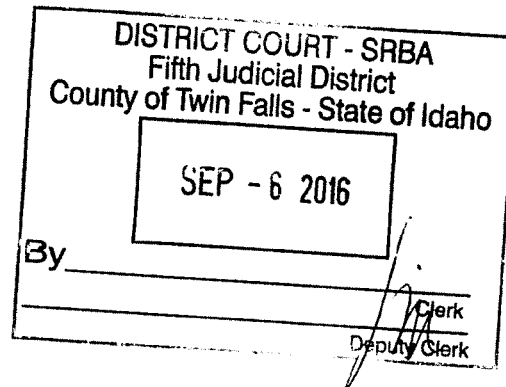


LAWRENCE G. WASDEN
Attorney General

CLIVE J. STRONG, ISB No. 2207
Deputy Attorney General
Chief, Natural Resources Division

ANN Y. VONDE, ISB No. 8406
Deputy Attorney General
700 W. State Street—2nd Floor
P.O. Box 83720
Boise, Idaho 83720-0010
(208) 334-2400
Facsimile: (208) 854-8072



Attorneys for the State of Idaho

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

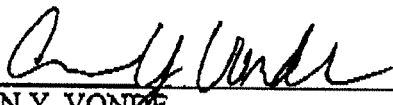
In Re SRBA	)	Consolidated Subcase No. 51-13089
Case No. 39576	)	Wild & Scenic Rivers Act Claims
	)	
	)	(Encompassing Subcases 51-13089, 51-13090,
	)	51-13091, 51-13092, 51-13093, 51-13094,
	)	51-13095, 51-13096, 51-13097, 55-13897,
	)	55-13898, 55-13899, 55-13900, 55-13901,
	)	55-13902, 55-13903)
	)	
	)	STATE OF IDAHO'S RESPONSE
	)	TO AFFIDAVITS OF FREDRIC W. PRICE,
	)	THOMAS J. "TJ" CLIFFORD,
	)	BRYCE A. BOHN, AND SCOTT E. HOEFER
	)	IN SUPPORT OF STIPULATION AND JOINT
	)	MOTION FOR ORDER APPROVING
	)	STIPULATION

The State of Idaho (the "State") by and through its counsel of record, hereby responds to the Affidavits of Fredric W. Price, Thomas J. "TJ" Clifford, Bryce A. Bohn, and Scott E. Hoefer (the "Affidavits") filed by the United States of America, Bureau of Land Management ("BLM") in the above captioned matter for the purpose of establishing a prima facie case for approval of STATE OF IDAHO'S RESPONSE TO AFFIDAVITS OF FREDRIC W. PRICE, THOMAS J. "TJ" CLIFFORD, BRYCE A. BOHN, AND SCOTT E. HOEFER IN SUPPORT OF STIPULATION AND JOINT MOTION FOR ORDER APPROVING STIPULATION—1

the federal reserved water rights set forth in the Stipulation and Joint Motion for Order Approving Stipulation and Entry of Partial Decrees (the "Stipulation") filed March 30, 2016. While the State of Idaho supports approval of the water rights set forth in the Stipulation, the State expressly reserves its objections to the quantification methodologies outlined in the Affidavits for the quantification of federal reserved water rights created under the Wild and Scenic Rivers Act. The State requests that any order approving the Stipulation expressly state that the methodologies outlined in the Affidavits are solely for the purpose of resolving the current legal dispute and approving the Stipulation and are not an admission by the State of the propriety or use of the quantification methodologies outlined in the Affidavits for the purpose quantifying any other federal reserved water rights.

Respectfully submitted this 6th day of September, 2016.

LAWRENCE WASDEN
Attorney General
CLIVE J. STRONG
Chief, Natural Resources Division


ANN Y. VONDE
Deputy Attorney General

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of September 2016, I caused the foregoing document to be filed with the Court and true and correct copies served on the following parties by the methods indicated:

1. Original to:

CLERK OF THE DISTRICT COURT SRBA 253 THIRD AVENUE NORTH PO BOX 2707 TWIN FALLS, ID 83303-2707	☐ U.S. Mail, postage prepaid ☐ Hand Delivery ☐ Federal Express ☒ Facsimile: (208) 736-2121
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2. Copies to:

U.S. DEPT OF JUSTICE ENVIRONMENT & NAT'L RESOURCES 550 W FORT ST., MSC 033 BOISE ID 83724	☒ U.S. Mail, Postage Prepaid ☐ Hand Delivery ☐ Federal Express
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ANN Y. VONDE
Deputy Attorney General