

Jun 16, 2025

DEPARTMENT OF
WATER RESOURCES

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STATE OF IDAHO

DEPARTMENT OF WATER RESOURCES

NOTICE OF INTENT TO RESPOND

IN THE MATTER OF APPLICATION
FOR TRANSFER 89232 IN THE NAME
OF GOOD TIMBER RANCH, LLC

The Protestants of Transfer 89232 collectively known as the “Good Neighbors” (Georgie Stanley, Susan Miller, the Maguire Family Trust, Rafe Rivers, Ainsley Rivers, and Gregory Collins) hereby give notice of the following:

1. On June 13, 2025 Good Timber Ranch filed an *Opposition to Motion to Stay Proceedings*.
Per IDAPA Rule 220.02.c, a reply brief may be filed within 7 days. The Good Neighbors intend to timely file a reply within this time period, on or before **June 20, 2025**.
2. Also on June 13, 2025 Good Timber Ranch filed a Motion to Amend Hearing Schedule.
Per IDAPA Rule 220.02.b, a response may be filed within 14 days. The Good Neighbors intend to timely file a response within this time period, on or before **June 27, 2025**.
3. On June 10, 2025 Good Timber Ranch filed an Application for Permit No. 22-14667 to appropriate ground water to be used in conjunction with Transfer 89232 to fill Lake Washakie. Notification is scheduled to be published June 18th and 25, 2025. Assuming publication successfully occurs on these dates, the protest period would end ten (10) days

after the publication, on **July 4, 2025**. The Good Neighbors intend to timely protest on or before this deadline.

4. On May 28, 2025 a *Notice of intent to sue Good Timber Ranch LLC, Nathan Godfrey, Jared Smith, and the Jared Smith Revocable Living Trust over violations of the Clean Water Act and their Nationwide Permit #27 at Good Timber Ranch in Victor, Idaho* was served upon the transfer applicant in this proceeding, and relevant state agencies. The notice states that the Good Neighbors will seek a declaratory judgment, injunctive relief, civil penalties, costs, and any other relief the court deems appropriate. Counsel for Good Timber Ranch notified our office on June 5, 2025 that they will oppose the Clean Water Act and related suits referenced in our notification letter. **In the interest of time, we asked for Good Timber to waive the 60-day statutory waiting period** since they are unwilling to negotiate any kind of settlement. We have received no response. As such, the Good Neighbors intend to proceed with filing the Clean Water Act and trespass/damages claims when the 60-day notice period tolls on **July 27, 2025**. If necessary, we will ask the court presiding over these claims to issue an order staying the Transfer 89232 and the Application for Permit No. 22-14667.

Dated this 16th day of June, 2025.

TRENTADUE LAW OFFICE PLLC.

BY



Anna Trentadue

Attorney for the Good Neighbors

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of June, 2025, I served the foregoing documents on the persons below via email or as otherwise indicated:

BY 
Anna Trentadue
Attorney for the Good Neighbors

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