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**BEFORE THE IDAHO DEPARTMENT OF WATER RESOURCES**

| | |
|---|---|
| IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS. | **SUEZ'S 2017 UPDATE REPORT ON IMAP AND *2065 MASTER WATER PLAN*** |

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## I. APPLICANT

These proceedings were initiated by Applicant United Water Idaho Inc. ("United Water"). In 2015, United Water changed its name to Suez Water Idaho Inc. ("Suez"). The name change reflected a desire for consistent corporate branding and was not the result of any change in ownership or management. See *Suez's Motion to Change Caption to Reflect Name Change* (Mar. 6, 2017). This submission of *Suez's 2017 Update Report on IMAP and 2065 Master Water Plan* ("*2017 Update*") to the Idaho Department of Water Resources ("Department" or "IDWR") employs the name United Water or Suez depending on the time frame of the reference.

## II. PURPOSE OF THE IMAP

Suez's Integrated Municipal Application Package ("IMAP") is a collection of water right transfer applications and permit amendment applications. The IMAP includes most, but not all, of Suez's water rights and permits.

The IMAP does not seek any additional appropriation of water. Instead, the IMAP serves three purposes:

1. It seeks alternative points of diversion ("APODs")[1] for 101 of its ground water rights and permits[2] and one additional point of diversion ("POD") for surface permit No. 63-12055.
2. It secures protection for forfeiture under the Municipal Water Rights Act of 1996 during the 50-year planning horizon for all rights included in the IMAP.

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[1] APODs are explained and discussed extensively in *United Water's Statement Updating and Explaining the IMAP Relaunch* ("*2012 Update*") (Aug. 14, 2012), pp. 14-33.

[2] As discussed below in section V.C(3) at page 14, the PODs for the Marden treatment plant's Ranney collector rights are not included in the "global" APOD list of ground water diversion points.

3. It tidies up various other aspects of the rights and permits: For example, it provides for a uniform description of the service area, nature of use, and season of use, and it eliminates volume limits (by reducing the instantaneous flow rate).

## III. PARTIES

In addition to the Applicant, the entities in the chart below are parties to this proceeding. Note that those labeled "Interested Parties" are not true parties. They are included on the service list and have only limited rights to participate (e.g., in status conferences) with no right of appeal.[3] Party status is discussed further in *Suez's Motions Regarding Party Status and Service Protocol* (Mar. 6, 2017) and *Suez's Amendment to Motions Regarding Party Status and Service Protocol* (Mar. 9, 2017).

**Table 1**

**Party Status and Representation as of April 28, 2017**

| Intervenors in support | | |
|---|---|---|
| Intervenor | | Representative |
| 1. | City of Boise | Stephan L. Burgos<br>Director, Public Works Department |
| | | Abigale R. Germaine[4]<br>City Attorney's Office |
| 2. | City of Caldwell | Brent Orton<br>Public Works Director and<br>City Engineer |
| 3. | City of Meridian | Warren Stewart<br>City Engineer |
| | | Kyle Radek<br>Assistant City Engineer |
| | | Charles L. Honsinger<br>Honsinger Law, PLLC |

[3] The Hearing Officer, Gary Spackman, described the "interested parties" as follows: "The following entities have filed notice reaffirming their intention to participate in this matter, but will need to be granted intervention to participate as a party." *Order Affirming Party Status and Notice of Status Conference* (Aug. 8, 2012), p. 2.

[4] *Suez's Amendment to Motions Regarding Party Status and Service Protocol* (Mar. 9, 2017) listed Stephan L. Burgos and Douglas K. Strickling as representing the City of Boise. Suez subsequently learned that Mr. Strickling will be retiring soon. The City has asked that Ms. Germaine be identified as counsel for the City of Boise in lieu of Mr. Strickling.

| Protestants | | |
|---|---|---|
| Protestant | | Representative |
| 1. | Boise Project Board of Control | Albert P. Barker<br>Shelley M. Davis<br>Barker, Rosholt & Simpson, LLP |
| 2. | Big Bend Irrigation District | |
| 3. | Boise-Kuna Irrigation District | |
| 4. | Wilder Irrigation District | |
| 5. | Nampa & Meridian Irrigation District | S. Bryce Farris<br>Andrew J. Waldera<br>Sawtooth Law Offices, PLLC |
| 6. | Settlers Irrigation District | |
| 7. | City of Middleton | Christopher E. Yorgason<br>Middleton City Attorney<br>Yorgason Law Offices, PLLC |
| 8. | Star Water & Sewer District | Cherese D. McLain<br>Moore, Smith, Buxton & Turke, Chartered |
| Interested Parties | | |
| Interested Party | | Representative |
| 1. | City of Eagle | Cherese D. McLain<br>Moore, Smith, Buxton & Turke, Chartered |
| 2. | City of Kuna | Richard T. Roats<br>Kuna City Attorney |
| | | Gordon N. Law<br>City Engineer and Public Works Director |
| 3. | City of Pocatello | Josephine P. Beeman[5]<br>Law Office |
| | | A. Dean Tranmer<br>Pocatello City Attorney |
| Former Parties (Protests Withdrawn) | | |
| Former Party | | Representative |
| 1. | The Terteling Company and T-7, LLC | *Formerly:*<br>Charles L. Honsinger<br>Ringert Law |
| 2. | Estate of Eleanor Chase | |
| 3. | City of Star | Christopher E. Yorgason<br>Star City Attorney<br>Yorgason Law Offices, PLLC<br>*Formerly:*<br>Bruce M. Smith<br>Moore, Smith, Buxton & Turke, Chartered |
| 4. | Pioneer Irrigation District | S. Bryce Farris<br>Andrew J. Waldera<br>Sawtooth Law Offices, PLLC<br>*Formerly:*<br>Scott L. Campbell<br>Moffatt, Thomas, Barrett, Rock & Fields, Chtd. |
| 5. | U.S. Bureau of Reclamation | E. Gail McGarry<br>Program Manager, Water Rights & Acquisitions |
| | | Matt J. Howard<br>Water Rights Analyst<br>U.S. Bureau of Reclamation |

[5] Suez is unable to confirm the status and representation of the City of Pocatello. Attempts to reach Ms. Beeman and Mr. Tranmer have been unsuccessful. Ms. Beeman previously appeared on behalf of the City. Mr. Tranmer has not appeared on behalf of the City; he is listed here because he serves as City Attorney.

If the table above or the Service List below contain incorrect or obsolete information, Suez urges the affected parties to contact Suez and to file any appropriate notice with the Department.

## IV. PRIOR PROCEEDINGS

### A. 2001 through 2003

This proceeding was initiated by United Water's filing of the IMAP on May 4, 2001. The 2001 IMAP included a 50-year forecast of reasonably anticipated future needs ("RAFN") within its planning area for the years 2000-2050.[6] An amended version of the IMAP was submitted on March 20, 2002 (with an Errata submitted on July 15, 2002). That version was amended again (at the direction of the Hearing Officer) by marginal notes approved by IDWR staff on April 9, 2003. We refer to this amended document as the 2003 IMAP.

On December 18, 2003, the Director of the Idaho Department of Water Resources ("IDWR" or the "Department") formally stayed the IMAP proceeding pending determination of United Water's SRBA claims by the District Court.

### B. 2012 Relaunch

Following the issuance of partial decrees in the SRBA, United Water filed *United Water's Motion to Lift Stay and Request for Status Conference* on October 6, 2011. The stay was lifted on June 6, 2012.

At a status conference on July 24, 2012, the Hearing Officer (Director Spackman) requested United Water to file "an updated report describing the changes it intends to pursue in the 2012 update." This is described in *Order Denying Motion to Dismiss Integrated Municipal Application Package (IMAP)* ("*Denial Order*") at page 1 (Jan. 11, 2013).

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[6] "Planning area" refers to Suez's anticipated future service area (less any excluded areas) at the end of the 50-year planning horizon.

In response, United Water filed a 124-page explanation entitled *United Water's Statement Updating and Explaining the IMAP Relaunch* ("*2012 Update*") (Aug. 14, 2012). The *2012 Update* was followed by a two-page Errata statement on August 28, 2012, which corrected certain references to existing wells.

On November 14, 2012, Boise Project Board of Control et al. filed a motion to dismiss the IMAP. The Hearing Officer (Director Spackman) denied that motion on January 11, 2013. *Denial Order.*

The *Denial Order* instructed United Water to "schedule a meeting with Department staff to identify and explain the 2012 changes" after which "United Water will deliver copies of the amended IMAP on all parties." *Denial Order*, p. 2. United Water complied with the directive. *United Water's Further Submission in Compliance with the Director's January 11, 2013 Order* ("*2013 Further Submission*") (Feb. 13, 2013).

The *2013 Further Submission* set out three updated documents, each of which was prepared in consultation with IDWR staff in compliance with the *Denial Order*:

- Attachment A to the *2013 Further Submission* is a list of all Suez water rights that are included in the IMAP transfer proceeding as of 2013.
- Attachment B to the *2013 Further Submission* is a list of all 81 alternative points of diversion (APODs) sought for all Suez ground water rights included in the IMAP (except the ground water rights associated with the Ranney collectors at the Marden Treatment Plant).
- Attachment C to the *2013 Further Submission* is the "Pink Line Map" showing Suez's planning area over the next 50 years. It is identical to the map included as Exhibit 1 to the *2065 Master Water Plan* (discussed in section VI at page 18).

There have been no changes to the APOD list or the Pink Line Map since 2013. Revisions to the list of water rights included in the IMAP since 2013 are described in section V.D beginning at page 14 below.

### C. Informal stay (2013 to 2017)

The RAFN forecast that formed the basis of the original IMAP was 11 years old by the time of the *2012 Update*. At that point, it had become evident that the Department would require United Water to update its 50-year forecast. Accordingly, United Water undertook a comprehensive revision of its 50-year forecast.[7]

United Water thereafter informally sought and obtained from the Department a suspension of activity in the proceeding while that was underway. For reasons discussed below, this revised forecast took over three years to complete.

## V. THE EVOLUTION OF THE IMAP

### A. Today's IMAP

Today's IMAP seeks transfers or amendments of 102 ground water rights and permits, and one surface water permit. Suez's total portfolio includes 112 ground water rights and permits, and 13 surface water rights, permits, and other entitlements.

During the 16 years since the IMAP was filed, Suez's portfolio and the IMAP have evolved somewhat. The modifications are discussed in the following pages of this section. The evolving numbers of ground and surface rights, permits, and other entitlements in the IMAP and in Suez's entire portfolio are summarized in the following table:

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[7] "United Water is now undertaking a re-calculation of its future need projections based on current circumstances. This is not yet completed. As noted in *United Water's Statement of Issues for July 24 Status Conference* dated July 20, 2012, however, preliminary work indicates that the population and water demands projected for United Water's service area at the end of the fifty-year planning horizon have moved downward. At this point we anticipate that United Water's RAFN over a 50-year planning horizon beginning in the year 2012 will be fairly close to its current portfolio of water rights." *2012 Update*, p. 54.

| Table 2 | | | |
|---|---|---|---|
| **Number of Water Rights Included in IMAP By Source of Right** | | | |
| Source of right | 2003 IMAP | 2012 IMAP | 2017 IMAP |
| Ground water: | 107 | 105 | 102 |
| Surface water: | 1 | 1 | 1 |
| TOTAL | 108 | 106 | 103 |
| **Number of Water Rights & Entitlements in Portfolio But Not Included in IMAP By Source of Right** | | | |
| Source of right | 2003 IMAP[8] | 2012 IMAP | 2017 IMAP |
| Ground water: | 5 | 7 | 10 |
| Surface water (incl. exchanges): | 5 | 12 | 12 |
| TOTAL | 10 | 19 | 22 |
| **Grand Total – Entire Portfolio** | | | |
| Source of right | 2003 IMAP | 2012 IMAP | 2017 IMAP |
| Ground water: | 112 | 112 | 112 |
| Surface water (& exchanges): | 6 | 13 | 13 |
| GRAND TOTAL | 118 | 125 | 125 |

An updated spreadsheet listing all rights, permits, and other entitlements in Suez's portfolio (not just those included in the IMAP) is set out as Exhibit 2 to the *2065 Master Water Plan*. An updated spreadsheet listing only those rights and permits included in today's IMAP is set out as Exhibit A to this *2017 Update*. (In other words, Exhibit A to this *2017 Update* is the same as Exhibit 2 to the *2065 Master Water Plan*, except that the non-IMAP rights, permits, and other entitlements are removed from Exhibit A.) Thus, Exhibit A to this *2017 Update* serves as an updated version of the list of IMAP water rights and permits set out as Attachment A to the *2013 Further Submission* (which was prepared at the direction of the Hearing Officer).[9]

[8] This tally does not include permit No. 63-31243, which was omitted inadvertently from the 2003 IMAP, but, in any event, is no longer owned by Suez. *2012 Update*, pp. 42-43. Nor does it include 4 permits (63-12424, 63-12463, 63-12506, and 63-12552) that were included in the 2001 IMAP but withdrawn prior to the 2003 IMAP, and are no longer owned by Suez. *2012 Update*, p. 42; *2017 Update*, footnote 10 at page 11.

[9] In order to save space, the columns labeled "Place of Use (after transfer)" and "Period of Use (after transfer)" in Attachment A to the *2013 Further Submission* are omitted from Exhibit 2 to the *2065 Master Water*

### B. Six water rights and permits that are no longer part of Suez's portfolio

For the reasons discussed below, the following six rights and permits (which were included in the 2001 IMAP) are no longer part of Suez's current portfolio. Accordingly, they are not included in either Exhibit 2 of the *2065 Master Water Plan* (portfolio list) or Exhibit A to this *2017 Update* (list of IMAP rights).

#### (1) No. 63-10533

On July 17, 2012, United Water submitted *United Water's Withdrawal of Water Right No. 63-10533 from IMAP*, explaining that United Water no longer owned this ground water right. This was discussed in the *2012 Update*, p. 8. Accordingly, Exhibit C to the *2012 Update* identified No 63-10533 as <u>not</u> included in either the IMAP or the portfolio, and the right was not listed at all in Attachment A (IMAP water rights) of the *2013 Further Submission.*

#### (2) No. 63-7077

Another ground water right, No. 63-7077, was identified in the 2003 IMAP, but was called out in a footnote as redundant with No. 63-4015. 2003 IMAP, Spreadsheet 1, Tab J. Consequently, its quantity was <u>not</u> included in the portfolio total (see footnote 17 at page 16). Accordingly, it was included in the list of 93 pre-change ground water licenses in (2003 IMAP, Spreadsheet 2, Tab K), but was <u>not</u> included in the list of 92 post-change licensed ground water rights (2003 IMAP, Spreadsheet 3, Tab L). It was not claimed in the SRBA and has thereby been relinquished. It was identified in Exhibit C (portfolio list) of the *2012 Update* as being included in neither the IMAP list nor the portfolio. It was not listed at all in Attachment A (IMAP water rights) of the *2013 Further Submission.*

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*Plan* and Exhibit A to this *2017 Update*. The post-transfer place of use for each IMAP right is the same ("Suez Service Area") and the post-transfer season of use for each IMAP right is also the same ("1/1 to 12/31").

#### (3) Nos. 63-12424, 63-12463, 63-12506, and 63-12552

On January 22, 2003, United withdrew four applications for amendment of permits (63-12424, 63-12463, 63-12506, and 63-12552) associated with non-contiguous system components that lie outside of the planning area.[10] These were included among the rights in the 2001 IMAP, but were shown as deleted on the 2003 IMAP. They have subsequently lapsed or been sold. Accordingly, they were identified as "removed" in the portfolio list in Exhibit C to the *2012 Update*, and were not included in the IMAP list in Attachment A to the *2013 Further Submission*.

### C. Twenty-two water rights withdrawn or excluded from the IMAP that remain in the portfolio

#### (1) Five rights and permits were not included in the 2003 IMAP

Five ground water rights and permits (Nos. 63-31406, 63-2915, 63-3239, 63-31856, and 63-31857) were not included in the 2003 IMAP, and remain excluded. See footnote 15 at page 16; *2012 Update*, pp. 10-11.

#### (2) Two rights withdrawn in 2010 for transfer

Water right Nos. 63-7066 and 63-12363 were removed from the IMAP in 2010 to facilitate a separate transfer action. *UWID's Notice of Withdrawal of Rights from IMAP* (Mar. 17, 2010). This withdrawal pre-dated the *2012 Update*. Consequently, it was discussed in the *2012 Update*, p. 8, and the withdrawal was reflected in the spreadsheets attached to the *2012 Update* and the *2013 Further Submission*.

#### (3) Three Ranney collector rights

The 2003 IMAP included one licensed right (No. 63-2892) associated with the Marden treatment plant's Ranney collectors. During the SRBA process, three ground water rights (Nos.

63-31797, 63-31798, and 63-31879) were "split" off of the licensed ground water right (No. 63-2892) and assigned earlier priority dates based on accomplished transfers of beneficial use rights. See discussion in *2012 Update*, pp. 22-23. All four Ranney collector rights were included among the IMAP rights listed in the *2012 Update* and the *2013 Further Submission.*

A question arose as to whether the early priority dates associated with the "split" rights would require re-advertisement of the IMAP. In order to moot that issue, United Water elected to remove the three early-priority rights from the IMAP.[11] Accordingly, on March 26, 2013 (subsequent to the *2013 Further Submission*), United Water submitted *United Water's Notice of Withdrawal of Water Right Nos. 63-31797, 63-31798, and 63-31879.* This had the effect of withdrawing these three water rights from the IMAP transfer applications, but had no effect on the water rights themselves. Accordingly, only No. 63-2892 is included in the current IMAP list (Exhibit A to the *2017 Update*), while all four (Nos. 63-2892, 63-31797, 63-31798, and 63-31879) are included in the current portfolio list (Exhibit 2 to the *2065 Master Water Plan*).

**(4) Twelve surface water rights and entitlements excluded from the IMAP**

As noted, the IMAP includes only one surface water entitlement (permit No. 63-12055). Suez owns (or is entitled to use[12]) 12 other surface water rights and entitlements (in addition to water bank rentals and short-term leases): Nos. 2-2339, 2-2341, 2-2358, 2-2420, 63-20041

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[10] *UWID's Notice of Withdrawal of Four Applications for Amendment of Permit from the IMAP and Motion to Amend the IMAP* (dated Jan. 20, 2003, filed Jan. 22, 2003).

[11] The Hearing Officer noted in his *Denial Order* at page 2 that "United Water included several water rights with earlier priority dates in the 2012 Update Statement that were not described in the 2002 legal notice may need to be advertised." United Water disagreed, *2013 Further Submission* at 7-10, but decided it was simpler to resolve the issue by withdrawing the early priority rights from the IMAP.

[12] Surface water No. 63-20041 (formerly 63-165L) (for 36.37 cfs) is held by the Boise Water Canal Company. Suez is entitled to use the portion of this right allocated to municipal use (0.68 cfs).

(formerly 63-165L), 63-169F, 63-243E, 63-243H, 63-31409, 63-31871, and contract entitlements for Anderson Ranch and Lucky Peak reservoirs.

Though not included in the IMAP for purposes of transfer or amendment, each of these 22 rights, permits, and other entitlements has been fully disclosed and is included in the quantification of Suez's portfolio for gap analysis purposes. *2012 Update*, pp. 44-47; *2065 Master Water Plan*, pp. 35-42.

### D. IMAP changes since 2013

The three attachments to Suez's *2013 Further Submission* discussed in section IV.B at page 7 (the list of IMAP rights, the list of ground water APODs, and the Pink Line Map) continue to accurately reflect current circumstances <u>except</u> for the following:

- As noted above, Suez has excluded three of the four Ranney collector water rights from the IMAP. Accordingly, Nos. 63-31797, 63-31798, and 63-31879 have been deleted from the list of IMAP water rights set out in Exhibit A to this *2017 Update*. This will have no effect on the list of 81 APODs, because the Ranney collector PODs were not included on the "global" APOD list for the IMAP Relaunch.[13] The one Ranney collector right that remains in the IMAP (No. 63-2892) is correctly identified in the portfolio list in Exhibit 2 of the *2065 Master Water Plan* and Exhibit A to this *2017 Update* as having three PODs within the same quarter-quarter (after the IMAP transfers are approved). This is a clarification of the description in Attachment A to the *2013 Further Submission*, which simply described the PODs as "Marden Collectors."

- One POD was omitted from the 2012 and 2013 spreadsheets describing surface water permit No. 63-12055.[14] This does <u>not</u> affect the list of 81 ground water APODs. The two PODs are correctly displayed in the current portfolio lists (*2065*

[13] The PODs for the Ranney collector license (No. 63-2892) were included on the APOD list for the 2003 IMAP (Spreadsheet 5, Tab N), but they were dropped from the APOD list at the time of the 2012 Relaunch (*2012 Update*, Exhibit D, p. 87).

[14] This is the <u>surface</u> water intake for the Marden Treatment Plant, permit No. 63-12055. It is the only one of Suez's surface rights that is included in the IMAP. Suez explained in the *2012 Update* at page 24 that it is seeking a second POD for this right at the existing Columbia Treatment Plant. However, the spreadsheet of portfolio rights attached to the *2012 Update* (Exhibit C) and the spreadsheet of IMAP rights attached to the *2013 Further Submission* (Attachment A) inadvertently failed to reflect that second POD. Note that Suez is not seeking global APOD authority for this or any surface water right. Nor are either of these two Boise River PODs included on the list of 81 APODs for ground water rights.

*Master Water Plan*, Exhibit 2 and *2017 Update*, Exhibit A) and in the current IMAP list (*2017 Update*, Exhibit A).

- Exhibit 2 of the *2065 Master Water Plan* and corresponding Exhibit A to this *2017 Update* display some minor changes to post-transfer water right quantities, as discussed in the text following Table 4 below.

The *2012 Update* and the *2013 Further Submission* tallied 106 water rights included in the IMAP (including 93 originally licensed rights, five "beneficial use" rights, and eight permits). *2012 Update*, Table 1, p. 10. The SRBA Court issued partial decrees for each of the five beneficial use rights, and for 72 of the rights originally based on a license. The other 21 originally licensed rights and the eight permits were not required to be claimed in the SRBA and, therefore, have no partial decrees. Thus, the group of 106 water rights in the 2012 IMAP can be described as including rights based on 77 partial decrees, 21 licenses, and eight permits.

Since 2013, the only change in the list of water rights included in the IMAP is the March 26, 2013 withdrawal of the three junior-priority Ranney collector rights, as described above in section V.C(3) at page 12. None of Suez's eight permits included in the *2013 Further Submission* has gone to license or lapsed, and no new permit applications have been filed nor permits granted. Accordingly, the number of water rights in the 2003, 2012, and 2017 versions of the IMAP may be summarized as follows:

**Table 3**

**Number of Water Rights Included in IMAP By Basis of Right**

| Basis of right | 2003 IMAP | 2012 IMAP | 2017 IMAP |
|---|---|---|---|
| Partial decrees: | 0 | 77 | 74 |
| Licenses: | 91 | 21 | 21 |
| Permits: | 15 | 8 | 8 |
| Ben. use claim | 2 | 0 | 0 |
| TOTAL | 108 | 106 | 103 |

As shown on Table 2 in section V.A above, the 2003 IMAP included all but five of United Water's then-existing ground water rights and permits.[15] Aside from one surface water right (No. 63-12055, discussed in the next paragraph), the 2003 IMAP included none of United Water's other surface water entitlements. Today's IMAP includes all but 10 of Suez's currently held ground water rights,[16] and continues to exclude all but one of its surface water entitlements.

From the outset, the IMAP has included only one (No. 63-12055) of Suez's 13 surface water rights and other entitlements. No. 63-12055 could have been excluded from the IMAP. Its PODs, obviously, are not included among the 81 ground water APODs. It was included simply because Suez is seeking an additional POD for this right—essentially its own mini-APOD list (the Marden plant POD and the Columbia plant POD).

The post-IMAP-transfer diversion quantity of Suez's total portfolio has increased modestly from the amount stated in the 2003 IMAP until today: from 302.84 cfs[17] to 330.58

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[15] Of the five ground water rights and permits not included in the 2003 IMAP: One was only a permit application at the time (No. 63-31406). The other four were licenses and beneficial use claims discovered, claimed, and decreed during the SRBA process (Nos. 63-2915, 63-3239, 63-31856, and 63-31857). *2012 Update*, pp. 10-11.

[16] Of the 10 ground water rights and permits not included in today's IMAP: Five are the same as those not included in the 2003 IMAP. See footnote 15. Two were withdrawn for transfer (Nos. 63-7066 and 63-12363). See section V.C(2) at page 13. Three of them are the Ranney collector rights (Nos. 63-31797, 63-31798, and 63-31879) discussed in section V.C(3) at page 14.

[17] The quantity for the total portfolio in 2003, 302.84 cfs, appears in Table 11 at page 50 of the 2003 IMAP. This quantification, though not explained in the text of the 2003 IMAP, was based on the sum of three numbers:

- 222.46 cfs (total of 92 ground water licensed and statutory rights) (as shown on page 2 of Spreadsheet 3, Tab L, of the 2003 IMAP) (one fewer than the 93 listed under Tab J, because redundant right No. 63-7077 was eliminated post-transfer),
- 63.66 cfs (total of 15 permits—1 surface, 14 ground water) (as shown on page 1 of Spreadsheet 4, Tab M, of the 2003 IMAP, and
- 16.21 cfs (total of five surface water contract entitlements) (as shown on Table 10, page 38, of the 2003 IMAP).

cfs[18] (a difference of 27.74 cfs). The water rights and permits involved in this difference were described in the *2012 Update*, and are summarized in Table 4 below:

**Table 4**

**Diversion rate differences in Suez's total portfolio (2003 IMAP compared to present)**

| Right No. | Added to Portfolio/ Removed from Portfolio/ Modified | Change in cfs (+/-) | Reason for addition, removal, or modification of right | Where right is discussed or referenced in *2012 Update* |
|---|---|---|---|---|
| 63-10533 | Removed | -0.52 | Sold | *2012 Update*, pp. 8-9, 10, 12, 13 |
| 63-12432 | Removed | -4.50 | Lapsed permit | *2012 Update*, pp. 9, 10, 13 |
| 63-31406 | Added | 1.11 | Permit issued | *2012 Update*, pp. 10, 43-44 |
| 63-2915 | Added/Modified | 1.42 | Late discovered | *2012 Update*, pp. 11, 44 |
| 63-3239 | Added/Modified | 0.42 | Late discovered | *2012 Update*, pp. 11, 44 |
| 63-31856 | Added | 2.12 | Late discovered | *2012 Update*, pp. 11, 44 |
| 63-31857 | Added | 2.48 | Late discovered | *2012 Update*, pp. 11, 44 |
| 63-31409 | Added | 0.00 | Post-2003 permit | *2012 Update*, pp. 46-47 |
| 2-2341 | Added | 35.21 | Post-2003 exchange | *2012 Update*, p. 46 |
| 2-2358 | Added | | Post-2003 exchange | *2012 Update*, p. 46 |
| 2-2420 | Added | | Post-2003 exchange | *2012 Update*, p. 46 |
| 63-31871 | Added | | Post-2003 exchange | *2012 Update*, p. 46 |
| 63-3457 | Modified | -1.44 | Volume limit | *2012 Update*, pp. 19-20, 40, 42, 53 |
| 63-10945 | Modified | -1.46 | Rate and volume limit | *2012 Update*, pp. 20, 35-42, 51, 53 |
| 63-12363 | Modified | -1.67 | Volume limit | *2012 Update*, pp. 8, 10, 12, 13, 43, 53 |
| 63-3448 | Modified | 0.01 | Rounding | *2012 Update*, pp. 16, 40 |
| 63-12139 | Modified | -1.70 | Licensed quantity | *2012 Update*, p. 51 |
| 63-169F | Modified | -0.42 | Volume limit | *2012 Update*, pp. 45, 46 |
| 63-243E | Modified | -1.97 | Volume limit | *2012 Update*, pp. 45, 46 |
| 63-243H | Modified | -0.60 | Volume limit | *2012 Update*, pp. 45, 46 |
| 63-4395 | Modified | -0.42 | Rate and volume limit | *2012 Update*, pp. 10, 19-20, 51-53 |
| 63-8385 | Modified | -0.25 | Rate and volume limit | *2012 Update*, pp. 19-20, 42, 52-53 |
| 63-10150 | Modified | -0.08 | Rate and volume limit | *2012 Update*, pp. 19-20, 42, 52-53 |
| NET CHANGE | | 27.74 | | |

The quantities listed in the column labeled "Change in cfs (+/-)" use the 302.84 cfs portfolio described in the 2003 IMAP as the baseline for calculations. The details for adjustments (i.e., modifications) to a water right's quantity are set out in Section VI and Exhibit 2 to the *2065 Master Water Plan*.

[18] The quantity 330.58 appears on Table 7 at page 36 of the *2065 Master Water Plan*. This, in turn, corresponds to the sum of all water right quantities listed under the column "EFFECTIVE CFS" in Exhibit 2 to the *2065 Master Water Plan*, less the 20 cfs for No. 63-31409 discussed at pages 38-40 of the *2065 Master Water Plan*.

## VI. *2065 MASTER WATER PLAN* AND THE REVISED 50-YEAR DEMAND

As noted in section IV.C at page 9, Suez has undertaken a comprehensive revision of its 50-year demand forecast—pushing out the projection to the year 2065. This is incorporated into Suez's water supply planning document entitled *Master Water Plan for the Years 2015 to 2065* ("*2065 Master Water Plan*"), which will be submitted separately for filing in this proceeding. The *2065 Master Water Plan* serves as Suez's official long-range planning document for water rights. Separate documents (with shorter planning horizons) address Suez's infrastructure planning. The *2065 Master Water Plan* was approved by Suez's Vice President and General Manager on September 23, 2016 (as shown on its cover). Subsequent "errata" corrections (which have no effect on the 50-year forecast) are noted on the inside cover (dated April 28, 2017).

The updated 50-year demand forecast for the years 2015 to 2065 prepared by Suez's consultant, John S. Church ("Church Forecast") is set out in Section V of the *2065 Master Water Plan*, pp. 8-35.[19] This new forecast replaces the forecast prepared by Mr. Church that formed the basis of the 2003 version (and prior versions) of IMAP.

The *2065 Master Water Plan* maintains the same 50-year duration for the planning horizon as the initial RAFN forecast in the 2003 IMAP. However, the starting and ending dates were pushed out 15 years, so that it now covers the years 2015 through 2065.

The 2015-2065 forecast projects lower demand than did the 2000-2050 forecast. For example, compared to the 2003 IMAP, the new peak demand projection for the year 2050 drops

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[19] The supporting data spreadsheets for the Church Forecast are set out in Appendix A to the *2065 Master Water Plan*. Mr. Church's affidavit and resume are set out as Exhibits 3 and 4, respectively, of the *2065 Master Water Plan*. As noted in his affidavit, Mr. Church is the supervising author responsible for Section V of the *2065 Master Water Plan*. He is also responsible for preparation of the supporting data set out in Appendix A of the *2065 Master Water* Plan.

from 415.7 cfs to 284 cfs. The new peak demand projection (370.87 cfs[20]) for the year 2065 is lower by 44.83 cfs than the original projection for year 2050 (415.7 cfs).

This reduction in forecasted demand is a function primarily of three things: (1) the impact of the "Great Recession" following the national economic crisis beginning in 2007, (2) improved prediction methodologies (consistent with IDWR's new guidance on RAFN forecasting[21]), and (3) new and more accurate data (including 2010 Census data, extensive new data collected by the Community Planning Association of Southwest Idaho ("COMPASS"), and another decade of Suez's production data).

## VII. CORROBORATION OF THE CHURCH FORECAST

### A. Don Reading Review

Following the completion of Mr. Church's revised RAFN forecast, Suez retained Dr. Don C. Reading of Ben Johnson Associates, Inc. in December of 2013 to review and critique the Church Forecast. Dr. Reading was selected for this task because he was the economist hired by IDWR to assist the Department in preparing its *RAFN Guidance*.[22] In undertaking his review, Dr. Reading was given full access to Mr. Church and his supporting data. Extensive review and consultation between Mr. Church and Dr. Reading followed. As a result, some revisions and clarifications were made by Mr. Church to his forecast, although his general methodology has remained unchanged.

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[20] The peak demand (aka Maximum Day Demand or MMD) of 370.87 is explained in section V(D)(12) of the *2065 Master Water Plan*, pp. 30-32, and is displayed on Table 4 of the *2065 Master Water Plan*, p. 32.

[21] Mat Weaver, *Memorandum – Application Processing No. 74, Permit Processing No. 20, License Processing No. 13, Transfer Processing No. 29* (Mar. 16, 2015) (replacing Nov. 15, 2014 and Nov. 13, 2013 versions) ("*RAFN Guidance*").

[22] "The 'Population Projection within the Planning Horizon' section of the RAFN handbook was prepared in conjunction with and under the review of Don Reading, Ph.D., a consulting economist with Ben Johnson Associates, Inc." *RAFN Guidance*, p. 9, footnote 2.

Ultimately, on July 8, 2016, Dr. Reading provided a report entitled *A Review of the Population and Water Demand Forecasts in Suez Idaho Inc.'s Master Water Plan (2015 – 2065)* ("*Reading Report*") (Exhibit 5 to the *2065 Master Water Plan*). The *Reading Report* concludes that (1) the Church Forecast comports with the Department's guidance and (2) its demand projections are at the low end of other predictions and the predictive tool approved by the Department:

> This Report generally follows the reasonably anticipated future needs (RAFN) Guidance issued by the Idaho Department of Water Resources, comparing Suez's forecasts with methodologies, standards, and benchmarks in the RAFN Guidance. . . .
>
> Suez's population and water demand forecasts are reasonable when compared to other contemporary forecasts. The contemporary forecasts used for comparison in this Report were developed for TV CAMP, COMPASS, and the Department's DCMI Report. An additional check of Suez's population projections was made using the Department's population forecasting tool referenced in the RAFN Guidance. With the exception of one model form—which, as explained in the Report, is not a good predictor of future population—all of Suez's projections are lower or equal to the other forecasts derived from the Department's forecasting tool.

*Reading Report* at 3 (footnote omitted).

### B. Christian Petrich Review

Meanwhile, in October of 2015, Suez retained Dr. Christian R. Petrich of SPF Water Engineering, LLC to undertake yet another independent review of the Church Forecast. Dr. Petrich was retained particularly to compare the Church Forecast with the 50-year forecast of DCMI (domestic, commercial, municipal, and industrial) water demand in the Treasure Valley commissioned by the Idaho Water Resource Board ("*DCMI Report*"). Dr. Petrich was the primary author of the *DCMI Report*. The *DCMI Report* quantified future municipal water demand throughout the Treasure Valley. Both forecasts cover the years 2015 to 2065.

Suez asked Dr. Petrich to determine whether the Church Forecast for Suez's planning area is consistent with conclusions reached for the larger geographic area studied in the *DCMI Report*. Specifically, Dr. Petrich was charged with extracting that portion of the *DCMI Report* forecast that corresponds to Suez's planning area in order to make an apples-to-apples comparison of the two. In undertaking his review, Dr. Petrich was given full access to Mr. Church and his supporting data.

Dr. Petrich issued his report on August 1, 2016 (Exhibit 7 to the *2065 Master Water Plan*). He confirmed that the Church Forecast is consistent with forecasts in the *DCMI Report*:

> Despite differences in methodology between Suez and SPF forecasts, the water-demand projections are consistent. The Suez 2065 water-demand projection for the Suez service area (103,000 AF – see Table 3) is similar to SPF's Scenario 2 water-demand projection (106,000 AF). . . .
>
> In my view, Scenario 2 (106,000 AF/year) is the most probable of the SPF scenarios given current water-use and urban-development trends.

*Petrich Report* at 3-4.

### C. Conclusion

In sum, the Church Forecast set out in the *2065 Master Water Plan* is more conservative than his prior forecast, relies on the most recent and comprehensive data available, conforms to IDWR's *RAFN Guidance*, and is consistent with the 50-year Treasure Valley demand forecast for the same time frame (2015 to 2065) developed for the Idaho Water Resource Board.

## VIII. MODEST GROWTH RATE

The Church Forecast predicts annual water demand growth of less than 1.85% percent over the next 50 years. This equates to a total increase of a multiple of 2.5 over that 50-year period. This increase in water demand, in turn, is based on a projected population growth rate of just 1.20% within the planning area (less than the annual growth rate of 1.69% for all of Ada

County). The growth rates associated with the Church Forecast are discussed in detail in Section V(E) of the *2065 Master Water Plan* at pages 32-35.[23]

IDWR's *RAFN Guidance* sets a benchmark 2.50% rate of annual population growth: "Growth rates in excess of 2.50% were realized by less than 14% of Idaho counties. As such, applicants should provide extra justification for requested growth rates in excess of 2.50% annually." *RAFN Guidance*, p. 9.

Although the Church Forecast's projected growth rate is substantially lower than IDWR's benchmark, the forecast nonetheless includes extensive justification for the requested growth rate.

## IX. GAP ANALYSIS

IDWR's *RAFN Guidance* calls for a "gap analysis" that quantifies the shortfall (if any) between a municipal provider's total portfolio of water rights and its projected RAFN at the end of the planning horizon. The idea is that an applicant for transfer of water rights may not obtain RAFN forfeiture protection for the transferred rights absent a showing that its existing water right portfolio does not exceed its projected future demand.[24]

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[23] In that section, Mr. Church explains that water demand will outpace population growth—even with significant, increasing conservation factored in—because household size is shrinking (which drives up the number of residential customers for the same population) and commercial demand is increasing at a faster pace than population (reflecting increases in both the density of commercial customers and the water demanded by each customer). Mr. Church also notes what while year-round (average) water demand per customer is on the decline, that decline is concentrated in the non-irrigation season. In contrast, peak demand per residential customer (driven by lawn irrigation) is expected to remain relatively stable. *2065 Master Water Plan*, p. 34. See also Mr. Church's discussion of potable versus non-potable irrigation ("NPI") demand. Although the ratio of potable versus NPI for the planning area (in contrast to the rest of Ada County) is expected to increase somewhat in the years ahead (resulting in more lawn irrigation water being supplied by Suez), Mr. Church conservatively assumed that the ratio will not change. *2065 Master Water Plan*, p. 25.

[24] The gap analysis also plays a role in an application for appropriation of new water rights for RAFN purposes. The Department will not approve a RAFN appropriation absent a showing that the applicant's existing portfolio plus the new appropriation does not exceed its long-term needs. Moreover, a gap analysis is required even for a non-RAFN appropriation. In that case, however, the gap analysis compares the existing portfolio with short-term needs. This is not applicable here, because Suez is not seeking a new appropriation.

The *2065 Master Water Plan* sets out such a "gap analysis" comparing Suez's 50-year demand forecast with its current portfolio of water rights.[25] It bears emphasis that the gap analysis looks at Suez's entire portfolio of rights, not just those rights included in the IMAP.

The forecasted peak day production in 2065 (370.87 cfs[26]) exceeds Suez's current portfolio of water rights and entitlements, which authorize, at most, instantaneous diversions of 330.58 cfs (see footnote 18 at page 17). The bottom line is that there is a shortfall or "gap" of 40.29 cfs in the year 2065.

**Table 5**

**Gap Analysis Summary (in 2003 and 2016)**

| | 2003 IMAP (cfs) For year 2050 | 2065 Master Water Plan (cfs) For year 2065 |
|---|---|---|
| Total portfolio | 302.84 | 330.58 |
| RAFN | 416.81 | 370.87 |
| Gap | 113.97 | 40.29 |

In sum, the "gap" has shrunk considerably since the 2013 IMAP. Suez's current portfolio is sufficient to cover its current demands and RAFN through the year 2058. *2065 Master Water Plan*, p. 41. In other words, it will be more than 40 years before Suez will be "short" of water to meet its peak demand. Approval of a 50-year planning horizon will enable Suez to negotiate willing-seller, willing-buyer transactions with other water right holders in the Treasure Valley (notably surface water users) to re-balance its portfolio over time to meet changing delivery system requirements.

[25] United Water's 2003 IMAP also contained a gap analysis, though it did not use that terminology. Table 11 at page 50 of the 2003 IMAP showed a shortfall (or "gap") of 113.97 cfs at the end of the 50-year planning horizon ending in 2050. The *2012 Update* and *2013 Further Submission* did not include any revised gap analysis, because, at that time, United Water had not yet undertaken a revised 50-year forecast.

[26] See footnote 20 at page 20 for the basis of the 370.87 cfs number.

## X. REOPENER

Suez is seeking RAFN protection based on a 50-year planning horizon. In doing so, Suez has made clear from the outset that it is willing to accept an appropriate reopener condition to address changes in circumstances. See *United Water's Statement of Issues for July 24 Status Conference* (July 20, 2012) ("*2012 Statement of Issues*"), Section VI, pp 10-11. The reopener concept is intended to address concerns that Suez's forecast will someday be found to overstate its actual future needs. Suez's willingness to agree to such a condition underscores the fact that Suez is seeking no more than the quantity of water that will actually be necessary to meet future needs.

Under such a condition, the Department would be authorized to require Suez to re-evaluate its future needs from time to time before the end of the planning horizon—presumably no more frequently than every 10 to 20 years. On these occasions, Suez would undertake a revised 50-year forecast from that point forward. In the unlikely, but possible, event that Suez could no longer justify retention of its entire portfolio—in other words, if the new gap analysis showed more water rights than future demand—Suez might be required to relinquish the corresponding "excess" portion of its water rights portfolio.

In 2012, Suez took the position that the Department has authority to impose such a reopener condition under two provisions of the Idaho Water Code. *2012 Statement of Issues*, Section VII, pp. 11-12. Idaho Code § 42-222(1) authorizes the Director to approve changes in water rights "upon conditions." Idaho Code § 42-211 similarly authorizes the Director to approve permit amendments "upon conditions."[27]

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[27] A third statutory provision, Idaho Code § 42-219(1), applies to the licensing of RAFN water rights. It authorizes the Director to impose "such other conditions as the director may deem appropriate." This provision is not applicable to the IMAP, because the IMAP does not entail the licensing of water rights. It only addresses transfers or amendments of existing licenses and permits.

In 2014, Suez engaged retired IDWR chief counsel Phillip J. Rassier to evaluate the legal basis for a RAFN reopener condition.[28] The end result of that legal evaluation was a memorandum from Mr. Rassier to counsel for Suez dated June 5, 2015 ("*Rassier Memo*") (Exhibit 9 to *2065 Master Water Plan*).

Mr. Rassier disagreed with the position taken by Suez. He concluded that Idaho Code Sections 42-222(1) and 42-211 do not authorize the Director to impose a reopener condition that could result in the reduction in the quantity element of a water right prior to the end of the planning horizon. Mr. Rassier concluded that the specific language of Idaho Code § 42-223(2) protecting the full quantity of RAFN rights during the planning horizon overrides the more general language in the statute authorizing the imposition of conditions.[29] This conclusion, however, was limited to re-opener conditions affecting the quantity element of the water right.

In the second part of his memorandum, Mr. Rassier concluded that the Director does have the authority to impose a condition on a RAFN right allowing the Director to adjust the length of the planning horizon in the future. He explained:

> The prohibitions against loss or forfeiture of a RAFN water right contained in Idaho Code § 42-223(2) do not prevent the Director from exercising his authority under Idaho Code § 42-219(1) to conditionally approve the length of the planning horizon for a RAFN right. The condition could provide the Director with the flexibility to periodically review and adjust the planning horizon in accordance with the changing needs of the municipal provider. For example, the condition could set a 50-year planning horizon with authorization for the Director to review the planning horizon at established intervals thereafter. The condition could allow the Director to either extend or reduce the planning horizon as determined appropriate in accordance with the changing

[28] Mr. Rassier's resume is set out in Exhibit 10 of the *2065 Master Water Plan*.

[29] Idaho Code § 42-223(2) provides: "A water right held by a municipal provider to meet reasonably anticipated future needs shall be deemed to constitute beneficial use, and such rights shall not be lost or forfeited for nonuse unless the planning horizon specified in the license has expired and the quantity of water authorized for use under the license is no longer needed to meet reasonably anticipated future needs."

> needs of the municipal provider. . . .
>
> If during review of a planning horizon, the Director determines that not all water available under the RAFN water right is necessary to meet reasonably anticipated future needs, the Director could either extend the term of the planning horizon, or reduce the length of the planning horizon with the intent of allowing it to expire. . . .
>
> With respect to Question No. 2, it is my conclusion that adding a reopener condition to a municipal RAFN water right for the purpose of reviewing and potentially extending or reducing the length of the planning horizon associated with the right, based on change in the reasonably anticipated future needs of the municipal provider, would fall within the discretionary authority of the Director of IDWR. The proposed reopener condition would serve as an appropriate vehicle to provide the Director with the flexibility to periodically review and adjust the planning horizon in accordance with the changing needs of the municipal provider in a manner consistent with the legislative directive contained in Idaho Code § 42-202B(7) and without violating the prohibitions contained in Idaho Code § 42-223(2) because any downward adjustment of the quantity element would occur after the planning horizon has expired.

*Rassier Memo*, pp. 5-6 (*2065 Master Water Plan*, pp. 131-32).[30]

Mr. Rassier's view that the Director lacks authority to condition the quantity element of a RAFN right relies on a very strict (Suez believes overly strict) reading of Idaho Code § 42-223(2). But the question is academic. The Director has the authority to accomplish the goal of avoiding an inflexible over-quantification of RAFN rights by adding a condition allowing the duration of the planning horizon to be shortened or extended (i.e., "pushing out" the 50-year period) if needed to meet changing circumstances.

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[30] In this quotation, Mr. Rassier referred only to the conditioning authority in Idaho Code § 42-219(1). In an email dated April 11, 2017, Mr. Rassier clarified that his conclusion (regarding a re-opener condition for future adjustment of the planning horizon) applies equally to all three statutory provisions authorizing the Director to impose conditions (Idaho Code § 42-219(1), 42-221, and 42-222(1). This email is included in Exhibit 9 to the *2065 Master Water Plan* at pages 135-36.

## XI. CONCLUSION

Suez has prepared this detailed update and explanation in order to assist the Department and the parties in understanding how the IMAP is affected by the revised 50-year forecast in the *2065 Master Water Plan* and other recent developments. Suez welcomes the opportunity to provide further explanation or clarification to any party, and looks forward to working with the Department and all parties to advance these proceedings based on this new information.

Respectfully submitted this 28th day of April, 2017.

GIVENS PURSLEY LLP

By _____
Christopher H. Meyer

By _____
Michael P. Lawrence

Attorneys for Suez Water Idaho Inc.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of April, 2017, the foregoing was filed, served, and copied as shown below.

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| Shelley W. Keen<br>Section Manager, Water Rights Section<br>IDAHO DEPARTMENT OF WATER RESOURCES<br>PO Box 83720<br>Boise ID 83720-0098<br>shelley.keen@idwr.idaho.gov<br>Hand delivery or overnight mail:<br>322 E Front St<br>Boise, ID 83702 | ☐<br>☒<br>☐<br>☐<br>☐ | U. S. Mail<br>Hand Delivered<br>Overnight Mail<br>Facsimile<br>E-mail |

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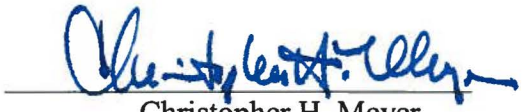

Christopher H. Meyer

## EXHIBIT A: IMAP WATER RIGHTS AND PERMITS

(This is the similar to Exhibit 2 to the *2065 Master Water Plan*, except that the non-IMAP rights have been excluded. This is an updated version of Attachment A to the *2013 Further Submission*)

# IMAP Water Rights and Permits

Dated 4-28-2017

| Right Number | Source | Priority as of 2016 (original priority in brackets if different than 2016) | Purpose of Use as of 2016 | CFS as of 2016 (on face of right) | Rights sharing combined diversion rate limits in 2016 | CFS as of 2016 (reduced to account for combined rate limits) | AFA as of 2016 | Rights sharing combined annual volume limits in 2016 | CFS as of 2016 (reduced to account for elimination of individual and combined annual volume limits) | EFFECTIVE CFS as of 2016 (accounting for the lower of reduction due to combined rate limits and elimination of volume limits) | Original well or diversion name | POD(s) as of 2016 | Post-IMAP transfer PODs | Place of Use as of 2016 | Period of Use as of 2016 | Current basis (or basis prior to decree, if any) | SRBA status |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 103 | <--count | | total --> | 272.35 | | 270.45 | | | | 256.64 | | | | | | | |
| 63-02500 | GW | 8/30/1934 | Municipal | 0.80 | | 0.80 | | | 0.80 | 0.80 | Thirteenth | 43 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-02506 | GW | 6/5/1935 | Municipal | 1.66 | | 1.66 | | | 1.66 | 1.66 | Mountain View | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-02576 | GW | 4/26/1938 | Municipal | 1.90 | | 1.90 | | | 1.90 | 1.90 | Orchid | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-02595 | GW | 8/31/1966 | Municipal | 1.34 | | 1.34 | | | 1.34 | 1.34 | Roosevelt #1 | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-02605 | GW | 7/2/1943 | Municipal | 0.90 | | 0.90 | | | 0.90 | 0.90 | 27th & Lemp | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-02668 | GW | 7/15/1947 | Municipal | 2.14 | | 2.14 | | | 2.14 | 2.14 | Arctic #1 | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-02703 | GW | 6/23/1948 | Municipal | 5.00 | | 5.00 | | | 5.00 | 5.00 | Cliffside | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-02808 | GW | 4/3/1950 | Municipal | 3.10 | | 3.10 | | | 3.10 | 3.10 | Longmeadow | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-02874 | GW | 8/18/1951 | Municipal | 4.00 | | 4.00 | | | 4.00 | 4.00 | Sixteenth St. | 43 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-02892 | GW | 2/7/1952 | Municipal | 6.18 | | 6.18 | | | 6.18 | 6.18 | Marden Collectors Veterans Collectors | Marden Collectors (3 PODs) | Marden Collectors (3 PODs) | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-02954 | GW | 8/27/1953 | Municipal | 0.90 | | 0.90 | | | 0.90 | 0.90 | Empire | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-02956 | GW | 8/27/1953 | Municipal | 0.56 | | 0.56 | | | 0.56 | 0.56 | Biggs | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-02989 | GW | 6/2/1954 | Municipal | 1.00 | | 1.00 | | | 1.00 | 1.00 | Westland Acres | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-03064 | GW | 10/31/1955 | Municipal | 1.22 | | 1.22 | | | 1.22 | 1.22 | Westmore-land | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-03073 | GW | 1/4/1956 | Municipal | 2.00 | | 2.00 | | | 2.00 | 2.00 | Country Club | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |

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Dated 4-28-2017

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|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 63-03105 | GW | 12/19/1956 | Municipal | 2.00 | | 2.00 | | | 2.00 | 2.00 | Franklin Park | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-03112 | GW | 9/11/1957 | Municipal | 1.44 | | 1.44 | | | 1.44 | 1.44 | Kirkwood | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-03128 | GW | 4/24/1958 | Municipal | 4.44 | | 4.44 | | | 4.44 | 4.44 | Taggart #1 | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-03164 | GW | 8/5/1959 | Municipal | 1.73 | | 1.73 | | | 1.73 | 1.73 | Sunrise | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-03172 | GW | 10/14/1959 | Municipal | 2.22 | | 2.22 | | | 2.22 | 2.22 | Hummel | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-03202 | GW | 6/8/1960 | Municipal | 2.89 | | 2.89 | | | 2.89 | 2.89 | Chamberlin #1 | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-03291 | GW | 5/21/1962 | Municipal | 2.40 | | 2.40 | | | 2.40 | 2.40 | Willow Lane #1 | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-03292 | GW | 5/21/1962 | Municipal | 2.26 | | 2.26 | | | 2.26 | 2.26 | Chamberlin #2 | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-03293 | GW | 5/21/1962 | Municipal | 3.56 | | 3.56 | | | 3.56 | 3.56 | Roosevelt #3 | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-03295 | GW | 5/24/1962 | Municipal | 3.24 | | 3.24 | | | 3.24 | 3.24 | Vista | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-03411 | GW | 6/17/1964 | Municipal | 1.50 | | 1.50 | 178.00 | | 0.25 | 0.25 | Willow Lane #2 | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-03448 | GW | 4/27/1965 | Municipal | 4.90 | | 4.90 | | | 4.90 | 4.90 | Beacon | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-03457 | GW | 7/14/1965 | Municipal | 1.67 | 63-3457 63-10945 | 1.67 | 168.00 | | 0.23 | 0.23 | Warm Springs Mesa #1 and #2 | T3N, R2E, S.24, SW,NE (2 PODs in Q-Q) | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-03494 | GW | 3/8/1966 | Municipal | 6.44 | | 6.44 | | | 6.44 | 6.44 | Hilton | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-03562 | GW | 11/7/1966 | Municipal | 1.47 | | 1.47 | | | 1.47 | 1.47 | Overland #6 | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-04015 | GW | 10/17/1960 | Municipal | 2.00 | | 2.00 | | | 2.00 | 2.00 | B.I.F. | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |

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|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 63-04395 | GW | 6/1/1950 | Municipal | 0.56 | 63-08385<br>63-10150<br>63-04395 | 0.56 | | 63-08385<br>63-10150<br>63-04395 | 0.33 | 0.33 | Barber #1 | T3N, R3E, S.28, SW,NW<br>T3N, R3E, S.29, SE,NE | 81 APODs | Suez Service Area | 1/1-12/31 | Beneficial use | Partial Decree |
| 63-04414 | GW | 7/1/1943 | Municipal | 1.11 | | 1.11 | | | 1.11 | 1.11 | Junker | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-04424 | GW | 7/1/1943 | Municipal | 1.33 | | 1.33 | | | 1.33 | 1.33 | Byrd | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-04752 | GW | 1/1/1947 | Municipal | 1.11 | | 1.11 | | | 1.11 | 1.11 | Central Park | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-07067 | GW | 2/28/1968 | Municipal | 2.84 | | 2.84 | | | 2.84 | 2.84 | Idaho | 43 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-07204 | GW | 3/13/1969 | Municipal | 1.82 | | 1.82 | | | 1.82 | 1.82 | Arctic #2 | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-07282 | GW | 12/2/1969 | Municipal | 4.12 | | 4.12 | | | 4.12 | 4.12 | Hillcrest | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-07348 | GW | 7/14/1970 | Municipal | 6.60 | | 6.60 | | | 6.60 | 6.60 | Bethel | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-07479 | GW | 8/20/1971 | Municipal | 7.00 | | 7.00 | | | 7.00 | 7.00 | Broadway | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-07577 | GW | 4/6/1972 | Municipal | 2.01 | | 2.01 | | | 2.01 | 2.01 | Terteling | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-07589 | GW | 4/20/1972 | Municipal | 4.40 | | 4.40 | | | 4.40 | 4.40 | Ball Hal #1 | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-07641 | GW | 8/17/1972 | Municipal | 2.00 | 63-07641<br>63-08405 | 2.00 | | | 2.00 | 2.00 | Hidden Valley Estates #1 | 12 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-07658 | GW | 1/8/1973 | Municipal | 1.06 | | 1.06 | | | 1.06 | 1.06 | Ball Hal #1 | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-07896 | GW | 11/13/1973 | Municipal | 0.25 | | 0.25 | | | 0.25 | 0.25 | Five Mile Estates W. #1 | 12 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-07979 | GW | 5/13/1974 | Municipal | 2.00 | | 2.00 | 1268.00 | | 1.75 | 1.75 | Hidden Valley Estates #2 | 12 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-07998 | GW | 6/25/1974 | Municipal | 1.27 | | 1.27 | 658.00 | | 0.91 | 0.91 | Five Mile Estates W. #2 | 12 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |

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Dated 4-28-2017

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|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 63-08011 | GW | 7/18/1974 | Municipal | 3.00 | | 3.00 | 276.00 | | 0.38 | 0.38 | Countryman Estates | 12 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-08059 | GW | 11/12/1974 | Municipal | 0.57 | | 0.57 | | | 0.57 | 0.57 | Willow Lane #3 | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-08236 | GW | 11/28/1975 | Municipal | 3.63 | | 3.63 | | | 3.63 | 3.63 | Centennial | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-08248 | GW | 1/2/1976 | Municipal | 1.57 | | 1.57 | 843.30 | | 1.16 | 1.16 | Victory | 12 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-08265 | GW | 2/23/1976 | Municipal | 2.37 | | 2.37 | | | 2.37 | 2.37 | Brookhollow No. 1 | 12 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-08385 | GW | 11/6/1977 | Municipal | 0.49 | 63-08385<br>63-10150<br>63-04395 | 0.24 | 182.40 | 63-08385<br>63-10150<br>63-04395 | 0.00 | 0.00 | Barber #1 | T3N, R3E, S.28, SW,NW<br>T3N, R3E, S.29, SE,NE | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-08405 | GW | 1/12/1977 | Municipal | 2.00 | 63-07641<br>63-08405 | 1.12 | 1320.00 | | 1.82 | 1.12 | Hidden Valley Estates #1 | 12 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-08432 | GW | 2/10/1977 | Municipal | 1.78 | | 1.78 | | | 1.78 | 1.78 | Sunset West #1 | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-08635 | GW | 8/17/1983 | Municipal | 0.89 | | 0.89 | 106.20 | | 0.15 | 0.15 | Sherman Oaks | 12 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-08990 | GW | 7/19/1977 | Municipal | 4.00 | | 4.00 | | | 4.00 | 4.00 | Cole | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-09087 | GW | 11/25/1977 | Municipal | 3.40 | | 3.40 | | | 3.40 | 3.40 | Country Squire | 12 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-09106 | GW | 1/23/1978 | Municipal | 1.12 | | 1.12 | | | 1.12 | 1.12 | Paradise North | 12 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-09147 | GW | 6/6/1978 | Municipal | 4.00 | | 4.00 | | | 4.00 | 4.00 | Swift #1 | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-09198 | GW | 1/2/1979 | Municipal | 2.45 | | 2.45 | | | 2.45 | 2.45 | Five Mile West #12 | 12 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-09199 | GW | 1/3/1979 | Municipal | 3.12 | | 3.12 | | | 3.12 | 3.12 | La Grange | 12 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-09204 | GW | 1/9/1979 | Municipal | 4.00 | | 4.00 | | | 4.00 | 4.00 | Joplin | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |

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|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 63-09205 | GW | 1/9/1979 | Municipal | 4.00 | | 4.00 | | | 4.00 | 4.00 | Settlers | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-09219 | GW | 3/20/1979 | Municipal | 2.23 | | 2.23 | | | 2.23 | 2.23 | Logger | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-09223 | GW | 4/3/1979 | Municipal | 4.23 | | 4.23 | | | 4.23 | 4.23 | Amity | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-09384 | GW | 5/27/1980 | Municipal | 1.00 | | 1.00 | 420.00 | | 0.58 | 0.58 | Lizaso Well | 12 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-09671 | GW | 2/25/1981 | Municipal | 2.12 | | 2.12 | | | 2.12 | 2.12 | Maple Hills #1 | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-09855 | GW | 12/23/1981 | Municipal | 3.34 | | 3.34 | | | 3.34 | 3.34 | Frontier | 42 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-10150 | GW | 7/1/1983 | Municipal | 0.48 | 63-08385<br>63-10150<br>63-04395 | 0.00 | 56.10 | 63-08385<br>63-10150<br>63-04395 | 0.00 | 0.00 | Barber #1<br>Barber #2 | T3N, R3E, S.29, SE,NE<br>T3N, R3E, S.28, SW,NW | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-10386 | GW | 9/19/1986 | Municipal | 1.11 | | 1.11 | | | 1.11 | 1.11 | Marden (well) | T3N, R2E, S.14, SE,NE (lot 7) | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-10391 | GW | 11/14/1986 | Municipal | 0.30 | | 0.30 | 62.40 | | 0.09 | 0.09 | Overland Estates | 12 APODs | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-10405 | GW | 3/17/1987 | Municipal | 1.56 | | 1.56 | | | 1.56 | 1.56 | River Run | T3N, R2E, S.24, SW,SE | 81 APODs | Suez Service Area | 1/1-12/31 | License | Partial Decree |
| 63-10569 | GW | 2/5/1988 | Municipal | 1.78 | | 1.78 | | | 1.78 | 1.78 | J.R. Flat | T2N, R2E, S.2, NW,NW | 81 APODs | Within city limits of Boise | 1/1-12/31 | License | Post-SRBA license |
| 63-10688 | GW | 8/15/1988 | Municipal | 2.00 | | 2.00 | | | 2.00 | 2.00 | Swift #2 | T4N, R2E, S.30, SW,SE | 81 APODs | Within the city limits of Boise and the surrounding service area | 1/1-12/31 | License | Post-SRBA license |
| 63-10862 | GW | 7/18/1989 | Municipal | 1.44 | | 1.44 | | | 1.44 | 1.44 | Bergeson | T3N, R2E, S.26, NW,NE,SE | 81 APODs | Within the city limits of Boise and the surrounding service area | 1/1-12/31 | License | Post-SRBA license |

# IMAP Water Rights and Permits

Dated 4-28-2017

| Right Number | Source | Priority as of 2016 (original priority in brackets if different than 2016) | Purpose of Use as of 2016 | CFS as of 2016 (on face of right) | Rights sharing combined diversion rate limits in 2016 | CFS as of 2016 (reduced to account for combined rate limits) | AFA as of 2016 | Rights sharing combined annual volume limits in 2016 | CFS as of 2016 (reduced to account for elimination of individual and combined annual volume limits) | EFFECTIVE CFS as of 2016 (accounting for the lower of reduction due to combined rate limits and elimination of volume limits) | Original well or diversion name | POD(s) as of 2016 | Post-IMAP transfer PODs | Place of Use as of 2016 | Period of Use as of 2016 | Current basis (or basis prior to decree, if any) | SRBA status |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 63-10945 | GW | 10/29/1989 | Irrgation, Domestic, Fire Protection | 1.72 | 63-3457<br>63-10945 | 1.43 | 393.00 | | 0.54 | 0.54 | Warm Springs Mesa #1, #2, and #3 | T3N, R2E, S.24, NE,SW,NE<br>(lot 2) 3PODs | 81 APODs | T3N, R3E, S19 NWNE, NENW, SWNW, SENW, NESW, NWSW; S24 SENE (lot 2); 256 homes and 53 acres within 71 acre PPU | 1/1-12/31, 3/15-11/15 | License | Post-SRBA license |
| 63-11034 | GW | 10/22/1989 | Municipal | 2.74 | | 2.74 | | | 2.74 | 2.74 | Mac | T3N, R2E, S.32, NW,NW | 81 APODs | Within the Boise Water Corp. service area | 1/1-12/31 | License | Post-SRBA license |
| 63-11068 | GW | 11/17/1989 | Municipal | 2.79 | | 2.79 | | | 2.79 | 2.79 | Clinton | T3N, R2E, S.8, NE,SW | 81 APODs | Within the Boise Water Corp. service area | 1/1-12/31 | License | Post-SRBA license |
| 63-11090A | GW | 1/21/1990 | Municipal | 1.73 | | 1.73 | 376.40 | | 0.52 | 0.52 | Floating Feather | T4N, R1E, S.5, SE,SW | 81 APODs | Within Suez's municipal service area | 1/1-12/31 | License | Post-SRBA license |
| 63-11118 | GW | 2/1/1990 | Municipal | 2.78 | | 2.78 | | | 2.78 | 2.78 | Cassia | T3N, R2E, S.16, NE,SE | 81 APODs | Within the city limits of Boise and the surrounding area served by Boise Water Corp. | 1/1-12/31 | License | Post-SRBA license |
| 63-11232 | GW | 2/12/1990 | Municipal | 2.83 | | 2.83 | | | 2.83 | 2.83 | Hope | T3N, R1E, S.9, SE,NE | 81 APODs | Within city limits of Boise | 1/1-12/31 | License | Post-SRBA license |
| 63-11384 | GW | 8/7/1990 | Municipal | 3.12 | | 3.12 | | | 3.12 | 3.12 | H.P. | T4N, R1E, S.27, SE,NE | 81 APODs | Within the city limits of Boise and the surrounding | 1/1-12/31 | License | Post-SRBA license |
| 63-11385 | GW | 8/7/1990 | Municipal | 2.58 | | 2.58 | | | 2.58 | 2.58 | Market | T3N, R2E, S.35, NE,NW | 81 APODs | Within the Boise Water Corp. service area | 1/1-12/31 | License | Post-SRBA license |
| 63-11467 | GW | 2/21/1991 | Municipal | 2.27 | | 2.27 | 520.00 | | 0.72 | 0.72 | Island Woods #1<br>Island Woods #2 | T4N, R1E, S.16, NW,SW (lot 5)<br>T4N, R1E, S.16, SW,SW | 81 APODs | Within the service area of Suez | 1/1-12/31 | License | Post-SRBA license |
| 63-11558 | GW | 6/24/1991 | Municipal | 2.67 | 63-11558<br>63-12363 | 2.67 | | | 2.67 | 2.67 | Fisk | T3N, R2E, S.6, SE,SE | 81 APODs | Within the city limits of Boise and the surrounding service area | 1/1-12/31 | License | Post-SRBA license |
| 63-11878 | GW | 6/15/1992 | Municipal | 0.99 | | 0.99 | 190.50 | | 0.26 | 0.26 | Redwood Creek | T4N, R1E, S.7, SW,NW (lot 2)<br>T4N, R1E, S.8, SE,NW | 81 APODs | Within the service area of Suez | 1/1-12/31 | Permit | Post-SRBA permit |

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|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 63-11950 | GW | 10/14/1992 | Municipal | 2.30 | | 2.30 | | | 2.30 | 2.30 | Taggart #2 | T3N, R2E, S.21, NE,NE | 81 APODs | Within the city limits of Boise and the surrounding service area of Suez | 1/1-12/31 | License | Post-SRBA license |
| 63-11951 | GW | 10/14/1992 | Municipal | 0.85 | | 0.85 | | | 0.85 | 0.85 | Overland | T3N, R2E, S.19, NE,NW | 81 APODs | Within the city limits of Boise and the surrounding service area of Suez | 1/1-12/31 | License | Post-SRBA license |
| 63-11990 | GW | 1/27/1993 | Domestic, Fire Protec-tion | 1.80 | | 1.80 | 624.00 | | 0.86 | 0.86 | Edgeview | T3N, R1E, S.16, SE,NE | 81 APODs | T3N, R1E, S15 NW1/4; S16 NE1/4 | 1/1-12/31 | License | Post-SRBA license |
| 63-12043 | GW | 7/23/1993 | Municipal | 4.46 | | 4.46 | | | 4.46 | 4.46 | Tenmile Raptor Pleasant Valley Pioneer | T2N, R2E, S.17, SE,NE T2N, R2E, S.17, NW,NW T2N, R2E, S.21, NE,NW T2N, R2E, S.22, NW,NE | 81 APODs | Within the service area of Suez; generally descibed as the city limits of Boise and surrounding service area | 1/1-12/31 | License | Post-SRBA license |
| 63-12055 | Boise River | 9/8/1993 | Municipal | 24.80 | | 24.80 | | | 24.80 | 24.80 | Marden surface water intake | T3N, R2E, S.14, SE,NE (lot 7) | T3N, R2E, S.14, SE,NE (lot 7) T2N, R2E, S.4, NW,NE | City limits of Boise and the area of certification | 1/1-12/31 | Permit | Post-SRBA permit |
| 63-12138 | GW | 8/19/1994 | Municipal | 3.90 | | 3.90 | | | 3.90 | 3.90 | Tenmile Raptor Pleasant Valley Pioneer | T2N, R2E, S.17, SE,NE T2N, R2E, S.17, NW,NW T2N, R2E, S.21, NE,NW T2N, R2E, S.22, NW,NE | 81 APODs | Within the city limits of Boise and the surrounding area served by Suez | 1/1-12/31 | License | Post-SRBA license |
| 63-12139 | GW | 8/19/1994 | Municipal | 3.20 | | 3.20 | | | 3.20 | 3.20 | Tenmile Raptor Pleasant Valley Pioneer | T2N, R2E, S.17, SE,NE T2N, R2E, S.17, NW,NW T2N, R2E, S.21, NE,NW T2N, R2E, S.22, NW,NE | 81 APODs | Within the city limits of Boise and the surrounding area served by Suez | 1/1-12/31 | License | Post-SRBA license |
| 63-12140 | GW | 10/19/1994 | Municipal | 3.50 | | 3.50 | | | 3.50 | 3.50 | McMillan | T4N, R1E, S.28, SW,SW | 81 APODs | Within the city limits of Boise and the surrounding service area | 1/1-12/31 | Permit | Post-SRBA permit |
| 63-12192 | GW | 8/6/2002 (3/31/1995) | Municipal | 5.00 | | 5.00 | | | 5.00 | 5.00 | Floating Feather Redwood | T4N, R1E, S.5, SE,SW T4N, R1E, S.7, SW,NW (lot 2) | 81 APODs | Certificated Area | 1/1-12/31 | Permit | Post-SRBA permit |

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|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 63-12310 | GW | 8/29/2001 (1/19/1996) | Municipal | 3.00 | | 3.00 | | | 3.00 | 3.00 | Veterans | T4N, R2E, S.32, SE,SE (lot 1) | 81 APODs | Certificated Area | 1/1-12/31 | Permit | Post-SRBA permit |
| 63-12334 | GW | 3/8/1995 | Municipal | 0.38 | | 0.38 | 42.00 | | 0.06 | 0.06 | Spurwing Foxtail | T4N, R1W, S.23, NE,SW T4N, R1W, S.24, SW,SE | 81 APODs | Within the service area of Suez | 1/1-12/31 | License | Post-SRBA license |
| 63-12362 | GW | 9/30/1996 | Fire Protection | 2.22 | | 2.22 | | | 2.22 | 2.22 | Foxtail | T4N, R1W, S.24, SW,SE | 81 APODs | T4N, R1W, S24 SWSE | 1/1-12/31 | License | Post-SRBA license |
| 63-12452 | GW | 4/15/1998 | Municipal | 4.50 | | 4.50 | | | 4.50 | 4.50 | Floating Feather Redwood | T4N, R1E, S.5, SE,SW T4N, R1E, S.7, SW,NW (lot 2) | 81 APODs | Within the service area of Suez | 1/1-12/31 | Permit | Post-SRBA permit |
| 63-12464 | GW | 7/13/1998 | Municipal | 0.30 | | 0.30 | | | 0.30 | 0.30 | Barber #1 Barber #2 | T3N, R3E, S.29, SE,NE T3N, R3E, S.28, SW,NW | 81 APODs | Within the Service Area of the Barber Water Corp. | 1/1-12/31 | Permit | Post-SRBA permit |
| 63-12516 | GW | 4/13/1999 | Municipal | 4.00 | | 4.00 | | | 4.00 | 4.00 | Spurwing Foxtail | T4N, R1W, S.23, NE,SW T4N, R1W, S.24, SW,SE | 81 APODs | Within the service area of Suez | 1/1-12/31 | Permit | Post-SRBA permit |
| 63-19456 | GW | 3/31/1953 | Municipal | 1.60 | | 1.60 | | | 1.60 | 1.60 | Twenty-seventh | 43 APODs | 81 APODs | Within the service area of Suez; generally descibed as the city limits of Boise and surrounding service area | 1/1-12/31 | Beneficial use | Partial Decree |