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 LAND AND WATER FUND OF THE ROCKIES
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RECEIVED

JUN 23 1995

Laird Lucas
 LAND AND WATER FUND OF THE ROCKIES
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Department of Water Resources
 Eastern District Office

BEFORE THE DEPARTMENT OF WATER RESOURCES
 STATE OF IDAHO

In the Matter of the)	
Application for Permit)	Petition to Intervene and
No. 11-07403)	Protest of Bear Lake
Delvin Humble and Toni)	Watch, Protestant
Humble, Applicants)	

1. Bear Lake Watch, Inc. is a Utah nonprofit corporation which was organized in 1994 to protect and restore the environment and waters of Bear Lake. Bear Lake Watch is seeking to assure that the public interest is served when decisions are made that have an impact on the allocation and utilization of Bear Lake's water.

2. The approximately 150 members of Bear Lake Watch live and/or have businesses in the Bear River basin and have a direct and substantial interest in this proceeding.

3. Bear Lake Watch, Inc. believes that the requested groundwater withdrawals will affect it and its members by reducing the contribution of groundwater to the surface flow of the Bear River below Bear Lake.

4. Indeed, many of the members of Bear Lake Watch, Inc. have already been directly and negatively impacted by low water levels

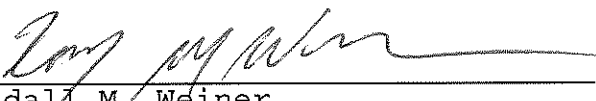
in Bear Lake, which have resulted, in part, from the huge demand for water from those currently entitled to water in the Bear River basin. Should the requested groundwater withdrawals be permitted, there will likely be less water in the Bear River to meet the demands of those currently entitled to water. As a result, more water may be removed from Bear Lake to meet these downstream demands, thereby lowering Bear Lake further than it would have been without the proposed withdrawals.

5. Further lowering of Bear Lake will greatly impact the members of Bear Lake Watch. It will result in lower property values, reduced fishing opportunities, additional boating problems, and reduced business revenues derived from the tourists who flock to a stable and healthy lake environment but stay away from a marshy and mosquito infested waterfront.

WHEREFORE, Bear Lake Watch, Inc. respectfully moves to intervene and protests this application and requests that it be denied.

DATED this 19th day of June, 1995.

Respectfully submitted,



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CERTIFICATE OF SERVICE

On this 19th day of June, 1995, I mailed a true and correct copy of the foregoing Protest, postage prepaid, via U.S. mail, to the following:

Delvin Humble and Toni Humble
581 Lewis Avenue
Idaho Springs, Idaho 83276

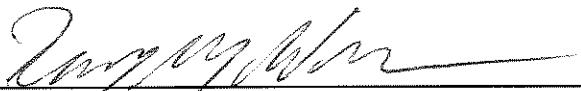
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