

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

In Re CFPRBA )  
Case No. 69576 )  
\_\_\_\_\_ )

A. Subcase Nos. 97-9880, 97-9882, 97-9885, 97-9893, 97-9899, 97-9903, 97-9905

STANDARD FORM 1  
OBJECTION

B. NAME AND ADDRESS OF PERSON OBJECTING

Name: Idaho Forest Group, LLC.  
Address: 687 Canfield Ave. Ste 100, Coeur d' Alene, ID 83815-5335  
Daytime Phone: (208) 290-8371

Name & Address of Attorney, if any:

Clive J. Strong, Attorney At Law  
14512 38th Ave. NE  
Lake Forest Park, WA 98155

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT

Name: United States of America, as trustee on behalf of the Kalispel Tribe of Indians of the Kalispel Indian Reservation, acting through the Northwest Regional Director  
Address: Department of Interior, Bureau of Indian Affairs, 911 N.E. 11<sup>th</sup> Ave., Portland, OR 97232

D. I object to the following elements or general provision as recommended in the Director's Report. (Please check the appropriate box(es)).

1.  **Name and Address**  
Should be: See Section E. Reasons Supporting Objections
2.  **Source**  
Should be: See Section E. Reasons Supporting Objections
3.  **Quantity**  
Should be: See Section E. Reasons Supporting Objections
4.  **Priority Date**  
Should be: See Section E. Reasons Supporting Objections
5.  **Point of Diversion**  
Should be: See Section E. Reasons Supporting Objections
6.  **Instream Flow Beginning and Ending Point**  
Should be: See Section E. Reasons Supporting Objections
7.  **Purpose(s) of Use**  
Should be: See Section E. Reasons Supporting Objections
8.  **Period of Year**  
Should be: See Section E. Reasons Supporting Objections
9.  **Place of Use**  
Should be: See Section E. Reasons Supporting Objections
10.  **General Provision**     Individual Water Right     All Water Rights  
 Should not be recommended.  
  
 This general provision was not recommended but should be recommended as described below.  
Should be: \_\_\_\_\_  
  
 General provision was recommended but should be modified as described below.  
Should be: \_\_\_\_\_

11.  **I object** because the recommendation contains an accomplished transfer under Idaho Code § 42-1425 resulting in injury to my water right(s) and/or enlargement of the original right.

12.  **I object because:**  
 This water right should not exist.

This water right was not recommended, but should be recommended with the elements described above.

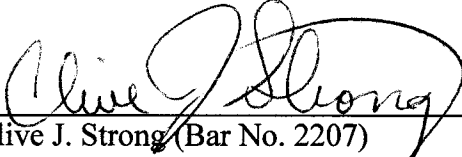
**E. REASONS SUPPORTING OBJECTION(S):** \_\_\_\_\_

1. The Kalispel Tribe's aboriginal title was extinguished; and therefore, no legal basis for the claim exists.

2. The "operative documents and circumstances surrounding the creation of the Kalispel Reservation, including but not limited to, the Executive Order signed by President Wilson on March 23, 1914," do not support this claim.

3. In the event the claimed water right is found not to have been fully extinguished, Idaho Forest Group, LLC objects to the claim on the basis that it exceeds the minimum amount reasonably necessary to achieve the claimed primary purpose.

Dated: June 21, 2026

  
\_\_\_\_\_  
Clive J. Strong (Bar No. 2207)  
Attorney for Idaho Forest Group, LLC.

**F.**

**CERTIFICATE OF MAILING**

I certify that on June 21, 2026, I mailed the original and copies of this objection, including all attachments, to the following persons:

1. Original to: Clerk of the District Court  
Clark Fork – Pend Oreille River Basins Adjudication  
253 Third Avenue North  
PO Box 2707  
Twin Falls, ID 83303-2707

2. One copy to the claimant of the water right at the following address:

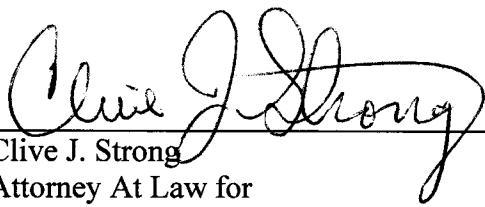
Vanessa Boyd Willard  
Marisa J. Hazell  
Trial Attorneys  
United States Department of Justice  
Environmental and Natural Resources Division  
Tribal Resources Section  
999 18<sup>th</sup> Street, Suite 370  
Denver, CO 80202

3. Copies to:

IDWR Document Depository  
PO Box 83720  
Boise, ID 83720-0098

United States Department of Justice  
Environment & Nat'l Resources Div  
P.O. Box 7611  
Ben Franklin Station  
Washington, D.C. 20044-7611

Chief, Natural Resources Division  
Office of Attorney General  
State of Idaho  
PO Box 83720  
Boise, ID 83720-0010

  
\_\_\_\_\_  
Clive J. Strong  
Attorney At Law for  
Idaho Forest Group, LLC.