

Nov 12, 2025

DEPARTMENT OF
WATER RESOURCES

November 12, 2025

Idaho Department of Water Resources
Eastern District Office
Attn: James Cefalo
900 N. Skyline Drive, Suite A
Idaho Falls, ID 83402-1718

Re: Stipulation for Resolution of Protest – Application for Permit No. No. 22-14467 (Good Timber Ranch, LLC)

Dear Mr. Cefalo:

Friends of the Teton River (“FTR”), by and through its authorized representative, executed the Stipulation for Resolution of Protest in relation to Application for Permit No. No. 22-14467 (“Application for Permit”), which was filed and provided to all parties on November 10, 2025. Assuming that all conditions outlined in the Stipulation for Resolution of Protest are satisfied, the Applicant has provided sufficient information, mitigation, and assurances to address the primary issues raised in FTR’s protest.

It is important to note, however, that FTR remains concerned that Application for Permit and Application for Transfer Nos. 89232 & 90102 (“Transfers”) will generate injurious localized, sub-watershed hydrologic impacts. Specifically, the Transfers propose moving water from a downgradient location to an upgradient location miles from the original point of diversion and place of use. So, while the proposed Application for Permit and Transfers, when analyzed together, likely result in no net impact to water supply on a basin-wide scale, they will change the location and timing of water availability in the immediate vicinity of the proposed Good Timber property, potentially resulting in reductions/alternations of spring discharges and negatively impact existing groundwater supplies and wells in the Pole Creek sub-watershed. In the past, IDWR has not been inclined to analyze injury on a sub-watershed scale level, yet FTR respectfully requests that the Department carefully evaluate the localized impact of the Application for Permit and Transfers when making its technical review and permitting decisions to ensure that existing water rights and local water resources are not adversely affected.

Respectfully submitted,

A handwritten signature in dark ink that reads 'Sarah Lien' in a cursive script.

Sarah Lien
Sarah Lien Law, PLLC
Attorney for Friends of the Teton River

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 12th day of November, 2025, I served a true and correct copy of the above and foregoing document to the following person(s) by email as follows:



Sarah Lien

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