IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA	**Subcase No. 36-7337A**
Case No. 39576	**MEMORANDUM DECISION AND ORDER ON CHALLENGE**

I.
FACTS AND PROCEDURAL BACKGROUND

1. This matter concerns a *Motion to Set Aside* a *Partial Decree* issued in the Snake River Basin Adjudication ("SRBA"). On January 31, 2013, Jim Scarrow ("Scarrow") filed the instant *Motion*, requesting that this Court set aside the *Partial Decree* entered for the above-captioned water right claim to correct an alleged error in the priority date. The *Motion* is made pursuant to Idaho Rule of Civil Procedure 60(a).

2. On April 29, 2013, the Special Master issued his *Special Master Report and Recommendation*, recommending that the *Motion* be denied. The Special Master found, among other things, that: (1) Scarrow is asking this Court to set aside a *Partial Decree* for a water right that no longer exists; (2) Scarrow's request to change the decreed priority date is an impermissible collateral attack on a prior license; and (3) granting the *Motion* would prejudice and harm intervening water rights.

3. *Motions to Alter or Amend* the *Special Master Report and Recommendation* were subsequently filed by Scarrow, John Sandy and Layne Osborn.

4. On September 26, 2013, the Special Master issued his *2nd Special Master Report and Recommendation*, recommending that the *Motions to Alter or Amend* be denied.

5. A timely *Notice of Challenge* was filed by Scarrow. Oral argument on Challenge was heard before this Court on December 9, 2013. The parties did not request additional briefing, nor does the Court require any. The matter is therefore deemed fully submitted the following business day, or December 10, 2013.

II.
STANDARD OF REVIEW

A district court is required to adopt a special master's findings of fact unless they are clearly erroneous. I.R.C.P. 53(e)(2); *Rodriguez v. Oakley Valley Stone, Inc.*, 120 Idaho 370, 377, 816 P.2d 326, 333 (1991). In determining whether findings of fact are clearly erroneous, a reviewing court "inquires whether the findings of fact are supported by substantial and competent evidence." *Gill v. Viebrock*, 125 Idaho 948, 951, 877 P.2d 919, 922 (1994). The party challenging the findings of fact has the burden of showing error, and a reviewing court will review the evidence in the light most favorable to the prevailing party. *SRBA Springs & Fountains Memorandum Decision & Order on Challenge*, Subcase No. 67-13701 (July 28, 2006), p. 18. The special master's conclusions of law, however, are not binding upon a reviewing court, although they are expected to be persuasive. *Higley v. Woodard*, 124 Idaho 531, 534, 861 P.2d 101, 104 (Ct. App. 1993). This permits the district court to adopt the master's conclusions of law only to the extent they correctly state the law. *Id.* Accordingly, a reviewing court's standard of review of the special master's conclusions of law is one of free review. *Id.*

III.
HISTORY OF WATER RIGHT 36-7337A AND ITS PROGENY

Consideration of the legal issues presented in this Challenge requires a historical review of water right 36-7337A. For reasons that will be shown below, the review cannot, however, be limited simply to water right 36-7337A. It must also encompass its parent right (36-7337) as well as its progeny. The review will include the SRBA proceedings preceding the instant *Motion*, as well as various pertinent administrative proceedings that occurred both before and after the *Partial Decree* was issued for water right 36-7337A.

A. Permit and licensing.

The history of water right 36-7337A is not in dispute. The application process began on May 25, 1973, when Scarrow's predecessor-in-interest, William C. Buxton ("Buxton"), filed an application for permit with the Department. The application sought to appropriate 7.28 cfs of groundwater for the irrigation of 364 acres located in Gooding County, Idaho. On December 7, 1973, the Department approved the application and issued permit no. 36-7337 subject to the following condition: "Proof of construction of works and application of water to beneficial use shall be submitted on or before January 1, 1977." Buxton failed to provide proof of beneficial use before the deadline. As a result, the permit lapsed. On February 23, 1977, Buxton filed an application with the Department requesting an extension of time within which to submit proof of beneficial use under the permit. The Department approved the request on February 28, 1977. In so approving, the Department reinstated the permit, advanced the priority date to January 17, 1973 pursuant to Idaho Code § 42-218a, and extended the time within which to submit proof of beneficial use until January 1, 1979.

On November 30, 1978, Buxton filed a second application for extension of time, requesting that the deadline to submit proof of beneficial use be extended until January 1, 1982. The request was approved by the Department on December 6, 1978. On April 20, 1982, the Department notified Buxton that permit no. 36-7337 had again lapsed, as no proof of beneficial use or request for extension of time had been filed with the Department prior to the January 1, 1982 deadline. At the time, Idaho Code § 42-218a provided that a permit may be reinstated upon a showing of reasonable cause within sixty days of the date of the notice of lapsing. On May 12, 1982, within sixty days of the notice of lapsing, Buxton submitted proof of beneficial use under the permit. After finding that Buxton had provided reasonable cause within sixty days of the notice of lapsing, the Department issued an *Order of Reinstatement* for permit no. 36-7337 on June 23, 1982. The *Order* reinstated the permit and advanced the priority date of the permit to November 25, 1977. Buxton did not object to the reinstatement of the permit with a November 25, 1977 priority date.

Before a license for permit no. 36-7337 was issued, the permit was administratively split. The split resulted in permit no. 36-7337A being issued to W.A. Sandy in 1989 and permit no. 36-

7337B being issued to Butch Veenstra in 1990.[1] The Department subsequently issued a license for water right no. 36-7337A on February 13, 1992 in the name of W.A. Sandy. The license authorized the diversion of 3.32 cfs of groundwater for the irrigation of 166 acres located in Gooding County, Idaho from March 15 to November 15. Of significance to this proceeding, the license was issued with a priority date of November 25, 1977. No objections to the issuance of the license were made by any party before the Department, nor did any party seek judicial review of any aspect of the license.

B. SRBA claim, recommendation and decree.

A *Notice of Claim* for water right 36-7337A was filed in the SRBA by John Sandy, William Sandy and Florence Sandy on December 26, 1990. The *Notice of Claim* asserted the right to divert 3.32 cfs of groundwater for the irrigation of 166 acres located in Gooding County, Idaho. Consistent with the permit and subsequent license for the right, the claim sought a November 25, 1977 priority date. On November 2, 1992, the Director filed his *Director's Report, Part I, Reporting Area 3 (Basin 36).* The Director recommended that water right claim 36-7337A be decreed in the names of the claimants for the diversion of 3.32 cfs of groundwater for the irrigation of 166 acres located in Gooding County, Idaho. The Director recommended a priority date of November 25, 1977, consistent with the *Notice of Claim.* No objections were filed to the Director's recommendation, and the Court entered its *Partial Decree* for water right claim 36-7337A on December 29, 1997, with a priority date of November 25, 1977. The *Partial Decree* included a Rule 54(b) Certificate deeming it a final and appealable judgment. No appeal was taken from the entry of the *Partial Decree.*

C. Subsequent administrative proceedings.

Following the issuance of the *Partial Decree*, water right 36-7337A was administratively split into 36-7337C and 36-7337D.[2] Thereafter a series of additional splits occurred resulting in many progeny. Water right no. 36-7337C was administratively split into 36-7337E and 36-7337F,[3] while 36-7337D was subsequently administratively renumbered to 37-8867. Water right

[1] Water right no. 36-7337B is not at issue in this proceeding.
[2] IDWR Approved Transfer No. 5051.
[3] IDWR Approved Transfer No. 5401.

no. 36-7337E was in turn split administratively into 36-7337G and 36-7337H.[4] Water right 36-7337G was then administratively split into 36-7337J and 36-7337K.[5] Water right 36-7337J was administratively split into 36-7337L and 36-7337M.[6] Right no. 36-7337M was subsequently administratively renumbered to 37-8901. Of significance to this case, the priority date of November 25, 1977 was carried through all of these administrative splits, and all water rights resulting from those splits contain a November 25, 1977 priority date.

From the splits identified above, Scarrow acquired water right numbers 36-7337K and 37-8901. Those two water rights were also the subject of post-decree administrative transfer proceedings pursuant to Idaho Code § 42-222. In 1999, Scarrow applied for transfers with respect to both water rights, seeking to change the purpose and period of use of the rights, among other things, for use in an existing dairy. The Department approved the transfer requests in December 1999. As a result, water right 36-7337K was changed from an irrigation right to a year round commercial and stockwater right. Water right 37-8901 was changed from an irrigation right to a year round stockwater right. Although the purposes and periods of use changed, the priority dates of both rights remained November 25, 1977. No objections to the approved transfers were made by any party before the Department, nor did any party seek judicial review of any aspect of the transfer proceedings.

IV.
MOTION TO SET ASIDE

It is with the above historical review in mind that we turn to the *Motion to Set Aside*. Scarrow asks this Court to set aside the *Partial Decree* entered for water right claim 36-7337A pursuant to Idaho Rule of Civil Procedure 60(a) "for correction of a priority date clerical error mistake." He alleges the error was committed by the Department during the permitting process for parent right 36-7337. Further, that the error was carried over into (1) the license for water right 36-7337A, (2) the *Partial Decree* for water right no. 36-7337A, and (3) the progeny of 36-7337A, including the water rights he now owns (i.e,. 36-7337K and 37-8901).

Specifically, Scarrow asserts that when the Department reinstated the permit for water right 36-7337 on June 23, 1982, it should have reinstated it with a priority date of November 25,

[4] IDWR Approved Transfer No. 5402.
[5] IDWR Approved Transfer No. 5403.
[6] IDWR Approved Transfer No. 5405.

1973 under Idaho Code § 42-218a, as opposed to November 25, 1977. The statute upon which Scarrow relies has been subsequently amended, but in 1982 it provided as follows:

> LAPSE OF APPLICATION FOR FAILURE TO REQUEST EXTENSION OR SUBMIT PROOF OF APPLICATION TO BENEFICIAL USE – NOTICE OF LAPSING. A permit upon which the proof of beneficial use has not been submitted, or a request for extension of time has not been received on or before the date set for such proof, shall lapse and be of no further force nor effect. Notice of said lapsing shall be sent by the department to the applicant at the address of record by regular mail provided: *that within sixty days after such notice of lapsing the department may, upon a showing of reasonable cause, reinstate the permit with the priority date advanced a time equal to the number of days that said showing is subsequent to the date set for proof.* The original priority date of a lapsed permit shall not be reinstated except upon a showing of error or mistake of the department.

I.C. § 42-218a (1967)[7] (emphasis added).[8]

The record in this case establishes that the Department notified the holder of permit no. 36-7337 that it had lapsed on April 20, 1982, for failure to timely submit proof of beneficial use. On May 12, 1982, within sixty days of the notice of lapsing, the permit holder submitted proof of beneficial use under the permit. The proof was submitted a total of 131 days after the January 1, 1982 deadline. The Department subsequently decided to reinstate permit no. 36-7337 and advanced the priority date to November 25, 1977. However, Scarrow argues that the advancement to that date was a clerical error. That under Idaho Code § 42-218a (1967), the priority date should have been advanced to November 25, 1973, which would have been 131 days after the prior applicable priority date for the right (i.e., July 17, 1973). It is not clear from the record why the Department advanced the priority date of the permit to November 25, 1977, when it chose to reinstate the permit in 1982. However, for the reasons set forth below, this Court in an exercise of its discretion declines to grant Scarrow's *Motion to Set Aside*.

A. The error alleged by Scarrow is not the type or nature of error capable of correction under Rule 60(a).

Rule 60(a) provides for the correction of "[c]lerical mistakes in judgments, orders or other parts of the record and errors therein arising from oversight or omission." The Idaho

[7] 1967 Idaho Session Law 1096.
[8] The statute was subsequently amended in 1983 (1983 Idaho Sess. Law 435–436) and again in 2011 (2011 Idaho Session Law 490).

Supreme Court has directed that Rule 60(a) applies to those errors in which the type of mistake or omission is "mechanical in nature which is apparent in the record." *Silsby v. Kepner*, 140 Idaho 410, 411, 95 P.3d 28, 29 (2004). Errors of a more substantial nature are to be corrected by a motion under Rule 59(e) or 60(b), as "Rule 60(a) is not a vehicle for relitigating matters that already have been litigated and decided, nor to change what has been deliberately done." *Dursteler v. Dursteler*, 112 Idaho 594, 597–98, 733 P.2d 815, 818–19 (Ct. App. 1987).

In this case, the error of which Scarrow complains is not readily apparent from the record. To the contrary, the priority date partially decreed reflects, and is consistent with, the record in this matter. The record reflects that water right 36-7337 was permitted with a priority date of November 25, 1977. Its progeny, water rights 36-7337A and 36-7337B, were both licensed with a priority date of November 25, 1977. The *Notice of Claim* filed by Scarrow's predecessors-in-interest for water right 36-7337A in the SRBA claimed a priority of November 25, 1977. The Department, following its independent investigation of the claim, recommended a priority date of November 25, 1977. The fact that the Department did not recommend an earlier priority date is presumed to be the deliberate result of its investigation. The claimant in the SRBA had the opportunity and duty to review the recommendations and timely file objections to any perceived errors contained therein. I.C. § 42-1412. However, the claimant failed to timely do so. As a result, a *Partial Decree* was entered for the above-captioned water right decreeing the right with a November 25, 1977, priority date. In light of the SRBA process, the *Partial Decree* as it pertained to the priority date element was thus "consistent" with the prior permit, prior license, *Notice of Claim* and the *Director's Report*. In short, the *Partial Decree* accurately reflects the record. Since the alleged error is not "mechanical in nature which is apparent in the record," it is not capable of correction under Rule 60(a). *Silsby v. Kepner*, 140 Idaho at 411, 95 P.3d at 29.

B. Scarrow's request that this Court decree a November 25, 1973, priority date for water right claim 36-7337A is an impermissible collateral attack on the prior license.

The Special Master found that Scarrow's attempt to amend the priority date of water right 36-7337A in this proceeding constitutes an impermissible collateral attack on the license. This

Court agrees. It has long been law of the case that the SRBA will not serve as a mechanism to collaterally attack an element of a water right license:

> If a party is aggrieved by any aspect of a license, that party's remedy is to seek an administrative review and then, if necessary, a judicial review of the license. I.C. §§ 42-1701A and 67-5270; *Hardy v. Higginson*, 123 Idaho 485, 849 P.2d 946. If the license is not appealed when issued, any attempt to appeal the license in a subsequent judicial proceeding, like the SRBA, would constitute a collateral attach on the license. *See e.g., Mosman v. Mathison*, 90 Idaho 76, 408 P.2d 450 (1965); *Bone v. City of Lewiston*, 107 Idaho 844, 693 P.2d 1046 (1984).

Supplemental Findings of Fact and Conclusions of Law, subcase nos. 36-2048 et. al., pp. 11–12 (July 31, 1998)[9] (subsequently adopted by the SRBA District Court in *Order on Challenge (Consolidated Issues) of "Facility Volume" Issue and "Additional Evidence" Issue*, subcase nos. 36-2048, et. al., p. 18 (Dec. 29, 1999)); *See also, Astorquia v. State of Idaho Dept. of Water Resources*, Ada County Case No. CV-WA-2012-14102, *Memorandum Decision and Order*, p.7 (May 7, 2013).

When the Department issued its *Order of Reinstatement* on June 23, 1982, it reinstated permit no. 36-7337 with an advanced priority date of November 25, 1977. If the permit holder disagreed with the advanced priority date, he was required to seek administrative review, and if necessary judicial review. He did not. Likewise, when the Department issued the license for water right 36-7337A on February 13, 1992, with a priority date of November 25, 1997, the license holder was required to seek administrative review, and if necessary judicial review, if he disagreed with the licensed priority date. He did not. The issue of priority was therefore never raised before the Department at the time of permit or licensing. The Court finds that Scarrow's attempt to raise the issue of priority for the first time in the SRBA, twenty-one years after the issuance of the license, constitutes an impermissible collateral attack on the license.

C. Granting the *Motion to Set Aside* would prejudice intervening water rights.

The Special Master found the *Motion to Set Aside* could not be granted without harming intervening rights. He noted the lengthy history of the alleged clerical error at issue, and the fact neither Scarrow, nor any of his predecessors-in-interest, raised the alleged error for over thirty-one years. The Special Master cited to and relied upon *Albion-Idaho Land Co. v. Adams*, 58 F.Supp.579 (D. Idaho 1945) in his analysis.

[9] A copy of the *Supplemental Findings of Fact and Conclusions of Law* is attached hereto as Exhibit 1.

Albion-Idaho Land Co. involved an action to adjudicate water rights on the Raft River and its tributaries. 58 F.Supp at 579. A decree was entered in that adjudication on October 23, 1928. *Id.* Approximately sixteen years later, Marlin H. Booth, a holder of one of the decreed water rights, brought a Rule 60(a) motion to correct a clerical error in the decree. *Id.* It was conceded that the water right at issue was erroneously decreed by the court with an irrigation season from October 1 to October 15 of each year, as opposed to the correct season of use of April 1 to October 15. *Id.* Notwithstanding the error, the court denied Booth's Rule 60(a) motion. The denial was based in part on the court's finding that it would be inequitable to grant the requested relief given the length of time that had passed since the error was made:

> Although there are exceptions to the rule, freedom from fault and negligence on the part of one seeking such relief is essential, and in the light of the facts here the motion to correct this error cannot be sustained. Clearly this Court should have been advised of the error so that it could have been corrected long before this time. It is well established as a principle of equity that a party seeking relief in a matter like this must use due diligence in asserting his right, and that negligence and laches in this regard are equally effectual bars to relief, and this is especially so if the correction would be harmful to intervening rights. The authorities are uniform in so holding.
>
> There is no evidence that either Crane or Booth was hindered in any way from discovering the mistake and it will be presumed that Booth knew what he was buying and of what the water right consisted at the time the deed was issued to him. There was nothing to hinder Booth at the time from finding out. He was at least carelessly inattentive to what he was buying unless he knew the contents of the decree. He had legal notice of its contents and there is no reasonable showing why both Crane and Booth have slept on their rights for so many years while other rights have intervened by purchase of land and water, not only by the parties appearing here and objecting to the correction of the decree who are injured if the decree is corrected, but no doubt where there are over four hundred other rights, other parties have purchased land and water over the last sixteen years who could claim injury by having the decree corrected.

Id. at 581–582.

This case is similar to *Albion-Idaho Land Co.* in many respects. The priority date clerical error alleged in this case occurred in 1982, when the Department issued its *Order of Reinstatement* for permit no. 36-7337. Approximately thirty-one years passed before Scarrow filed the instant *Motion to Set Aside* to attempt to correct the alleged error. However, before the filing of the instant *Motion* the right went through a plethora of administrative and judicial proceedings wherein neither Scarrow, nor his predecessors-in-interest, raised the issue of the

alleged error. These proceedings included: (1) the reinstatement of permit no. 36-7337 by the Department; (2) the administrative split of permit 36-7337 into 36-7337A and 36-7337B by the Department; (3) the issuance of the license for water right 36-7337A by the Department; (4) the filing of the notice of claim for water right 36-7337A in the SRBA; (5) the Department's recommendation for water right 36-7337A in the SRBA; (6) the entry of the *Partial Decree* for water right 36-7337A in the SRBA; (7) the post-decree split of water right 36-7337A into 36-7337K and 37-8901 (among other progeny) by the Department; and (8) the post-decree administrative transfer of 36-7337K and 37-8901 by the Department.

During the thirty-one years that have elapsed since the alleged clerical error, other rights intervened by purchase of land and water that would be more than justified in having relying upon water right 36-7337A and its progeny having a November 25, 1977, priority date. Indeed the Special Master found that if the priority dates of Scarrow's water rights were advanced four years to November 25, 1973, the number of active water right in Basins 36 and 37 that would be jumped in priority is approximately 1,340. Therefore, the Special Master's finding that the *Motion to Set Aside* could not be granted without harming intervening rights is affirmed.

D. Mootness.

Under Idaho law, a case becomes moot, and therefore will not be considered by the court, when the issues presented are no longer live, the parties lack a legally cognizable interest in the outcome, or a judicial determination will have no practical effect upon the outcome. *Goodson v. Nez Perce County Bd. of County Comm'rs*, 133 Idaho 851, 853, 993 P.2d 614, 616 (2000). An issue will also be considered moot "when a favorable judicial decision would not result in any relief." *Clayson v. Zebe*, 153 Idaho 228, 236, 280 P.3d 731, 739 (2012). The Idaho Supreme Court has directed that a Court may only review cases in which a judicial determination will have a practical effect on the outcome. *Fenn v. Noah*, 142 Idaho 775, 779, 133 P.3d 1240, 1244 (2006), *overruled on other grounds*. The issue of mootness can be raised at any time, including for the first time on appeal. *State v. Keithly*, 2013 WL 6184054 (Idaho 2013).

In this case, the Court finds the issue raised in Scarrow's *Motion to Set Aside* to be moot. The Special Master made the finding that Scarrow is asking this Court to set aside the *Partial Decree* for a water right that no longer exists. The Special Master is correct in this respect. After the above-captioned water right was partially decreed in the SRBA, it underwent a series of

administrative proceedings before the Department that ended the existence of water right 36-7337A, and resulted in the creation of its progeny. These proceedings included post-decree administrative splits, as well as post-decree administrative transfers pursuant to Idaho Code § 42-222. Scarrow is the present owner of two of the progeny.

The law of the case in the SRBA is that administrative changes to a water right initiated and completed after the entry of the SRBA partial decree for that right, supercede the *Partial Decree*. *See e.g.*, *Memorandum Decision and Order on Challenge in the Matter of the Final Unified Decree*, SRBA Subcase No. 00-92099, pp.7 & 17 (June 28, 2012). Such is the case here. The two progeny rights presently held by Scarrow, which authorize commercial and stockwater water use associated with a dairy operation, no longer resemble and indeed have superceded the *Partial Decree* entered by this Court for 36-7337A, which authorized the use of water for irrigation purposes. As a result, the issue of whether the priority date partially decreed in the SRBA for water right 36-7337A should be changed is no longer a live issue. That right no longer exists.

Moreover, even if the Court could address the priority date issue with respect to water right 36-7337A, it would not result in any relief to Scarrow. Scarrow seeks the advancement of priority dates for his water rights, 36-7337K and 37-8901.[10] The administrative proceedings that resulted in the creation of Scarrow's water rights were subject to judicial review and/or declaratory judgment under the provisions of chapter 52, title 67, Idaho Code. At no time during those proceedings did Scarrow raise an objection regarding the priority date of his water rights before the Department, nor did he seek judicial review of any aspect of those proceedings. Idaho Code § 42-1401D places jurisdictional limitations on this Court's ability to review, in the SRBA, an agency action of the Department which is subject to judicial review or declaratory judgment under the provisions of chapter 52, title 67, Idaho Code. Therefore, this Court is precluded from granting Scarrow the relief he seeks, which is the advancement of the priority dates for water right numbers 36-7337K and 37-8901.

[10] Water right numbers 36-7337K and 37-8901 were not claimed, decreed or adjudicated in the SRBA.

V.

CONCLUSION

BASED ON THE FORGOING, THE FOLLOWING ARE HEREBY ORDERED:

1. The ruling of the Special Master is **affirmed.** Pursuant to I.R.C.P. 53(e)(2) and *SRBA Administrative Order 1*, Section 13f, this Court has reviewed the Findings of Fact and Conclusions of Law contained in the ***Special Master Report and Recommendation*** and wholly adopts them as its own.

2. Scarrow's *Motion to Set Aside* is **denied.**

DATED: January 2, 2014

Eric J. Wildman,
Presiding Judge of the
Snake River Basin Adjudication

RULE 54(b) CERTIFICATE

With respect to the issues determined by the above judgment or order it is hereby CERTIFIED, in accordance with Rule 54(b), I.R.C.P., that the court has determined that there is no just reason for delay of the entry of a final judgment and that the court has and does hereby direct that the above judgment or order shall be a final judgment upon which execution may issue and an appeal may be taken as provided by the Idaho Appellate Rules.

DATED: January 2, 2014

Eric J. Wildman,
Presiding Judge of the
Snake River Basin Adjudication

CERTIFICATE OF MAILING

I certify that a true and correct copy of the MEMORANDUM DECISION AND ORDER ON CHALLENGE was mailed on January 02, 2014, with sufficient first-class postage to the following:

JIM SCARROW
Represented by:
DANA L HOFSTETTER
608 W FRANKLIN ST
BOISE, ID 83702-5509
Phone: 208-424-7800

JOHN A SANDY
HAGERMAN, ID 83332

WILLIAM RIEBESELL
JEROME CHEESE COMPANY
547 W NEZ PERCE AVE
JEROME, ID 83338
Phone: 208-324-8806

FLORENCE M & WILLIAM A SANDY
PO BOX 326
HAGERMAN, ID 83332

DIRECTOR OF IDWR
PO BOX 83720
BOISE, ID 83720-0098

LAYNE OSBORNE
18208 US HIGHWAY 30
HAGERMAN, ID 83332

MICHAEL THOMPSON
335 WEST 300 NORTH
JEROME, ID 83338

Julie Murphy
Deputy Clerk