

MEMO

State of Idaho
Department of Water Resources
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Date: 3/16/2021

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cc: Mat Weaver, Deputy Director
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Subject: Review of Implementation of Rotation into Storage in 2020 by Water District 34

Introduction

The Director of the Idaho Department of Water Resources (IDWR) issued "*Interlocutory Order Regarding Instructions To Water District 34 Watermaster; Order Vacating Deadline and Hearing Dates; Notice of Status Conference*" (Order) on April 7th, 2017. In that order, the Director notified the parties that a status conference was scheduled for November 14, 2017. Water District 34 (WD34) did not implement rotation during the 2017, 2018, and 2019 irrigation seasons, so the Director postponed the status conference. WD34 implemented rotation during the 2020 irrigation season. The Director held a status conference on January 26, 2020. At that status conference, the Director tasked his staff with reviewing the interlocutory order to determine if the requirements were met during the 2020 irrigation season.

Review

This memo constitutes the requested review and is based on data from the WD34 ditch rider logs, Big Lost River Irrigation District (BLRID) storage balance worksheets, BLRID rotation report, and communication with the WD34 Watermaster. For this memo, IDWR first quotes (in bold) an instruction from the interlocutory order. Following the quoted instruction, IDWR reviews how the instruction was implemented.

1. **On or before May 1, any water user planning to rotate a natural flow water right into storage in the up-coming irrigation season is required to completely fill out and submit to the watermaster a notice of intent to rotate a natural flow water right into storage. The watermaster shall prepare a standard form for notice of intent to rotate Big Lost River rights into storage ("NOI").**

IDWR Review: Eight water users submitted NOI forms to utilize rotation during the 2020 irrigation season to the WD34 Watermaster on or before the May 1, 2020 deadline. Each of these water users submitted the NOI form created by the WD34 Watermaster. IDWR received copies of the applications submitted by these water users.

Water User	Canal	Water Rights	Implemented Rotation
B & L Farms	Darlington 3-In-1 Burnett Lower Burnett Beck McGowen Pehrson Ditch	15	Yes
Holly Seefried	Darlington	1	Yes
Jenny Smith	Darlington	4	No
Josh Pehrson	Burnett	4	Yes
Nelson Mackay Ranch	Swauger	1	Yes
Randy Pehrson	Darlington Burnett Swauger	10	Yes
Nancy McCaslin (Mauthe)	Sharp	4	Yes
Shane Rosenkrance	Darlington	6	No

Several water users submitted NOI forms after the May 1, 2020 deadline. IDWR sent correspondence to the WD34 watermaster and BLRID on May 20, 2020 advising that the Director expected strict adherence to the requirements of the Interlocutory Order, including deadlines for submitting NOIs. The watermaster did not approve or deny the applications received after May 1, 2020, but these water users did not utilize rotation for credit during the 2020 irrigation season. IDWR did not request copies of the applications submitted by these water users.

2. **The NOI must contain the following information:**

- **A list of all natural flow water rights the water user plans to rotate during the irrigation season;**

IDWR Review: In the application materials received from WD34, all water users submitted a list of the natural flow water right(s) they planned to rotate into storage during the 2020 irrigation season.

- **Identification of all surface and ground water rights, excluding BLRID storage rights, with places of use overlapping the place of use described by the water right(s) for which rotation into storage notice is being submitted;**

IDWR Review: All water users identified any surface and groundwater rights overlapping the place of use for the water right(s) being rotated.

- **A map of the irrigated lands to which the natural flow water rights are appurtenant (maps should be on 8.5" x 11" attachments);**

IDWR Review: All water users, except one, submitted 8.5" by 11" maps of the appurtenant irrigated lands as attachments.

- **Personal attestation by the water user in writing of his/her intent to beneficially use the water rotated into storage during the year in which the water is rotated and acknowledgement that rotated water will only be used on the place of use described by the water right.**

IDWR Review: All water users submitted a signed attestation to beneficially use rotated water during the 2020 irrigation season and only on the place of use described in the water right.

Water User	Natural Flow Water Rights Being Rotated	Overlapping Surface & Groundwater Rights	Map	Personal Attestation
B & L Farms	Y	Y	Y	Y
Holly Seefried	Y	Y	Y	Y
Jenny Smith	Y	Y	N	Y
Josh Pehrson	Y	Y	Y	Y
Nelson Mackay Ranch	Y	Y	Y	Y
Randy Pehrson	Y	Y	Y	Y
Nancy McCaslin (Mauthe)	Y	Y	Y	Y
Shane Rosenkrance	Y	Y	Y	Y

3. **In addition to the NOI form, during the irrigation season, a water user must notify the ditch rider each time the user wants to rotate natural flow into storage. Requests by water users to rotate natural flow into storage must be made 48 hours in advance, but no more than 72 hours in advance, of the calendar date on which rotation into storage is requested to occur. The ditch rider must submit written documentation of water user requests to rotate natural flow into storage to the BLRID, and BLRID must submit written documentation of such requests to the**

watermaster, the same day requests are made. The watermaster shall identify and record the water rights and diversion rate to be rotated. The calendar dates on which rotation of natural flow into storage is requested to occur cannot predate the date of the water user's request. A water user is not required to provide additional notice to the ditch rider if the water user's water right goes out of priority and subsequently comes back into priority.

IDWR Review: The Big Lost River data routing procedure starts with ditch riders recording delivery data each day of the irrigation season. The ditch rider sends a ditch rider log each day to BLRID, which forwards a copy to the watermaster. BLRID enters the daily delivery data from the ditch rider logs into its storage balance worksheets two or three times per week.

Water users notified the ditch rider of their intent to rotate into storage in advance of when the water user wanted to rotate natural flow into storage using a form created by the watermaster. IDWR received copies of the forms submitted to the ditch riders. Each form identifies the water rights and diversion rate to be rotated into storage. No notifications were received more than 72 hours in advance, but several notifications were received less than 48 hours in advance. The watermaster should deny rotation for water users that consistently submit late notification during future irrigation seasons. Notification forms are available for all rotation, except for two days of rotation by Josh Pehrson. These two days are the only days that the notification requirements were not met. The watermaster should deny rotation to water users who do not submit notification of rotation during the irrigation season. The ditch rider submitted the notification forms to BLRID, which sent copies to WD34, fulfilling the requirement to submit the notifications to the watermaster. For the 2021 irrigation season, the watermaster intends to incorporate the rotation request notification into the ditch rider logs and cease using the separate form used for the 2020 irrigation season.

IDWR received feedback from the watermaster expressing his concern that the final sentence of this instruction (A water user is not required to provide additional notice...) is too broad. For example, a water right could go out of priority in May and not come back into priority until September. The watermaster would prefer that water users submit a new notification when a water right comes back into priority. This notification would be consistent with the requirement that water users must communicate with the ditch rider when a natural flow water right comes back into priority.

Water User	Date Notification Submitted	Intended Rotation Date	Dates Rotation Occurred	Notification For Rotation
B & L Farms	5/29/20	5/30-6/10	5/30-6/10	Y
	6/10/20	6/11-6/22	6/11-6/22	Y
	6/22/20	6/23-7/4	6/23-7/4	Y
Holly Seefried	8/4/20	8/5-8/7	8/5-8/7	Y
	8/13/20	8/13-8/24	8/13-8/24	Y
Jenny Smith			Did not rotate.	
Josh Pehrson	5/15/20	5/15-6/26	5/15-6/26 7/2	Y N

Water User	Date Notification Submitted	Intended Rotation Date	Dates Rotation Occurred	Notification For Rotation
			7/5	N
Nelson Mackay Ranch	5/20/20	5/20-5/26	5/20-5/26	Y
	6/27/20	6/28-7/11	6/28-7/10	Y
Randy Pehrson	5/21/20	5/22-5/25	5/23-5/25	Y
Nancy McCaslin (Mauthe)	5/10/20	5/12-5/27	5/12-5/27	Y
	7/2/20	7/3-7/4	7/3-7/4	Y
	7/2/20	7/5-7/16	7/5-16	Y
Shane Rosenkrance			Did not rotate.	

4. Prior to approving rotation into storage requests, the watermaster shall confirm on an individual water right basis the following:

- **Whether the water user can beneficially use the rotated water on the land identified on the standard NOI form by the end of the current irrigation season;**
- **Whether there is a "reasonable need for irrigation water" on the land identified;**
- **Whether the water user has operable diversion, delivery, and application facilities;**
- **Whether the water is deliverable to the water right place of use and the irrigated lands identified;**
- **Whether the Big Lost River is disconnected as described by the General Provisions, or if connected that the priority date on the river is October 1, 1936, or junior;**
- **Whether the diversion rate of the water rights being rotated into storage conforms to all total diversion rate limitations including diversion rate limitations on overlapping ground water rights;**
- **Whether the water right(s) being rotated overlap with supplemental ground water rights with provisions requiring the user to make full beneficial use of all surface water available to the user for irrigation prior to utilizing supplemental ground water. Supplemental ground water rights with these provisions will be limited according to the supplemental ground water right conditions when overlapping surface water rights are being rotated into storage; and**
- **That the rotation conforms to all conditions of the General Provisions and the WD34 Rules.**

IDWR Review: The watermaster stated he considered all of the listed requirements when reviewing rotation applications and only approved applications that met them.

- 5. If the watermaster determines that rotation can be approved, the watermaster will document the analysis supporting approval. If the watermaster determines rotation cannot be approved, the watermaster will notify the water user and BLRID in writing and explain the basis for the denial. Water users dissatisfied with denial of rotation into storage requests may petition the Director for reconsideration of the watermaster's denial.**

IDWR Review: The WD34 Watermaster approved eight applications to rotate natural flow into storage during the 2020 irrigation season. The watermaster stated the approved applications serve as the documentation supporting the approval. The watermaster did not document his analysis of whether the considerations in instruction #4 were met.

This provision is unclear whether its intent is to document approval of the NOI or document approval of requests during the irrigation season. Prior to May 1, when the NOI forms are submitted, not all of the information needed for this analysis is available to the watermaster. The provisions listed in instruction #4 should be considered for each in-season rotation request and could be added to the in-season notification form. Each provision would have a box for the watermaster to initial indicating approval and space for watermaster comments. IDWR staff is concerned that documentation for every rotation request during the season could become burdensome for the watermaster. One option for streamlining the documentation is for the watermaster to only provide comments for special circumstances or a denial.

The watermaster did not deny any rotation applications for the 2020 irrigation season. The watermaster stated he would have notified a water user in writing if an application was denied.

- 6. During the irrigation season, water users with rotation storage balances that want rotation storage delivered must notify the ditch rider when the user wants rotation storage delivered. The ditch rider must receive requests for delivery of rotation storage 48 hours in advance, but no more than 72 hours in advance, of the calendar date on which delivery of rotation storage is requested to commence. The ditch rider must record each request for rotation storage delivery into a ditch rider log which must be submitted to the BLRID and watermaster daily. BLRID must submit a written report daily to the watermaster documenting delivery requests. The watermaster will review delivery requests to ensure that rotation storage will be beneficially used at the same place of use described by the water right for which natural flow was rotated into storage.**

IDWR Review: The watermaster stated that ditch riders used the ditch rider logs to document notification for delivery of rotation storage, the same process WD34 uses for notification of natural flow and storage deliveries. IDWR's understanding is that the ditch rider logs represent the actual deliveries to water users. Additional documentation is needed on the ditch rider logs to record each request for rotation storage delivery. For

the 2021 irrigation season, the watermaster intends to add a column to the ditch rider logs that the ditch rider can use to document requests for rotation storage deliveries.

The ditch rider logs and the BLRID storage balance worksheets do not match. On some days, a delivery of rotation storage is recorded on both the ditch rider log and the BLRID storage balance worksheet. On other days, a delivery of rotation storage is only recorded on the BLRID storage balance worksheet. The watermaster provided feedback that any inconsistency between ditch rider logs and BLRID storage balance worksheets resulted from BLRID's policy to not change the ditch rider logs after they have been submitted to BLRID. Any necessary changes BLRID staff identifies during their quality control review are made to the BLRID storage balance worksheets. The watermaster stated that he needs to emphasize to ditch riders to accurately record rotation delivery data on ditch rider logs.

Water User	Canal	Ditch Rider Logs	Storage Balance Worksheet
B & L Farms	Burnett	Values for storage delivery with "x" in "Rotation Used" column	Values for rotation delivery.
	Darlington 3-In-1 Lower Burnett Beck McGowen Pehrson Ditch	No rotation delivery recorded.	No rotation delivery recorded.
Holly Seefried	Darlington	No rotation delivery recorded. Values recorded for storage delivery.	Values for rotation delivery.
Jenny Smith	Darlington	No rotation delivery recorded.	No rotation delivery recorded.
Josh Pehrson	Burnett	No rotation delivery recorded. Values recorded for storage delivery.	Values for rotation delivery.
Nelson Mackay Ranch	Swauger	No rotation delivery recorded in July. Values recorded for storage delivery in July. Values recorded for rotation delivery in September.	Values for rotation delivery.

Water User	Canal	Ditch Rider Logs	Storage Balance Worksheet
Randy Pehrson	Darlington Burnett Swauger	No rotation delivery recorded. Values for storage delivery.	Values for rotation delivery.
Nancy McCaslin (Mauthe)	Sharp	Rotation delivery recorded on only 3 (15 days in storage balance worksheet) Values for storage delivery.	Values for rotation delivery.
Shane Rosenkrance	Darlington	No rotation delivery recorded.	No rotation delivery recorded.

The Order states “BLRID must submit a written report daily to the watermaster documenting delivery requests.” In practice, the BLRID did not submit a separate daily report to the watermaster. Instead, the watermaster relied on the ditch rider logs that he received daily as the written report documenting delivery requests.

The watermaster stated he reviewed delivery requests to ensure that rotation storage was beneficially used at the same place of use described in the water right that was rotated into storage. For most users, this review is straightforward because they only have one place of use. However, this analysis is complex for water users with multiple places of use and diversions from multiple canals. B & L Farms is an example of a potentially complicated analysis. However, B & L Farms rotated into storage from and delivered rotation storage to just one canal during the 2020 irrigating season, simplifying the analysis. Water users with multiple places of use and diversions from multiple canals should be required in future years to submit any additional information the watermaster deems necessary to complete his analysis.

- 7. For delivery of rotation storage, the watermaster will consult with the BLRID and determine the total amount of rotation storage to be released from the reservoir, the amount of rotation water to be released for each user and for each point of diversion, and the dates when rotation storage will be delivered. The watermaster shall assess losses to the delivery of rotation storage consistent with WD34 Rule 40.03.**

IDWR Review: Consultation between BLRID and the watermaster for rotation deliveries followed the same process used for determining releases from Mackay Reservoir for natural flow and storage deliveries.

The BLRID storage balance worksheets confirm BLRID assessed losses to water users when rotation storage was delivered. The calculation consisted of the rotation storage

delivery at the head of the canal multiplied by a delivery factor. For example, in “Burnett_storage_2020_Balances.xlsx” the “(Used) Rotation at Head” (column S) is multiplied by the “Reach Delivery Factor” (column T) with the result being the “Total” (column U).

8. The watermaster will retain the following information in the Water District archives and make it available for public review:

- **All NOI forms submitted by water users;**

IDWR Review: All of the NOI forms for the 2020 irrigation season are archived at Water District 34 and available to the public. IDWR received copies of the NOI applications for the eight water users approved by the watermaster to rotate into storage during the 2020 irrigation season. IDWR did not request copies of the NOI applications submitted by water users after May 1, 2020 because the watermaster did not approve them.

- **All written correspondence submitted to the watermaster by BLRID documenting in-season requests by water users to rotate natural flow into storage or have rotation storage delivered;**

IDWR Review: The rotation notification forms and the ditch rider logs serve as this documentation. All of the rotation notification forms and ditch rider logs for the 2020 irrigation season are archived at Water District 34 and available to the public. IDWR has obtained copies of all of these documents.

- **All written watermaster correspondence denying requests for rotation for credit and/or denying requests for delivery of rotation storage; and**

IDWR Review: The watermaster did not deny any applications for the 2020 irrigation season.

- **The annual rotation for credit summary report submitted by BLRID.**

IDWR Review: BLRID wrote a report titled *Rotation Credit Annual Report for the 2020 Irrigation Season* (“BLRID Report”). This report is archived at Water District 34 and available to the public. IDWR received a copy of the BLRID Report on December 8, 2020. The report contains the following for each user approved to rotate during the 2020 irrigation season:

- The amount of undelivered rotation at the end of the irrigation season.
- The amount of undelivered BLRID storage at the end of the irrigation season.
- Copies of the BLRID storage balance worksheets, which contain the daily rotation storage balances, daily BLRID storage account balances, and water users water rights

9. A summary of rotation for credit for the irrigation season will be included in the watermaster's annual report. The intent of the summary is to provide transparency so water users in WD34 understand how rotation for credit was implemented during the irrigation season. The watermaster has discretion concerning the content and format of the summary report. The report may vary from year to year based on the circumstances of the irrigation season, but at a minimum it should include the following information:

- Identification of each user that rotated natural flow into storage, by canal or point of diversion;
- Volume of water under each natural flow water right rotated for credit and rotation storage released associated with each natural flow water right from the reservoir for each user at each point of diversion;
- Volume of any unused rotation storage that remained in Mackay Reservoir at the end of the irrigation season for each user for each point of diversion;
- Each user who was denied rotation for credit and a discussion of reasons for denying rotation for credit;
- A discussion of positive and negative input received from water users regarding how rotation for credit is being implemented; and
- Recommendations by the watermaster and/or water district advisory committee for improving implementation of rotation for credit.

IDWR Review: The watermaster submitted his 2020 WD34 Watermaster report to IDWR in January 2021. He did not discuss rotation for credit in the report. Instead, the watermaster referenced the BLRID Report, which identified each user that rotated natural flow into storage, volume of water rotated for credit and subsequently delivered, natural flow water rights being rotated into storage, and the volume of rotation storage that remained in Mackay Reservoir at the end of the irrigation season. The BLRID Report did not identify the canal where the rotation to storage and rotation storage delivery occurred.

The following instructions shall be implemented by the BLRID in the administration and accounting of rotation for credit:

1. **The BLRID must adopt and implement accounting procedures to track rotation for credit and the subsequent delivery of rotated storage that produce data that can be shared with and used by WD34 for administrative and accounting processes. Accounting procedures implemented by the BLRID must:**
 - a. **Identify individual water right rotation storage balances on a daily time step and publish such information on a weekly basis to its webpage;**

IDWR Review: BLRID used its 2020 storage balance worksheets to document for each water user on a daily time step the amount of natural flow rotated into storage and the amount of rotation storage delivered. Each week, BLRID published on its website a summary for each canal showing each user's:

- Total remaining BLRID storage.
- Total deliveries to the field headgate.
- Total deliveries to the canal headgate
- Total storage deliveries to the canal headgate.
- Total natural flow deliveries to the canal headgate.
- Total rotation into storage remaining to be delivered.

b. Apply losses to the storage and delivery of rotation storage as determined by the watermaster consistent with WD34 Rule 40.03;

IDWR Review: The BLRID storage balance worksheets confirm BLRID assessed losses to water users when rotation storage was delivered. The calculation consisted of the rotation storage delivery at the head of the canal multiplied by a delivery factor. For example, in "Burnett_storage_2020_Balances.xlsx" the "(Used) Rotation at Head" (column S) is multiplied by the "Reach Delivery Factor" (column T) with the result being the "Total" (column U).

c. Prohibit negative rotation storage balances;

IDWR Review: According to the BLRID Report, no user ended the irrigation season with a negative rotation storage balance.

In addition to the BLRID Report, IDWR received individual storage balance worksheets from BLRID on October 31, 2020. These worksheets are generally in agreement with the BLRID report, but indicate one water user with a rotation storage balance of -5 miner's inches at the end of the irrigation season. This discrepancy appears to be normal data adjustments associated with finalizing data after the irrigation season.

d. Prohibit cancellation of negative storage water account balances with rotation storage balances;

IDWR Review: The BLRID storage balance worksheets confirm that BLRID did not cancel negative storage water account balances with rotation storage balances.

e. Prohibit the use of rotation storage on lands separate from the place of use under the rights rotated into storage (rotation storage must be used on the same land as the rights rotated to storage);

IDWR Review: The BLRID General Manager stated he reviewed each delivery request to ensure that rotation storage was beneficially used at the same place of use described in the water right that was rotated into storage.

- f. Ensure that if the Mackay Reservoir fills after water has been rotated into storage, all water in the reservoir at the time it fills becomes storage water of the BLRID; and**

IDWR Review: This criteria was not triggered in 2020 because Mackay Reservoir did not reach a four (4) day average elevation of 6,066.12 feet during the period from April 1, 2020 until August 1, 2020. The maximum four (4) day average elevation during this period was 6,064.75 feet on May 2, 2020.

- g. Ensure any water stored under rotation for credit that is not used in the same irrigation season in which it is stored shall become storage water of the BLRID at the end of the irrigation season.**

IDWR Review: The BLRID Report indicates 10 miners inches (0.4 AF) of undelivered rotation storage remained at the end of the 2020 irrigation season. BLRID has no procedure for allowing individual water users to carryover storage allocations into the next irrigation season so IDWR assumes this 0.4 AF has become BLRID storage.

- h. Each year, after the end of the irrigation season, but no later than December 15, the BLRID will prepare and submit an annual report to the watermaster and the Director summarizing rotations for that year. The written summary must include daily rotation storage balances and storage water right balances for all water rights for which rotation for credit occurred. The summary must also include year-end rotation storage balances and storage water right balances for all water rights for which rotation occurred.**

IDWR Review: IDWR received the BLRID Report on December 3, 2020. This report contains the following for each user approved to rotate natural flow into storage during the 2020 irrigation season:

- The amount of undelivered rotation at the end of the irrigation season.
- The amount of undelivered BLRID storage at the end of the irrigation season.
- Copies of the BLRID storage balance worksheets, which contain the daily rotation storage balances, daily BLRID storage account balances, and water users water rights

The following standards will be used for determination by the watermaster that rotation into storage improves the efficiency of water use as required by the General Provisions:

1. Water rotated into storage must be used in the same irrigation season in which it is rotated.

IDWR Review: The BLRID Report indicates 10 miners inches (0.4 AF) of undelivered rotation storage remained at the end of the 2020 irrigation season.

2. On or about September 1 of each year, the watermaster will notify water users of their rotation storage balances. Following notification of rotation storage balances, individual water users will only be allowed to rotate additional natural flow into storage if they: (1) declare in writing their intent to continue to rotate natural flow into storage; and (2) demonstrate to the watermaster that all water already rotated into storage and any additional rotation storage can be beneficially used by the end of the irrigation season.

IDWR Review: Water users communicated regularly with the watermaster during the irrigation season to determine the amount of rotation storage remaining to be delivered. The BLRID storage balance worksheets indicate no rotation into storage occurred after August 24, 2020. Due to the regular communication with water users and no requests from users to rotate into storage after August 24, the watermaster did not send written notification to water users of their rotation storage balances on September 1, 2020.

Given that weekly rotation balances are posted on the BLRID website and there is regular communication between the watermaster and water users, this instruction can be modified to remove the mandatory notification on September 1. However, the portion of this instruction stating that the watermaster will only approve rotation requests on or after September 1 when the two conditions stated are satisfied should remain in the Order.

Water User	Canal	Last Day of Rotation into Storage in 2020
B & L Farms	Burnett	July 4
	Darlington	---
	3-In-1	---
	Lower Burnett	---
	Beck	---
	McGowen	---
	Pehrson Ditch	---
Holly Seefried	Darlington	August 24
Jenny Smith	Darlington	---
Josh Pehrson	Burnett	July 5
Nelson Mackay Ranch	Swauger	July 10
Randy Pehrson	Darlington	May 25
	Burnett	---
	Swauger	---
Nancy McCaslin (Mauthe)	Sharp	July 16
Shane Rosenkrance	Darlington	---

3. **The watermaster shall review BLRID storage account balances during the irrigation season that are associated with the same places of use for which Big Lost River water right rotation into storage requests are made. The watermaster may request additional written justification for rotation into storage requests when the water user has a significant BLRID storage account balance and/or has used little to no water under the BLRID storage account balance. The watermaster may deny rotation into storage requests when the watermaster concludes that storage account balances and/or rotation storage balances will not be beneficially used during the year in which the water is stored. Water users dissatisfied with denial of rotation into storage requests may petition the Director for reconsideration of the watermaster's denial.**

IDWR Review: The watermaster regularly reviewed BLRID storage balances and undelivered rotation storage balances during the 2020 irrigation season. The watermaster provided feedback that he is reluctant to deny rotation into storage requests on the basis of a water user's BLRID storage account balance.

This instruction states the watermaster "may" deny rotation into storage requests. This instruction should remain in the Order to provide the watermaster the ability to deny a request.

4. **In the event that a futile call determination on the Big Lost River below the Beck Canal diversion is imminent or likely, the watermaster shall contact water users with diversions below the Beck Canal diversion who have rotation storage balances and request whether the users wish to release rotation storage.**

IDWR Review: No water user made a futile call below the Beck Canal, so this condition did not apply in 2020. The watermaster delivered water to the Arco and Munsey Canals throughout the irrigation season.

Administration of rotation deliveries in 2020

The WD34 Watermaster delivered rotation storage when requested by the water user. Delivery of rotation storage occurred under these circumstances:

- Rotation storage was delivered to a water user at the same time as delivery of the water user's in priority natural flow.
- Rotation storage was delivered before the water user's available BLRID storage.
- Rotation storage was delivered before the water user's in priority natural flow.

The final case, turning off a natural flow water right to deliver storage, is an uncommon practice in Idaho water administration. The intent of delivering rotation storage before natural flow appears to be to ensure water users have no undelivered rotation storage at the end of the irrigation season. It masks that fact that at least a portion of the water user's water demand later in the irrigation season could have been satisfied by the water user's natural flow water rights, the rotation storage was not needed at that time. The following table compares the result of delivering rotation storage before and after natural flow.

Water User	Undelivered Rotation - Deliver Rotation Storage Before Natural Flow Water Rights (MI)	Undelivered Rotation - Deliver Rotation Storage After Natural Flow Water Rights (MI)
B & L Farms	0	0
Holly Seefried	5	234
Jenny Smith	---	---
Josh Pehrson	1	0
Nelson Mackay Ranch	0	3,412
Randy Pehrson	0	0
Nancy McCaslin (Mauthe)	4	773
Shane Rosenkrance	---	---

Use of overlapping groundwater rights while rotating natural flow rights

IDWR suspects that water users are utilizing their groundwater rights while rotating their natural flow water rights into storage. The General Provisions do not prohibit this practice and the groundwater rights normally do not include conditions requiring surface water use prior to groundwater use. However, water users had not developed groundwater rights when the practice of rotation was conceived. Water users developed groundwater sources starting in the 1950s to address late season water shortages, the same problem rotation was implemented to remedy. Use of overlapping groundwater rights should be prohibited when a water user is rotating natural flow water rights into Mackay Reservoir.