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**BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO**

IN THE MATTER OF APPLICATION	)	IFPL’S OBJECTIONS AND
FOR PERMIT NO. 63-34614,	)	RESPONSES TO MICRON’S
IN THE NAME OF MICRON	)	FIRST DISCOVERY REQUESTS
TECHNOLOGY INC.	)	
_____	)	

Protestant IDAHO FOUNDATION FOR PARKS AND LANDS (IFPL) hereby
responds to applicant MICRON TECHNOLOGY INC’s (Micron) First Set of Discovery
Requests to IFPL, dated November 22, 2019, as follows:

GENERAL STATEMENT

IFPL incorporates and repeats the “General Statement” made in Micron’s
Objections and Response to IFPL’s First Discovery Requests, dated November 15, 2019,
as if fully set forth and repeated here.

GENERAL OBJECTIONS

IFPL incorporates and repeats the “General Objections” made in Micron’s Objections and Response to IFPL’s First Discovery Requests, dated November 15, 2019, as if fully set forth and repeated here. IFPL further objects to specific Interrogatories and Document Requests as set forth below.

INTERROGATORY RESPONSES

INTERROGATORY NO. 1: State all the facts explaining the basis for your opposition to approval of Application No. 63-34614.

RESPONSE TO INTERROGATORY NO. 1: The Boise River historically saw spring floods that scoured the river and deposited new banks of silt and sediment, from which stands of black cottonwoods and other vegetation would grow. Through different periods of flood and low water, the Boise River channel would braid and flow in different paths, sustaining the cottonwood gallery. Flocks of birds abounded, as did wildlife and fish.

Completion of Lucky Peak dam changed all that. Lucky Peak is a flood control dam, and it closely regulates releases to the lower Boise River. This regulation prevents the scale of floods seen in the past. The cottonwood stands along the Boise River are substantially reduced, and their regeneration is impaired.

Preserving and restoring cottonwood galleries on the lower Boise River is a goal shared by many who live here. Federal, state, county and city governments and agencies support this goal and strive to achieve it. Non-profit organizations do as well, and the Idaho Foundation for Parks and Lands is one of them.

The City of Boise has placed a priority on protecting, enhancing, and restoring the Boise River over several decades now. In 1983, a group of scientists prepared a study of

the Boise River's values and management needs for the City of Boise, entitled "Boise River Wildlife and Fish Habitat Study: Wetland Inventory and Management Guidelines" (Final Report, Dec. 1983). It inventoried and described fish and wildlife habitat along the river, and identified management guidelines intended to maintain existing habitat and conditions, including "extremely important" wetlands such as the Barber Pool.

The wetland classifications included riparian forests and woody riparian areas, and the study identified abundant bird species that use the forested wetlands along the Boise River: bald eagle, osprey, great blue heron, belted kingfisher, hawks and owls, nighthawks, and about 100 other species. Management guidelines were recommended to protect these habitats from further loss and degradation.

The Barber Pool is located below Diversion Dam on the lower Boise River, and was identified in the 1983 study as vital for protection because of its forested wetland values. The Barber Dam downstream limits the river flow, and the absence of development in the river channel and much of its floodplain has allowed cottonwoods and other riparian vegetation to persist, with side channels and wetlands that are one of the last vestiges of the historic Boise River and its cottonwood galleries.

The Idaho Foundation for Parks and Lands (IFPL) has worked to protect and restore the Barber Pool for decades. Since its beginning in 1972, IFPL (a private nonprofit 501(c)(3) corporation) has worked to protect beautiful and critically important properties, and handled more than \$12,000,000 in real estate assets. Idaho's oldest land trust, IFPL holds fee title, conservation easements, management agreements, and other instruments to protect and restore high value conservation properties around the State of Idaho. The Barber Pool is one of its signature properties. In 1978, Boise Cascade initially

gifted 420 acres, and then IFPL purchased additional acres from Pullman Brick. In 2016, IFPL purchased 12 more acres, and has entered into a relationship with the Shakespeare Festival on this property as well as an additional property. IFPL is currently under contract to acquire an additional 35 acres known as the Gregerson property.

Over the decades, IFPL has worked with landowners, developers, neighbors, volunteers, agencies, and governments to promote protection and restoration of the Barber Pool. IFPL has taken on or sponsored projects like wrapping cottonwood trees with chicken wire to protect them from beavers; working with aborists to propagate and transplant cottonwood seedlings; manual and chemical treatment of invasive plants; and preparing studies and plans to conserve the Barber Pool.

In 2002, IFPL teamed with the U.S. Army Corps of Engineers, and representatives of Idaho Department of Parks and Recreation, Boise City Parks and Recreation, Ada County Parks and Watersheds, the Idaho Shakespeare Festival, and others to form a “Friends of Barber Pool Conservation Area Technical Committee” and release a “Barber Pool Conservation Area Master Plan.”

That 2002 Master Plan identified the Barber Pool Conservation Area (“BPCA”) as covering 712.6 acres in the Barber Pool area, of which IFPL owned about 44%, private owners held 31%, and the State of Idaho, Ada County, Idaho Shakespeare Festival, and the federal government owned smaller amounts. The 2002 Master Plan identified numerous steps to protect and expand the values of the Barber Pool, including classifying areas available to the public (including interpretative trails) and areas closed to protect the birds, wildlife and other natural values. The Plan explained the reasons for limiting public access, including to protect nesting and wintering bald eagles, and reduce

disturbance of wildlife and possibility of fire. Ways to promote connectivity between the Barber Pool and other fish and wildlife habitats in the Boise River valley, and to expand protections of the Barber Pool, were also identified. Continuing research, and educating and involving the public in BPCA protection, were also emphasized.

Protecting the riparian and wetland areas of the Barber Pool was one of the highest priorities of the Master Plan. Because the BPCA “supports one of the last intact cottonwood forests on the urbanized Boise River. . . [m]anagement should support the current population, as well as the regeneration of new trees.” That remains a core, guiding principle of IFPL in its work to protect and restore the Barber Pool.

In July 2018, IFPL convened a science-based Barber Pool Advisory Council to help achieve this goal. Composed of scientists, neighbors, businesses, and others, the Council is helping IFPL study ways to expand the forested wetlands of the Barber Pool. The Council recently completed vegetation mapping of the Barber Pool. With the help of hydrologists and botanists, IFPL is developing an irrigation plan to restore the cottonwood forest, utilizing water rights obtained from the New York Irrigation District for use in bringing back wetland conditions. Even small amounts of water matter in this effort.

Micron’s Application No. 63-34614 seeks a new right to divert water from the Boise River, just above the Barber Pool and BPCA. Taking additional water out of the Boise River, right above the Barber Pool, threatens to reduce the timing and amounts of flows available through the Barber Pool to promote cottonwood survival and regeneration, and impair other riparian vegetation. It may reduce water in side channels and deplete groundwater levels needed to sustain the forested wetlands habitat. And it

sets a precedent that others may follow, because the Boise River is over-appropriated and what Micron calls “flood flows” are the only possible remaining source of new water rights from the river.

It is uncertain what Micron means by “flood flows” in its Application No. 63-34614. The Army Corps of Engineers has one definition; the Idaho Department of Water Resources has another; other water users have even others. Micron’s application materials and discovery responses raise serious concerns about what Micron actually intends to do, because they seek to define the period of use based on 1,500 cfs flows at the Glenwood Bridge gage. That is located far downstream from the Micron pump station, just below the Highway 21 bridge, and far below the Barber Pool, which will be most immediately impacted by Micron’s proposed diversions.

In June 1997, Micron submitted its Application for Permit 63-12420, seeking approval to divert water from the Boise River at its pump station near the Highway 21 bridge. The application sought 15 cfs for groundwater recharge and 5 cfs for industrial use, specified as “for manufacturing of semiconductor and electronic components.” Various protests to that application were resolved when Micron agreed to certain terms and conditions, including the following: “If measured or calculated Boise River flows at the point of diversion are less than 240 cfs during the period beginning June 16 and ending February 29, water shall not be diverted,” and “[i]f measured or calculated Boise River flows at the point of diversion are less than 1,100 cfs during the period beginning March 1 and ending May 31, water shall not be diverted.” The terms and conditions specifically provided: “Measured or calculated Boise River flows at the point of diversion

shall be based on gauged Lucky Peak Dam Discharge minus the gauged diversions to the New York Canal.”

In the following years, Micron did not need the 15 cfs Boise River diversions it sought in Application for Permit 63-12420. After having to prod Micron to submit proof of beneficial use and “prove up” the permit, IDWR issued Water Right License No. 63-12420 in April 2015, i.e., almost twenty years after the permit was issued. The license only authorized Micron to divert 5 cfs, and specified that 3.34 cfs could be diverted for groundwater recharge, and 5 cfs for industrial use, *i.e.*, “for manufacturing of semiconductor and electronic components.” The license repeated the conditions limiting diversions, noted above, and specified that the right could only be exercised “when the Boise River is on flood release below Lucky Peak dam/outlet” as determined by the 1985 Water Control Manual for the Boise River reservoirs.

As noted above, Micron’s discovery responses reveal that Micron has not, in fact, complied with the terms and conditions of its permit and license No. 63-12420. Again, these specify that Micron’s allowed diversions are based on “gauged Lucky Peak Dam Discharge minus the gauged diversions to the New York Canal,” yet Micron is using flows at the Glenwood Bridge instead, without any apparent recognition that it is violating its license in doing so.

Moreover, having not been able to use the 15 cfs approved in the 1997 permit, and with groundwater recharge limited to 3.34 cfs under the 2015 license, it is difficult to understand why Micron would now seek a new right to divert 12 cfs from the Boise River at the pump station, including 12 cfs for industrial use and 5 cfs for groundwater recharge, as sought in Application No. 63-34614. Micron has provided no sound reason

or concrete facts to support its claim that it needs the new water for either recharge or industrial use. Micron cannot even specify how and when it has diverted and used water for the authorized purposes under its permit and license No. 63-12420. Moreover, Micron discharges large volumes of water to the sewer system, indicating it could do far more to recycle and reuse the water it already has.

Additionally, in the last decade or more, Micron has shifted its manufacturing of semiconductor and electronic components away from Boise. Micron has invested, and continues to invest, billions of dollars in manufacturing facilities in other states and overseas, including Taiwan, Singapore, Japan, and Virginia. Employment at its Boise facility has dropped substantially, and jobs have been exported overseas. It appears the Boise facility remains a site for research and development, but no longer manufactures anything. Again, Micron has failed to provide concrete facts or reasons why it supposedly needs additional Boise River now for “industrial” purposes. At best, the “industrial” uses appear to be peripheral to its R&D operations, which support manufacturing operations in other locations.

In short, Micron wants to further deplete the Boise River—and threaten the protection and restoration of the cottonwoods and other habitat offered by Barber Pool—so it can ship jobs overseas. Micron’s application is speculative and not made in good faith, is not in the local public interest, and is not in the interests of conserving Idaho’s water resources.

Finally, IFPL notes that Micron has withheld information sought in discovery and IFPL’s investigation is continuing. IFPL reserves the right to amend or supplement this response as necessary and appropriate in the future.

INTERROGATORY NO. 2: In regard to Application No. 63-34614, describe your contentions and the basis for each such contention regarding each criterion for application approval set out in Idaho Code §42-203A(5).

RESPONSE TO INTERROGATORY NO. 2: See Response to Interrogatory No.1. I.C. §42-203A(5) requires Micron, as the applicant for a new water right, to produce sufficient evidence at hearing to meet all requirements of I.C. §42-203A(5), and it is not IFPL's duty or obligation to demonstrate any such compliance or non-compliance.

The evidence and reasons Micron has advanced to date, of which IFPL is aware, indicate that Application No. 63-34614 is not made in good faith and/or is made for speculative purposes, under I.C. §42-203A(5)(c); is not in the local public interest under I.C. §42-203A(5)(d); and/or is contrary to the conservation of water resources in Idaho, under I.C. §42-203A(5)(e).

Pursuant to I.C. §42-203A(5)(d) and the IDWR Rules of Procedure, public witnesses may provide additional testimony and facts concerning Application No. 63-34614 and the local public interest at the hearing herein.

INTERROGATORY NO. 3: Set forth the name, address and phone number of each person with knowledge of the basis for your opposition to Application No. 63-34614 and specify the nature of that knowledge.

RESPONSE TO INTERROGATORY NO. 3: Objection; compound interrogatory; calls for disclosure of privileged attorney-client and/or attorney work product material; IFPL is under no obligation to disclose addresses and phone numbers, which are private information. Subject to and without waiving IFPL's objections, Charles McDevitt,

Stephani Hilding, Sharon Hubler, and Laird Lucas have knowledge relating to IFPL's opposition to Application No. 63-34614.

INTERROGATORY NO. 4: Set forth the name, address, and phone number of each person consulted as an expert regarding this matter or whom you intend to call as an expert witness at the hearing on this matter, and for each person list the following:

a. His or her position or employment, background, expert qualifications, training, and education; b. What he or she was consulted on; c. All opinions and inferences to which he or she may testify and the reasons therefore; and d. All data or other materials that he or she relied on in reaching those opinions or making those inferences.

RESPONSE TO INTERROGATORY NO. 4: Objection; compound interrogatory; calls for disclosure of privileged attorney-client and attorney work product material.

IFPL has not yet determined what experts it may call at hearing. IFPL will comply with any order requiring disclosure of experts before hearing.

INTERROGATORY NO. 5: Set forth the name, address, and phone number of every person you intend to call as a lay witness at the hearing on this matter, and for each person list the following: a. His or her position or employment, background, training, and education; and b. The subject of his or her testimony.

RESPONSE TO INTERROGATORY NO. 5: Objection; compound interrogatory; calls for disclosure of privileged attorney-client and/or attorney work product material; IFPL is under no obligation to disclose addresses and phone numbers, which are private

information. IFPL has not yet determined what law witness it may call at hearing. IFPL will comply with any order requiring disclosure of lay witnesses before hearing.

INTERROGATORY NO. 6: Identify each document you intend to introduce as evidence in a hearing on this matter and briefly explain the significance of each. For any such document that is more than 15 pages or 3,000 words, identify or quote the portions of the document that you contend are relevant.

RESPONSE TO INTERROGATORY NO. 6: Objection; compound interrogatory; overly burdensome; calls for disclosure of privileged attorney-client and/or attorney work product material. IFPL has not yet determined what documents it may introduce at hearing. IFPL will comply with any order requiring disclosure of hearing exhibits before hearing. Subject to and without waiving IFPL's objections, see Documents produced herewith, some or all of which may be offered at hearing.

INTERROGATORY NO. 7: Set forth the name, address, and phone number of every person, including IDWR and any other protestants, with whom you have communicated regarding Application No. 63-34614 and/or its potential impacts on Black Cottonwood stands and/or property owned by IFPL, and for each person list the following: a. His or her position or employment, background, training, and education; and b. The subject of your communication regarding this matter.

RESPONSE TO INTERROGATORY NO. 7: Objection; compound interrogatory; overly burdensome; calls for disclosure of privileged attorney-client and/or attorney work product material; calls for material beyond IFPL's knowledge or control.

Subject to and without waiving IFPL's objections, IFPL has conferred with wildlife ecologist Charles Blair, who has extensive experience with the Barber Pool, its ecological functions and values, and efforts to protect and restore those values; Karl Gebhardt, a hydrologist, who has extensive experience with the Barber Pool, its ecological functions and values, and efforts to protect and restore those values; and other members of the Barber Pool Advisory Council.

INTERROGATORY NO. 8: Identify all studies or other analysis that you are aware of that examine the potential hydrological impacts of Application No. 63-34614.

RESPONSE TO INTERROGATORY NO. 8: None. It appears from Micron's application materials and discovery responses to IFPL that Micron has not performed any such studies or analysis.

INTERROGATORY NO. 9: Identify all facts, studies, or other analysis that you are aware of that indicate that approval of Application No. 63-34614 may negatively impact black cottonwoods and any other riparian, aquatic, recreational, environmental, or other values associated with the Barber Pool.

RESPONSE TO INTERROGATORY NO. 9: See Response to Interrogatory No. 1. Well-established scientific research, data, studies and analyses document the ecological values and functions of black cottonwoods and other riparian vegetation on the Boise River and are applicable to the analysis of potential adverse impacts that approval of Application No. 63-34614 may have upon them.

INTERROGATORY NO. 10: Identify IFPL's management goals for the Barber Pool Conservation Area and explain how these goals benefit the public.

RESPONSE TO INTERROGATORY NO. 10: See Response to Interrogatory No. 1. See also 2002 BPCA Master Plan. The public benefits from the protection and restoration of the Barber Pool because of the many ecological, recreational, inspirational, and other values its supports.

INTERROGATORY NO. 11: Specify the annual number of visitors to the Barber Pool Conservation Area during the years 2009 to present.

RESPONSE TO INTERROGATORY NO. 11: Objection; vague and ambiguous as to meaning of "visitors" and "Barber Pool Conservation Area"; calls for information beyond IFPL's knowledge or control. Subject to and without waiving IFPL's objections, IFPL is informed and believes that more than 100,000 people visited the Barber Pool Conservation Area last year.

INTERROGATORY NO. 12: Specify the percentage of the Barber Pool Conservation Area accessible to members of the public.

RESPONSE TO INTERROGATORY NO. 12: Objection; vague and ambiguous as to meaning of "Barber Pool Conservation Area" and "accessible to members of the public"; calls for information beyond IFPL's knowledge or control. Subject to and without waiving IFPL's objections, members of the public can view the Barber Pool from many locations, including IFPL and Idaho Dept. of Parks and Recreation interpretative trails, the Barber Pool Observation Point, the Boise River greenbelt and others.

INTERROGATORY NO. 13: Identify all planned management activities, including all activities related to conservation, preservation, restoration, and land acquisition by IFPL relating to the Barber Pool Conservation Area.

RESPONSE TO INTERROGATORY NO. 13: See Response to Interrogatory No. 1.

INTERROGATORY NO. 14: Identify any studies, reports or other analysis that evaluate the ecology of black cottonwoods in the area now included in the Barber Pool Conservation Area and adjacent areas along the Boise River.

RESPONSE TO INTERROGATORY NO. 14: Objection; overly broad and burdensome in request “any studies, reports or other analysis”; calls for information beyond IFPL’s knowledge or control. Subject to and without waiving the foregoing objections, see Response to Interrogatory No. 1 and documents produced herewith.

INTERROGATORY NO. 15: To the extent that you contend that approval of Application No. 63-34614 would impact the local public interest, state all facts fully describing the basis for such contentions.

RESPONSE TO INTERROGATORY NO. 15: See Responses to Interrogatories Nos. 1 and 2.

INTERROGATORY NO. 16: Identify all actions IFPL has taken to maintain black cottonwoods within the Barber Pool Conservation Area and adjacent areas along the Boise River.

RESPONSE TO INTERROGATORY NO. 16: Objection; overly broad and burdensome in seeking “all actions” IFPL has taken, when IFPL has held and managed property along the Barber Pool to protect its values for over 40 years. Subject to and without waiving IFPL’s objections, see Response to Interrogatory No. 1.

INTERROGATORY NO. 17: Set forth the name, address, and phone number of each person who contributed to the responses to these interrogatories and state his or her relation to IFPL.

RESPONSE TO INTERROGATORY NO. 17: Objection; compound interrogatory; calls for privileged attorney-client and/or attorney work product material; IFPL is under no obligation to disclose addresses and phone numbers, which are private information. Subject to and without waiving IFPL’s objections, persons who contributed to IFPL’s response include Charles McDevitt and Laird Lucas, counsel for IFPL; and Stephani Hilding, IFPL Secretary Treasurer.

INTERROGATORY NO. 18: Set forth the name, address and phone number of each person who supplied information for these interrogatories and requests for production, and for each person state his or her relation to IFPL and specify for which interrogatories and/or requests for production he or she supplied information.

RESPONSE TO INTERROGATORY NO. 18: Objection; compound interrogatory; overly broad and burdensome; seeks privileged and confidential attorney-client and/or attorney work product material; IFPL is under no obligation to disclose addresses and

phone numbers, which are private information. Subject to and without waiving IFPL's objections, see Responses to Interrogatories Nos. 3 and 17.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Provide copies of all Documents which you have relied upon or reviewed in responding to any of these discovery requests.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1: Objection; the request for any document "reviewed" in responding to the discovery requests is overly broad, irrelevant, burdensome, and seeks material protected by attorney-client and/or attorney work product privileges. Subject to and without waiving IFPL's objections, see Documents produced herewith.

REQUEST FOR PRODUCTION NO. 2: Provide copies of all Documents in your possession that relate to your answers to all of the above interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2: Objection; overly broad, ambiguous and confusing as to what "relate to" means. Subject to and without waiving IFPL's objections, see Documents produced herewith.

REQUEST FOR PRODUCTION NO. 3: Provide all correspondence and communications both internal and external relating to Application No. 63-34614, including those identified in your response to Interrogatory No. 7.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3: Objection; ambiguous and confusing as to what "correspondence and communications both internal and external"

means; calls for privileged attorney-client and/or attorney work product material. Subject to and without waiving IFPL's objections, see Documents produced herewith.

REQUEST FOR PRODUCTION NO. 4: Provide all documents, and/or tangible evidence you expect to introduce or use, or may use, at the hearing on this matter. To the extent these materials have already been produced in response to any of these discovery requests please identify them but do not produce the materials more than once.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4: Objection; IFPL has not completed its discovery or determinations regarding documents it may introduce at hearing. IFPL will comply with any prehearing exhibit disclosure date.

REQUEST FOR PRODUCTION NO. 5: Provide all documents, including financial records, relating to all IFPL management activities that you contend could be impacted by approval of Application No. 63-34614.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5: Objection; overly broad, burdensome and seeks material not relevant to these proceedings; seeks confidential and privileged material.

Dated: this 23rd day of December, 2019.

Respectfully Submitted,



Chas. McDevitt
Laird J. Lucas
Bryan Hurlbutt

Attorneys for Protestant IFPL

VERIFICATION

I, Stephani Hilding, declare under penalty of perjury pursuant to the law of the State of Idaho, Idaho Code 9-1406, that I have read the foregoing IFPL OBJECTIONS AND RESPONSES TO MICRON'S FIRST DISCOVERY REQUESTS and that the answers contained therein are true and correct to the best of knowledge, information, and belief. Dated this 23rd day of December, 2019, at Boise, Idaho.


Stephani Hilding

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of December, 2019, I caused the original of the foregoing IFPL'S OBJECTIONS AND RESPONSES TO MICRON'S FIRST DISCOVERY REQUESTS (and accompanying documents) to be served via the method of service show below, upon the following persons:

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