

July 19, 2023

Angie Hansen  
Idaho Department of Water Resources  
322 E. Front Street, Suite 648  
Boise, Idaho 83702  
[rulesinfo@idwr.idaho.gov](mailto:rulesinfo@idwr.idaho.gov)

**Re: IDAPA 37.03.08 – Water Appropriation Rules  
Written Comments of Idaho Ground Water Appropriators, Inc.**

Dear Ms. Hansen:

Idaho Ground Water Appropriators, Inc. (IGWA) appreciates the opportunity to submit these comments related to the Preliminary Draft Rule (Strawman v2.0) with Redline dated June 30, 2023, setting forth proposed amendments to the Water Appropriation Rules, IDAPA 37.03.08.

**Rule 036**

The Department has historically allowed applicants to request successive delays or interruptions in processing of an application for good cause shown. Consider adding a sentence to the end of Rule 036 to memorialize the Department's authority to grant successive requests for good cause shown.

**Rule 054 - Additional information requirements**

Revise Rule 054.d.i to replace "will only" with "may." Revise Rule 054.d.ii to read ". . . within the time allowed, an extension has not been granted, the Director may void. . ."

Thank you for your consideration of these comments. Please contact me if you have any questions.

Sincerely,



T. J. BUDGE