

MEMO

State of Idaho
Department of Water Resources
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Date: February 2, 2023

To: Gary Spackman, Director

From: Matt Anders, Hydrology Section Supervisor

cc: Mat Weaver, Deputy Director
Garrick Baxter, Deputy Attorney General
Tim Luke, Water Compliance Bureau Chief
Sean Vincent, Hydrology Section Manager

Subject: Review of Implementation of Rotation into Storage in 2022 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. The purpose of the status conference was to evaluate how Water District 34 (WD34) implemented the watermaster instructions regarding rotation for credit during the irrigation season.

- 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, 2021.

Based on IDWR’s review of rotation and discussions at the status conference in 2021, the Director issued “*Amended Interlocutory Order Regarding Instructions to Water District 34 Watermaster; Notice of Status Conference*” (Order) on April 26th, 2021.

- WD34 implemented rotation during the 2021 irrigation season. The Director held a status conference on February 9, 2022. An amended interlocutory order was not issued after the status conference.
- WD34 implemented rotation during the 2022 irrigation season. The Director will hold a status conference on February 6, 2023.

IDWR prepared this review for the status conference on February 6th to determine if WD34 met the requirements of the interlocutory order issued in 2021 during the 2022 irrigation season.

Review

Water District 34 and Big Lost River Irrigation District (BLRID) had staff turnover during the 2022 irrigation season. Lucas Yockey resigned as the Watermaster of WD34 (Watermaster) on June 27, 2022. IDWR appointed Preston Marcroft the Watermaster for WD34 on July 18, 2022. Lucas Yockey also resigned as general manager of BLRID in June 2022. Kevin Whitcomb was hired as general manager of BLRID on November 1, 2022. I did not seek input from Lucas Yockey for this review. Preston Marcroft and Kevin Whitcomb provided limited input on this review due to their short time in their new positions.

This memo is based on data from the WD34 ditch rider logs, BLRID storage balance worksheets, BLRID rotation report, WD34 Watermaster Report, communication with the WD34 Watermaster, and communication with the BLRID general manager. For this memo, IDWR first quotes an instruction in bold from the 2021 interlocutory order. Following the quoted instruction, IDWR reviews how WD34 and BLRID implemented the instruction.

- 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: Eleven water users submitted NOI forms to the Watermaster to utilize rotation during the 2022 irrigation season on or before the May 1, 2022, deadline. Each of these water users submitted the NOI form created by the Watermaster. IDWR received copies of the applications submitted by these water users.

Water User	Canal	Water Rights	Implemented Rotation
B & L Farms	3-In-1 Burnett Lower Burnett Beck McGowen Pehrson Ditch	15	Yes
Dean Lombardi	Darlington	4	Yes
Francis Livestock	Beck	7	Yes
Jeanie Smith (Lewene Clark)	Darlington	4	Yes
Josh Pehrson	Burnett	4	Yes
Mel Elwien (Mike Dotenrod)	Burnett	3	No
Nelson Mackay Ranch	Swauger	1	Yes
Ramshorn Grazing (Nolan Beard)	Burnett	4	Yes
Randy Pehrson	Darlington Burnett Swauger	10	Yes

Water User	Canal	Water Rights	Implemented Rotation
Rick Mauthe (Nancy McCaslin)	Sharp	4	Yes
Shane Rosenkrance	Darlington	6	Yes

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 eleven water users submitted a list of the natural flow water rights they planned to rotate into storage during the 2022 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 eleven water users identified surface and/or groundwater rights overlapping the place of use for the water rights 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 eleven water users 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 eleven water users submitted a signed attestation to beneficially use rotated water during the 2022 irrigation season and only on the place of use described in the water right.

The following table summarizes the NOI forms submitted by water users.

Water User	Natural Flow Water Rights Being Rotated	Overlapping Surface & Groundwater Rights	Map	Personal Attestation
B & L Farms	Y	Y	Y	Y
Dean Lombardi	Y	Y	Y	Y

Water User	Natural Flow Water Rights Being Rotated	Overlapping Surface & Groundwater Rights	Map	Personal Attestation
Francis Livestock	Y	Y	Y	Y
Jeanie Smith (Lewene Clark)	Y	Y	Y	Y
Josh Pehrson	Y	Y	Y	Y
Mel Elwien (Mike Dotenrod)	Y	Y	Y	Y
Nelson Mackay Ranch	Y	Y	Y	Y
Ramshorn Grazing (Nolan Beard)	Y	Y	Y	Y
Randy Pehrson	Y	Y	Y	Y
Rick Mauthe (Nancy McCaslin)	Y	Y	Y	Y
Shane Rosenkrance	Y	Y	Y	Y

3. Prior to approving an NOI form, the Watermaster shall confirm on an individual water right basis the following:

- **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.**

IDWR Review: For the 2021 irrigation season, the Watermaster stated he considered the listed requirements when reviewing rotation applications and only approved applications that met them. He calculated the combined diversion rate for surface and groundwater rights for each applicant. IDWR did not receive copies of these analyses for the 2022 irrigation season. IDWR assumes that Lucas Yockey completed the same procedures for the 2022 irrigation season when he was Watermaster.

4. A water user must notify the ditch rider each time the user wants to rotate natural flow into storage during the irrigation season. Requests by water users to rotate natural flow into storage must be made 48 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.

IDWR Review: For the 2022 irrigation season, the Watermaster had water users communicate directly with their ditch rider to request rotation into storage. This is the same procedure water users use to request natural flow and storage deliveries. The written request requirement was met by the ditch rider recording on the ditch rider log the date the water user requested to start and end rotation into storage.

The Big Lost River data routing procedure for the 2022 irrigation season started with water users verbally communicating with their ditch rider to request delivery of natural flow, delivery of storage, rotation of natural flow water rights into Mackay Reservoir, and/or delivery of rotation storage. The ditch riders recorded these requests each day of the irrigation season on a ditch rider log. The ditch rider sent a ditch rider log each day to BLRID, which forwarded a copy to the Watermaster. BLRID entered the daily delivery data from the ditch rider logs into its storage balance worksheets two or three times per week.

The following table summarizes when rotation into storage occurred according to the BLRID storage balance worksheets and if the dates rotation started and ended were recorded on the ditch rider log. The start and end date of rotation into storage was recorded in almost all instances on the ditch rider logs.

Water User	Canal	Dates Rotation into Storage Occurred According to Storage Balance Worksheets	Start/End Dates Recorded on Ditch Rider Log
B & L Farms	3-In-1	Did not rotate.	---
	Burnett	5/1-5/23	Yes
	Lower Burnett	Did not rotate.	---
	Beck	Did not rotate.	---
	McGowen	Did not rotate.	---
Dean Lombardi	Darlington	Pehrson Ditch	Did not rotate.
		5/1-5/17	Yes
		6/12-6/17	Yes
		7/3-7/11	Yes
		7/15-7/21	Yes
		7/28-7/28	Yes
Francis Livestock	Beck	8/12-8/13	Yes
		5/1-5/24	Yes
		5/30-5/30	Yes
Jeanie Smith (Lewene Clark)	Darlington	6/12-6/14	Yes
		5/1-5/11	Yes
Josh Pehrson	Burnett	5/1-5/23	Yes
Mel Elwien (Mike Dotenrod)	Burnett	5/1-5/3	Yes
Nelson Mackay Ranch	Swauger	5/5-5/24	Yes
		6/27-6/28	Yes
		6/30-6/30	Yes

Water User	Canal	Dates Rotation into Storage Occurred According to Storage Balance Worksheets	Start/End Dates Recorded on Ditch Rider Log
		7/5-7/6	Yes
		8/19-8/22	Yes
Ramshorn Grazing (Nolan Beard)	Burnett	5/1-5/3	Yes
Randy Pehrson	Darlington	5/1-5/22	Yes
		6/13-6/17	Yes
		6/27-6/28	Yes
		6/30-6/30	Yes
		7/3-7/6	Yes
		8/19-8/19	Yes
	Burnett	Did not rotate.	---
	Swauger	Did not rotate.	---
Rick Mauthe (Nancy McCaslin)	Sharp	5/1-5/31	Yes
		6/2-6/2	Yes
		6/19-6/19	Yes
		7/4-7/6	Yes
		7/8-7/11	Yes
Shane Rosenkrance	Darlington	5/1-5/25	Yes
		6/12-6/17	Yes
		6/20-6/20	Yes
		7/15-7/20	Yes
		7/22-7/22	Yes
		8/12-8/13	Yes

5. Prior to approving rotation into storage requests during the irrigation season, 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;**
- **That the rotation conforms to all conditions of the General Provisions and the WD34 Rules.**

IDWR Review: For the 2021 irrigation season, the Watermaster stated he considered the listed requirements when reviewing rotation into storage requests during the irrigation season and only approved requests that met them. IDWR assumes that Lucas Yockey completed the same procedures for the 2022 irrigation season when he was Watermaster.

- 6. After September 1 of each year, the Watermaster may only approve rotation into storage requests when an individual water user can demonstrate: a) that the water user's water supply (natural flow plus remaining BLRID storage plus remaining water already rotated into storage) is insufficient for the remainder of the irrigation season, and b) all water already rotated into storage and any additional rotation storage can be beneficially used by the end of the irrigation season. The Watermaster may request additional information and/or written justification from the water user to complete this analysis. Water users dissatisfied with denial of rotation into storage requests may petition the Director for reconsideration of the Watermaster's denial.**

IDWR Review: No water users requested rotation after September 1, 2022.

- 7. 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: At the status conference on February 9, 2022, the Watermaster stated that he was concerned that documenting every rotation into storage request during the season is too burdensome. IDWR agreed to update this instruction to:

If the Watermaster determines a request to rotate into storage (Instruction 5 above) 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 did not receive any documentation that the Watermaster denied any rotation applications for the 2022 irrigation season.

- 8. 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 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 Big Lost River data routing procedure for the 2022 irrigation season started with water users verbally communicating with their ditch rider to request delivery of natural flow, delivery of storage, rotation of natural flow water rights into Mackay Reservoir, and/or delivery of rotation storage. The ditch riders recorded these requests each day of the irrigation season on a ditch rider log. The ditch rider sent a ditch rider log each day to BLRID, which forwarded a copy to the Watermaster. BLRID entered the daily delivery data from the ditch rider logs into its storage balance worksheets two or three times per week.

For the 2022 irrigation season, the Watermaster had water users communicate directly with their ditch rider to request delivery of rotation. The ditch rider documented the requests to start and end delivery of rotation on the ditch rider log. This is the same procedure water users use to request rotation into storage. The start and end dates of delivery of rotation are recorded in some cases, but not in others. The requirement to record the start and end date for each request for delivery of rotation storage was inconsistently met during the 2022 irrigation season.

The Order states “BLRID must submit a written report daily to the watermaster documenting delivery requests.” For the 2022 irrigation season, 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.

For the 2021 irrigation season, the Watermaster stated he reviewed requests for delivery of rotation storage to ensure that water users beneficially used rotation storage at the same place of use described in the water right that they rotated into storage. This review was straightforward for most users because they only have one place of use. However, this analysis was complex for water users with multiple places of use and diversions from multiple canals. 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. The new Watermaster did not review requests for delivery of rotation storage to ensure that water users beneficially used rotation storage at the same place of use described in the water right that they rotated into storage for the 2022 irrigation season.

The ditch rider logs and the BLRID storage balance worksheets did not always match. BLRID provided feedback for the 2021 irrigation season that any inconsistency between the ditch rider logs and BLRID storage balance worksheets resulted from BLRID’s policy not to change the ditch rider logs after the ditch riders submitted them to BLRID. Any necessary changes BLRID staff identified during their quality control review were made to the BLRID storage balance worksheets. BLRID appears to have followed the same procedure for the 2022 irrigation season.

Water User	Canal	Dates Delivery of Rotated Storage Occurred According to Storage Balance Worksheets	Start/End Dates Recorded on Ditch Rider Log
B & L Farms	3-In-1	Rotation not delivered	---
	Burnett	Rotation not delivered	---
	Lower Burnett	Rotation not delivered	---
	Beck	9/10-10/13	Yes
McGowen Pehrson Ditch		Rotation not delivered	---
		9/10-10/9	Yes
Dean Lombardi	Darlington	7/14-7/14	No
		7/30-8/3	No
		8/6-8/9	No
		8/29-10-15	Yes
Francis Livestock	Beck	7/14-7/18	No
		7/20-8/2	No
		8/19-8/19	No
		9/3-9/8	No
Jeanie Smith (Lewene Clark)	Darlington	7/14-7/23	No
		7/26-7/27	No
		7/29-8/1	No
		8/3-8/8	No
Josh Pehrson	Burnett	Rotation not delivered	---
Mel Elwien (Mike Dotenrod)	Burnett	Rotation not delivered	---
Nelson Mackay Ranch	Swauger	7/8-7/14	No
		7/22-7/22	No
		7/25-8/5	No
		8/24-9/8	Yes
		9/28-9/30	Yes
Ramshorn Grazing (Nolan Beard)	Burnett	7/8-7/13	No
Randy Pehrson	Darlington	7/14-7/14	No
		7/26-7/28	No
		8/3-8/10	No
		8/25-9/11	Yes
	Burnett Swauger	Rotation not delivered	---
Rick Mauthe (Nancy McCaslin)	Sharp	7/20-8/7	No
		8/12-8/12	No
		8/23-9/30	Yes
Shane Rosenkrance	Darlington	7/24-7/27	No
		7/29-7/29	No
		8/2-8/8	No
		8/25-10/9	Yes

9. 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, on the "Pehrson" tab in "BECK_Storage_2022_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).

- 10. 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 rotated natural flow into storage on a canal downstream of the Beck Canal during the 2022 irrigation season. One water user rotated water into storage on the Burnett Canal, which is upstream of the Beck Canal, and delivered that rotation to the 3IN1 Canal and Pehrson Ditch, which are downstream of the Beck Canal. This requirement did not apply for 2022.

- 11. 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 eleven of the NOI forms for the 2022 irrigation season are archived at Water District 34 and available to the public. IDWR received copies of the eleven NOI applications approved by the Watermaster to rotate into storage during the 2022 irrigation season.

- 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 ditch rider logs serve as this documentation. All of the ditch rider logs for the 2022 irrigation season are archived at Water District 34 and available to the public. IDWR has obtained copies of all the ditch rider logs.

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

IDWR Review: IDWR did not receive any documentation that the Watermaster denied any rotation applications for the 2022 irrigation season.

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

IDWR Review: BLRID wrote a report titled *2022 BLRID Report for Rotation Credit* (“BLRID Report”). This report is archived at Water District 34 and available to the public. IDWR received a copy of the BLRID Report on approximately December 21, 2022. The report contains the following for each user approved to rotate into storage during the 2022 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

IDWR staff noted the following regarding the table in the report showing end-of-year rotation balances:

- According to the final BLRID storage balance worksheets received by IDWR, Francis Livestock, Jeanie Smith, and Josh Pehrson exercised rotation into storage, but were not included in the table in the report.
- It is unclear how the rotation into storage balance of 8,066 miner’s inches was calculated for B & L Farms. IDWR’s calculation = 8,441 - 4,618 - 4,200 = -377.
 - For other water users in the table, when a rotation balance was minus BLRID set the rotation balance to zero and reduced the water user's storage balance by the negative rotation value.

Water User	Canal	End-of-Year Rotation into Storage Balance (Miner’s Inches)	End-of-Year Storage Balance (Miner’s Inches)
B & L Farms	3-In-1	---	0
	Burnett	8,441 ¹	7,323
	Lower Burnett	---	---
	Beck	-4,618 ¹	892

Water User	Canal	End-of-Year Rotation into Storage Balance (Miner's Inches)	End-of-Year Storage Balance (Miner's Inches)
	McGowen Pehrson Ditch	--- -4,200 ¹	--- 3,730
Dean Lombardi	Darlington	0	1,811
Francis Livestock	Beck	0	1,628
Jeanie Smith (Lewene Clark)	Darlington	0	-1,264
Josh Pehrson ²	Burnett	575	3,248
Mel Elwien ² (Mike Dotenrod)	Burnett	320	0
Nelson Mackay Ranch	Swauger	4	0
Ramshorn Grazing (Nolan Beard)	Burnett	692	0
Randy Pehrson	Darlington	0	495
	Darlington	540	-516
	Burnett	---	12,140
	Swauger	---	---
Rick Mauthe (Nancy McCaslin)	Sharp	25	121
Shane Rosenkrance	Darlington	13	4,772

¹ Water user rotated water into storage on the Burnett Canal, and delivered that rotation to the Beck Canal and Pehrson Ditch.

² Rotated into storage, but did not request delivery of rotation.

12. 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 the 2022 WD34 Watermaster report to IDWR on January 9, 2023. The report did not contain any discussion or data related to rotation for credit. The Watermaster stated he was not aware of this instruction, but plans include rotation information in the 2023 watermaster report.

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 2022 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, on the "Pehrson" tab in "BECK_Storage_2022_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 water user ended the irrigation season with a negative rotation storage balance. The final storage balance

worksheets IDWR received after the irrigation season from BLRID indicate that “B & L Farms” had a negative rotation balance on the Beck Canal and “Dean Lombardi” had a negative rotation balance on the Darlington Canal.

- 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: For the 2021 irrigation season, the BLRID General Manager stated that he reviewed each delivery request to ensure that water users beneficially used rotation storage at the same place of use described in the water right that they rotated into storage. IDWR assumes Lucas Yockey followed the same procedure for the 2022 irrigation season when he was the general manager of BLRID.

- 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 condition was not triggered in 2022 because Mackay Reservoir did not reach a four (4) day average elevation of 6,066.12 feet during the period from April 1, 2022, until August 1, 2022. The maximum four (4) day average elevation during this period was 6,058.35 feet on June 30, 2022.

- 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 9,660 miners inch (383 AF) of undelivered rotation storage remained at the end of the 2022 irrigation season. BLRID has no procedure for allowing individual water users to carryover storage allocations into the next irrigation season, so IDWR assumes this 383 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 approximately December 21, 2022. This report contains the following for each user approved to rotate natural flow into storage during the 2022 irrigation season:

- The amount of undelivered rotation storage 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