

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

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DEC 19 2025

By \_\_\_\_\_

*QC* Clerk

*QC* 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 RYAN FOBES IN  
SUPPORT OF IRRIGATORS' MOTION  
FOR SUMMARY JUDGMENT**

I, **Ryan Fobes**, declare as follows:

1. I am over the age of eighteen, and I am legally competent to testify in this matter based upon my personal knowledge of the facts and statements set forth herein.
2. I am a Licensed Engineer in the State of Idaho, and the owner of Foresite Engineering, PLLC.
3. I was employed by Idaho Forest Group, LLC from 2008 until the summer of 2016.
4. I currently provide consulting services to Idaho Forest Group, LLC.
5. Idaho Forest Group, LLC. hired me to collect topographic data when Chilco Reservoir was drained for repair in November 2021.

6. On November 2nd, 2021, I collected topographic data with a Topcon GR-5, survey-grade GPS, along with a small unmanned aerial system (sUAS). The data was processed in Pix4D to create a 3D model of the subject area. This 3d Model was then imported into Civil 3D to estimate the lake volume. The emergency spillway top elevation was tied with the GPS to determine the lake full elevation. The volume was estimated at 396.37 acre-feet available for diversion.

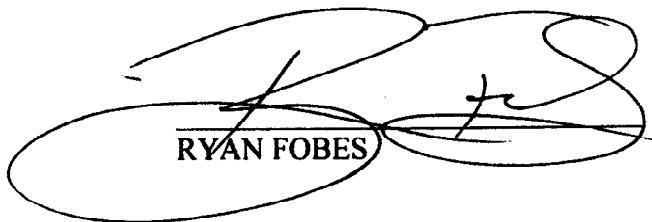
7. I shared my methodology and findings regarding the storage capacity of Chilco Reservoir with Gary Godde, Chairman, Kootenai Properties, on April 25, 2022.

8. I also shared my methodology with the irrigation storage water right holders.

9. Rand Wichman, Kootenai Properties, Inc. project manager and I use 396.37 acre-feet as the Chilco storage volume for purposes of allocating the water stored in Chilco Reservoir.

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 16 day of December, 2025.



RYAN FOBES

A handwritten signature of "RYAN FOBES" is enclosed within a large, roughly oval-shaped outline. The signature is written in a cursive, flowing style.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 18<sup>th</sup> 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:**

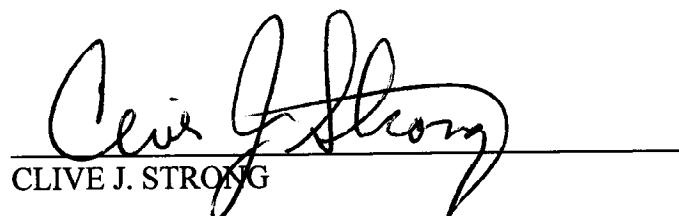
Director of IDWR  
P.O. Box 83720  
Boise, ID 83720-0098

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



CLIVE J. STRONG