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Apr 09, 2026

DEPARTMENT OF
WATER RESOURCES

Clive J. Strong, ISB No. 2207
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Attorney for Claimant Idaho Forest Group, LLC, Gary Creagle, Gary W. and Karen B. Creagle 1995 Trust, Curtis and Lana Carney, R&R Smith Properties, LLC, R&R Smith Trust, and Ryan and Crystal Smith

BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO

IN THE MATTER OF FORFEITURE OF
WATER RIGHT 95-16447

DECLARATION OF CLIVE J. STRONG IN
SUPPORT OF PETITION FOR
FORFEITURE OF WATER RIGHT 95-
16447

I, **Clive J. Strong**, declare as follows:

1. I am over the age of eighteen, and I am the Attorney for Claimant Idaho Forest Group, Gary W. Creagle, Gary W. and Karen B. Creagle 1995 Trust, Curtis and Lana Carney, R&R Properties, LLC, R&R Smith Family Trust, and Ryan and Crystal Smith.
2. I contracted with DMS Natural Resources to create from publicly available data **Attachment 1** to the Affidavit of Randall Smith in Support of Petition for Forfeiture of Water Right 95-16647 (herein after Randall Smith Affidavit”) to show the location of the water supply system used to deliver Chilco storage water to the lands below Chilco Reservoir and the place of use of and ownership of the decreed irrigation storage rights.

3. I contracted with DMS Natural Resources to create from publicly available data **Attachment 1** to the Affidavit of Curtis B. Carney in Support of Petition for Forfeiture of Water Right 95-16647 (hereinafter "Curtis B. Carney Affidavit") to show the location of the water supply system used to deliver Chilco storage water to the lands below Chilco Reservoir and the place of use of and ownership of the decreed irrigation storage rights.

4. I caused to be gathered true, accurate and correct copies of the following documents from the sources identified below:

Attachment 2 to the Randall Smith and Curtis B. Carney Affidavits: Partial Decree 95-16447 was collected from the Idaho Department of Water Resources 95-16447 water right file.

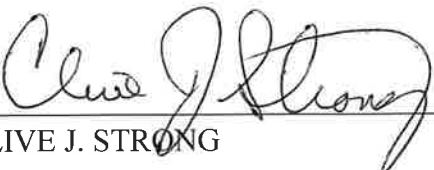
Attachment 3 to the Randall Smith and Curtis B. Carney Affidavits: Certificate of Existence was collected from the Office of the Secretary of State of the State of Idaho.

Attachment 4 to the Randall Smith and Curtis B. Carney Affidavits: The ownership record for parcel 52N03W79100 was collected from the records of the Kootenai County Assessor's Office.

Attachment 5: The letter from Craig L. Saxton to Carl Lowry dated October 16, 2024, which is attached hereto and incorporated herein by reference, was collected from the Idaho Department of Water Resources 95-16447 water right file.

I declare under the penalty of perjury under the laws of the State of Idaho that to the foregoing is true and correct.

Dated the 9th day of April 2026.


CLIVE J. STRONG

CERTIFICATE OF SERVICE

I certify that on the 9th day of April 2026, I served or caused to be served a copy of the *Affidavit of Clive J. Strong In Support of Petition for Forfeiture of Water Right 95-16447* to the parties by the following method(s):

Idaho Department of Water Resources
322 E. Front St Ste 648
P.O. Box 83720
Boise, ID 83720-2707

USPS (postage prepaid)
email file@idwr.idaho.gov

Carl Lowry and Caitlyne Coman
22128 N. Pope Rd.
Athol, ID 83801

USPS Certified Mail/Return Receipt Requested



CLIVE J. STRONG



IDAHO DEPARTMENT OF
WATER RESOURCES

322 E Front Street, Suite 648, Boise ID 83702 • PO Box 83720, Boise ID 83720-0098
Phone: 208-287-4800 • Fax: 208-287-6700 • Email: idwrinfo@idwr.idaho.gov • Website: idwr.idaho.gov

Governor Brad Little

Director Mathew Weaver

October 16, 2024

CARL LOWRY
22128 N POPE RD
ATHOL ID 83801

RE: Notice of Change in Water Right Ownership
Water Right Number 95-16447
Coeur d'Alene-Spokane River Basin Adjudication (CSRBA) claim 95-15247

Dear Carl Lowry:

It has come to our attention that you might be the owner of the property described as the place of use for water right 95-16447. The property in question is also part of the place of use for CSRBA claim 95-15247 which is currently pending before the CSRBA adjudication court. According to our records, the property to which I am referring to was most recently owned by JAMESON MORTGAGE CO and can be described as follows:

Legal description:	T52N, R03W, S7, SESE
Parcel No:	52N03W079100 in Kootenai Co.

We recommend that if, in fact, you now own the property in question, and do use the water for the purposes claimed, you file a "Change in Ownership" with this department in order that we may send all further correspondence to the appropriate owner(s).

Enclosed is a Change in Ownership form. Please fill out the form completely, sign and date it and return it to IDWR's Coeur d'Alene office, along with a "copy" of your Warranty Deed and legal description of the property you have purchased.

Note: A fillable PDF version of the Notice of Change in water right ownership can be found on IDWR's website at: <http://www.idwr.idaho.gov/form/adjudication>

If you have any questions regarding this matter, please feel free to contact me at (208) 287-4916.

Respectfully submitted,

Craig L. Saxton
Adjudication Section Manager
craig.saxton@idwr.idaho.gov

Enclosure(s)