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NO. _____ FILED _____
 A.M. _____ P.M. _____

OCT 07 2010

J. DAVID NAVARRO, Clerk
 By A. GARDEN
 DEPUTY

IN THE DISTRICT COURT FOR THE FOURTH JUDICIAL DISTRICT OF THE
 STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

BLUE LAKES TROUT FARM,)
 INC.,)
)
 Petitioner/Plaintiff,)
)
 vs.)
)
 GARY SPACKMAN, in his official)
 capacity as Director of the Idaho)
 Department of Water Resources,)
 and the IDAHO DEPARTMENT)
 OF WATER RESOURCES,)
)
 Respondents/Defendants.)
 _____)

CV-WA-2010-19823
~~CV WA 1010832~~

CASE NO.: _____
**VERIFIED COMPLAINT, DECLARATORY
 JUDGMENT ACTION AND PETITION
 FOR WRIT OF MANDATE**

COME NOW the Petitioner/Plaintiff, Blue Lakes Trout Farm, Inc. (hereinafter referred to as "Plaintiff"), by and through its undersigned attorneys of record, Ringert Law Chartered, and complains and petitions as follows:

COPY

GENERAL ALLEGATIONS

1. Plaintiff, Blue Lakes Trout Farm, Inc., is an Idaho corporation, with its principal office in Boise, Ada County, Idaho.

2. Defendant, Gary Spackman, is a resident of Ada County, Idaho, and is the Director of the Defendant, Idaho Department of Water Resources (“IDWR”), with its main offices located in Boise, Ada County, Idaho.

3. Jurisdiction is proper in the District Court pursuant to Idaho Code §§ 1-705 and 7-301, *et seq.* (Writs of Mandate) and shall be reassigned to the presiding judge of the Snake River Basin Adjudication District Court of the Fifth Judicial District pursuant to *Administrative Order Adopting Procedures for the Implementation of the Idaho Supreme Court Administrative Order dated December 9, 2009.*

4. Plaintiff is the owner of certain water rights which have been the subject of a delivery call for the past five years or since 2005. The procedural history of said delivery call has been summarized by the Director as follows in the *Order Setting Hearing and Schedule and Order Limiting Scope of Hearing* (“*Order*”) issued on October 1, 2010:

In 2005, Blue Lakes Trout Farm, Inc. (“Blue Lakes”) and Clear Springs Foods, Inc. (“Clear Springs”) sent letters to the Idaho Department of Water Resources (“Department”) requesting that the Department administer junior priority water rights to supply Blue Lakes’ and Clear Springs’ senior water rights. A multi-day hearing on the request for administration was held in November 2007, in which the parties to this case presented evidence and testimony to the hearing officer. The hearing officer issued his recommended decision on January 11, 2008 and the Department issued a final order on July 11, 2008.

The Department’s July 11, 2008 final order was appealed to the district court. The District Court issued its *Order on Petition for Judicial Review* on June 19, 2009. In the *Order on Petition for Judicial Review* (hereinafter referred to as “*order on*”

Review”), the Court held, among other things, that the Department did not properly apply the appropriate burdens of proof and evidentiary standards regarding seasonal variation when the Director found no injury to water right no. 36-7210, held by Blue Lakes and water right no. 36-4013A, held by Clear Springs. The Court remanded the issue of seasonal variability back to the Department for further proceedings. *Order on Review* at 24. The District Court affirmed the Department on other issues and many of those issues are currently on appeal to the Idaho Supreme Court. *See Clear Springs Foods, Inc., et al. v. IDWR*, Supreme Court Docket No. 37308-2010.

The District Court’s decision about the burdens of proof and evidentiary standards determining the effects of seasonal variability was not appealed to the Idaho Supreme Court. On May 11, 2010, District Judge John Melanson issued an *Order Granting in part Motion to Enforce Orders*. The order required that the Director apply the proper burdens of proof and evidentiary standards to determine the effects of seasonal variability on water rights held by Blue Lakes and Clear Springs.

On July 19, 2010, Interim Director Gary Spackman (“Director”) of the Idaho Department of Water Resources (“Department”) issued his *Final Order* regarding the issue of seasonal variability and injury (“July 19, 2010 Final Order”) to Blue Lakes’ water right no. 36-7210 and Clear Springs’ water right no. 36-4013A.

The Department received *Petition Requesting Hearing on July 19, 2010 Final Order* from Blue Lakes on July 19, 2010. On August 2, 2010, the Department received *Petition Requesting Hearing on July 19, 2010 Final Order* from Clear Springs. The Department received *Ground Water Users’ Petition for Reconsideration and Request for Hearing* filed by Idaho Ground Water Appropriators, Inc., North Snake Ground Water District, and Magic Valley Ground Water District (collectively “Ground Water Users”) on August 2, 2010.

On August 20, 2010, the Director issued his *Order Granting Request for Hearing and Scheduling Prehearing Conference* (“Prehearing Order”) in which he set a prehearing conference and directed the parties to come prepared to discuss hearing dates and the scope of hearing. In the *Order*, the Director suggested that because some of the issues identified by the parties in their petitions are on review to the Idaho Supreme Court, the Director might limit the scope of the hearing to exclude those issues on appeal.

A true and correct copy of said *Order* is attached hereto as **Exhibit A**.

5. As indicated in the *Order*, a status conference was held on September 14, 2010, and Plaintiff asserted that it intended to present evidence of updated, improved and/or new data, analysis

and methods for determining the impact of junior ground water diversions on Plaintiff's water rights. Plaintiff has sought the opportunity to present updated, improved and/or new data, analysis and methods for determining the impacts of junior ground water diversions on Plaintiff's water rights for the past two years and Defendants have repeatedly refused and/or denied Plaintiff the opportunity to do so. Plaintiff contends that its evidence provides a better technical basis for determining the extent of injury and mitigation obligations than the "trimline" and "spring allocation" determinations of the Director. Plaintiff's intention to present such evidence is consistent with the prior decision of the Hearing Officer, which was affirmed by the Director and the District Judge John Melanson, which found that "Continuing efforts should be made to improve the accuracy of all scientific conclusions . . . and "[i]f that produces more reliable results, those results should be used in the future." The District Judge John Melanson also found that when better methods are developed to determine the impact of ground water diversions on spring flows and to deal with model uncertainty in administration, those better methods should be used.

6. Despite the prior recognition by the Director and the District Court of a present and ongoing duty to consider updated, improved and/or new data, analysis or methods for determining the impact of junior ground water diversions on Plaintiff's water rights, the Director issued the *Order* that "petitioners Blue Lakes and Clear Springs are precluded from addressing, in this proceeding, issues related to the 10% model uncertainty, the trim-line, or other issues related to the use or application of the ground water model." Even though the *Order* precludes Plaintiff from presenting updated, improved and/or new data, analysis and methods for applying and using the ground water model, the Director also ordered that the Ground Water Users may present testimony and evidence

relating to new facts which affect the legal conclusions previously reached by the Director.

7. The Director's *Order* sets a hearing for January 10-14, 2011. Prefiled direct testimony, including expert reports (in which Blue Lakes intends to present the aforementioned data and analysis), are due by November 5, 2010. If Plaintiff is precluded from addressing issues related to the use or application of the ground water model at such hearing then Plaintiff will go another year of not being allowed to present evidence of updated, improved and/or new data, analysis and methods for determining the impact of junior ground water diversions on Plaintiff's water rights. As a direct result of the Director's *Order*, Plaintiff is being and will be irreparably harmed in that Plaintiff is unable to use all of their fish propagation facilities, and those fish propagation facilities that are presently being used have been damaged and continue to be damaged on a daily basis in that Plaintiff has inadequate water pursuant to its senior water rights.

COUNT ONE (WRIT OF MANDATE)

8. Plaintiff incorporates the allegations set forth in Paragraphs 1 through 7 of this Verified Complaint, Declaratory Judgment Action and Petition for Writ of Mandate as though fully set forth herein.

9. The Defendants have a duty to utilize the best available science to determine the impact of junior ground water diversions on Plaintiff's senior water rights, and to adjust his decisions and actions accordingly. As a direct and proximate result of Defendants' failure administer water rights according to Defendants' statutory duties and responsibilities and Defendants' denial of Plaintiff's right to present evidence related to the use or application of the ground water model, Plaintiff is being irreparably damaged, and has no plain, adequate nor speedy remedy at law.

10. Defendants failure to perform their statutory duties, and/or failure to allow Plaintiff to present evidence related to the use or application of the ground water model violates Plaintiff's right to due process, deprives Plaintiff of the use and enjoyment of its property and is causing Plaintiffs irreparable harm, which damage can only be remedied by an order of this Court compelling Defendants to promptly, completely and immediately determine the full extent of injury to Plaintiff's water rights, to consider updated, improved and/or new data, analysis and methods for determining the impact of junior ground water diversions on Plaintiff's water rights, and to allow Plaintiff to present such evidence in any proceeding before Defendants related to Plaintiff's water delivery call.

COUNT TWO (DECLARATORY JUDGMENT)

11. Plaintiff incorporates the allegations set forth in Paragraphs 1 through 10 of this Verified Complaint, Declaratory Judgment Action and Petition for Writ of Mandate as though fully set forth herein.

12. Defendants' failure to consider updated, improved and/or new data, analysis and methods for determining the impact of junior ground water diversions on Plaintiff's water rights, violates, interferes with and impairs the constitutionally protected priority of Plaintiff's water rights, constitutional right to due process and equal protection, is outside the scope of Defendants' authority and is contrary to the public policies of this state, and if the Defendants' actions and/or inactions are allowed to stand, the constitutional rights of other water users of this state will be threatened and diminished.

13. Plaintiffs are entitled to an order from this Court declaring that Defendants must promptly, completely and immediately determine injury to Plaintiff's water rights and to consider

updated, improved and/or new data, analysis and methods for determining the impact of junior ground water diversions on Plaintiff's water rights, and to allow Plaintiff to present such evidence in any proceeding before IDWR related to Plaintiff's water delivery call.

REQUEST FOR ATTORNEY FEES

14. As a further direct and proximate result of the Defendants' refusal and continued refusal to perform their statutory duties, Plaintiff has been required to employ the services of the law firm of Ringert Law Chartered, and have also incurred various costs and will in the future continue to incur various future court costs and attorney fees. Therefore, under Idaho law, including, but not limited to Idaho Code §§ 12-117 and § 12-121 and the Private Attorney General Doctrine, the Defendants should be required to pay to Plaintiff its reasonable costs and attorney fees.

WHEREFORE, Plaintiffs pray for the issuance of a writ of mandamus and/or order of the court directed to the Defendants ordering as follows:

(1) For a writ and/or order compelling Defendants to promptly, completely and immediately determine injury to Plaintiff's water rights, to consider updated, improved and/or new data, analysis and methods for determining the impact of junior ground water diversions on Plaintiff's water rights, and to allow Plaintiff to present such evidence in any proceeding before IDWR related to Plaintiff's water delivery call;

(2) For an order declaring that the Defendants *Order* precluding Plaintiff from presenting evidence related to the use or application of the ground water model is contrary to Defendants' statutory duties, violates Plaintiff's right to due process, and deprives Plaintiff of the use and enjoyment of its property;

(3) For an alternative writ and/or order to show cause upon the filing of this Verified Complaint, Declaratory Judgment Action and Petition for Writ of Mandate commanding Defendants to consider updated, improved and/or new data, analysis and methods for determining the impact of junior ground water diversions on Plaintiff's water rights, and to allow Plaintiff to present such evidence in the aforementioned proceeding before IDWR related to Plaintiff's water delivery call, or appear before the Court on Thursday, October 28, 2010 at 1:30 p.m., at the SRBA District Court located at 253 3rd Ave. N., in Twin Falls, Idaho, and show cause why they have not elected to comply with the alternative writ;

(4) For an order awarding Plaintiff its costs and attorney's fees incurred in the prosecution this action; and

(5) For such other relief as to the court shall seem just and equitable in the premises.

DATED this 7th day of October, 2010.

RINGERT LAW CHARTERED

By: 
Daniel V. Steenson
Attorneys for Petitioner/Plaintiff

STATE OF IDAHO)
) ss
COUNTY OF Ada)

VERIFICATION

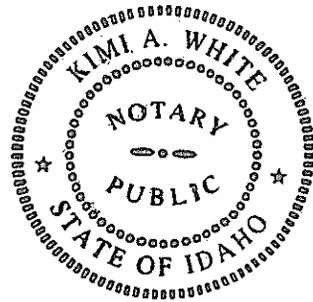
Gregory Kaslo, after being first duly sworn on oath depose and state as follows:

1. That I am the Vice-President of Blue Lakes Trout Farm, Inc., the Petitioner/Plaintiff in the above-entitled action, and I have reviewed the Verified Complaint, Declaratory Judgment Action and Petition for Writ of Mandate and I believe the facts contained therein to be true and correct to the best of my knowledge.



Gregory Kaslo

SUBSCRIBED AND SWORN TO before me this 7th day of October, 2010.





Notary Public for Idaho
Residing: Boise, Idaho
My Commission Expires: 01/01/12

EXHIBIT A

RECEIVED

OCT 04 2010

Ringer Law Chartered

BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO

IN THE MATTER OF DISTRIBUTION OF WATER)	
TO WATER RIGHTS NOS. 36-02356A, 36-07210,)	Docket No. CM-DC-2010-002
AND 36-07427.)	
(Blue Lakes Delivery Call))	Docket No. CM-DC-2010-003
)	
IN THE MATTER OF DISTRIBUTION OF WATER)	ORDER SETTING HEARING
TO WATER RIGHTS NOS. 36-04013A, 36-04013B,)	SCHEDULE and ORDER
AND 36-07148.)	LIMITING SCOPE OF
(Clear Springs Delivery Call))	HEARING
)	

I. Scope of Proceedings

In 2005, Blue Lakes Trout Farm, Inc. ("Blue Lakes") and Clear Springs Foods, Inc. ("Clear Springs") sent letters to the Idaho Department of Water Resources ("Department") requesting that the Department administer junior priority water rights to supply Blue Lakes' and Clear Springs' senior water rights. A multi-day hearing on the request for administration was held in November of 2007, in which the parties to this case presented evidence and testimony to the hearing officer. The hearing officer issued his recommended decision on January 11, 2008 and the Department issued a final order on July 11, 2008.

The Department's July 11, 2008 final order was appealed to district court. The District Court issued its *Order on Petition for Judicial Review* on June 19, 2009. In the *Order on Petition for Judicial Review* (hereafter referred to as "Order on Review"), the Court held, among other things, that the Department did not properly apply the appropriate burdens of proof and evidentiary standards regarding seasonal variation when the Director found no injury to water right no. 36-7210, held by Blue Lakes and water right no. 36-4013A, held by Clear Springs. The Court remanded the issue of seasonal variability back to the Department for further proceedings. *Order on Review* at 24. The District Court affirmed the Department on other issues and many of those issues are currently on appeal to the Idaho Supreme Court. *See Clear Springs Foods Inc., et. al v. IDWR*, Supreme Court Docket No. 37308-2010.

The District Court's decision about the burdens of proof and evidentiary standards for determining the effects of seasonal variability was not appealed to the Idaho Supreme Court. On

May 11, 2010, District Judge John Melanson issued an *Order Granting in part Motion to Enforce Orders*. The order required that the Director apply the proper burdens of proof and evidentiary standards to determine the effects of seasonal variability on water rights held by Blue Lakes and Clear Springs.

On July 19, 2010, Interim Director Gary Spackman (“Director”) of the Idaho Department of Water Resources (“Department”) issued his *Final Order* regarding the issue of seasonal variability and injury (“July 19, 2010 Final Order”) to Blue Lakes’ water right no. 36-7210 and Clear Springs’ water right no. 36-4013A.

The Department received *Petition Requesting Hearing on July 19, 2010 Final Order* from Blue Lakes on July 29, 2010. On August 2, 2010, the Department received *Petition Requesting Hearing on July 19, 2010 Final Order* from Clear Springs. The Department received *Ground Water Users’ Petition for Reconsideration and Request for Hearing* filed by Idaho Ground Water Appropriators, Inc., North Snake Ground Water District, and Magic Valley Ground Water District (collectively “Ground Water Users”) on August 2, 2010.

On August 20, 2010, the Director issued his *Order Granting Request for Hearing and Scheduling Prehearing Conference* (“Prehearing Order”) in which he set a prehearing conference and directed the parties to come prepared to discuss hearing dates and the scope of the hearing. In the *Order*, the Director suggested that because some of the issues identified by the parties in their petitions are on review to the Idaho Supreme Court, the Director might limit the scope of the hearing to exclude those issues on appeal.

On September 14, 2010, the Director conducted a pre-hearing conference in this matter. At the hearing, the parties agreed to a hearing schedule. The parties also presented argument to the Director regarding the appropriate scope of the hearing. The Ground Water Users recognize that some of the legal issues raised in their petition are on appeal to the Idaho Supreme Court, but argue that this is the first time the Director has found that these particular water rights had been injured, and the new facts of this proceeding require the Director to reconsider previously determined questions of law in light of the new facts. For example, the Ground Water Users point out that under the *July 19, 2010 Final Order*, junior ground water users must mitigate an additional 3.5 cfs and 1.2 cfs of simulated depletions to Blue Lakes’ and Clear Springs’ water rights respectively to prevent curtailment. The Ground Water Users question whether Blue Lakes and Clear Springs can beneficially use the additional amount of water if it is provided and seek to raise this issue in the proceeding.

In response to the Director’s question about the appropriate scope of the hearing, Blue Lakes and Clear Springs also argue that previously determined legal issues raised in their petitions should again be considered by the Department. They argue that, because there are new facts increasing the mitigation obligation of the Ground Water Users, the Director should reconsider previous determinations about the accuracy and limitations of the Eastern Snake Plain Aquifer Model (“ESPAM”). For example, Blue Lakes and Clear Springs argue that the Director should revisit his previous determinations regarding 10% model uncertainty, the trim-line, and the ability of the model to predict the effect of pumping on a particular spring.

After due consideration, the Director finds it appropriate to limit the scope of the hearing. First, the issue of 10% model uncertainty, the trim-line, and ability of the model to predict effect on a particular spring were already addressed in the November 2007 hearing. At the hearing, testimony and evidence regarding the ESPAM model was presented and evaluated by the hearing officer. As a result, the hearing officer made specific findings upholding the validity of the ESPAM model. *Opinion Constituting Findings of Fact, Conclusions of Law and Recommendation* (January 11, 2008) at 13-14. These findings were adopted by the Director. *Final Order Regarding Blue Lakes and Clear Springs Delivery Calls* (July 11, 2008) at 9. The District Court on judicial review upheld the Director's determination of 10% model uncertainty, the use of the trim line and modeling of the reach gains. *Order on Petition for Judicial Review* at 12, 25-26, 28. The issues of the 10% model uncertainty and the trim line have been appealed by Blue Lakes and Clear Springs to the Idaho Supreme Court and oral arguments on these issues are set to be heard in December of this year. As such, these issues are within the jurisdiction of the Idaho Supreme Court and it is not appropriate to address in this proceeding. See *Order Granting in par Motion to Enforce Orders; Order Setting Status Conference* at 4 (holding that the District Court will not address the ESPAM model issues raised by Blue Lakes because those issues are on appeal to the Idaho Supreme Court and are not within the scope of the remand). Furthermore, the issue of modeling the reach gains was not appealed to the Supreme Court by any party. Thus, the District Court's finding on this issue is binding on the parties and the Department declines to revisit this issue in this proceeding.

The Director believes it would be appropriate to address the issues of 10% model uncertainty, the trim-line, and modeling of the reach gains in this proceeding if the Department had modified how it applied the ESPAM model on remand. However, the same model version (ESPAM 1.1) was employed by the Department to determine the mitigation obligation when the matter of seasonal variability was remanded back to the Department. While the Department found that additional water rights are being materially injured, the question of material injury does not require us to revisit the validity of ESPAM 1.1. Blue Lakes and Clear Springs will be allowed to present evidence and argument on how the *July 19, 2010 Final Order* implemented curtailment. See Clear Springs' *Petition Requesting Hearing on July 2010 Final Order* ¶¶ 4-6; Blue Lakes' *Petition Requesting Hearing on July 19, 2010 Final Order* ¶¶ 5-6.

While the legal arguments raised by the Ground Water Users are on appeal to the Idaho Supreme Court, the Ground Water Users should not be precluded from arguing that the new facts and the related additional curtailment obligations created by the July 19, 2010 order could affect how the law is applied to the new facts. The Director will allow the Ground Water Users to present testimony on the legal issues raised in their petition but only to the extent new facts affect the legal conclusions previously reached by the Director. For example, IGWA may present information on whether the additional increment of water allotted to Blue Lakes and Clear Springs in the *July 19, 2010 Final Order* can be put to beneficial use for fish propagation. However, this opportunity is not open-ended. The Director will reject any argument or presentation of economic benefits that simply compare the economic benefit of ground water pumping versus the economic benefit of fish propagation. This straight comparison of economic benefit has already been rejected by the Director.

ORDER

IT IS HEREBY ORDERED that the following schedule shall govern this proceeding:

October 1, 2010	Disclosure of Expert Witnesses
November 5, 2010	Simultaneous Filing of Prefiled Direct Testimony
December 17, 2010	Simultaneous Filing of Prefiled Rebuttal Testimony
January 10–14, 2011	Hearing (5 days) starting at 9:00 am Location: IDWR State Office located at 322 East Front Street, Boise Idaho, 6 th Floor Conference Rooms C & D.

IT IS FURTHER ORDERED that petitioners Blue Lakes and Clear Springs are precluded from addressing, in this proceeding, issues related to the 10% model uncertainty, the trim-line, or other issues related to the use or application of the ground water model. The Ground Water Users may present testimony on the legal issues raised in their petition, but only to the extent new facts affect the legal conclusions previously reached by the Director.

IT IS FURTHER ORDER that the parties are authorized to conduct discovery consistent with the scope of the hearing as limited by this Order. IDAPA 37.01.01.521.

IT IS FURTHER ORDERED that the Department will make the following witnesses available for questioning consistent with the scope of the hearing as limited by this Order:

Allan Wylie
Mat Weaver
Liz Cresto

If the parties wish to depose these individuals, the parties shall contact Garrick Baxter to schedule deposition times.

DATED this 1st day of October 2010.


GARY SPACKMAN
Interim Director

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of October 2010, the above and foregoing, was served by the method indicated below, and addressed to the following:

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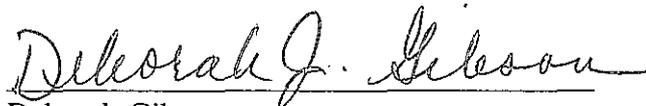
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Deborah Gibson
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