

MEMORANDUM

Date: February 10, 2026
To: Transfer 89548
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 groundwater irrigation water rights within the Eastern Snake Plain Aquifer and create an 874 acre permissible place of use (PPU) for the rights. The rights will be diverted from two points of diversion and delivered through an interconnected water delivery system. Four water rights (35-7914, 35-14861, 35-14860, and 35-14845), which authorize a combined 343.2 acres of irrigation, are already located within the area of the proposed PPU. This transfer proposes to move 68 acres of irrigation rights into the PPU. The 68 acres being moved are composed of portions of rights 29-10265, 35-7969, 35-2632, and 35-8218, which were pre-split and renumbered in Adhoc into rights 35-14906, 35-14898, 35-14899, and 35-14900, respectively. The transfer also proposes to incorporate water rights 35-14241 and 35-14655 into the permissible place of use in the event that the applicant can provide mitigation for these rights. At the time of the transfer approval, rights 35-14241 and 35-14655 are not mitigated for and do not authorize any irrigation.

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 in this transfer were decreed in the Snake River Basin adjudication and many of the rights were included in various transfers approved within the past 5 years. Many of the rights were leased to the Water Supply Bank during the 2025 irrigation season. No forfeiture issues identified.

Injury to Other Water Rights: The transfer was protested and all protests were withdrawn. 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 in the area and there is no evidence that moving additional rights to the proposed point of diversion would injure other groundwater users locally.

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. Combined diversion rate, volume, and acre limit conditions have been applied to the water rights where necessary.

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.