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DEPARTMENT OF
WATER RESOURCES

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BEFORE THE DEPARTMENT OF WATER RESOURCES

OF THE STATE OF IDAHO

IN THE MATTER OF APPLICATIONS
FOR PERMITS FOR THE DIVERSION
AND USE OF SURFACE AND GROUND
WATER WITHIN THE SNAKE RIVER
BASIN

**COALITION OF CITIES' OBJECTION
AND REQUEST FOR HEARING**

COMES NOW the Cities of Bliss, Burley, Carey, Declo, Detrich, Gooding, Heyburn, Hazelton, Jerome, Paul, Richfield, Rupert, Shoshone and Wendell ("Coalition of Cities") pursuant to I.C. § 42-1701A(3), and hereby files this *Objection and Request for Hearing* in the above-captioned matter.

On October 21, 2022, the Director of the Idaho Department of Water Resources ("IDWR" or "Department") issued the *Amended Snake River Basin Moratorium Order* ("Amended Moratorium Order"). Each of the cities that are part of the Coalition of Cities own municipal water rights that are located within the area included with the Amended Moratorium Area. The Coalition of Cities are also parties to and original signatories to the *Settlement Agreement Between the Surface Water Coalition, Participating Members of Idaho Ground Water Appropriators, Inc., and Signatory Cities* (the "Municipal Settlement Agreement").

Without repeating the issues raised by the City of Bellevue, the City of Idaho Falls and The Wellsprings Group, in their respective objection and challenges, the Coalition of Cities are

also concerned about the conclusions contained with the Amended Moratorium Order relating to the presumption that municipal water rights are fully consumptive and the conclusions' potential impact on the ability to acquire new municipal water rights in the future, meet the requirements under existing water rights and use and obligations and practices under the Municipal Settlement Agreement.

Based on the foregoing, and because the only relief allowed for in the *Amended Moratorium Order* is to contest this action by requesting a hearing, the Coalition of Cities hereby requests a hearing in this matter pursuant to I.C. § 42-1701A(3).

DATED this 4th day of November, 2022.



CANDICE M. MCHUGH

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of November, 2022, I served a true and correct copy of the foregoing document on the person(s) whose names and addresses appear below by the method indicated:

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