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JUN 04 2007

Department of Water Resources
Eastern Region

Gary M. Mulkey
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Hermiston, OR 97838

May 31, 2007

William Lake Recreational Water and Sewer District
PO Box 82
Salmon Idaho 83467-0082

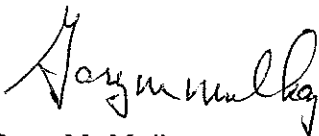
RE: Amendment for water right
75-7052 and 75-7589

Williams Lake Water & Sewer District

I have received the District's response to my request for discovery. As I reread my request for discovery and interrogatories, I find a response to four discovery items and no response to the interrogatories. The four responses to the discovery items seem to be generic information that would be provided to all protestants and not specifically to my questions. For the record I requested six discovery items and six interrogatories. I ask that my documents be reviewed and specific answers given as I requested. Under anyone's calendar the time for discovery and interrogatory responses has expired. I would suggest that the items be prepared and mailed to me before week's end.

My number one discovery request was for minutes of board meetings from January of 2000 through August 2006, but now should be May 2007. Your response is that my request is irrelevant to the issues and burdensome to the district. My request is not irrelevant as to what I am specifically looking for and how can the board make the determination that it is irrelevant? In addition, since this board is a public entity and under the Idaho Public Records Act, this request is not burdensome. I would not have asked for these minutes if I would have been provided them as I requested several times in face to face conversations with your counsel, Mr. Slavin.

Sincerely,

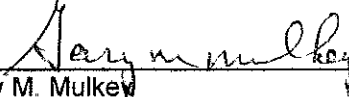


Gary M. Mulkey

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 31st day of May 2007, a true and correct copy of the above document was served on the following by mailing with the correct postage thereon, by facsimile or e-mail:

Gary C. Hawkins	()	U.S. Mail, Postage prepaid
9 Copper Mountain Road	()	Facsimile
Salmon, Idaho 83467	()	E-mail
Kathleen Rae Gliksman	()	U.S. Mail, Postage prepaid
87 Dapplegray Lane	()	Facsimile
Rolling Hills Estates, CA 90274	()	E-mail
Leslie May Shumate	()	U.S. Mail, Postage prepaid
139 Lake Creek Road	()	Facsimile
Salmon, ID 83467	()	E-mail
Valeea Steinbruegge	()	U.S. Mail, Postage prepaid
P. O. Box 106	()	Facsimile
Springfield, ID 83277-106	()	E-mail
Estate of James Kingston	()	U.S. Mail, Postage prepaid
1108 McRae Road	()	Facsimile
Arlington, WA 98223	()	E-mail
Thomas James Thompson	()	U.S. Mail, Postage prepaid
12623 Quercus	()	Facsimile
Wellington, FL 33414467	()	E-mail
Bureau of Land Management	()	U.S. Mail, Postage prepaid
Alan Bittner	()	Facsimile
1206 S. Challis	()	E-mail
Salmon, ID 83467		
Allen Merritt, Hearing Officer	()	U.S. Mail, Postage prepaid
Idaho Dept of Water Resources	()	Facsimile
1341 Fillmore Street, Suite 200	()	E-mail
Twin Falls, ID 83301-3380		
Idaho Department of Water Resources	()	U.S. Mail, Postage prepaid
900 N. Skyline Drive, Suite A	()	Facsimile
Idaho Falls, ID 83402-6105	()	E-mail



Gary M. Mulkey

Discovery Documents

It is assumed all documents will be copies not originals.

1. Minutes of the Williams Lake Recreational Water and Sewer District from January 200 through August 2006.* (*proposed minutes for August 2006 are acceptable.)
2. All correspondence to and from property owners who may have been in violation of water usage restrictions under which current water permits 75-7589 and 75-7590 were issued.
3. Any and all documents related to past, present, and future business, operational, maintenance and development plans for the Williams Lake Recreational Water and Sewer District from 1995-2006.
4. Yearly budgets for 1995-2007.
5. Monthly breakdown of all income and expenditures from October 2000 through August 2006.
6. All written and email correspondence to and from property owners concerning proposed change of district status.

Interrogatories

1. The Williams Lake Recreational Water and Sewer District is requesting a change in status from a recreational district to a municipal district. How will this proposed change benefit the patrons of the district? Please be specific.
2. From an operational standpoint what will a municipal district be able to do that the current recreational district is prevented or barred from doing? Please be specific.
3. How is the Williams Lake Recreational Water and Sewer District currently using the water provided under permit 75-7052?
4. What are all of the duties and responsibilities of the Williams Lake Recreational Water and Sewer District?
5. The legislature created recreational districts so that property owners who lived in Idaho would be allowed to vote and serve on the board even though they did not live within the district. What statutes guarantee that a municipal change will not disenfranchise these voters?
6. During document discovery I have asked for all documents pertaining to business, operational, maintenance and development plans. If the district is unable to provide this documentation, I would like the following question answered. If the Williams Lake Recreational Water and Sewer District does not have a set of comprehensive plans to serve as a roadmap for future needs and development, how does the Williams Lake Recreational Water and Sewer District justify asking for a change of status?