

MEMORANDUM

Date: February 10, 2026
To: Transfer 89546
From: Christian Stewart
Re: Review & Evaluation of Sufficiency of Information

This transfer proposes to change the point of diversion and place of use for several irrigation water rights and create a combined place of use for the rights. The rights being split (rights 35-7969, 29-7042, 29-2520A, and 29-2472) were pre-split and renumbered in Adhoc as rights 35-14896, 35-14903, 35-14904, and 35-14905, respectively.

Authority to File: The application for transfer was filed by Farmland Reserve Inc, the owner of record for the water rights involved in this transfer. The application was signed by Scott Baird, a vice president of Farmland Reserve per the Idaho Secretary of State. The proposed place of use is owned by Farmland Reserve.

Water Right Validity: The water rights involved in this transfer were decreed in the Snake River Basin adjudication between 2002 and 2004. The irrigated acres being moved were leased to the Water Supply Bank or were irrigated in the past 5 years. No forfeiture issues identified.

Injury to Other Water Rights: This transfer proposes to change the point of diversion for groundwater rights within the Eastern Snake Plain Aquifer. According to ETRAN modeling results, the combined impacts of the depletions to the Snake River from this transfer do not exceed any thresholds for which mitigation would be required. There are other large irrigation wells near the proposed point of diversion. There is no evidence that moving these rights to the proposed point of diversion would injure nearby groundwater rights.

Enlargement of Use: This transfer does not increase the diversion rate, annual volume, or irrigated acres of any water rights. The rights being moved are not stacked with other water 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.