final Recommendations

Final review of this transfer found that the analysis of historical use does not follow current standards. Right 47-4287 is a supplemental groundwater right. The Transfer Memo directs using an average of historical annual volume for supplemental rights when changing the nature of use to avoid enlargement. The evaluation of the amount available for transfer identified by the consultant was 122.7 afa. This is nearly the highest recorded annual volume submitted with the application as the historical pumping volume. Information submitted shows a range from 0.3 af to 128.2 af per year from 1993 to 2000. The average of this period equals **79.4 afa**.

After discussion with state office manager and region staff, the following modifications to recommendations have been made. 79.4 af of water used supplementally on 121.6 acres or the equivalent of 19.9 acres primary use at the standard 4.0 af/acre. The transfer requests 75.4 af for dairy uses. The historical consumptive use volume for the irrigation use was determined to be 2.99 or 3.0 af/acre. At this rate, 19.9 acres equals **59.7 af available for transfer to new uses**. This amount accounts for the entire right leaving no further irrigation use. **20 shares of Twin Falls Canal Company** associated with the transferred groundwater use will be required held without being used at the dairy to avoid enlargement of use by unstacking surface and groundwater rights.