

MEMORANDUM

Date: July 10, 2025

To: Transfer 89818

From: Christian Stewart

Re: Review & Evaluation of Sufficiency of Information

This transfer proposes to change the place of use for 7 acres to reflect the place of use being irrigated today by water rights 17-7064, 17-7182, and 17-7189 as found by the beneficial use field examination.

Authority to File: Juniper Dry Farm, LLC is the owner of record for water right 17-7064. Juniper Dry Farm, LLC is the owner of the place of use according to Oneida County parcel records. The application was signed by Bryce Campbell, manager of Juniper Dry Farm LLC according to Idaho Secretary of State records.

Water Right Validity: Water right 17-7064 was licensed on July 15, 1986. The original licensed amount was 307 total acres, and the method of irrigation listed in the beneficial use exam was mainline to sprinklers. It should be noted that the licensed cfs per acre was 0.005, a low amount by any standard. In 1992-2000 imagery, two pivots could be seen on the place of use covering about 250 acres, it is unclear whether the corners were irrigated at that time. Imagery from 2004-2023 at the east pivot shows clear evidence of irrigation, the west pivot shows some signs of agriculture, but little irrigation. The applicant stated that a towable pivot was used and transported between the two pivot circles to provide irrigation to the area under both pivot circles, 2023 imagery confirms this at that time. In 2015, permits 17-7182 and 17-7189 were issued and eventually were moved to overlap the place of use for 17-7064. 2024 imagery shows irrigation of 307 acres between the three rights. Right 17-7064 has clearly been used throughout its history to irrigate 1-2 125-acre pivots under the small diversion rate and volume authorized by the license. No forfeiture issues identified.

Injury to Other Water Rights: Only place of use is changing. No injury issues identified.

Enlargement of Use: No increase in rate, volume, or acres. This transfer changes some of the acres that were authorized by the license to match the 307 acres physically irrigated in 2024 and 2025 as found during the field examination for permits 17-7182 and 17-7189. No acres are being unstacked. The three rights will share a 307-acre combined place of use. No enlargement issues identified.

Local Public interest: No issues identified.

Beneficial Use/Conservation of Water Resources: No issues identified.

Review of the application finds there is no clear inconsistency with criteria set forth in Section 42-222 Idaho Code preventing processing of this application.