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**BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO**

IN THE MATTER OF RIVERSIDE'S
PETITION FOR DECLARATORY RULING
REGARDING NEED FOR A WATER
RIGHT UNDER REUSE PERMIT NO.
M-255-01

Docket No. P-DR-2020-01

**REUSE PROPONENTS' STIPULATION OF
FACTS**

STIPULATION

Pursuant to the Department’s Rule 557 (IDAPA 37.01.01.557), this Stipulation is submitted jointly by the Cities of Boise, Caldwell, Idaho Falls, Jerome, Meridian, Nampa, Pocatello, Post Falls, and Rupert, the Association of Idaho Cities (“AIC”), and the Hayden Area Regional Sewer Board (“HARSB”) (collectively, “Municipal Intervenors”) and Pioneer Irrigation District (“Pioneer”). Municipal Intervenors and Pioneer are referred to collectively as “Reuse Proponents.”¹

Reuse Proponents have shared drafts of this Stipulation with Riverside Irrigation District (“Riverside”) and Idaho Power Company (“Idaho Power”) (collectively, “Reuse Opponents”). In doing so, Reuse Opponents sought input from Reuse Opponents and invited them to join in

¹ This and other submissions by the Reuse Proponents employ the following shorthand definitions:

“AF”	acre-feet
“AFA”	acre-feet per annum (year)
“AIC”	Association of Idaho Cities
“Boise-Kuna”	Boise-Kuna Irrigation District
“Bureau”	U.S. Bureau of Reclamation
“DMR”	Discharge Monitoring Report
“EPA”	U.S. Environmental Protection Agency
“HARSB”	Hayden Area Regional Sewer Board
“IDWR” or “Department”	Idaho Department of Water Resources
“IDEQ”	Idaho Department of Environmental Quality
“Idaho Power”	Idaho Power Company
“Municipal Intervenors”	The cities of Boise, Caldwell, Idaho Falls, Jerome, Meridian, Nampa, Pocatello, Post Falls, and Rupert, AIC and HARSB.
“Nampa” or “City”	City of Nampa
“Nampa WWTP”	Nampa’s wastewater treatment plant
“NMID”	Nampa Meridian Irrigation District
“NPDES Permit”	Nampa’s National Pollution Discharge Elimination System Permit No. ID0022063
“Party” or “Parties”	Any or all of the Reuse Proponents and Reuse Opponents
“PI System”	Nampa’s non-potable pressurized irrigation water delivery system
“Pioneer”	Pioneer Irrigation District
“Potable System”	Nampa’s potable water delivery system
“Reuse Agreement”	The agreement between Pioneer and Nampa known as <i>Recycled Water Discharge and Use Agreement</i> dated 3/7/2018
“Reuse Opponents”	Riverside Irrigation District and Idaho Power Company
“Reuse Permit”	Reuse Permit No. M-255-01 issued to Nampa by IDEQ
“Reuse Project”	The project authorized by Nampa’s <i>Reuse Permit</i>
“Reuse Proponents”	Municipal Intervenors and Pioneer
“Riverside”	Riverside Irrigation District
“WWTP”	Wastewater treatment plant

the Stipulation or a revision thereof. Although discussions continue, as of this time, Reuse Opponents have not elected to join in this Stipulation. Accordingly, Reuse Proponents submit this Stipulation (together with the associated submissions of exhibits) in advance of the upcoming status conference in the interest of facilitating discussions aimed at identifying areas of agreement or disagreement. This Stipulation is not intended to discontinue further efforts to reach agreements with Reuse Opponents aimed at narrowing and clarifying the issues before the Department.

I. PURPOSE AND EFFECT OF THE STIPULATION

The objective of this Stipulation is to clarify and resolve the underlying potentially material facts in an effort to reduce or eliminate the need for the submission of contested evidence and a factual hearing.

Consistent with Rule 557, the Reuse Proponents stipulate to the submission of the exhibits described in section II beginning on page 4 and to the facts set out in section III beginning on page 5. (Due to their size, the exhibits will be submitted separately.) The Reuse Proponents agree that the facts contained in the section II exhibits and the facts set out in section III are potentially material to the Department's declaratory ruling and may form the basis of that ruling.

In setting out the facts and documents in sections II and III, the Reuse Proponents have endeavored to identify those facts and documents that are potentially relevant and material and could provide a sufficient factual basis to allow the Department to issue a declaratory ruling. However, it is not always possible to recognize at the outset every fact that may be relevant and material. Accordingly, this Stipulation does not preclude any Party from seeking to establish

additional relevant and material facts through the timely offer of evidence during the course of this proceeding.

In addition to these stipulated facts, Reuse Proponents reserve the right to lay out in briefing, by affidavit, or otherwise additional background facts that do not pertain to Nampa and Pioneer's actions pursuant to the *Reuse Permit*, but instead describe Reuse Proponents' water rights, their use of water, and/or their current or anticipated approaches to the disposal of wastewater. The Reuse Proponents agree that such background facts that are not directly relevant or material to the *Reuse Permit* shall be offered for the limited purpose of providing context to the Department (or to a reviewing court) to aid in understanding how the precedent established by the declaratory ruling might be applied in other situations. The Reuse Proponents agree that facts offered for this limited purpose shall not form the basis of the declaratory order unless the Reuse Proponents are put on notice by the Hearing Officer that such facts may be deemed material to the decision and the Reuse Proponents are afforded an opportunity to contest such facts.

II. STIPULATED SUBMISSION OF EXHIBITS

In separate submissions, the Reuse Proponents will submit the following exhibits by stipulation:

- | | |
|-----------|--|
| Exhibit A | Map showing Canyon County irrigation districts (Reuse Application, Figure 5) |
| Exhibit B | Map showing Nampa's area of city impact and the district boundaries of irrigation districts |
| Exhibit C | Map showing proposed alternatives for discharge of recycled water to Phyllis Canal (Attachment to Reuse Agreement) |

- Exhibit D Map of Recycled Water Flow through Pioneer (Reuse Application, Figure 8)
- Exhibit E Map of Recycled Water Flow through Pioneer: Focus on Upper Portion of Area of Analysis (Reuse Application, Figure 9)
- Exhibit F Reuse Agreement (3/7/2018)
- Exhibit G Reuse Permit (1/21/2020)
- Exhibit H IDEQ's Staff Analysis of Nampa's Reuse Permit Application (10/10/2019)
- Exhibit I EPA Fact sheet: Nampa's NPDES Permit (2015)
- Exhibit J Application for Reuse Permit (including cover letter, Preliminary Technical Report, Plan of Operations, Figures 1-13, and Appendices A-F) (3/19/2019)

Exhibit A, Exhibit D, Exhibit E, and Exhibit J were submitted by Nampa to IDEQ under signature of its Public Works Director, Tom Points, attesting to their truth and accuracy.

Exhibit I is an official document of the EPA. Exhibit G and Exhibit H are official documents issued by IDEQ. Exhibit C and Exhibit F are a private agreement between Pioneer and Nampa which is central to this matter. Exhibit B is a figure from Nampa's *2014 Irrigation Master Plan*, which is on file with IDWR.

III. STIPULATED FACTS

Pursuant to Rule 557, the Reuse Proponents stipulate to the following facts:

1. Pioneer is a duly organized and operating Idaho irrigation district providing irrigation water to approximately 34,000 acres of land within its district boundary.
2. The land served by Pioneer includes north and northwest Nampa and much of the City of Caldwell.

3. A map showing the overlap of the district boundaries of Pioneer and other irrigation districts within Nampa's area of city impact is submitted separately as Exhibit B.
4. Riverside is a duly organized and operating non-profit ditch company providing irrigation water to approximately 10,000 acres within its authorized water right place of use located primarily west of Greenleaf, Idaho.
5. Nampa is a duly organized and operating Idaho municipal corporation with a population of approximately 100,000.
6. Nampa is a "municipality" within the definition of Idaho Code § 42-202B(4) and is a "municipal water provider" within the meaning of Idaho Code § 42-202B(5).
7. Nampa owns and operates two municipal water delivery systems, one for potable water ("Potable System") and one for non-potable pressurized irrigation water ("PI System").
8. Nampa's delivery systems were historically separate systems. In recent years, they have been substantially integrated through cross-connections that allow water from Nampa's historically Potable System wells to be used in either the Potable or PI Systems.
9. Nampa's integrated Potable System relies on a system of municipal wells, owned and operated by Nampa, from which it diverts ground water under the municipal water rights shown in Table 1 below.

Table 1: Nampa's Integrated Potable System Ground Water Rights

Water Right No.	Nominal Diversion Rate (cfs)	Priority	Authorized Purpose	Basis
63-02779	2.00	9/2/1949	Municipal	Decree (SRBA)
63-02781	3.00	9/2/1949	Municipal	Decree (SRBA)
63-05258	2.10	7/20/1954	Municipal	Decree (SRBA)
63-07567	2.79	3/6/1972	Municipal	Decree (SRBA)
63-08324	3.00	6/1/1976	Municipal	Decree (SRBA)
63-09180	4.00	9/27/1978	Municipal	Decree (SRBA)
63-10212	2.23	6/28/1983	Municipal	Decree (SRBA)
63-11729	2.68	3/6/1992	Municipal	License (Post-SRBA)
63-12463	3.00	6/25/1998	Municipal	License (Post-SRBA)
63-12474	3.50	10/1/1998	Municipal	License (Post-SRBA)
63-12506	3.50	2/2/1999	Municipal	License (Post-SRBA)
63-12543	4.00	7/30/1999	Municipal	License (Post-SRBA)
63-12591	3.50	8/21/2000	Municipal	License (Post-SRBA)
63-28219	1.22	12/24/1937	Municipal	Decree (SRBA)
63-28220	1.93	12/1/1949	Municipal	Decree (SRBA)
63-31243	2.60	5/14/2001	Municipal	License (Post-SRBA)
63-33022	4.50	3/31/2008	Municipal	License (Post-SRBA)
63-32835	5.00	6/15/2018	Municipal	License (Post-SRBA)
TOTAL	54.55			

10. Each of the water rights set out in Table 1 in Paragraph 9 is authorized for “municipal purposes” in accordance with Idaho Code § 42-202B(6).

11. Each of the water rights set out in Table 1 in Paragraph 9 has a place of use corresponding to Nampa’s expanding service area, in accordance with Idaho Code § 42-202B(9).

12. Nampa’s PI System relies on a combination of ground water and surface water.

13. Nampa obtains surface water for its PI System from three irrigation districts: Pioneer, NMID, and Boise-Kuna. A map showing the service areas of these and other irrigation districts serving Canyon County is submitted separately as Exhibit A.

14. Pioneer delivers surface water to Nampa’s PI System from its Phyllis Canal and laterals. These deliveries from Pioneer serve 2,985 acres within Nampa’s PI System (as documented in Pioneer’s “2019 Irrigation Assessments – Pioneer Account #7777” dated October

10, 2019). At 4.5 AF/acre, that equates to 13,432.5 AF/year. Pioneer also makes additional, non-pressurized deliveries to Nampa residents and businesses separate from its deliveries to Nampa's PI System. Some of these additional, non-pressurized deliveries include the City itself.

15. Nampa supplements its surface water supply for its PI System with ground water pumped from a number of municipal wells, owned and operated by Nampa, under a number of municipal water rights.

16. Municipal water that is delivered by Nampa to its municipal customers via Nampa's Potable System generates sewage wastewater (aka effluent) that is collected by Nampa's sewage system.

17. That wastewater derives from Nampa's Potable System, not from its PI System. Accordingly, the wastewater is composed virtually entirely of ground water originally diverted under Nampa's municipal water rights.

18. That wastewater is collected, treated, stored, and disposed of by Nampa in publicly owned treatment works, the Nampa WWTP.

19. At this time, the wastewater collected by Nampa is treated and then discharged from Nampa's WWTP to Indian Creek at a point just north of the Union Pacific Railroad tracks and just west of Northside Boulevard.

20. The WWTP discharge point is upstream of Riverside's point of diversion.

21. Currently, the City discharges approximately 18.6 cfs (6,825 acre-feet) of wastewater to Indian Creek during the 185-day irrigation season and 17.0 cfs (6,069 acre-feet) during the 180-day non-irrigation season. These numbers are based on recent Discharge Monitoring Reports ("DMRs") submitted by Nampa to IDEQ. Monthly data for the years 2017-2019 is presented in Table 2 below.

TABLE 2: EFFLUENT DATA - Based on DMR reports submitted by Nampa to IDEQ
 (Available at <https://www.cityofnampa.us/1021/Monthly-Reporting>)
 (See DRM line labeled "flow, in conduit or thru treatment plant")

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2017 Effluent Flow - Average (GPD)	11.406	11.895	10.869	10.985	11.339	11.754	11.638	12.000	12.095	11.571	10.502	10.028
2017 Effluent Flow - Average (cfs)	17.648	18.405	16.817	16.997	17.544	18.187	18.007	18.567	18.714	17.903	16.249	15.516
2018 Effluent Flow - Average (GPD)	9.833	9.525	9.505	9.682	10.154	11.084	11.275	11.148	11.122	10.927	10.416	10.489
2018 Effluent Flow - Average (cfs)	15.214	14.738	14.707	14.981	15.711	17.150	17.445	17.249	17.209	16.907	16.116	16.229
2019 Effluent Flow - Average (GPD)	10.470	10.764	10.589	10.636	12.037	12.224	11.840	11.555	12.047	11.434	11.039	10.632
2019 Effluent Flow - Average (cfs)	16.200	16.655	16.384	16.457	18.624	18.914	18.320	17.879	18.640	17.691	17.080	16.451

22. Wastewater currently discharged by Nampa to Indian Creek is comingled with other waters of the State. That wastewater has historically been diverted and put to use by downstream water right holders, including Riverside.

23. Indian Creek is a source of water for Riverside.

24. Riverside water right sources also include the Boise River, Mammen Gulch Creek/Drain, West End Drain, East Arena Drain, Christian Gulch Wasteway, and Guess Gulch Creek/Drain.

25. Riverside diverts water from Indian Creek at the Riverside Canal west of the City of Caldwell. Riverside has the right to divert approximately 180 cfs of water sourced from Indian Creek under Water Right Nos. 63-2279 and 63-2374 with 1915 and 1922 priority dates.

26. As a result of the *Reuse Permit*, Nampa will reduce the amount of wastewater it releases to Indian Creek during certain times of the year.

27. Pioneer does not hold a water right, nor has it sought a water right, that expressly authorizes it to accept recycled water from Nampa pursuant to its agreement with Nampa.

28. Nampa's WWTP discharges are governed by NPDES Permit No. ID0022063 issued to Nampa pursuant to the Clean Water Act. The most recent permit was issued by EPA on September 20, 2016 (effective November 1, 2016). A copy of the NPDES Permit is set out in Appendix A to Nampa's Application for Reuse Permit (a copy of which is submitted separately as Exhibit J). The NPDES Permit requires Nampa to provide pollution control and treatment of

its wastewater stream based on numeric criteria (discharge limits) prior to discharge to Indian Creek. Among others, the NPDES Permit contains discharge limits for nutrients (Phosphorus) and temperature.

29. Nampa is in compliance with the NPDES Permit standards in effect today. In the coming years, stricter standards will apply for phosphorus (in 2026) and for temperature (in 2031). If Nampa continues to discharge its WWTP wastewater into Indian Creek, compliance with these future standards will require pollution control system upgrades costing roughly \$210 million.

30. In contrast, pollution control upgrades based on irrigation season delivery of water to the Phyllis Canal (generally April 1 through November 1) under the *Reuse Permit* will entail net costs of roughly \$190 million (reflecting savings of roughly \$40 million offset by additional costs of roughly \$20 million) yielding net savings of roughly \$20 million. These savings are explained further in the following three paragraphs.

31. Roughly \$20 million of the \$210 million upgrade cost corresponds to the cost of meeting future temperature limits in Indian Creek, which will be more stringent during the summer irrigation season. IDEQ's water quality standards treat irrigation canals as manmade waterbodies with a water quality standard of "agricultural water supply." Accordingly, the future summertime temperature requirements applicable to Indian Creek are not applicable to discharges to the Phyllis Canal.

32. The future summertime tertiary treatment standard for phosphorus in Indian Creek will be 0.1 ppm (or mg/l), while the wintertime tertiary treatment standard for Indian Creek will be 0.35 ppm (or mg/l). Under the *Reuse Permit*, Nampa will treat year-round (Phyllis Canal in

the summer and Indian Creek in the winter) to 0.35 ppm (or mg/l), saving another roughly \$20 million, bringing the savings to \$40 million.

33. The roughly \$40 million in savings will be offset by an additional roughly \$20 million in costs entailed in constructing the Class A water recycling system, including delivery to the Phyllis Canal, necessitated by the *Reuse Permit*. The net result (\$40 million in savings less \$20 million in additional costs) will be savings of \$20 million to Nampa and its customers achieved by implementing the recycled water program authorized by the *Reuse Permit*.

34. In many respects, the Class A recycled water discharged to the Phyllis Canal will be of higher quality than the background quality of the irrigation water in the Phyllis Canal.

35. Nampa's wastewater discharge to the Phyllis Canal has been approved by IDEQ pursuant to the *Reuse Permit*.

36. On March 7, 2018, Nampa and Pioneer entered into a *Reuse Agreement* whereby Nampa would seek a recycled water reuse permit from IDEQ authorizing Nampa to discharge up to 41 cfs of Class A Recycled Wastewater to Pioneer's Phyllis Canal as supplemental irrigation water supply. (The 41 cfs number is larger than the 31 cfs authorized under the *Reuse Permit*, reflecting longer-term water reuse goals beyond the 20-year timeframe of the permit.) A copy of the agreement is submitted separately as Exhibit F. (It also appears as Appendix B to the *Application for Reuse Permit*, which is submitted separately as Exhibit J.)

37. On March 9, 2019, Nampa, with Pioneer's support, filed its reuse permit application package with IDEQ. A copy of the application is submitted separately as Exhibit J. IDEQ ultimately approved the application and issued *Reuse Permit No. M-255-01* to Nampa on January 21, 2020. The *Reuse Permit* expires on January 21, 2030.

38. The *Reuse Permit* authorizes Nampa to discharge to the Phyllis Canal (for subsequent redelivery to the City's PI System) up to 31 cfs of Class A Recycled Water from the Nampa WWTP between May 1 and September 30 each year.

39. Nampa will continue to discharge its WWTP effluent to Indian Creek during the non-irrigation season.

40. A map showing five alternative paths for discharge of wastewater from Nampa's WWTP to the Phyllis Canal (options 1A, 1B, 2A, 2B, and 3) is submitted separately as Exhibit C. (It is also set out as an attachment to the *Reuse Agreement*, a copy of which is submitted separately as Exhibit F.)

41. Two maps showing the locations at which Pioneer delivers irrigation water to Nampa are submitted separately as Exhibit D and Exhibit E.

42. Nampa's delivery of wastewater under the *Reuse Permit* will benefit Nampa and Pioneer by offsetting in part declining Phyllis Canal sources upstream of Nampa (notably the declining Fivemile Feeder Canal inputs into the Phyllis Canal, caused by declining drain flows in Fivemile Drain).

43. The cooperative endeavor by Nampa and Pioneer under the *Reuse Permit* will further maximize water delivery efficiency and reduce operational spills of water by linking and coordinating operations of Nampa's Eaglecrest and Moss Point pump stations with the Crestwood and Asbury Park pump stations, also owned, operated and maintained by Nampa as part of its PI System. The other two PI System pump stations served by the Phyllis Canal on or upstream of the McCarthy Lateral are the Horton and Orchard Heights pump stations. Nampa also owns and operates a PI System pump station on the Phyllis Canal just downstream of the Canal's crossing of the Jonah Drain (the Midway Park pump station).

44. As explained further in paragraphs 45 through 49, Nampa will recover and put to beneficial use the entire quantity of wastewater that it delivers to Phyllis Canal.

45. Within approximately three miles downstream of Nampa's WWTP discharge into the Phyllis Canal, Pioneer delivers irrigation water to six PI System pump stations operated by Nampa. In addition, Pioneer makes a number of deliveries to others within Nampa's area of city impact (older subdivisions using non-pressurized irrigation systems as well as individuals using water for residential or agricultural irrigation).

46. These deliveries downstream of the WWTP discharge are located on the Phyllis Canal, the 15.0 Lateral, Hatfield Lateral, Stevens Lateral, Stone Lateral, the McCarthy Lateral, and branches thereof. The 15.0 Lateral system alone, located within a mile downstream of the proposed WWTP discharge point, diverts 32 cfs from the Phyllis Canal (slightly more than the 31 cfs authorized in the *Reuse Permit*) for use on approximately 1,600 acres of lands located within Nampa's service area, including two of Nampa's PI System pump stations (Eaglecrest and Moss Point). (This number appears in Table 7-2 of the Preliminary Technical Report submitted by Nampa as part of its Reuse Permit Application, see separately submitted Exhibit J, page 61).

47. In aggregate, Nampa and other Pioneer landowners within Nampa's area of city impact are served by approximately 138 cfs of Phyllis Canal diversions located between the proposed Nampa WWTP discharge point and the McCarthy Lateral. This number is the sum of the eight laterals and headgate deliveries listed in Table 7-2 (Phyllis Canal Diversions and Inputs) on page 7-8 of the Preliminary Technical Report submitted by Nampa as part of its Reuse Permit Application, see separately submitted Exhibit J, page 61. This number is more than four times the 31 cfs that Nampa will discharge into the Phyllis Canal.

48. While the terminal ends of the 15.0 Lateral, Stevens Lateral, and Stone Lateral cross over into and serve some Caldwell lands, the vast majority of this water is used by Nampa residents and businesses.

49. Looking solely to Pioneer's deliveries to Nampa's PI System (excluding deliveries to other Pioneer landowners), Pioneer delivers approximately 60 cfs to Nampa's PI System from its Phyllis Canal and laterals.

Respectfully submitted this 30th day of June, 2020.

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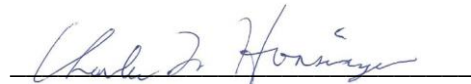
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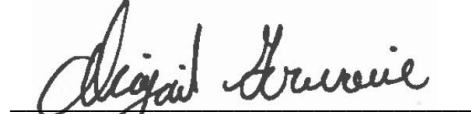
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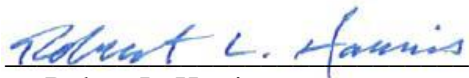
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A handwritten signature in blue ink that reads "Robert L. Harris". The signature is written in a cursive style and is positioned above a horizontal line.

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I HEREBY CERTIFY that on this 30th day of June, 2020, the foregoing was filed, served, and copied as shown below.

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