

MEMORANDUM

Date: December 4, 2025
To: Transfer 90061
From: Christian Stewart
Re: Review & Evaluation of Sufficiency of Information

This transfer proposes to change the nature of use of an irrigation right to provide water for the consumptive use requirements of an industrial gravel mining facility and several excavated storage ponds. The transfer is accompanied by a companion application for permit seeking authorization for the nonconsumptive water needs of the facility.

Authority to File: Jack B Parson Companies is the owner of the gravel facility according to Bear Lake County parcel records. Jack B Parson Companies is an assumed business name according to the Idaho Secretary of State. Jack B Parson Companies is a corporate entity related to Staker Parson Companies. The application was signed by Jake Goodlife, Northern Utah Vice President for Staker Parson Companies. The water rights are owned by Brad Woolstenhume, who also signed the application.

Water Right Validity: Right 11-7151 was licensed on 07/30/2012. Right 11-7151 is an active recommendation in the Bear River Basin Adjudication. The acres being transferred appear to have been cultivated in recent imagery and were likely irrigated. No forfeiture issues identified.

Injury to Other Water Rights: The application was not protested and the watermaster did not provide any comments. The transfer proposes to divert groundwater from a well and from excavated ponds for consumptive uses. The proposed diversions are within the floodplain of the Bear River and are likely closely hydraulically connected to the Bear River. The historical point of diversion for the irrigation rights was from a well located approximately 4 miles upstream of the gravel ponds. The historical well is located 0.2 miles from the Bear River and also drew from groundwater that is likely closely connected to the Bear River. The historical and proposed points of diversion are both located within the Central Division administrative boundary governed under the Bear River Compact. No injury issues identified.

Enlargement of Use: The precipitation deficit for winter grain (the most recent crop) is estimated to be 1.55 AF/yr according to ETIDWR at the Montpelier station. The transfer proposes to change the nature of use for 42.7 irrigated acres of spring grain. The total consumptive use of the spring grain is 66 AF. The summertime precipitation deficit for open water shallow systems is 1.43 AF/yr for a total precipitation deficit of 67.8 AF. Detailed analysis of 1969 imagery of the footprint of the ponds shows that the excavation of the ponds displaced 21.6 acres of cottonwood trees and 25.8 acres of range grasses. The total precipitation deficit of the cottonwoods and grasses that were displaced by the gravel ponds is 39.9 AF, which ultimately offsets evaporation from the open water surface. No enlargement issues identified.

Local Public interest: No issues identified.

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

Effect on Agricultural Base of the Local Area: The irrigated acres being changed are unlikely to have a significant effect on the local agricultural base.

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.