

MAY 12 2026

DEPT. OF WATER RESOURCES
EASTERN REGION

2025 Review of Historical Pumping

Irrigation of Smith Farm, including the POU of the B&B Farms WR in the NW1/4 of Section 32, T6N R40E

WMISNumber	SptID	DataID	RightIDs	Volume 2025 (afa)
1003002	364401	593127, 593130, 593132, 593137, 593146, 593151		595.5
1003003	364402	593127, 593130, 593132, 593137, 593146, 593151		756.14
1003033	364992	593127, 593130, 593137, 593146, 593151		0
1003005	364416	594424, 594427, 672536		386.5
Sum for the Farm (afa)				1738.14

Active Irrigated Acres 1346
AF/ac 1.29

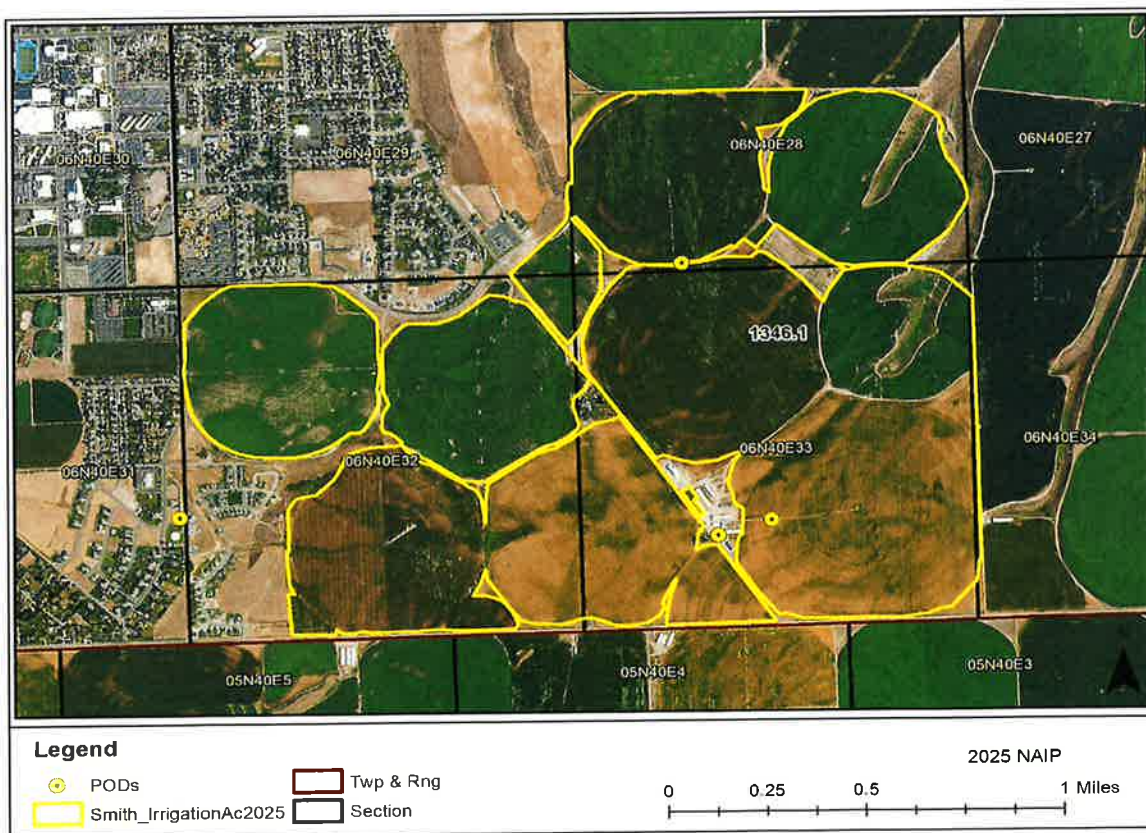
The Smith Farm includes four wells, only three of which are active, that operate jointly in a combined system to deliver water.

In 2024 and 2025, the Smith Farm irrigated the POU of the B&B Farms water right in the NW1/4 of Section 32 and delivered water to the farm via the three Smith wells.

These wells are listed above and show the pumped volume as recorded in WMIS.

Based on irrigation of 1,346 acres in 2025, the historical pumping shows 1.29 af/ac.

The map below shows the boundary used to calculate the irrigated acres.



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APR 02 2026

DEPT. OF WATER RESOURCES
EASTERN REGION**AMENDED Conversion of Nature of Use***B & B Farms*

Applicant proposes to convert a portion of existing water rights 22-13958 and 22-13797 from irrigation to be used for municipal purposes. The combined total of these water rights is irrigation for 66.8 acres. This amendment is being submitted to provide additional documentation of crop history and historical pumping. At the time that the original application was submitted, it was represented that the farm had grown alfalfa in rotation with potatoes and grain. However, after review of FSA reports for 2018-2022, an adjustment is required of the historical use.

The farm appears to have been operated with an equal grain/potato rotation during the years 2018-2022, with an occasional year of all grain. Additional interviews with the water right owners, neighbors, and other lessees have confirmed this practice. The pumping records available in the WMIS database are quite low for the anticipated crop requirements based on this rotation schedule. Therefore, a review using two sources of evapotranspiration data has been prepared to compare values and determine a valid historical consumption.

The place of use has changed over the years. Since about 2008, the applied place of use was essentially under the pivot, even though the authorized place of use included corners and some land to the south and southwest. There's some history of water rights being transferred and replaced, but the water right record supports that the place of use was essentially just the pivot, or the place of use boundary approved in Transfer 86273 in 2022. Therefore, this evaluation is based on the 2022 place of use boundary, which appears to be more accurate to the exact irrigated acres rather than the FSA report, which excludes the NENW. Observation of aerial photography during 2018-2022 seems to also confirm that the irrigated lands are located under just the pivot.

ET-IDWR

Using ET-IDWR, and based upon information gathered at the Rexburg Ricks College station (NWS – USC00107644), Spring Grain – Irrigated has a precipitation deficit of 548.84 mm/year, or 1.8 af/year, for the growing season and Potatoes – Late Harvest has a precipitation deficit of 500.45 mm/yr, or 1.64 af/year. Applying these values to the historical cropping patterns always operated with ½ grain and ½ potatoes, with occasional years of all grain (such as 2022) results in an average of **1.72 af/acre** for years of both crops (2018-2021) and **1.8 af/acre** for years of all grain (2022).

Excerpts of the ET IDWR precipitation deficits are included in Figure 1.

METRIC

IDWR's Evapotranspiration Viewer provides a better evaluation of actual ET and CIR for the crops grown on a given year. Using the 2022 POU boundary to identify the area of

interest, the maximum CIR value calculated is **1.89 af/acre**. Figure 2 includes excerpts of the calculations.

Summary

The ET-IDWR data is comparable to the METRIC data, but may be more conservative as it is based upon 30-year averages. The CIR calculated by the METRIC data reflects the actual usage during the 5-year period the water rights were last used and are a better representation of the historical consumption. Below is a table that includes the results of all three data sets.

The WMIS record does not match the ET values. At this time, it is unknown why the WMIS record is significantly lower. According to the water right user, it does not reflect operations during that time period.

Year	METRIC CIR (af/ac)	ET-IDWR Precip Def. (af/ac)	WMIS Record (af/ac)
2018	1.0	1.72	2.00
2019	1.89	1.72	1.14
2020	1.84	1.72	1.11
2021	1.85	1.72	0.92
2022	NULL*	1.80	0.57
Max	1.89	1.80	2.00

**Note that 2022 did not have CIR data. However, the ET values of 2022 are between 2019 and 2021 ET values, suggesting that the CIR would not likely be higher than 2019 values.*

It is proposed to use the 1.89 af/ac value obtain from the METRIC dataset to represent actual historical usage. **Therefore, 66.8 acres of water rights would convert to 126.3 afa of consumptive use.**

Figure 1. ET Values from Rexburg Ricks College (NWS-USC00107644)

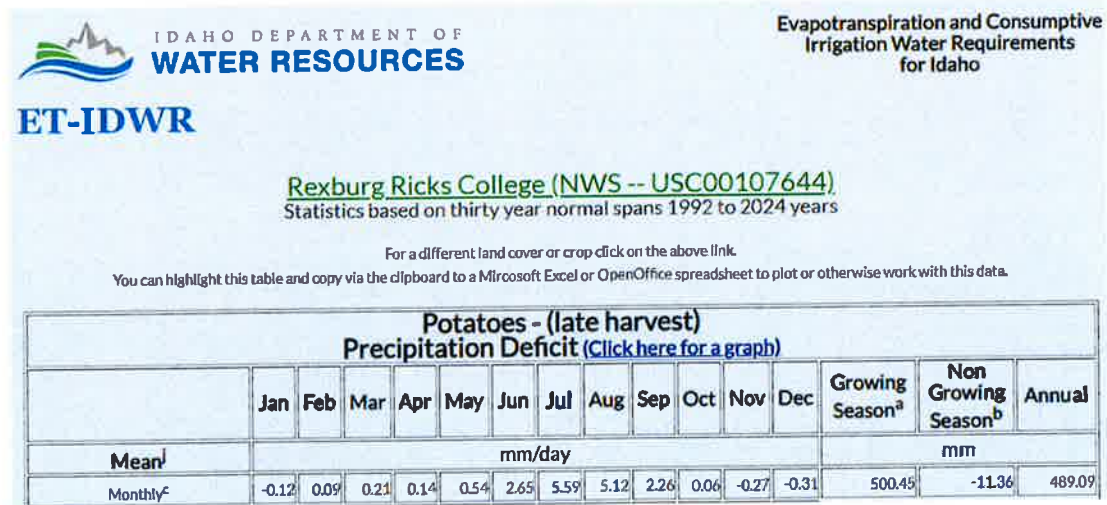
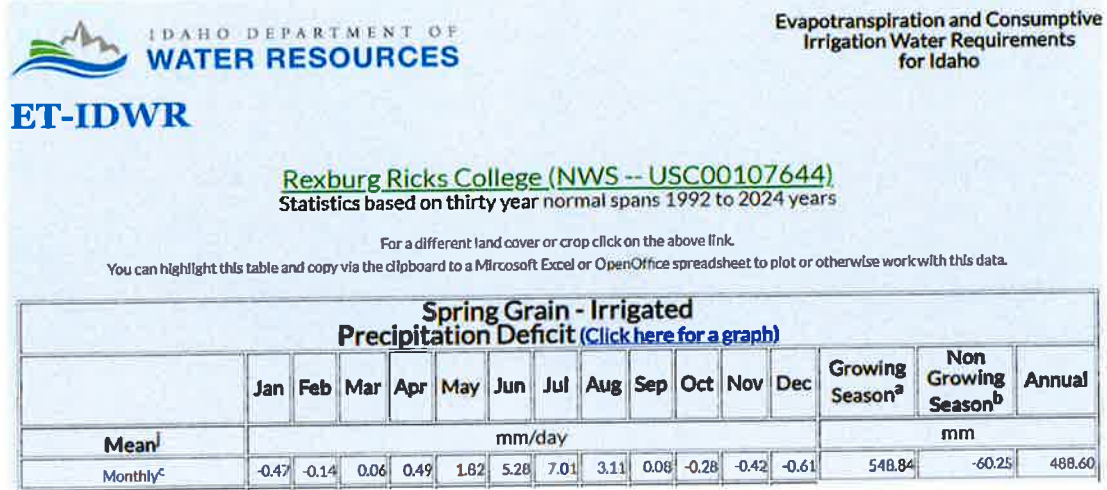


Figure 2. METRIC CIR REVIEW



Year	Mean CIR/ac (af/ac)
2018	1.000
2019	1.89
2020	1.84
2021	1.85
2022	NULL
Max	1.89

2018 METRIC

OBJECTID_1	OBJECTID	COUNT	AREA	MIN	MAX	RANGE	MEAN	STD	SUM	VARIETY	MAJORITY	MAJORITY_COUNT	MAJORITY_PERCENT	MINORITY	MINORITY_COUNT	MINORITY_PERCENT	MEDIAN	PCT90	CATEGORY
1	1	559059	559059	124	763	639	567.875607	93.67659284	317475969	285	565	8970	1.604500055	416	1	0.0002	584	661	ET
2	1	559059	559059	-139	500	639	304.875607	93.67659284	170443452	285	302	8970	1.604500055	153	1	0.0002	321	398	CIR

2019 METRIC

OBJECTID_1	OBJECTID	COUNT	AREA	MIN	MAX	RANGE	MEAN	STD	SUM	VARIETY	MAJORITY	MAJORITY_COUNT	MAJORITY_PERCENT	MINORITY	MINORITY_COUNT	MINORITY_PERCENT	MEDIAN	PCT90	CATEGORY
1	1	559059	559059	316	952	636	797.4536659	107.7099784	445823649	295	836	9000	1.609799981	527	1	0.0002	835	893	ET
2	1	559059	559059	96	732	636	577.4536659	107.7099784	322830669	295	616	9000	1.609799981	307	1	0.0002	615	673	CIR

2020 METRIC

OBJECTID_1	OBJECTID	COUNT	AREA	MIN	MAX	RANGE	MEAN	STD	SUM	VARIETY	MAJORITY	MAJORITY_COUNT	MAJORITY_PERCENT	MINORITY	MINORITY_COUNT	MINORITY_PERCENT	MEDIAN	PCT90	CATEGORY
1	1	559059	559059	243	911	668	711.7389864	108.0606457	397904086	336	783	7920	1.416700006	283	4	0.0007	728	828	ET
2	1	559059	559059	92	760	668	560.7389864	108.0606457	313486177	336	632	7920	1.416700006	132	4	0.0007	577	677	CIR

2021 METRIC

OBJECTID_1	OBJECTID	COUNT	AREA	MIN	MAX	RANGE	MEAN	STD	SUM	VARIETY	MAJORITY	MAJORITY_COUNT	MAJORITY_PERCENT	MINORITY	MINORITY_COUNT	MINORITY_PERCENT	MEDIAN	PCT90	CATEGORY
1	1	559059	559059	280	966	686	734.7445779	81.2387452	410765569	272	717	8100	1.448899984	365	4	0.0007	737	824	ET
2	1	559059	559059	159	773	614	564.409565	74.23294565	315538247	254	627	8100	1.448899984	349	1	0.0002	568	644	CIR

2022 METRIC

OBJECTID_1	OBJECTID	COUNT	AREA	MIN	MAX	RANGE	MEAN	STD	SUM	VARIETY	MAJORITY	MAJORITY_COUNT	MAJORITY_PERCENT	MINORITY	MINORITY_COUNT	MINORITY_PERCENT	MEDIAN	PCT90	CATEGORY
1	1	559059	559059	263	926	663	748.7993539	88.84639544	418623018	272	780	8100	1.448899984	411	1	0.0002	773	825	ET

*No CIR calculated in ET Viewer

Re: B&B Farms Transfer

From Kristin Moore <kristin.rmea@gmail.com>
Date Thu 4/2/2026 2:36 PM
To McKenna Webster <mckenna.webster@idwr.idaho.gov>

 1 attachment (1 MB)
Attach4C-5_Amended.pdf;

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McKenna,

See the attached amended 4C-5.

Kristin Moore

Water Rights Analyst
482 Constitution Way, Ste 303, Idaho Falls, ID 83402
E-Mail: kristin.rmea@gmail.com
VOICE: 208-524-2353 ||| FAX: 208-524-1795



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On Thu, Mar 26, 2026 at 8:40 AM McKenna Webster <mckenna.webster@idwr.idaho.gov> wrote:
Kristin,

Yes, if you could get a new Attachment 4C-5 to me that would be great.

Best Regards

McKenna Webster | Water Resource Agent

900 N Skyline Dr. Ste. A Idaho Falls, ID 83402

(208) 525-7161 (office) | www.idwr.idaho.gov



From: Kristin Moore <kristin.rmea@gmail.com>
Sent: Tuesday, March 24, 2026 5:30 PM
To: McKenna Webster <mckenna.webster@idwr.idaho.gov>
Subject: Re: B&B Farms Transfer

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McKenna,

We have been working with the water right owner to evaluate the historical volumes more closely. After reviewing the FSA documents of crop history and rotation and evaluated them using ET-IDWR and METRIC, we have estimated ET to be more in line with the 2018 pumping. I'm unsure why the other years are so low compared to what the crops required as they are the same crops rotated from year to year. The water right owner is skeptical of the accuracy as well. The max ET that I calculated was very close to the 280 af documented through the flowmeter in 2018.

What do you need to proceed with approval? Do you need a new Attachment 4C-5?

Kristin Moore

Water Rights Analyst

482 Constitution Way, Ste 303, Idaho Falls, ID 83402

E-Mail: kristin.rmea@gmail.com

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On Mon, Mar 9, 2026 at 10:54 AM Kristin Moore <kristin.rmea@gmail.com> wrote:
Thanks for the reminder, McKenna. I'll look into the volumes and get back with you.

B & B Farms has not irrigated the property since the 2022 season, I believe. A neighbor has leased the land instead and obtained water rights from the water bank, which were diverted from his own well rather than the well associated with the farm ground. A different entity owns the farm well and would not consent to the use of it for the rental water. That's why you see no recent pumping, but you can see irrigation has occurred.

Kristin Moore

Water Rights Analyst

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On Mon, Mar 9, 2026 at 8:25 AM McKenna Webster <mckenna.webster@idwr.idaho.gov> wrote:
Kristin,

I wanted to check in to see if you have made any progress on those issues I described in my previous email. Before we can continue processing this application, those items will need to be addressed. Let me know if you have any questions.

Best Regards

McKenna Webster | Water Resource Agent

900 N Skyline Dr. Ste. A Idaho Falls, ID 83402

(208) 525-7161 (office) | www.idwr.idaho.gov



From: McKenna Webster

Sent: Tuesday, March 3, 2026 10:27 AM

To: kristin.rmea@gmail.com, <kristin.rmea@gmail.com>

Subject: B&B Farms Transfer

Good morning,

During the review of the B&B Farms Transfer, we noticed a few things regarding the volume. According to WMIS records, the volume actually being diverted is less than the historical diversion volume of 2.41 af/ac. We are seeing measurements closer to 2 af/ac and, in 2022, just over 1 af/ac. As a result, the volume to be transferred will need to be recalculated.

Additionally, it looks like the well previously used to irrigate these acres is no longer in use and hasn't been since 2023. However, imagery shows that the land has been irrigated. We need information on how the place of use has been irrigated since 2023.

Thank you

Best Regards

McKenna Webster | Water Resource Agent

900 N Skyline Dr. Ste. A Idaho Falls, ID 83402

(208) 525-7161 (office) | www.idwr.idaho.gov

