

# Request for Clarification Regarding Bellevue Facility Plan and Water-Rights Risk

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Dear DEQ Drinking Water Program Leadership,

I am writing as a Bellevue resident and elected member of the Bellevue City Council (for identification only) to request immediate clarification regarding DEQ's support for the City of Bellevue's Drinking Water Facility Plan Technical Draft, in light of recent information disclosed by the City regarding risks to Bellevue's water right priority date.

For two years, DEQ has stated that Bellevue could not receive funding until an updated Facility Plan was completed and approved. The City has repeated this requirement publicly and in Council meetings. Yet the April 27, 2026 meeting packet now states that the original Technical Draft Facility Plan—approved in 2024—will be submitted to DEQ for final approval, and that “no further action will be needed by the council/bond authority.”

This reversal raises a fundamental question: What has changed?

The Technical Draft includes the creation of a new springs collection system project (SS-1) and associated work on the City's points of diversion. However, at the March 23, 2026 Council meeting, the City disclosed for the first time that this work may jeopardize Bellevue's water right priority date. This information was disclosed to explain why the project would no longer include a new springs collection system.

The Public Works Director stated: “Chris Bromley, our water attorney, was worried about moving the collection system or rehabilitating it.” “If we go any deeper or if we move it outside the quarter-quarter-quarter — the 10 acres from our points of diversion — we could jeopardize our priority date.”

In response to questions and statements indicating that maybe the City should just "plow ahead" and build the new springs anyway, the City Attorney then stated: “That's something we absolutely can't do. We lose our priority date. We lose it all. We can't move.”

The City's own written memorandum dated March 23, 2026 (Exhibit G) states the same: “If the location was changed or modified the water rights would possibly need modification and could change the priority date of the water right.”

Despite these warnings, the April 27, 2026 memo now recommends submitting the original Technical Draft Facility Plan to DEQ for approval, stating it “aligns closer to our current use and water rights as decreed,” and that this course was recommended after discussions with Twin Falls regional staff and the City's water attorney.

This creates a serious credibility issue: How can DEQ approve a Facility Plan that includes a project the City's own attorneys say could jeopardize Bellevue's water rights?

Accordingly, I respectfully request DEQ's written clarification on the following:

1. Does DEQ consider the Technical Draft Facility Plan to accurately reflect the project that will actually be constructed, given the City's statements that the springs project cannot safely proceed?
2. If DEQ previously required an updated Facility Plan for funding, why is the original Technical Draft now considered sufficient?
3. Does DEQ believe the Technical Draft meets ACAS requirements if the core springs project (SS-1) is no longer feasible due to water-rights risk?
4. Is DEQ prepared to approve a Facility Plan that includes a project the City Attorney has stated could cause Bellevue to "lose our priority date" and "lose it all"?

Bellevue residents deserve clarity on whether DEQ is supporting a plan that the City itself has stated could threaten the community's water rights. I appreciate your prompt attention to these questions and look forward to your response.

Sincerely,

Suzanne Wrede  
Bellevue Resident  
Member, Bellevue City Council (for identification only)

**[Bellevue\\_Water\\_Project\\_Reversal\\_from\\_4\\_27\\_2026\\_CC\\_Meeting\\_Packet.pdf](#)** (327 KB)