

RECEIVED
NOV 24 2014
DEPARTMENT OF
WATER RESOURCES

**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

)
)
)
)
)

A. Subcases: See Attachment A

**STANDARD FORM 2
RESPONSE TO OBJECTION**

B. NAME AND ADDRESS OF PERSON RESPONDING

Name: Hagadone Hospitality Co.
Address: PO Box 6200
Coeur d'Alene, ID 83816
Daytime Phone: (208) 667-3431

Name & Address of Attorneys:

Christopher H. Meyer
Michael P. Lawrence
Jeffrey W. Bower
GIVENS PURSLEY LLP
601 W. Bannock Street
P.O. Box 2720
Boise, ID 83701-2720
Telephone: (208) 388-1200

**C. NAME AND ADDRESS OF PERSON WHO FILED THE OBJECTION TO WHICH
YOU ARE RESPONDING**

Name: State of Idaho
Address: 700 W. Jefferson, Room 210
PO Box 83720
Boise, ID 83720-0010

D. I am responding to the Objections to the following elements or general provision.*

1. ☒ **Name and Address**
2. ☒ **Source**
3. ☒ **Quantity**
4. ☒ **Priority Date**
5. ☒ **Point of Diversion**
6. ☒ **Instream Flow Beginning and Ending Point**
7. ☒ **Purpose(s) of Use**
8. ☒ **Period of Year**
9. ☒ **Place of Use**
10. ☐ **General Provision**
11. ☒ **Recommendation:**
 - ☒ This water right should not exist.
 - ☐ This water right was not recommended, but should be recommended with the elements described above.

*The Respondent is responding to each element objected to by the State of Idaho for each claim listed in Attachment A.

DATED this 21st day of November, 2014.

GIVENS PURSLEY LLP



Christopher H. Meyer

Michael P. Lawrence

Jeffrey W. Bower

Attorneys for Respondents

E.

CERTIFICATE OF MAILING

I certify that on November 21, 2014, I mailed the original and one copy of this Response, including all attachments, to the following persons:

1. Original to:
Clerk of the District Court
Coeur d'Alene-Spokane River Basin Adjudication
253 Third Avenue North
PO Box 2707
Twin Falls, ID 83303-2707
2. One copy to the claimant of the water right at the following address:
Name: See Attachment A
Address: See Attachment A
3. One copy to the party who filed the Objection at the following address:
Name: State of Idaho
Address: 700 W. Jefferson, Room 210
PO Box 83720
Boise, ID 83720-0010
4. Copies to:
IDWR Document Depository
PO Box 83720
Boise, ID 83720-0098

United States Department of Justice
Environment & Nat'l Resources Div
550 W Fort Street, MSC 033
Boise, ID 83724

Chief, Natural Resources Division
Office of Attorney General
PO Box 83720
Boise, ID 83720-0010



Michael P. Lawrence

ATTACHMENT A

The Respondent named in Item B of the attached Standard Form 2 Response to Objection (“SF2”) responds to the Objections filed by the State of Idaho in the following subcases. The Claimants’ names and addresses for service (SF2 Item E.2) also are listed.

	Subcase No.	Claimant’s Name	Claimant’s Address
1.	95-16663	Avista Corporation	1411 East Mission Spokane, WA 99220-3727
2.	95-16664		
3.	91-7624	United States of America, on behalf of the U.S.D.A. Forest Service	550 W. Fort Street MSC 033 Boise, ID 83724
4.	91-7636		
5.	91-7729		
6.	92-10890		
7.	92-10891		
8.	93-7433		
9.	94-8621		
10.	94-9133		
11.	95-16527		
12.	91-7755	United States of America, as trustee on behalf of the Coeur d’Alene Tribe of the Coeur d’Alene Indian Reservation acting through the Northwest Regional Director, Department of the Interior, Bureau of Indian Affairs	911 N.E. 11th Ave Portland, OR 97232
13.	91-7756		
14.	91-7757		
15.	91-7758		
16.	91-7759		
17.	91-7760		
18.	91-7761		
19.	91-7762		
20.	91-7763		
21.	91-7764		
22.	91-7765		
23.	91-7766		
24.	91-7767		
25.	91-7768		
26.	91-7769		
27.	91-7770		
28.	91-7771		
29.	91-7772		
30.	91-7773		
31.	91-7774		
32.	91-7775		
33.	91-7776		
34.	91-7777		
35.	91-7778		
36.	91-7779		
37.	91-7780		
38.	91-7781		
39.	91-7782		

	Subcase No.	Claimant's Name	Claimant's Address
40.	91-7783	United States of America, as trustee on behalf of the Coeur d'Alene Tribe of the Coeur d'Alene Indian Reservation acting through the Northwest Regional Director, Department of the Interior, Bureau of Indian Affairs, <i>continued</i>	
41.	91-7784		
42.	91-7785		
43.	91-7786		
44.	91-7787		
45.	91-7788		
46.	91-7789		
47.	92-10906		
48.	92-10907		
49.	92-10908		
50.	92-10909		
51.	92-10910		
52.	92-10911		
53.	92-10912		
54.	92-10913		
55.	92-10914		
56.	92-10915		
57.	92-10916		
58.	92-10917		
59.	92-10918		
60.	92-10919		
61.	92-10920		
62.	92-10921		
63.	92-10922		
64.	93-7462		
65.	93-7463		
66.	93-7464		
67.	93-7465		
68.	93-7466		
69.	93-7467		
70.	93-7468		
71.	93-7469		
72.	93-7470		
73.	93-7471		
74.	93-7472		
75.	93-7473		
76.	93-7474		
77.	93-7475		
78.	93-7476		
79.	93-7477		
80.	93-7478		
81.	93-7479		
82.	93-7480		
83.	93-7481		
84.	93-7482		

	Subcase No.	Claimant's Name	Claimant's Address
85.	93-7483	United States of America, as trustee on behalf of the Coeur d'Alene Tribe of the Coeur d'Alene Indian Reservation acting through the Northwest Regional Director, Department of the Interior, Bureau of Indian Affairs, <i>continued</i>	
86.	93-7484		
87.	93-7485		
88.	93-7486		
89.	93-7487		
90.	93-7488		
91.	93-7489		
92.	93-7490		
93.	93-7491		
94.	93-7492		
95.	93-7493		
96.	93-7494		
97.	93-7495		
98.	93-7496		
99.	93-7497		
100.	93-7498		
101.	93-7499		
102.	93-7500		
103.	93-7501		
104.	93-7502		
105.	93-7503		
106.	93-7504		
107.	93-7505		
108.	93-7506		
109.	93-7507		
110.	93-7508		
111.	93-7509		
112.	93-7510		
113.	93-7511		
114.	93-7512		
115.	93-7513		
116.	93-7514		
117.	93-7515		
118.	93-7516		
119.	93-7517		
120.	93-7518		
121.	93-7519		
122.	93-7520		
123.	93-7521		
124.	93-7522		
125.	93-7523		
126.	93-7524		
127.	93-7525		
128.	93-7526		
129.	93-7527		

	Subcase No.	Claimant's Name	Claimant's Address
130.	93-7528	United States of America, as trustee on behalf of the Coeur d'Alene Tribe of the Coeur d'Alene Indian Reservation acting through the Northwest Regional Director, Department of the Interior, Bureau of Indian Affairs, <i>continued</i>	
131.	93-7529		
132.	93-7530		
133.	93-7531		
134.	93-7532		
135.	93-7533		
136.	93-7534		
137.	93-7535		
138.	93-7536		
139.	93-7537		
140.	93-7538		
141.	93-7539		
142.	93-7540		
143.	93-7541		
144.	93-7542		
145.	93-7543		
146.	93-7544		
147.	93-7545		
148.	93-7546		
149.	93-7547		
150.	93-7548		
151.	93-7549		
152.	93-7550		
153.	93-7551		
154.	93-7552		
155.	93-7553		
156.	93-7554		
157.	93-7555		
158.	93-7556		
159.	93-7557		
160.	93-7558		
161.	93-7559		
162.	93-7560		
163.	93-7561		
164.	93-7562		
165.	93-7563		
166.	93-7564		
167.	93-7565		
168.	93-7566		
169.	93-7567		
170.	93-7568		
171.	93-7569		
172.	93-7570		
173.	93-7571		
174.	93-7572		

	Subcase No.	Claimant's Name	Claimant's Address
175.	93-7573	United States of America, as trustee on behalf of the Coeur d'Alene Tribe of the Coeur d'Alene Indian Reservation acting through the Northwest Regional Director, Department of the Interior, Bureau of Indian Affairs, <i>continued</i>	
176.	93-7574		
177.	93-7575		
178.	93-7576		
179.	93-7577		
180.	93-7578		
181.	93-7579		
182.	93-7580		
183.	93-7581		
184.	93-7582		
185.	93-7583		
186.	93-7584		
187.	93-7585		
188.	93-7586		
189.	93-7587		
190.	93-7588		
191.	93-7589		
192.	93-7590		
193.	93-7591		
194.	93-7592		
195.	93-7593		
196.	93-7594		
197.	93-7595		
198.	93-7596		
199.	93-7597		
200.	93-7598		
201.	93-7599		
202.	93-7600		
203.	93-7601		
204.	93-7602		
205.	93-7603		
206.	93-7604		
207.	93-7605		
208.	93-7606		
209.	93-7607		
210.	93-7608		
211.	93-7609		
212.	93-7610		
213.	93-7611		
214.	93-7612		
215.	93-7613		
216.	93-7614		
217.	93-7615		
218.	93-7616		
219.	93-7617		

	Subcase No.	Claimant's Name	Claimant's Address
220.	93-7618	United States of America, as trustee on behalf of the Coeur d'Alene Tribe of the Coeur d'Alene Indian Reservation acting through the Northwest Regional Director, Department of the Interior, Bureau of Indian Affairs, <i>continued</i>	
221.	93-7619		
222.	93-7620		
223.	93-7621		
224.	93-7622		
225.	93-7623		
226.	93-7624		
227.	93-7625		
228.	93-7626		
229.	93-7627		
230.	93-7628		
231.	93-7629		
232.	93-7630		
233.	93-7631		
234.	93-7632		
235.	93-7633		
236.	93-7634		
237.	93-7635		
238.	93-7636		
239.	93-7637		
240.	93-7638		
241.	93-7639		
242.	93-7640		
243.	93-7641		
244.	93-7642		
245.	93-7643		
246.	93-7644		
247.	93-7645		
248.	93-7646		
249.	93-7647		
250.	93-7648		
251.	93-7649		
252.	93-7650		
253.	93-7651		
254.	93-7652		
255.	94-9244		
256.	94-9245		
257.	94-9246		
258.	94-9247		
259.	94-9248		
260.	94-9249		
261.	94-9250		
262.	94-9251		
263.	94-9252		
264.	94-9253		

	Subcase No.	Claimant's Name	Claimant's Address
265.	94-9254	United States of America, as trustee on behalf of the Coeur d'Alene Tribe of the Coeur d'Alene Indian Reservation acting through the Northwest Regional Director, Department of the Interior, Bureau of Indian Affairs, <i>continued</i>	
266.	94-9255		
267.	94-9256		
268.	94-9257		
269.	94-9258		
270.	94-9259		
271.	94-9260		
272.	94-9261		
273.	94-9262		
274.	94-9263		
275.	94-9264		
276.	94-9265		
277.	94-9266		
278.	94-9267		
279.	94-9268		
280.	94-9269		
281.	94-9270		
282.	94-9271		
283.	94-9272		
284.	94-9273		
285.	94-9274		
286.	94-9275		
287.	94-9276		
288.	94-9277		
289.	94-9278		
290.	94-9279		
291.	94-9280		
292.	94-9281		
293.	94-9282		
294.	94-9283		
295.	95-16668		
296.	95-16669		
297.	95-16670		
298.	95-16671		
299.	95-16672		
300.	95-16673		
301.	95-16674		
302.	95-16675		
303.	95-16676		
304.	95-16677		
305.	95-16678		
306.	95-16679		
307.	95-16680		
308.	95-16681		
309.	95-16682		

	Subcase No.	Claimant's Name	Claimant's Address
310.	95-16683	United States of America, as trustee on behalf of the Coeur d'Alene Tribe of the Coeur d'Alene Indian Reservation acting through the Northwest Regional Director, Department of the Interior, Bureau of Indian Affairs, <i>continued</i>	
311.	95-16684		
312.	95-16686		
313.	95-16687		
314.	95-16688		
315.	95-16689		
316.	95-16690		
317.	95-16691		
318.	95-16692		
319.	95-16693		
320.	95-16694		
321.	95-16695		
322.	95-16696		
323.	95-16698		
324.	95-16699		
325.	95-16700		
326.	95-16701		
327.	95-16702		
328.	95-16703		
329.	95-16704		
330.	95-16705		
331.	95-16706		
332.	95-16708		
333.	95-16709		
334.	95-16710		
335.	95-16711		
336.	95-16712		
337.	95-16713		
338.	95-16714		
339.	95-16715		
340.	95-16716		
341.	95-16717		
342.	95-16718		
343.	95-16719		
344.	95-16720		
345.	95-16721		
346.	95-16722		
347.	95-16723		
348.	95-16724		
349.	95-16725		
350.	95-16726		
351.	95-16727		
352.	95-16728		
353.	95-16729		
354.	95-16730		

	Subcase No.	Claimant's Name	Claimant's Address
355.	95-16731	United States of America, as trustee on behalf of the Coeur d'Alene Tribe of the Coeur d'Alene Indian Reservation acting through the Northwest Regional Director, Department of the Interior, Bureau of Indian Affairs, <i>continued</i>	
356.	95-16734		
357.	95-16735		
358.	95-16736		
359.	95-16737		
360.	95-16738		
361.	95-16739		
362.	95-16740		
363.	95-16741		
364.	95-16742		