

RECEIVED

Sep 08, 2026

RECEIVED

SEP 10 2026

DE

WATER RESOURCES
WESTERN REGION

DEPARTMENT OF
WATER RESOURCES

CHRIS M. BROMLEY ISB #6530
CANDICE M. MCHUGH ISB #5908
MCHUGH BROMLEY, PLLC
PO Box 107
BOISE, ID 83701
Telephone (208) 287-0991
Facsimile (208) 287-0864
Email: cbromley@mchughbromley.com
cmchugh@mchughbromley.com

Attorneys for City of Meridian

BEFORE THE DEPARTMENT OF WATER RESOURCES

OF THE STATE OF IDAHO

IN RE APPLICATION FOR TRANSFER
NO. 90607

Filing Fee: Exempt, I.C. § 67-2301

In the Name of the City of Kuna

NOTICE OF PROTEST

COMES NOW the City of Meridian ("Protestant"), by the through its attorneys of record, McHugh Bromley, PLLC, and hereby files this Notice of Protest as to Application for Transfer No. 90607, filed in the name of the City of Kuna, as to water right nos. 63-3266, 63-8215, and 63-11970. The initial bases for the Protest are as follows:

1. The Applicant has not demonstrated that the Application is consistent with I.C. § 42-222, particularly as to place of use.
2. The Applicant has not explained how the Application will be administered as to existing and future water rights.
3. This Protest may be resolvable with additional information from Applicant, as the City is generally supportive of the goals of the Application. The Protestant has been in communication with the Applicant and believes the Protest is likely resolvable.
4. For such other and further reasons as may be discovered or set forth at the hearing on this matter.

RESPECTFULLY SUBMITTED this 8th day of September, 2026.

MCHUGH BROMLEY, PLLC



CHRIS M. BROMLEY

Attorneys for City of Meridian

I certify that on this 8th day of September, 2026, I caused to be served a true and correct copy of the foregoing *Notice of Protest* upon the following persons by the method(s) indicated:

Idaho Department of Water Resources
322 East Front Street
PO Box 83720
Boise, ID 83720-0098
file@idwr.idaho.gov

☐ U.S. Mail, Postage Prepaid
☐ Hand Delivered
☒ Electronic Filing

HDR
412 E. Parkcenter Blvd., Ste. 100
Boise, ID 83706
lori.graves@hdrinc.com

☐ U.S. Mail, Postage Prepaid
☐ Hand Delivered
☒ Electronic Filing

Brian O'Bannon
White Peterson
5700 E. Franklin Rd., Ste. 200
Nampa, ID 83687
bobannon@whitepeterson.com

☐ U.S. Mail, Postage Prepaid
☐ Hand Delivered
☒ Electronic Filing



CHRIS M. BROMLEY