

MEMORANDUM

Date: November 20, 2025
To: Transfer 89865
From: Christian Stewart
Re: Review & Evaluation of Sufficiency of Information

This transfer proposes to rearrange the place of use for four irrigation rights to reflect the acres actually irrigated by the applicants. As noted in the amended transfer application, the four water rights involved in this transfer resulted from previous splits executed by IDWR. This transfer clarifies the place of use and ownership of the water rights.

Authority to File: The application was signed by Fred Imler, applicant, and by Scott Currier, a representative of The Currier Family Trust. The applicants are the owners of the places of use for the respective portions of their water rights. A thorough review of the ownership history of the properties found that the applicants are the owners of the water rights in the quantities identified in the transfer approval.

Water Right Validity: Rights 34-297A and 34-298A were decreed by the SRBA court in December 2001 to for a combined irrigation of 10 acres and 0.4 cfs. Subsequent ownership changes split the rights into numbers 34-14093, 14094, 14095, and 14096. The acres identified by both rights at the time of the decree were 9.0 in NENW S15 and 1.0 in SENW S15, T08N R21E. Aerial imagery indicates that the water rights have been well utilized for irrigation within the past 5 years. The water rights are valid; no forfeiture issues identified.

Injury to Other Water Rights: No changes are being made to the points of diversion. No injury issues identified.

Enlargement of Use: Diversion rate and authorized acres are not increasing. No water rights are being unstacked. The water rights are not being rearranged as to change the combined use configuration between the overlapping junior and senior rights. 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.

Filing Fees: On June 13, 2025, Currier Family Trust filed Application for Transfer 89865 and submitted a filing fee of \$500. On July 17, 2025, Fred Imler filed an Ownership Change proposing to split water rights 34-14093, 34-14094, 34-14095 and 34-14096 and submitted a filing fee of \$400, the proper fee for splitting four water rights. Ultimately, the transfer application and ownership change were addressed in a single transfer approval. The Department did not create new water rights, but instead adjusted the elements and amounts of water rights 34-14093 through 34-14096. Imler is the owner of 34-14093 and 34-14095. Currier Family Trust is the owner of water rights 34-14094 and 34-14096. Because the transfer shifted acres between QQs and moved acres to new QQs, the \$500 transfer application fee was appropriate. 6 acres (0.24 cfs) was changed. Also, because the elements were adjusted on all four water rights, the split filing fee (\$400) was appropriate.