

## MEMORANDUM

**Date:** March 6, 2026  
**To:** Transfer 90287  
**From:** McKenna Webster  
**Re:** Review & Evaluation of Sufficiency of Information

This transfer proposes to rearrange the place of use to reflect active irrigation practices and to resolve unauthorized water use. No hydrologic change is occurring. The rights involved in this transfer are 31-10503, 31-2248, 31-62S, 31-63S, and 31-7203.

**Authority to File:**

According to IDWR records, the applicant is the current owner of the water rights included in the transfer. Additionally, Jefferson County parcel data shows that the applicant is the owner of the proposed place of use. The annual report was provided showing Todd Cornelison as an authorized signer on behalf of TB&R Investments LLC.

**Water Right Validity:**

The water rights were decreed in 2002. Aerial imagery shows regular irrigation of the place of use for over a decade. Water District 110 watermaster reports show water being diverted regularly as well.

**Injury to Other Water Rights:**

No hydrologic change is occurring. It is simply a rearrangement of the place of use to reflect current irrigation practices. No legal notice is required. Watermaster does not oppose this application. No injury identified.

**Enlargement of Use:**

The proposed changes will not result in enlargement because the authorized diversion rate, volume, and acreage will not increase as a result of the transfer.

**Local Public Interest:**

No issues identified.

**Beneficial Use / Conservation of Water Resources:**

No issues identified.

**Effect on Economy of the Local Area:**

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.