

DISTRICT COURT - CSRBA  
Fifth Judicial District  
County of Twin Falls - State of Idaho

Clive J. Strong, ISB No. 2207  
Attorney at Law  
14512 38<sup>th</sup> Ave. N.E.  
Lake Forest Park, WA 98155  
Telephone: (208) 850-7792  
Email: [clivejstrong@gmail.com](mailto:clivejstrong@gmail.com)

DEC 19 2025

By \_\_\_\_\_

Clerk

 Deputy Clerk

*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*

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE STATE  
OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

IN RE CSRBA

Case No. 49576

Subcase No. 95-18274

**DECLARATION OF CHARLES  
JACKMAN IN SUPPORT OF  
IRRIGATORS' MOTION FOR  
SUMMARY JUDGMENT**

I, **Charles Jackman**, declare as follows:

1. I am over the age of eighteen, and I am legally competent to testify in this matter based on my personal knowledge of the facts and statements set forth herein.
2. I have been employed by Idaho Forest Group, LLC since 2016. I am currently the Sawmill Manager and previously served as the Maintenance Manager.
3. Since December 2017, I have been responsible for monitoring and regulating the release of storage water from Chilco Reservoir for Idaho Forest Group, LLC and the irrigation storage right holders.

**DECLARATION OF CHARLIE JACKMAN IN SUPPORT OF IDAHO FOREST  
GROUP'S AND IRRIGATION CLAIMANTS' MOTION FOR SUMMARY JUDGMENT -**

5. An 8-inch HPDE hard pipe is used to deliver storage water from Chilco Reservoir to Idaho Forest Group, LLC and the irrigation storage water right holders.

6. Idaho Forest Group, LLC begins using Chilco storage water to water logs when the temperature rises above 70 degrees, which typically occurs in early May.

7. Prior to opening the irrigation storage release valve located on the 8-inch HPDE hard pipe, Idaho Forest Group, LLC coordinates with the other storage water right holders to determine when to open the valve for delivery of storage water.

8. Idaho Forest Group, LLC then informs Kootenai Properties, Inc. when IFG and the irrigators plan to open the storage release valve.

9. On the agreed date for opening the storage release valve, I or someone designated by me opens the irrigation storage release valve, which remains open throughout the irrigation season.

10. The practice is to store all inflow into the reservoir during the irrigation season to and to use the inflow to satisfy the decreed storage water rights.

11. The historic practice had been to close the storage release valve when stumps began to reappear in the reservoir, which is approximately 8 to 9 feet on the staff gauge. In the absence of any water meters, this level was maintained to preserve water in the reservoir.

12. In 2024, Kootenai Properties, Inc. expressed concern that the historic Chilco reservoir operation practice of turning off the storage release valve was not protective of its storage water rights.

13. In 2024, Kootenai Properties, Inc. purchased and Chilco mill staff installed the meter in the 8" HPDE hard pipeline downstream from the storage release valve as part of an

**DECLARATION OF CHARLIE JACKMAN IN SUPPORT OF IDAHO FOREST GROUP'S AND IRRIGATION CLAIMANTS' MOTION FOR SUMMARY JUDGMENT -**

effort to implement a real time allocation storage allocation methodology. The meter, however, failed.

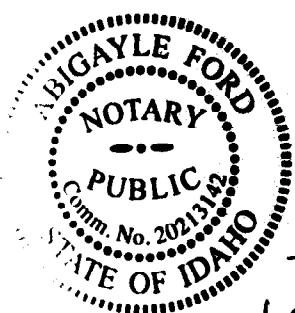
14. In 2025, Idaho Forest Group and Kootenai Properties, Inc. each installed water meters in the 8" HPDE hard pipeline above Chilco Falls to measure storage releases through the pipeline that they now use to monitor and allocate storage water.

15. Since all decreed storage rights share a common priority date, the storage water is allocated proportionately to the decreed rights.

16. Idaho Forest Group, LLC annually inspects Chilco Dam and conducts routine maintenance on the Dam prior to opening the storage release valve for delivery of storage water to the mill and irrigation storage water right holders.

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

DATED this 1 day of December, 2025.



Charles Jackman  
CHARLES JACKMAN

State of Idaho County of Kootenai  
the foregoing Instrument was acknowledged  
before me this 1st day of December  
by Abigail Ford Notary Public Abigail Ford.  
My Commission expires 6/22/2027

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 18 day of December, 2025, a true and correct copy of the foregoing document to be served by U.S. Mail postage prepaid addressed to the following individuals:

**ORIGINAL:**

Clerk of the Court  
Coeur d'Alene-Spokane River Basin  
Adjudication Court  
P.O. Box 2707  
Twin Falls, ID 83303-2707

**COPIES:**

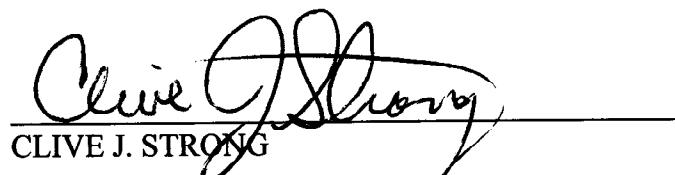
Director of IDWR  
P.O. Box 83720  
Boise, ID 83720-0098

Travis L. Thompson  
Parsons Behle & Latimer  
P.O. Box 63  
Twin Falls, ID 83303-0063

The David L. Haman Trust  
P.O. Box 3311  
Hayden, ID 83835

Jameson Mortgage Co.  
2243 W. Dakota Ave  
Hayden, ID 83835

LK Erickson Living Trust  
123 Montgomery Rd.  
Gillette, WY 82716-9155



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CLIVE J. STRONG