

MEMORANDUM

Date: December 10, 2025
To: Transfer 90164
From: Christian Stewart
Re: Review & Evaluation of Sufficiency of Information

This transfer proposes to change the nature of use, period of use, point of diversion, place of use, and add points of diversion for a 5-acre portion of water right 22-7143. Water will be diverted from seven existing points of diversion and used within the City of Driggs service boundary for municipal purposes.

Authority to File:

The application was filed by Ski Hill Road Owner LLC (applicant) and was signed by Bryan Dunn, managing member of Ski Hill Road Owner LLC per the Idaho Secretary of State. The owners of record for the water right 22-7143 are Thomas and Lexie Hill (right owners). The application included signed documentation from the applicant, the right owners, and Rocky Mountain Water Exchange, all consenting to the proposed changes. Additionally, the City of Driggs provided a letter supporting the transfer application.

Water Right Validity:

Right 22-7143 was decreed by the SRBA Court on 10/28/2009. The place of use appears to be irrigated. Right 22-7143 was most recently included in approved Transfer 90104. No forfeiture issues identified.

Injury to Other Water Rights:

The transfer was advertised without protest. The proposed points of diversion are located within Water District 122 which was established on December 3, 2025. A watermaster has not yet been elected for the district. The proposed points of diversion are existing wells within the City of Driggs municipal boundary. There is no evidence that this transfer is moving the point of diversion to a different aquifer. No injury issues identified.

Enlargement of Use:

Water rights 22-7143, 22-7144, 22-7145, and 22-7156 share the same point of diversion and are limited to a combined diversion rate of 6.63 cfs. However, only water rights 22-7143 and 22-7144 include a condition limiting the diversion rate to 6.63 cfs. The combined rate limit was reduced by 0.07 cfs to account for the portion of the rate being split away and moved by this transfer. Water right 22-7144 was included in this transfer as an associated right to update the condition of approval involving the diversion rate limit. Water rights 22-7145 and 22-7156 will not be included in this transfer as associated water rights.

The growing season precipitation deficit at the Tetonia Experiment ET station for Alfalfa - Less Frequent Cuttings is 575mm. This is a total consumptive volume of 9.5 acre-feet for 5 acres. This transfer does not result in increased diversion rate or volume. 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:

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.