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February 15, 2018

**VIA EMAIL & U.S. MAIL**

Director Gary Spackman  
Idaho Dept. of Water Resources  
322 E. Front St.  
Boise, Idaho 83720-0098

RECEIVED  
FEB 19 2019  
DEPARTMENT OF  
WATER RESOURCES

**Re: 2019 Conjunctive Administration (Step 1 Methodology Order)**

Dear Director Spackman:

We are writing on behalf of our clients A&B Irrigation District, Burley Irrigation District, Milner Irrigation District, North Side Canal Company, and Twin Falls Canal Company in response to your February 7, 2019 letter concerning Step 1 of the Third Amended Methodology Order.

With respect to the Step 1 requirement to confirm irrigated acreage for the year, our clients adopt and resubmit the letter that was delivered to you for purposes of 2014 administration that is on file with you in this matter.<sup>1</sup> As noted in that letter, all of our clients' decreed natural flow water rights identify the number of authorized acres to irrigate within their respective project boundaries. Accordingly, the Director is required to use the elements of the partial decrees for purposes of water right administration. I.C. §§ 42-607; 1417.

Moreover, all clients have confirmed that the expected irrigated area within each project this year has not varied by more than 5% from the existing information (electronic shape files) that have been submitted to you in prior years.

The number of irrigated acres identified by existing shape files on file with the SRBA Court or as submitted to you in prior years is as follows: A&B – 15,924<sup>2</sup>; BID – 46,083; Milner – 13,335; NSCC – 154,067; TFCC – 194,778.

<sup>1</sup> Step 1 did not change for purposes of the various methodology orders.

<sup>2</sup> This is the number of acres associated with A&B's decreed natural flow surface water rights (1-14 et al.). The District is also delivering surface water to other District lands through "soft conversion" projects. See *Travis L. Thompson December 22, 2016 Letter to Director Spackman*.

Director Gary Spackman  
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If you have any questions please contact me at (208) 733-0700.

Sincerely,

**BARKER ROSHOLT & SIMPSON LLP**



Travis L. Thompson

cc: Managers (clients)