

ADMINISTRATOR'S MEMORANDUM

To: Water Allocation Bureau **Water Supply Bank Processing No. 4**
Regional Offices

From: Shelley W. Keen 

RE: Entering Numerical Values in Water Supply Bank Records

Date: November 7, 2025

Purpose

The purpose of this memo is to describe best practices for entering values for diversion rate, volume, and acres into the Water Supply Bank ("WSB") database, WSB lease contracts, and WSB rental agreements. For WSB records, the guidance in this memo replaces and supersedes the guidance in Application Processing Memo No. 6 ("App. Memo No. 6").

Background

App. Memo No. 6 provides guidance for calculating and recording numerical values used in water right approvals, legal notices, orders, adjudication claims and recommendations, and other water right documents that the Department issues. The guidance in App. Memo No. 6 is based largely on the ability to accurately measure and deliver water in the field. Determining numerical values in the WSB is dependent on three additional factors:

- When water rights are split in the WSB, the results are temporary.
- WSB rental agreements combine portions of multiple water rights into one authorized water use.
- WSB transactions require the calculation and payment of annual rental fees.

Because WSB rental fees are based on the total water volume rented, which is often comprised of portions of multiple water rights, the accurate determination of fees requires practices that are not accomplished by the significant figures and rounding guidance in App. Memo No. 6.

Practices

Due to the unique processes and financial transactions that occur in the WSB program and to reduce the possibility of exceeding water right elements through rounding, the following procedures are adopted for all WSB program processes:

1. When entering data into the WSB database for all elements of any lease application, rental application, or approval document, staff will enter the diversion rate using two (2) decimal places, the annual diversion volume using one (1) decimal place, and the number of irrigated acres using one (1) decimal place.
2. The following practices shall apply to the numerical values entered into the WSB database for diversion rates, annual diversion volumes, and acres:
 - The sum of all leased portions and the unleased portion of a water right must not exceed the total amount of the water right as listed on the permit, license, or decree.
 - For a single water right, the sum of all rented portions must not exceed the total amount of the portion of the water right accepted for lease.
3. When an entire water right is accepted for lease and the numerical values recorded on the permit, license, or partial decree are shown to more decimal places than the standards in procedure number one of this memo, enter the values into the database in accordance with the decimal place guidance in procedure number one and number two. Rounding values in the lease data entry steps sets them so that any rental amount will not exceed the total value of the water right. However, staff should make sure that the rate, volume, and number of acres (if applicable) listed on the lease contract are the same values as listed on the permit, license, or decree without rounding. Using the rounded value on the lease contract would imply that a value other than the full water right was accepted for lease.
4. When splitting water rights for lease contracts and rental agreements, values greater than five (5) will be rounded up and values lower or equal to five (5) will be rounded down. Applying this rounding practice and the guidance in procedure number one of this memo may result in water right portions with elements that do not sum to the full water right. For example, a water right for 0.11 cfs split into two equal portions of 0.055 cfs and rounded down for data entry would result in two portions of 0.05 cfs each, with 0.01 cfs unaccounted for. When this occurs, round the unleased portion or unrented portion up so the sum of the portions equals the full water right. In the 0.11 cfs example, the unleased or unrented portion would be rounded to 0.06 cfs. This practice will ensure the total value of the water right is fully accounted for but not exceeded when split multiple times.
5. The rental agreement fee shall be calculated from the total annual diversion volume rented which, according to the guidance above, should be recorded to the nearest one decimal place. The volume listed on the rental agreement approval document must be the same value entered into the database and the same number used to calculate the fee so that the fee calculation is fully transparent.

Since WSB processes can be complex, situations may arise where applying the guidance in procedures one (1) through five (5) does not achieve practical results. In those situations, IDWR staff should exercise professional judgement when accepting water rights into the WSB, combining portions of leased water rights to fulfill a rental request, and completing data entry. In those instances, IDWR staff should carefully consider the potential to enlarge the

elements of water rights through rounding and the impact to related financial transactions. Staff should describe their recommendations so that subsequent WSB actions on the same water rights can follow the same alternative method.