



MARTEN LAW

March 25, 2025

VIA EMAIL & HAND DELIVERY (Southern Regional Office)

Sarah Tschohl
Idaho Dept. of Water Resources
322 E. Front St.
Boise, Idaho 83720-0098

Re: 2025 Conjunctive Administration (Step 1 Methodology Order)

Dear Sarah:

We are writing on behalf of our clients A&B Irrigation District, Burley Irrigation District, North Side Canal Company, and Twin Falls Canal Company in response to the Director's March 5, 2025 letter concerning Step 1 of the *Sixth Amended Methodology Order*.¹

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 the former Director for purposes of 2014 administration that is on file with IDWR in this matter.² 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; 42-1420.

Further, enclosed herewith (via hand delivery to the Southern Regional Office) is a thumb drive with an updated shapefile for the Twin Falls Canal Company for 2025. TFCC has worked to revise the prior shapefile submitted in 2024 pursuant to a review of the most recent aerial imagery available (2023). TFCC expects to continue to update this shapefile as well.³

Our three remaining 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.

¹ Milner Irrigation District previously responded to the Step 1 requirement pursuant to its own letter sent on March 13, 2025.

² Step 1 did not change for purposes of the various methodology orders.

³ TFCC has continued to update the shapefile as best it could with available information based upon the updated imagery. Additional work is continuing regarding various urban and residential areas and that update is forthcoming.

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The number of irrigated acres identified by existing shape files on file with the SRBA Court or as submitted to you as explained above is as follows: A&B – 14,748.7⁴; BID – 46,083; NSCC – 154,067; TFCC – 195,925.

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

Sincerely,



Travis Thompson
Partner

Direct: (208) 735-2227
Email: tthompson@martenlaw.com

Enclosures

cc: Managers, clients

⁴ This is the total number of irrigated acres associated with A&B's decreed non-enlargement natural flow surface water rights (1-14, 1-10237, 1-10238, 1-10239, and 1-10240). The total excludes any irrigated acres associated with enlargement water rights 1-10225 and 1-10241. 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.*