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DEPARTMENT OF WATER RESOURCES FORM 2021 Rev. 09/25

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RECEIVED Jan 12, 2026 DEPARTMENT OF WATER RESOURCES

STATE OF IDAHO DEPARTMENT OF WATER RESOURCES

DWA/NORTH Ident. No. 81-12051

90215

AMENDED (P&D)

APPLICATION FOR PERMIT

To appropriate the public waters of the State of Idaho

SB. 1/9/26

1. Name of applicant(s) Lochsa Holdings LLC Bledsoe Connor Holdings LLC Phone (208) 942-0283

Attach list of directors, partners, or members names if applicable

Name connector (check one):  and  or

Mailing address 11 Old Elk Summit Road City Lolo

State MT ZIP 59847-9352 Email scottbledsoe@gmail.com

2. Name of representative, if any Albert P. Barker Phone (208) 424-2030

Mailing address 101 S. Capitol Blvd., Suite 1200 City Boise

State ID ZIP 83702 Email abarker@martenlaw.com

- a.  Send all correspondence for this application to the representative and not to the applicant OR  Send original correspondence to the applicant and copies to the representative.
b.  The representative may submit information for the applicant but is not authorized to sign for the applicant OR  The representative is authorized to sign for the applicant. Attach a Power of Attorney or other documentation.
c.  Check here if applicant or representative will accept service of documents by email at the email address(es) listed above.

3. Source of water supply North Fork Spruce Creek which is a tributary of Spruce Creek

4. Location of point(s) of diversion:

Table with 9 columns: Twp, Rge, Sec, Govt Lot, 1/4, 1/4, County, Source, Local name or tag #. Row 1: 38N, 16E, 25, SE, NW, Idaho, North Fork Spruce Creek.

- a. If this application is in the Swan Falls Trust Water Area, check one box below. If the application is outside the Swan Falls Trust Water Area, skip to item 5 and leave item 4.a. blank. See instructions for map of Swan Falls Trust Water Area and for more information.
 In Swan Falls Trust Water Area and proposing a reallocation of trust water OR
 In Swan Falls Trust Water Area and proposing use of unappropriated water. (selecting this option is not common - see Application for Permit Instructions)

5. Water will be used for the following purposes:

Amount 0.12 cfs for Irrigation purposes from 4/15 to 10/31 (both dates inclusive)

Amount for purposes from to (both dates inclusive)

Amount for purposes from to (both dates inclusive)

- Check if the irrigation use is for a longer season of use and justification for the longer use is included in item 12 or attached to the form. See instructions for season of use details.

6. Total quantity to be appropriated is (a) 0.12 cubic feet per second (cfs) and/or (b) acre-feet per year (af).

For Department Use

Received by JA Date 12/15/2025 Time Preliminary check by
Fee \$100.00 Received by JA Receipt No. C124397 Date 12/15/2025

RECEIVED

DEC 15 2025

DEPARTMENT OF WATER RESOURCES  
FORM 202 Rev 09/25

RECEIVED

DEC 22 2025

STATE OF IDAHO **DWR** / NORTH Ident. No. 81-12051  
DEPARTMENT OF WATER RESOURCES **90215**  
**APPLICATION FOR PERMIT**

To appropriate the public waters of the State of Idaho

1. Name of applicant(s) Lochsa Holdings LLC Phone (208) 942-0283  
Attach list of directors, partners, or members names if applicable Name connector (check one):  and  or  
Mailing address 11 Old Elk Summit Road City Lolo  
State MT ZIP 59847-9352 Email scottcbledsoe@gmail.com

2. Name of representative, if any Albert P. Barker Phone (208) 424-2030  
Mailing address 101 S. Capitol Blvd., Suite 1200 City Boise  
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- a.  Send all correspondence for this application to the representative and not to the applicant OR  Send original correspondence to the applicant and copies to the representative.
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- c.  Check here if applicant or representative will accept service of documents by email at the email address(es) listed above.

3. Source of water supply North Fork Spruce Creek which is a tributary of Spruce Creek

4. Location of point(s) of diversion:

Twp	Rge	Sec	Govt Lot	¼	¼	County	Source	Local name or tag #
38N	16E	25		SE	NW	Idaho	North Fork Spruce Creek	

- a. If this application is in the Swan Falls Trust Water Area, check one box below. If the application is outside the Swan Falls Trust Water Area, skip to item 5 and leave item 4.a. blank. See instructions for map of Swan Falls Trust Water Area and for more information.
  - In Swan Falls Trust Water Area and proposing a reallocation of trust water OR
  - In Swan Falls Trust Water Area and proposing use of unappropriated water. (selecting this option is not common - see Application for Permit Instructions)

SUPERSEDED

5. Water will be used for the following purposes:

Amount 0.12 cfs for Irrigation purposes from 4/15 to 10/31 (both dates inclusive)  
(cfs or acre-feet per year)

Amount \_\_\_\_\_ for \_\_\_\_\_ purposes from \_\_\_\_\_ to \_\_\_\_\_ (both dates inclusive)  
(cfs or acre-feet per year)

Amount \_\_\_\_\_ for \_\_\_\_\_ purposes from \_\_\_\_\_ to \_\_\_\_\_ (both dates inclusive)  
(cfs or acre-feet per year)

- Check if the irrigation use is for a longer season of use and justification for the longer use is included in item 12 or attached to the form. See instructions for season of use details.

6. Total quantity to be appropriated is (a) 0.12 cubic feet per second (cfs) and/or (b) \_\_\_\_\_ acre-feet per year (af).

For Department Use

Received by JA Date 12/15/2025 Time \_\_\_\_\_ Preliminary check by \_\_\_\_\_  
 Fee \$ 100.00 Received by JA Receipt No. C124397 Date 12/15/2025

7. Proposed diverting works:

- a. Describe type and size of devices used to divert water from the source. List information such as pump, motor, ditch, pipeline, or diversion structure sizes. Pump in creek; pipe to place of use.
- b. If well is already drilled, when? \_\_\_\_\_; drilling firm \_\_\_\_\_; well was drilled for (well owner) \_\_\_\_\_; Drilling Permit No. \_\_\_\_\_
- c. Proposed well diameter is \_\_\_\_\_ inches; proposed depth of well is \_\_\_\_\_ feet.
- d. Height of storage dam \_\_\_\_\_ feet; active reservoir capacity \_\_\_\_\_ acre-feet; total reservoir capacity \_\_\_\_\_ acre-feet. If the reservoir will be filled more than once each year, describe the refill plan in item 12. For dams 10 feet or more in height AND having a storage capacity of 50 acre-feet or more, submit a separate Application for Construction or Enlargement of a New or Existing Dam. Dam application required?  Yes  No

8. Description of proposed uses (if irrigation only, skip to item 9):

- a. Hydropower; attach the Affidavit For Water Rights To Be Used For Power Purposes and show total feet of head and proposed capacity in kW. \_\_\_\_\_
- b. Stockwatering; list number and type of livestock \_\_\_\_\_
- c. Municipal; complete and attach the Municipal Water Right Application Checklist.
- d. Domestic; show number of households. \_\_\_\_\_  
 Check if domestic use is for multiple-home subdivision, include ownership plan. See instructions for additional information.
- e. Low Temperature Geothermal, describe how the ground water will be primarily used for heat value or how it is exempt pursuant to Section 43-233(1), Idaho Code. \_\_\_\_\_
- f. Other; describe fully. \_\_\_\_\_

9. Description of place of use (If the place of use is an existing service area place of use, see item 9.c. or 9.d):

- a. If water is for irrigation, indicate acreage in each quarter-quarter in the table below.
- For irrigation of less than 10 acres, use the nearest one-tenth (0.1) acre.
  - For irrigation is greater than or equal to 10 acres, round to the nearest whole acre.
- b. If water is used for other purposes, place a symbol of the use (example: D for Domestic) in the corresponding quarter-quarter in the table below. See instructions for standard symbols.

TWP	RGE	SEC	NE				NW				SW				SE				TOTALS
			NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	
38N	16E	25			2				2	2									6

Total number of acres to be irrigated: 6

c. Irrigation Entities Using Existing Service Area Boundaries:

- Name of established service area. N/A
- List the water right number(s) for the established service area. \_\_\_\_\_
- Total number of acres to be irrigated. \_\_\_\_\_
- Attach a map depicting the established place of use boundary.

d. Municipal providers supplying water for fire protection attach a map depicting the service area.



**STATE OF MONTANA**  
 SECRETARY OF STATE  
 2025 ANNUAL REPORT

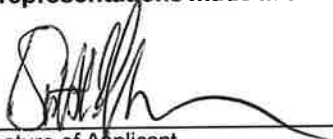
STATE OF MONTANA  
**-FILED-**  
 SECRETARY OF STATE  
 File Number: 16633772  
 Date Filed: 4/2/2025 8:04:30 AM

B1431-7041 04/02/2025 8:04 AM Received by MT Secretary of State Christi Jacobsen

Business Type		Domestic Limited Liability Company																	
Business Type		Limited Liability Company																	
Business Sub-Type																			
Business Name		Bledsoe Connor Holdings, LLC																	
Name of Business Entity		C1040693																	
The file number of this entity on the records of the Montana Secretary of State is																			
Country of Organization		United States																	
State of Organization		Montana																	
Annual Report Year		2025																	
Business Purpose																			
Business Mailing Address of Principal Office		11 OLD ELK SUMMIT ROAD																	
Address		LOLO, MT 59847																	
Business Physical Address of Principal Office		None																	
Address																			
The registered agent on record is:		DON C ST PETER																	
Registered Agent		Non-Commercial Registered Agent																	
		Agent Number																	
		RA00022597																	
		Email Address																	
		Website																	
		Physical Address																	
		2620 RADIO WAY																	
		MISSOULA, MT 59808																	
		Mailing Address																	
		PO BOX 17255																	
		MISSOULA, MT 59808																	
Select the Type of Change																			
Select one if a registered agent change is needed:																			
LLC Management		Managers																	
LLC Managed By																			
Managers																			
<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:35%;">Name Of Individual Or Business Entity</th> <th style="width:30%;">Business Mailing Address</th> <th style="width:15%;">Email Address</th> <th style="width:20%;">Active Registered Entity</th> </tr> </thead> <tbody> <tr> <td>Scott Bledsoe</td> <td>11 Old Elk Summit Road Lolo, MT 59847</td> <td></td> <td></td> </tr> <tr> <td><input checked="" type="checkbox"/> Leigh Bledsoe</td> <td>11 OLD ELK SUMMIT ROAD LOLO, MT 59847</td> <td></td> <td></td> </tr> <tr> <td><input checked="" type="checkbox"/> Luke Bledsoe</td> <td>11 OLD ELK SUMMIT ROAD LOLO, MT 59847</td> <td></td> <td></td> </tr> </tbody> </table>				Name Of Individual Or Business Entity	Business Mailing Address	Email Address	Active Registered Entity	Scott Bledsoe	11 Old Elk Summit Road Lolo, MT 59847			<input checked="" type="checkbox"/> Leigh Bledsoe	11 OLD ELK SUMMIT ROAD LOLO, MT 59847			<input checked="" type="checkbox"/> Luke Bledsoe	11 OLD ELK SUMMIT ROAD LOLO, MT 59847		
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<input checked="" type="checkbox"/> Luke Bledsoe	11 OLD ELK SUMMIT ROAD LOLO, MT 59847																		
Declarations																			

10. List any other water rights used for the same purposes as described above. Include water delivered by a municipality, canal company, or irrigation district. N/A.
- 
- a. If applicant is entitled to water delivery from a water delivery entity, explain if the current distribution system is capable of delivering water to the place of use. \_\_\_\_\_
- 
- b. If this application is for domestic purposes, describe how the proposed water, water from another source, or both will be used to irrigate a lawn, garden, and/or landscaping. \_\_\_\_\_
- 
11. a. Who owns the property at the point of diversion? Applicant
- b. Who owns the property to be irrigated or place of use? Applicant
- c. Whose property will the water be conveyed across? Applicant
- d. If the property is owned by a person other than the applicant, describe the arrangement enabling the applicant to make this filing. \_\_\_\_\_
12. Describe in narrative form and provide additional explanation for any of the items above. Attach additional pages if necessary. Irrigation of 6 acres on Applicant's property for irrigation of trees and grasses.
- 
- 
- 
13. Time required to complete project works and application of water to proposed beneficial use is 5 years (1 to 5 years).
14. **MAP OF PROPOSED PROJECT REQUIRED** - Attach an 8½" x 11" map or maps clearly identifying the proposed point of diversion and place of use.

The information contained in this application is true to the best of my knowledge. I understand that any willful misrepresentations made in this application may result in rejection of the application or cancellation of an approval.



Signature of Applicant  
 Scott Bledsoe, Member

Print Name (and title, if applicable)

Signature of Applicant

Print Name (and title, if applicable)





IDAHO DEPARTMENT OF  
**WATER RESOURCES**

Northern Region • 7600 N Mineral Drive, Suite 100 • Coeur D'Alene, ID 83815-7763  
Phone: 208-762-2800 • Fax: 208-762-2819 • Email: [northerninfo@idwr.idaho.gov](mailto:northerninfo@idwr.idaho.gov) • Web: [idwr.idaho.gov](http://idwr.idaho.gov)

Governor Brad Little

Director Mathew Weaver

February 5, 2026

BLEDSOE CONNER HOLDINGS LLC  
11 OLD ELK SUMMIT RD  
LOLO, MT 59847-9352

RE: Application for Permit No. 81-12051

Dear Applicant(s):

The Department of Water Resources has received your water right application. Please refer to the number referenced above in all future correspondence regarding this application.

A legal notice of the application has been prepared and is scheduled for publication in the COTTONWOOD CHRONICLE, IDAHO COUNTY FREE PRESS on 2/11/2026 and 2/18/2026. Protests to this application may be submitted for a period ending ten (10) days after the second publication.

If the application is protested, you will be sent a copy of each protest. All protests must be resolved before the application can be considered for approval. If the protest(s) cannot be resolved voluntarily, the Department will conduct a conference and/or hearing on the matter.

If the application is not protested, the Department will process your application and notify you of any action taken on the application. If your application is approved, the Department will send you a copy of the permit.

Please contact this office if you have any questions regarding the application.

Sincerely,

Kristina Hammond  
Administrative Assistant 1

CC:  
ALBERT P BARKER  
101 S CAPITOL BLVD STE 1200  
BOISE, ID 83702-7780

## Kristina Hammond

---

**From:** Kristina Hammond  
**Sent:** Thursday, February 5, 2026 12:01 PM  
**To:** iflegals@idahocountyfreepress.com  
**Subject:** Application for Permit No. 81-12050, 81-12051, 81-12052, 82-12289  
**Attachments:** LEGAL NOTICE FOR WR 81-12050, 81-12501, 81-12052, 82-12298.docx

Please publish the enclosed legal notice on the dates indicated 2/11/2026 AND 2/18/2026IFP. If you cannot publish the notice on the proposed dates, please contact us immediately.

An affidavit of publication must be submitted to the Department along with the publication bill. Please send the affidavit and bill to this office before 3/2/2026. Your cooperation is appreciated.

Thank you,

**Kris Hammond | Administrative Assistant 1**  
Idaho Department of Water Resources  
Northern Regional Office  
7600 N Mineral Drive, Suite 100  
Coeur d'Alene, ID 83815-7763  
Phone (208) 762-2807



## Kristina Hammond

---

**From:** Kristina Hammond  
**Sent:** Thursday, February 5, 2026 12:19 PM  
**To:** Anna Moody; Jenna Fortier; Hickey,Clay; IWRB Water Use Reviews;  
AllisonL@nezperce.org  
**Subject:** WR applications 81-12050, 81-12051, 81-12052

Dear Interested Party:

The Department of Water Resources (Department) is notifying you of an application for amendment of permit that may be of interest to you. A full description concerning property location may be found at:

<https://research.idwr.idaho.gov/apps/waterrights/wrappliationresults/>.

Lochsa Holdings LLC has filed an application for permit 81-12050, 81-12051, 81-12052. n

If you desire to file a formal protest against approval of the application, a written protest along with the \$25 protest fee for each application protested must be received by March 2, 2026. Notice of Protest forms are available on our website, [www.idwr.idaho.gov](http://www.idwr.idaho.gov).

Please contact the Department's State office at (208) 287-4800 if you have any questions regarding the application

**Kris Hammond | Administrative Assistant 1**

Idaho Department of Water Resources  
Northern Regional Office  
7600 N Mineral Drive, Suite 100  
Coeur d'Alene, ID 83815-7763  
Phone (208) 762-2807



IDAHO DEPARTMENT OF  
**WATER RESOURCES**

The following application(s) have been filed to appropriate the public waters of the State of Idaho:

**81-12050**

LOCHSA HOLDINGS LLC  
11 OLD ELK SUMMIT RD  
LOLO, MT 59847-9352  
Point of Diversion NWSE S21 T38N R16E IDAHO County  
Source BRUSHY FORK Tributary CROOKED FORK  
Point of Diversion SWSE S21 T38N R16E IDAHO County  
Source BRUSHY FORK Tributary CROOKED FORK  
Use: IRRIGATION  
05/01 to 10/31 0.12 CFS  
Total Diversion:  
0.12 CFS  
Date Filed: 12-15-2025  
Place Of Use: IRRIGATION  
T38N R16E S21 SWSE  
Total Acres: 6

This application proposes the diversion and use of water from Brushy Fork tributary of the Lochsa Wild & Scenic River.

The decreed minimum stream flow rights for the federal Wild & Scenic Rivers are subordinate to certain categories of water use and to specific amounts of water use established after the minimum stream flow. The water use proposed in this application will benefit from the subordination provision because the diversion rate and acres will be applied to the subordination amounts specified in the decree for the Wild & Scenic River listed above.

**81-12051**

BLEDSOE CONNER HOLDINGS LLC  
11 OLD ELK SUMMIT RD  
LOLO, MT 59847-9352  
Point of Diversion SENW S25 T38N R16E IDAHO County  
Source SPRUCE CREEK Tributary SPRUCE CREEK  
Use: IRRIGATION  
05/01 to 10/31 0.12 CFS  
Total Diversion:  
0.12 CFS  
Date Filed: 12-15-2025  
Place Of Use: IRRIGATION  
T38N R16E S25 SWNE, SENW, NESW  
Total Acres: 6

This application proposes the diversion and use of water from North Fork Spruce Creek tributary of the Lochsa Wild & Scenic River.

The decreed minimum stream flow rights for the federal Wild & Scenic Rivers are subordinate to certain categories of water use and to specific amounts of water use established after the minimum stream flow. The water use proposed in this application will benefit from the subordination provision because the diversion rate and acres will be applied to the subordination amounts specified in the decree for the Wild & Scenic River listed above.

**81-12052**

LOCHSA HOLDINGS LLC  
11 OLD ELK SUMMIT RD  
LOLO, MT 59847-9352  
Point of Diversion SWNE S27 T38N R16E IDAHO County  
Source SPRUCE CREEK Tributary BRUSHY FORK  
Use: IRRIGATION  
05/01 to 10/31 0.12 CFS  
Total Diversion:  
0.12 CFS  
Date Filed: 12-15-2025  
Place Of Use: IRRIGATION  
T38N R16E S27 SWNE, SENW  
Total Acres: 6

This application proposes the diversion and use of water from Spruce Creek tributary of the Lochsa Wild & Scenic River.

The decreed minimum stream flow rights for the federal Wild & Scenic Rivers are subordinate to certain categories of water use and to specific amounts of water use established after the minimum stream flow. The water use proposed in this

# MEMORANDUM

January 12, 2026

Application for Permit: 81-12051

Author: LBates JSB 1/12/2026

Subject: Irrigation season of use & Applicant name amendment

---

The application contemplates irrigation beneficial use with a season of use applied for 4/15-10/31. During data entry I identified the Department standard irrigation season of use for this region of Admin Basin 81 = 5/1 to 10/31. I have clarified the season of use prior to the statutory two-week advertising cycle. No advancement of priority is required for the clarifying action in accordance with IDAPA 37.03.08 Section 035.04.a.

---

During advertisement review ArcGIS Pro tax parcel information indicated different parcel ownership than designated on the original filing. I communicated with the Applicant, who owns multiple LLC(s), and it was a product of templating errors as the Applicant submitted three each application(s) at the same time in the same approximate region of the State. Mr. Bledsoe acknowledged the ownership is currently under Bledsoe Connor Holdings, LLC whereas the application was submitted with Applicant name Lochsa Holdings, LLC.

IDWR received an amended Application PG1 form via Department E-File with email date 1/9/2026 and attached JPG document and subsequently received PDF document by E-File date stamped 1/12/2026. The amendment changes the Applicant Name, but no other part of the contact information. I've updated the Applicant name in AdHoc for this filing to reflect Bledsoe Conner Holdings, LLC.

IDAPA 37.03.08 Section 035.03.a.ii requires the Applicant's name and mailing address in addition to the "names of all partners or members and the name of the managing partner or member, if any" be included with the application submission to be acceptable for filing. As filed originally Scott Bledsoe is the Managing Member for both Lochsa Holding, LLC and Bledsoe Connor Holdings, LLC (see attached Secretary of State – Montana documents).

IDAPA 37.03.08 Section 035.04.g. requires changes to applicant's name or mailing address be updated/notified by the applicant or representative in writing. In this case, the PG1 amendment received by E-File on 1/9/2026 & 1/12/2026 accomplishes this requirement. As Mr. Scott Bledsoe is the Managing Member for both LLCs and who originally signed the application, I don't recommend advancement of Priority for clarifying the Applicant name, which didn't change the mailing address nor phone/email contact information.

## Bates, Luke

---

**From:** Albert P. Barker <abarker@martenlaw.com>  
**Sent:** Thursday, January 29, 2026 2:13 PM  
**To:** Hickey,Clay  
**Cc:** Bates, Luke; scottcbledsoe@gmail.com; Luke Bledsoe; Jenna Fortier; Allison Lebeda; Ryan Banks  
**Subject:** RE: IDWR 81-12050, 81-12051, & 81-12052 30-day pre-advertisement agency comment period requirement

**CAUTION: This email originated outside the State of Idaho network. Verify links and attachments BEFORE you click or open, even if you recognize and/or trust the sender. Contact your agency service desk with any concerns.**

Clay

I'm not trying to be difficult. But these are very small diversions in a portion of the system above some very significant waterfalls. One of the purposes of the diversions is to enhance the health of the timber lands and vegetation adjacent to the streams. Whether there are significant populations in the area of the diversions could be important in light of the request to IDWR for limitations on the use of the water rights. If there is no readily available data for those areas above the falls that is where we will leave it for now and we can revisit this request in the event of a protest.

### Albert P. Barker

Partner

**M- 208.724.1506**

**D - 208.424.2030**

[martenlaw.com](http://martenlaw.com)

101 S. Capitol Blvd, Suite 1200

Boise, ID, 83702



**From:** Hickey,Clay <clay.hickey@idfg.idaho.gov>  
**Sent:** Thursday, January 29, 2026 2:37 PM  
**To:** Albert P. Barker <abarker@martenlaw.com>  
**Cc:** Bates, Luke <Luke.Bates@idwr.idaho.gov>; scottcbledsoe@gmail.com; Luke Bledsoe <lukecbledsoe@gmail.com>; Jenna Fortier <Jenna.Fortier@deq.idaho.gov>; Allison Lebeda <allisonl@nezperce.org>; Ryan Banks <Ryan.Banks@osc.idaho.gov>  
**Subject:** RE: IDWR 81-12050, 81-12051, & 81-12052 30-day pre-advertisement agency comment period requirement

Mr. Barker I am not sure how this data helps you. It is a lot of data we have collected fisheries data in that area for 20 plus years. Additionally, this data is organized by river meaning I would need to do this for Brushy Fork, Spruce Creek, and the North Fork of Spruce Creek and would take a considerable amount of time. If we protest your water right and you want the data I will provide it but given, we are in the sensitive basin comment period I don't believe this amount of time is warranted. You can however request this data at the link below. This would qualify as a small project on this list and would have a \$200 fee associated with the request.

<https://idfg.idaho.gov/data/request>

Thanks,

Clay Hickey

Regional Technical Assistance Manager, Clearwater Region

Idaho Department of Fish and Game

3316 16<sup>th</sup> Street

Lewiston, ID 83501

Office (208) 750-4217

[Clay.hickey@idfg.idaho.gov](mailto:Clay.hickey@idfg.idaho.gov)



**From:** Albert P. Barker <[abarker@martenlaw.com](mailto:abarker@martenlaw.com)>

**Sent:** Thursday, January 29, 2026 7:47 AM

**To:** Hickey, Clay <[clay.hickey@idfg.idaho.gov](mailto:clay.hickey@idfg.idaho.gov)>

**Cc:** Bates, Luke <[Luke.Bates@idwr.idaho.gov](mailto:Luke.Bates@idwr.idaho.gov)>; [scottcbledsoe@gmail.com](mailto:scottcbledsoe@gmail.com); Luke Bledsoe <[lukecbledsoe@gmail.com](mailto:lukecbledsoe@gmail.com)>;

Jenna Fortier <[Jenna.Fortier@deq.idaho.gov](mailto:Jenna.Fortier@deq.idaho.gov)>; Allison Lebeda <[allisonl@nezperce.org](mailto:allisonl@nezperce.org)>; Ryan Banks

<[Ryan.Banks@osc.idaho.gov](mailto:Ryan.Banks@osc.idaho.gov)>

**Subject:** RE: IDWR 81-12050, 81-12051, & 81-12052 30-day pre-advertisement agency comment period requirement

**CAUTION: This email originated outside the State of Idaho network. Verify links and attachments BEFORE you click or open, even if you recognize and/or trust the sender. Contact your agency service desk with any concerns.**

Clay

Would it be possible to share with the applicants the IFG information referenced in your email on the spatial distribution of the fisheries in the area where the applications are proposed? Thank you in advance.

**Albert P. Barker**

Partner

**M- 208.724.1506**

**D - 208.424.2030**

[martenlaw.com](http://martenlaw.com)

101 S. Capitol Blvd, Suite 1200

Boise, ID, 83702

**From:** Hickey, Clay <[clay.hickey@idfg.idaho.gov](mailto:clay.hickey@idfg.idaho.gov)>  
**Sent:** Wednesday, January 28, 2026 9:49 AM  
**To:** Albert P. Barker <[abarker@martenlaw.com](mailto:abarker@martenlaw.com)>; Jenna Fortier <[Jenna.Fortier@deq.idaho.gov](mailto:Jenna.Fortier@deq.idaho.gov)>; Ryan Banks <[Ryan.Banks@osc.idaho.gov](mailto:Ryan.Banks@osc.idaho.gov)>; Allison Lebeda <[allisonl@nezperce.org](mailto:allisonl@nezperce.org)>  
**Cc:** Bates, Luke <[Luke.Bates@idwr.idaho.gov](mailto:Luke.Bates@idwr.idaho.gov)>; [scottcbledsoe@gmail.com](mailto:scottcbledsoe@gmail.com); Luke Bledsoe <[lukecbledsoe@gmail.com](mailto:lukecbledsoe@gmail.com)>  
**Subject:** RE: IDWR 81-12050, 81-12051, & 81-12052 30-day pre-advertisement agency comment period requirement

IDFG has reviewed applications 81-12050, 81-12051, and 81-12052 for .12 cfs each of irrigation from Brushy Fork, Spruce Creek, and the North Fork of Spruce Creek. Both Brushy Fork and Spruce Creek are important areas for steelhead, chinook, bull trout, and cutthroat trout. IDFG has data showing widespread reproduction for these species in this system. IDFG would recommend putting an appropriate volume cap these water rights to limit the total water allocated under these applications. If that limitation is added to these permits IDFG would not oppose these applications. IDFG will however watch these non-DCMI carveout values closely. We appreciate the opportunity to comment.

Thanks,

Clay Hickey

Regional Technical Assistance Manager, Clearwater Region

Idaho Department of Fish and Game

3316 16<sup>th</sup> Street

Lewiston, ID 83501

Office (208) 750-4217

[Clay.hickey@idfg.idaho.gov](mailto:Clay.hickey@idfg.idaho.gov)



**From:** Albert P. Barker <[abarker@martenlaw.com](mailto:abarker@martenlaw.com)>  
**Sent:** Wednesday, January 14, 2026 9:25 AM  
**To:** Hickey, Clay <[clay.hickey@idfg.idaho.gov](mailto:clay.hickey@idfg.idaho.gov)>; Jenna Fortier <[Jenna.Fortier@deq.idaho.gov](mailto:Jenna.Fortier@deq.idaho.gov)>; Ryan Banks <[Ryan.Banks@osc.idaho.gov](mailto:Ryan.Banks@osc.idaho.gov)>; Allison Lebeda <[allisonl@nezperce.org](mailto:allisonl@nezperce.org)>  
**Cc:** Bates, Luke <[Luke.Bates@idwr.idaho.gov](mailto:Luke.Bates@idwr.idaho.gov)>; [scottcbledsoe@gmail.com](mailto:scottcbledsoe@gmail.com); Luke Bledsoe <[lukecbledsoe@gmail.com](mailto:lukecbledsoe@gmail.com)>  
**Subject:** FW: IDWR 81-12050, 81-12051, & 81-12052 30-day pre-advertisement agency comment period requirement

**CAUTION: This email originated outside the State of Idaho network. Verify links and attachments BEFORE you click or open, even if you recognize and/or trust the sender. Contact your agency service desk with any concerns.**

Good morning,

Lochsa Holdings and Conner Bledsoe Holdings have applied for irrigation water rights from Spruce Creek and Brushy Fork in T38N R16E sections 21, 25 and 27, all in Idaho County near the Montana border. The water will be used for up to 6 acres at each location on private land and is intended to enhance the health of the forest and timber in those areas. There is no intent to grow traditional row crops.

The Idaho Water Resource Board holds a water right 81-11935 for minimum stream flows for Spruce Creek and Brushy Fork in various flow rates depending on the month. As you know the Idaho Water Resource Board is the only entity entitled to hold instream flow rights in the state of Idaho. Water right 81-11935 is subordinated to future non-DCMI uses up to 0.9 cfs. The maximum diversion rate under the applications will be less than half of the subordination amount, i.e. 0.36 cfs. IDWR records show no other water rights above the segment protected by the instream flow right, Water right 81-11935. The subordination provision reflects a judgement that future non-DCMI uses should be allowed to be developed.

If you have any questions or comments on these applications, please contact me and Scott Bledsoe by email within 14 days so that the IDWR has your questions and comments for processing the application. Please also feel free to contact me by telephone.

Thank you for your consideration.

**Albert P. Barker**

Partner

**M- 208.724.1506**

**D - 208.424.2030**

[martenlaw.com](http://martenlaw.com)

101 S. Capitol Blvd, Suite 1200

Boise, ID, 83702



**From:** Bates, Luke <[Luke.Bates@idwr.idaho.gov](mailto:Luke.Bates@idwr.idaho.gov)>

**Sent:** Wednesday, December 31, 2025 2:16 PM

**To:** [scottbledsoe@gmail.com](mailto:scottbledsoe@gmail.com); Albert P. Barker <[abarker@martenlaw.com](mailto:abarker@martenlaw.com)>

**Cc:** Hickey, Clay <[clay.hickey@idfg.idaho.gov](mailto:clay.hickey@idfg.idaho.gov)>; Jenna Fortier <[Jenna.Fortier@deq.idaho.gov](mailto:Jenna.Fortier@deq.idaho.gov)>; Ryan Banks <[Ryan.Banks@osc.idaho.gov](mailto:Ryan.Banks@osc.idaho.gov)>; Allison Lebeda <[allisonl@nezperce.org](mailto:allisonl@nezperce.org)>

**Subject:** FW: IDWR 81-12050, 81-12051, & 81-12052 30-day pre-advertisement agency comment period requirement

Scott –

Apologies, the suspense date below should reflect **31 Jan 2026** rather than 2025.

Thank you,

Luke Bates – Sr Water Resource Agent

Idaho Department of Water Resources

Northern Regional Office

7600 N Mineral Dr Suite 100 Coeur D Alene ID 83815-7763

**From:** Bates, Luke

**Sent:** Wednesday, December 31, 2025 12:03 PM

**To:** [scottbledsoe@gmail.com](mailto:scottbledsoe@gmail.com); Albert P. Barker <[abarker@martenlaw.com](mailto:abarker@martenlaw.com)>

**Cc:** Jenna Fortier <[Jenna.Fortier@deq.idaho.gov](mailto:Jenna.Fortier@deq.idaho.gov)>; Hickey, Clay <[clay.hickey@idfg.idaho.gov](mailto:clay.hickey@idfg.idaho.gov)>; Ryan Banks <[Ryan.Banks@osc.idaho.gov](mailto:Ryan.Banks@osc.idaho.gov)>; Allison Lebeda <[allisonl@nezperce.org](mailto:allisonl@nezperce.org)>

**Subject:** IDWR 81-12050, 81-12051, & 81-12052 30-day pre-advertisement agency comment period requirement

Mr. Scott Bledsoe,

IDWR has received your three Application for Permit(s) 81-12050, 81-12051, and 81-12052, which falls within Administrative Basin 81 - designated as a Wild & Scenic River Basin + Clearwater River Basin for administrative management purposes. Idaho Department of Water Resource (IDWR) requires a pre-advertisement cycle, 30-day external agency comment period, prior to the statutory 14-day public advertisement cycle intended to develop collaboration between applicants and external agency POCs for all surface water source filings in the Basin 81.

I have attached an IDWR correspondence letter herein along with related attachments to your email address on file.

IDWR requires the applicant to reach out to respective agency POC(s) for comments within 30 days, no later than **31 January 2025**. On the Application you have declared request to accept service of documents by email at the email address(es) listed on the filing (Step 2.c.); based on this declaration, IDWR shall not mail a hard copy correspondence of the request for information rather maintain electronic transmission as requested.

I recommend the following process to gain agency comment responses:

- You or your appointed representative may pursue the pre-advertisement agency comment requirement.
- Email each point of contact (POC) and request a written comment related to your application for permit. Request they respond within 14 days of your written/emailed request. You may follow up with a call to each agency's POC if no response is garnered using email channels.
  - You may consider forwarding this email to the agency with added comments from yourself requesting feedback on the filing. The intent is for the Applicant and Agency POC(s) to collaborate on best management practices which may result in changes to your filing prior to the statutory advertisement cycle.
  - The intent is not to initiate Agency(s) election to protest the application, as it hasn't entered the statutory two-week public comment period currently.
  - Agencies may elect not to comment, have no comment, or provide detailed comments.
- **Forward agency emailed responses to IDWR** using my email address. If an agency replies to you and carbon copies IDWR I shall add the correspondence to the respective application packet prior to the statutory advertisement cycle.

Once IDWR receives ALL comments or confirmation of "no comments" from the respective agency POCs, IDWR will advance your application to advertisement. You may notify IDWR upon conclusion of the 30-day period if you received zero feedback from the respective agency POCs.

Upon conclusion of the 30-day period or earlier if all comments are received, IDWR will advance your application to the two-week statutory public advertisement period regardless of correspondence between applicant/agencies.

Thank you,  
Luke Bates – Sr Water Resource Agent  
Idaho Department of Water Resources  
Northern Regional Office  
7600 N Mineral Dr Suite 100 Coeur D Alene ID 83815-7763

---

This e-mail may contain confidential and privileged information and is sent for the sole use of the intended recipient. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

IRS CIRCULAR 230 NOTICE: To the extent that this message or any attachment concerns tax matters, it is not intended to be used and cannot be used by a taxpayer for the purpose of avoiding penalties that may be imposed by law.

RE: IDWR 81-12050, 81-12051, & 81-12052 30-day pre-advertisement agency comment period requirement

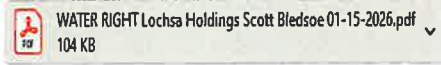


Jenna Fortier

To: [abarker@martenlaw.com](mailto:abarker@martenlaw.com)  
Cc: [Bates, Luke](mailto:Bates, Luke); [scottcbledsoe@gmail.com](mailto:scottcbledsoe@gmail.com); [Luke Bledsoe](mailto:Luke Bledsoe)



Thu 1/15/2026 2:15 PM



All,

DEQ received the request to comment on three water right applications, 81-12050, 81-12051, 81-12052. Attached are DEQ's comments for all three applications in one letter.

Please reach out if you have any questions.

Thank you,  
Jenna



**Jenna Fortier**

Surface Water Quality Manager  
Idaho Department of Environmental Quality  
1118 F Street, Lewiston, Idaho 83501  
P: (208) 799-4370 | C: (208) 739-2187  
[www.deq.idaho.gov](http://www.deq.idaho.gov)

From: Albert P. Barker <[abarker@martenlaw.com](mailto:abarker@martenlaw.com)>

Sent: Wednesday, January 14, 2026 9:25 AM

To: Hickey, Clay <[clay.hickey@idfg.idaho.gov](mailto:clay.hickey@idfg.idaho.gov)>; Jenna Fortier <[Jenna.Fortier@deq.idaho.gov](mailto:Jenna.Fortier@deq.idaho.gov)>; Ryan Banks <[Ryan.Banks@osc.idaho.gov](mailto:Ryan.Banks@osc.idaho.gov)>; Allison Lebeda <[allisonl@nezperce.org](mailto:allisonl@nezperce.org)>

Cc: Bates, Luke <[Luke.Bates@idwr.idaho.gov](mailto:Luke.Bates@idwr.idaho.gov)>; [scottcbledsoe@gmail.com](mailto:scottcbledsoe@gmail.com); Luke Bledsoe <[lukecbledsoe@gmail.com](mailto:lukecbledsoe@gmail.com)>

Subject: FW: IDWR 81-12050, 81-12051, & 81-12052 30-day pre-advertisement agency comment period requirement

**CAUTION: This email originated outside the State of Idaho network. Verify links and attachments BEFORE you click or open, even if you recognize and/or trust the sender. Contact your agency service desk with any concerns.**

Good morning,

Lochsa Holdings and Conner Bledsoe Holdings have applied for irrigation water rights from Spruce Creek and Brushy Fork in T38N R16E sections 21, 25 and 27, all in Idaho County near the Montana border. The water will be used for up to 6 acres at each location on private land and is intended to enhance the health of the forest and timber in those areas. There is no intent to grow traditional row crops.

The Idaho Water Resource Board holds a water right 81-11935 for minimum stream flows for Spruce Creek and Brushy Fork in various flow rates depending on the month. As you know the Idaho Water Resource Board is the only entity entitled to hold instream flow rights in the state of Idaho. Water right 81-11935 is subordinated to future non-DCMI uses up to 0.9 cfs. The maximum diversion rate under the applications will be less than half of the subordination amount, i.e. 0.36 cfs. IDWR records show no other water rights above the segment protected by the instream flow right, Water right 81-11935. The subordination provision reflects a judgement that future non-DCMI uses should be allowed to be developed.

If you have any questions or comments on these applications, please contact me and Scott Bledsoe by email within 14 days so that the IDWR has your questions and comments for processing the application. Please also feel free to contact me by telephone.

Thank you for your consideration.

**Albert P. Barker**

Partner

M- 208.724.1506

D - 208.424.2030

[martenlaw.com](http://martenlaw.com)

101 S. Capitol Blvd, Suite 1200

Boise, ID, 83702

MARTEN LAW



January 15, 2026

Idaho Department of Water Resources  
7600 North Mineral Drive, Suite 100  
Coeur d'Alene, Idaho 83501

Subject: Water Right Application 81-12050, 81-12051, 81-12052

Dear Idaho Department of Water Resources:

We received a request to comment on three water right applications, this letter will address all three. Assuming all federal, state and local permits have been obtained, regulations met, and reviews completed, we offer the following comments.

Water Right #	Amount	Date Start	Date End	Purpose	Source
81-12050	0.12	April 15	October 31	Irrigation	Brushy Fork
81-12051	0.12	April 15	October 31	Irrigation	N.F. Spruce Creek
81-12052	0.12	April 15	October 31	Irrigation	Spruce Creek

Water right application 81-12050 would have two points of diversion, diversion points are in Township 38N, Range 16E, and Section 21, water withdrawn would be from Brushy Fork Creek. The withdrawal locations are in Assessment Unit (AU) 17060303CL037\_02. Brushy Fork Creek is listed in Category 5 in Idaho's 2024 Integrated Report. It is designated as not supporting Cold Water Aquatic Life and Salmonid Spawning due to temperature.

Water right application 81-12051 would have one point of diversion in Township 38N, Range 16E, Section 25, water withdrawn would be from the North Fork Spruce Creek. The withdrawal location is in AU 17060303CL036\_02. The North Fork Spruce Creek is listed in Category 5 in Idaho's 2024 Integrated Report. It is designated as not supporting Cold Water Aquatic Life and Salmonid Spawning due to temperature.

Water right application 81-12052 would have one point of diversion in Township 38N, Range 16E, and Section 27, water withdrawn would be from Spruce Creek. The withdrawal location is in AU 17060303CL036\_02. Spruce Creek is listed in Category 5 in Idaho's 2024 Integrated Report. It is designated as not supporting Cold Water Aquatic Life and Salmonid Spawning due to temperature.

If approved, DEQ recommends withdrawal be made during periods of seasonal high flows. To protect and maintain cold water aquatic life beneficial use, stream flow adequate to sustain existing aquatic life needs to be maintained in these streams (IDAPA 58.01.02.100.1).

DEQ recommends that the flow should not be allowed to drop below 1 cubic feet per second (cfs), and at no time should the stream be allowed to go dry as a result of water withdrawals.

Thank you for the opportunity to comment on this application. If you have any questions regarding the Idaho Water Quality Standards or the conditions listed above, please reach out at 208-799-4370, or [jenna.fortier@deg.idaho.gov](mailto:jenna.fortier@deg.idaho.gov).

Sincerely,



Jenna Fortier  
Regional Water Quality Manager

c: Lochsa Holdings LLC, Scott Bledsoe  
Albert Barker  
EDMS

## Bates, Luke

---

**From:** Bates, Luke  
**Sent:** Wednesday, December 31, 2025 12:03 PM  
**To:** scottbledsoe@gmail.com; Albert P. Barker  
**Cc:** Jenna Fortier; Hickey,Clay; Ryan Banks; Allison Lebeda  
**Subject:** IDWR 81-12050, 81-12051, & 81-12052 30-day pre-advertisement agency comment period requirement  
**Attachments:** 81-12050, 81-12051, & 81-12052 Cover Letter - Wild & Scenic Rivers + Clearwater River Basin Request for Rule 40.04 packet.pdf; Wild & Scenic + Clearwater River Basin Application letter - 42-203A(5).pdf; Request for Rule 40.04 infor requirements doc.pdf; Agency Contact Information.docx; 81-12050 - Copy App for Permit - Brushy Fork trib of Crooked Fork.pdf; 81-12051 -Copy App for Permit - N.F. Spruce Creek trib of Spruce Creek.pdf; 81-12052 - Copy App for Permit - Spruce Creek trib of Brushy Fork.pdf

Mr. Scott Bledsoe,

IDWR has received your three Application for Permit(s) 81-12050, 81-12051, and 81-12052, which falls within Administrative Basin 81 - designated as a Wild & Scenic River Basin + Clearwater River Basin for administrative management purposes. Idaho Department of Water Resource (IDWR) requires a pre-advertisement cycle, 30-day external agency comment period, prior to the statutory 14-day public advertisement cycle intended to develop collaboration between applicants and external agency POCs for all surface water source filings in the Basin 81.

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  - You may consider forwarding this email to the agency with added comments from yourself requesting feedback on the filing. The intent is for the Applicant and Agency POC(s) to collaborate on best management practices which may result in changes to your filing prior to the statutory advertisement cycle.
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Thank you,  
Luke Bates – Sr Water Resource Agent  
Idaho Department of Water Resources  
Northern Regional Office  
7600 N Mineral Dr Suite 100 Coeur D Alene ID 83815-7763



IDAHO DEPARTMENT OF  
**WATER RESOURCES**

Northern Region • 7600 N Mineral Drive, Suite 100 • Coeur D'Alene, ID 83815-7763  
Phone: 208-762-2800 • Fax: 208-762-2819 • Email: [northerninfo@idwr.idaho.gov](mailto:northerninfo@idwr.idaho.gov) • Web: [idwr.idaho.gov](http://idwr.idaho.gov)

**Governor Brad Little**

**Director Mathew Weaver**

December 31, 2025

LOCHSA HOLDINGS LLC  
C/O SCOTT BLEDSOE  
11 OLD ELK SUMMIT RD  
LOLO MT 59847-9352

Subject: Application(s) for Permit to Appropriate Water **81-12050, 81-12051, & 81-12052**

To Whom It May Concern:

Please find enclosed a request for additional information which is required prior to the issuance of a permit. As stated in the attached document, if you do not respond to this request within 30 days, the Department may void your application. If you have any questions regarding this matter, please call me at 208-762-2800.

Sincerely,

Luke Bates  
Senior Water Resource Agent

Enclosure(s): Wild & Scenic + Clearwater River Basin Application Letter 42-203A(5)  
Rule 40.04 additional information  
Agency Point of Contact roster  
Copy(s) – Application for Permit(s) 3ea

cc: Allison Lebeda, Water Rights Program Coordinator, Nez Perce Tribe  
Clay Hickey, Regional Technical Assistant Manager, Clearwater Region IDFG  
Jenna Fortier, Water Quality Manager, IDEQ  
Ryan Banks, Natural Resources Project Manager, Office of Species Conservation



### **Applying for a Permit to Appropriate Water in the Clearwater River Basin**

Idaho Code § 42-203A(5) requires IDWR to evaluate the following criteria for applications to appropriate water:

- The potential to reduce the quantity of water under existing water rights
- The sufficiency of the water supply for the proposed appropriation
- The good faith nature of the application
- The adequacy of the applicant's financial resources
- The local public interest in the public water resource
- The conservation of water resources in Idaho
- Impacts to the economy of the local area or watershed

To ensure that IDWR has sufficient information to evaluate the criteria, Rule 40.04 of the Water Appropriation Rules (IDAPA 37.03.08.040.04) requires water right applicants to submit additional information to IDWR in connection with their applications. Because the water of the Clearwater River drainage is habitat for fish species listed as endangered or threatened under the Federal Endangered Species Act, caution is necessary to ensure that new appropriations of water do not undermine efforts to protect and restore the ESA listed fish species and other public values in the basin's rivers and streams. IDWR is, therefore, requiring that applicants submit the additional information required by Water Appropriation Rules 40.04.g, Local Public Interest, even when the applications are for less than the usual 5.0 cfs/500 af threshold. **To satisfy the additional information requirement, please contact the respective agencies listed below\*, obtain their written comments on your proposed project, and submit the comments to IDWR.**

Please submit the information required by Water Appropriation Rules 40.04.g to IDWR within 30 days from the date you are notified that it is required. IDWR will hold your application until you have submitted the additional information. If you do not respond within 30 days, IDWR may void your application. If you need additional time to submit the required information, please submit a written request. IDWR can grant additional time "upon a showing of good cause."

The following are agency representatives who will help you respond to the local public interest requirement of Rule 40.04.g. **Please contact these agency representatives at least 15 days prior to the end of your 30-day response period.**

**\*Reference separate PDF for external agency contact information.**



**Governor Brad Little**

**Director Mathew Weaver**

**IDAHO ADMINISTRATIVE CODE**  
**Department of Water Resources**

**IDAPA 37.03.08**  
**Water Appropriation Rules**

**040.04. Additional Information Requirements.**

(7-1-93)

**a.** For unprotested applications and permits being reprocessed, the additional information required by Subsection 040.04.c. shall be submitted within thirty (30) days after the Director notifies the applicant that the application or permit is being reviewed for decision. The Director may extend the time within which to submit the information upon request by the applicant and upon a showing of good cause. Failure to submit the required information within the time period allowed will be cause for the Director to void an application or to advance the priority of a permit being reprocessed by the number of days that the information submittal is late. The Director will provide opportunity for hearing as provided in Section 42-1701A, Idaho Code.

**b.** For protested applications or protested permits being reprocessed, the information required by Subsection 040.04.c. may be requested by the Director to be submitted within thirty (30) days after notification by the Director, may be made a part of the record of the hearing held to consider the protest, or may be made available in accordance with any pre-hearing discovery procedures. Failure to submit the required information within the time period allowed will be cause for the Director to void an application or to advance the priority of a permit being reprocessed by the number of days that the information submittal is late.

**c.** The following information shall be submitted for applications to appropriate un-appropriated water or trust water and for permits being reprocessed for trust water. The additional information submittal requirements of this rule are waived for filings which seek to appropriate five (5) cfs or less or storage of five hundred acre-feet (500 AF) or less and for filings seeking reallocation of trust water which the Director determines will reduce the flow of the Snake River measured at Murphy Gauge by not more than two (2) acre-feet per day. For filings proposing irrigation as a purpose of use, the additional information is required if more than two hundred (200) acres will be irrigated. However, the Director may specifically request submittal of any of the following information for any filing, as he determines necessary. Information relative to the effect on existing water rights, Section 42-203A(5)(a), Idaho Code, shall be submitted as follows:

- i. For applications appropriating springs or surface streams with five (5) or fewer existing users, either the identification number, or the name and address of the user, and the location of the point of diversion and nature of use for each existing water right shall be submitted.
- ii. For applications appropriating groundwater, a plat shall be submitted locating the proposed well relative to all existing wells and springs and permitted wells within a one-half mile radius of the proposed well.
- iii. Information shall be submitted concerning any design, construction, or operation techniques which will be employed to eliminate or reduce the impact on other water rights.

**d.** Information relative to sufficiency of water supply, Section 42-203A(5)(b), Idaho Code, shall be submitted as follows:

- i. Information shall be submitted on the water requirements of the proposed project, including, but not limited to, the required diversion rate during the peak use period and the average use period, the volume to be diverted per year, the period of year that water is required, and the volume of water that will be consumptively used per year.
- ii. Information shall be submitted on the quantity of water available from the source applied for, including, but not limited to, information concerning flow rates for surface water sources available during periods of peak and average project water demand, information concerning the properties of the aquifers that water is to be taken from for groundwater sources, and information on other sources of supply that may be used to supplement the applied for water source.

**e.** Information relative to good faith, delay, or speculative purposes of the applicant, Section 42-203A(5)(c), Idaho Code, shall be submitted as follows:

- i. The applicant shall submit copies of deeds, leases, easements or applications for rights-of-way from federal or state agencies documenting a possessory interest in the lands necessary for all project facilities and the place of use or if such interest can be obtained by eminent domain proceedings the applicant must show that appropriate actions are being taken to obtain the interest. Applicants for hydropower uses shall also submit information required to demonstrate compliance with Sections 42-205 and 42-206, Idaho Code.
- ii. The applicant shall submit copies of applications for other needed permits, licenses and approvals, and must keep the department apprised of the status of the applications and any subsequent approvals or denials.

**f.** Information Relative to Financial Resources, Section 42-203A(5)(d), Idaho Code, shall be submitted as follows:

- i. The applicant shall submit a current financial statement certified to show the accuracy of the information contained therein, or a financial commitment letter along with the financial statement of the lender or other evidence to show that it is reasonably probable that financing will be available to appropriate the water and apply it to the beneficial use proposed.
- ii. The applicant shall submit plans and specifications along with estimated construction costs for the project works. The plans shall be definite enough to allow for determination of project impacts and implications.

**g.** Information Relative to Conflict with the Local Public Interest, Section 42-203A(5)(e), Idaho Code, shall be submitted as follows: The applicant shall seek comment and shall submit all letters of comment on the effects of the construction and operation of the proposed project from the governing body of the city and/or county and tribal reservation within which the point of diversion and place of use are located, the Idaho Department of Fish and Game, the Idaho Department of Environmental Quality, and any irrigation district or canal company within which the proposed project is located and from other entities as determined by the Director.

**h.** The following information Relative to the Public Interest Criteria of Section 42-203C(2), Idaho Code, shall be submitted by an applicant seeking reallocation of trust water for a project which the Director determines will reduce the flow of the Snake River by more than two (2) acre-feet per day. For filings proposing irrigation as a purpose of use, the additional information is required if more than two hundred (200) acres will be irrigated. The Director may request any or all of the following information for any filing seeking the reallocation of trust water.

- i. A project design and estimate of cost of development shall be submitted. For applications appropriating more than twenty-five (25) cfs, or ten thousand (10,000) AF of storage, or generating more than five (5) megawatts, the information shall be prepared and submitted by a qualified engineer licensed under the provisions of Chapter 12, Title 54, Idaho Code, unless waived by the Director. The design shall be definite enough to reflect the project's impacts and implications as required in subsequent rules.
- ii. If the project proposes development for irrigation purposes, information shall be submitted on crop rotation, including acreages, for lands when newly developed.
- iii. Information shall be submitted concerning the number and kinds of jobs that will be created or eliminated as a direct result of project development including both the construction and operating phases of the project. If jobs are seasonal, the estimated number of months per year of employment shall be submitted.
- iv. For applications or permits being reprocessed for more than twenty-five (25) cfs, or more than ten thousand (10,000) AF of storage, or more than five (5) megawatts, information shall be submitted concerning the changes to community services that will be required during the construction and operation phases of the project including, but not limited to, changes to schools, roads, housing, public utilities and public health and safety facilities, if any.
- v. Information shall be submitted concerning the source of energy for diverting and using water for the project, the estimated instantaneous demand and total amount of energy that will be used, the efficiency of use, and energy conservation methods.
- vi. Information shall be submitted concerning the location, amount, and quality of return flow water, and any water conservation features of the proposed project.
- vii. If the project proposes irrigation as a use, information shall be submitted concerning the kinship, if any, of the operator of the land to be irrigated by the project to the applicant, the location and acreage of other irrigated lands owned, leased, or rented by the applicant, the names, addresses and number of shares held by each shareholder if the applicant is a corporation, evidence of tax-exempt status if a corporation is so claiming, a soil survey prepared in accordance with the U.S. Soil Conservation Service irrigatable land classification system, and a schedule for bringing into production the project lands.

REQUEST FOR INFORMATION FROM DESIGNATED AGENCIES  
EXTERNAL AGENCY CONTACT INFORMATION

1. **Allison Lebeda**  
Water Rights Program Coordinator  
Water Resource Division  
Nez Perce Tribe  
PO BOX 365  
Lapwai, ID 83540  
T: (208) 843-7368  
E: [allisonl@nezperce.org](mailto:allisonl@nezperce.org) [Preferred method of correspondence]
  
2. **Clay Hickey**  
Regional Technical Assistant Manager, Clearwater Region  
Idaho Department of Fish and Game  
3316 16<sup>th</sup> Street  
Lewiston, ID 83501  
O: (208) 750-4217  
E: [Clay.hickey@idfg.idaho.gov](mailto:Clay.hickey@idfg.idaho.gov)
  
3. **Jenna Fortier**  
Water Quality Manager  
Idaho Department of Environmental Quality  
1118 F Street  
Lewiston, ID 83501  
O: (208) 799-4892  
E: [Jenna.Fortier@deq.idaho.gov](mailto:Jenna.Fortier@deq.idaho.gov)
  
4. **Ryan Banks**  
Natural Resources Project Manager  
Executive Office of the Governor  
Office of Species Conservation  
220 E 5<sup>th</sup> Street, Suite 213  
Moscow, ID 83843  
O: (208) 791-3014  
E: [Ryan.Banks@osc.idaho.gov](mailto:Ryan.Banks@osc.idaho.gov)

## Bates, Luke

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**From:** Albert P. Barker <abarker@martenlaw.com>  
**Sent:** Friday, January 9, 2026 4:25 PM  
**To:** IDWR File  
**Cc:** Bates, Luke; scottcbledsoe@gmail.com; lukecbledsoe@gmail.com  
**Subject:** Re: Spruce Creek 81-12051 amendment  
**Attachments:** 20260109\_135541.jpg

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Please accept this amendment to line 1 of this application.  
Scott Bledsoe is the member of Bledsoe Conner Holdings LLC with signature authority.

### Albert P. Barker

Partner

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**M- 208.724.1506**

**D - 208.424.2030**

[martenlaw.com](http://martenlaw.com)

101 S. Capitol Blvd, Suite 1200  
Boise, ID, 83702



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## Bates, Luke

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**From:** Albert P. Barker <abarker@martenlaw.com>  
**Sent:** Tuesday, January 6, 2026 8:22 AM  
**To:** Bates, Luke  
**Cc:** scottbledsoe@gmail.com; Luke Bledsoe  
**Subject:** FW: IDWR 81-12050, 81-12051, & 81-12052 30-day pre-advertisement agency comment period requirement  
**Attachments:** ACTION BY THE MEMBER OF.pdf

**CAUTION: This email originated outside the State of Idaho network. Verify links and attachments BEFORE you click or open, even if you recognize and/or trust the sender. Contact your agency service desk with any concerns.**

Luke

Attached is a copy of an action by Scott Bledsoe as the sole member of Lochsa Holdings LLC, appointing Luke Bledsoe, Leigh Bledsoe and Scott Bledsoe as managers of the LLC. Under Montana Code Annotated 2023 section 35-8-301(2)(b) a manager in a manager managed LLC has authority to act on behalf of the LLC as agent for the LLC. "a manager is an agent of the limited liability company for the purpose of its business or affairs and the act of a manager, including but not limited to the execution of any instrument in the name of the limited liability company for apparently carrying on in the usual way the business or affairs of the limited liability company binds the limited liability company..."

I hope this is clear enough for IDWR to accept Scott's initials on the amendment as manager of the LLC even though Luke is also a manager.

**Albert P. Barker**

M- 208.724.1506

**M- 208.724.1506**

D - 208.434.2030

martenlaw.com

101 S. Capitol Blvd. Suite 1200

Boise, ID 83702

 **MARTEN LAW**

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**ACTION BY THE MEMBER OF  
LOCHSA HOLDINGS, LLC**

The undersigned, being the sole Member of Lochsa Holdings, LLC, a Montana Limited Liability Company, hereinafter the "Company", in lieu of holding a special meeting, hereby adopts the following resolutions by written consent pursuant to the Limited Liability Company Act of the State of Montana effective the 3rd day of June, 2024.

1. Appointment of Managers of Lochsa Holdings, LLC. The Articles of Organization and Operating agreement have been amended to modify the Company into a manager managed LLC. Luke Bledsoe has acted as the sole Manager of the LLC since June, 2023. Pursuant to Sections 6.1 and 6.5 of the Operating Agreement of the LLC, as amended, the sole member elects Scott C. Bledsoe, Leigh A Bledsoe and Luke Bledsoe as Managers of the LLC.

The undersigned sole Member, Scott Bledsoe hereby ratifies, confirms, approves and consents to the foregoing actions and resolutions taken without a meeting effective the 3rd day of June, 2023.

MEMBER



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Scott C. Bledsoe, Member