

MAY 22 2020

WATER RESOURCES
WESTERN REGION

S. Bryce Farris [ISB # 5636]
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*Attorneys for Protestant
Nampa & Meridian Irrigation District*

**BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO**

IN THE MATTER OF APPLICATION FOR
PERMIT NO. 63-34883 IN THE CITY OF
MERIDIAN, PARKS & RECREATION
DEPARTMENT

NOTICE OF PROTEST

COMES NOW, Nampa & Meridian Irrigation District ("Protestant"), by and through its attorneys of record Sawtooth Law Offices, PLLC, hereby files this Notice of Protest to Application for Permit No. 63-34883 ("Application"), filed in the name of the City of Meridian, Parks & Recreation Department.

The bases for the Protest are:

1. The Application will cause injury to existing water rights, specifically those of the Protestant.
2. The Application is contrary to, or may conflict with Idaho Code Section 42-203A(5), subsections (a) through (f).
3. The Application is not compliant with Idaho law, including but not limited to, Idaho Code Section 67-6537.
4. For such other and further reasons as may be set forth at the hearing on this matter.

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RELIEF REQUESTED

The Protestant respectfully requests that for the above listed reasons, proposed Application for Permit No. 63-34883 be denied in all respects. In the alternative, the Protestant respectfully requests that any approval of Application for Permit No. 63-34883 be conditioned upon complete protection of the Protestant's existing water rights, including, but not limited to, a condition that Applicant's use for irrigation purposes is supplemental to the existing surface water rights which are delivered by Protestant.

DATED this 20th day of May, 2020.

SAWTOOTH LAW OFFICES, PLLC

By 

S. Bryce Farris

Attorneys for Nampa & Meridian Irrigation District

CERTIFICATE OF SERVICE


I HEREBY CERTIFY that on this 20th day of May, 2020, I caused a true and correct copy of the foregoing **NOTICE OF PROTEST** to be served by the method indicated below, and addressed to the following:

City of Meridian
Parks & Recreation Department
33 East Broadway Ave., Ste 206
Meridian, ID 83642
T (208) 888-3579
E mbarton@meridiancity.org

☒ (X) U.S. Mail, Postage Prepaid
☐ () Hand Delivered
☐ () Overnight Mail
☐ () Facsimile
☐ () Email

SPF Water Engineering
Attn: Lori Graves
300 E. Mallard Drive, Suite 350
Boise, ID 83706
T (208) 383-4140
E lgraves@spfwater.com

☒ (X) U.S. Mail, Postage Prepaid
☐ () Hand Delivered
☐ () Overnight Mail
☐ () Facsimile
☐ () Email


S. Bryce Farris

Boise Office

Golden Eagle Building
1101 W. River St., Ste. 110
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Challis Office

1301 E. Main Ave.
P.O. Box 36
Challis, Idaho 83226
Tel. (208) 879-4488
Fax (208) 879-4248

Twin Falls Office

236 River Vista Place
Suite 301
Twin Falls, Idaho 83301
Tel. (208) 969-9585

Fax (all offices)
(208) 629-7559



**SAWTOOTH LAW
OFFICES, PLLC**

Wednesday, May 20, 2020

David P. Claiborne *

S. Bryce Farris

Patxi Larrocca-Phillips

Evan T. Roth

Daniel V. Steenson

Matthew A. Sturzen

Katie L. Vandenberg

Andrew J. Waldera **

James R. Bennetts (retired)

*Attorneys licensed in Idaho
* Also licensed in Washington
** Also licensed in Oregon*

Idaho Department of Water Resources
Western Region Office
2735 Airport Way
Boise, ID 83705-5082

Re: Protest of Application for Permit No. 63-34883 – City of Meridian

Dear Western Region Office:

Please find enclosed the Protest of Nampa & Meridian Irrigation District to the City of Meridian's Application for Permit No. 63-34883. Please return a date stamped copy of the protest in the return envelope provided.

Please contact this office if you have any questions.

Very truly yours,

Debby Long
Assistant to S. Bryce Farris

SBF/dll
Enclosures

RECEIVED

MAY 22 2020

**WATER RESOURCES
WESTERN REGION**