

MEMORANDUM

Date: May 14, 2026
To: Transfer 90230
From: Blake Jordan
Re: Review & Evaluation of Sufficiency of Information

This transfer proposes to convert a 66.8-acre portion of water rights 22-13797 and 22-13958 to municipal for uses within City of Rexburg's municipal service boundary. The City's water delivery system consists of eleven interconnected points of diversions, all of which are equipped with flow meters.

Authority to File:

According to IDWR records, the water rights involved in this transfer are owned by B & B Farms (applicant). The application was signed by both the applicant and Jerry Merrill, the mayor of the City of Rexburg. The annual report for B&B Farms was provided showing Bradley Jensen as having authority to sign on behalf of the company.

Water Right Validity:

Water rights were decreed in the SRBA in 2010. The imagery from 2019-2025 shows irrigation at the current place of use. However, Water District 100 watermaster reports show water being delivered regularly to the place of use. Forfeiture is not an issue.

Injury to Other Water Rights:

The current and proposed points of diversion are within the ESPA area of common ground water supply. The applicant used the weighted centroid approach for their ESPA analysis. According to the analysis, impacts to all the reaches of the Snake River are less than 2.0 acre-feet/ trimester. No mitigation is required. The transfer application was advertised, and no protests were received. The Water District 100 Watermaster does not oppose the application.

Enlargement of Use:

The nature of use will be changed to municipal. The volume of water available for municipal use is based on water measurement records associated with the irrigations system used to irrigate the 66.8 acres under rights 22-13958 and 22-13797. During the review of the applicant's nature of use change analysis, inconsistencies were identified between applicant's calculated consumptive use volumes and Water District 100 water measurement reports. The applicant's calculated consumptive use volume exceeded the volumes reported by the Water District 100 Watermaster. This inconsistency was discussed with the applicant's representative, who then provided historic water use information pertaining to the points of diversion and irrigation system used to irrigate the 66.8 acres. According to this historic water use information, approximately 1.29 acre-feet per acre has been applied to farmland planted in spring grain and potatoes. The representative's water use information is consistent with Water District 100 measurement records. Therefore, the amount of water available for municipal use is based on 1.29 acre-feet per acre.

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.