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WATER RESOURCES
WESTERN REGION

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Attorney for Boise Project Board of Control,
Wilder Irrigation District, and
Big Bend Irrigation District

BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO

IN THE MATTER OF 99	)	
APPLICATIONS FOR TRANSFER	)	
AND 13 APPLICATIONS FOR	)	
AMENDMENT OF PERMITS, KNOWN	)	BOISE PROJECT'S RESPONSE
AS THE INTEGRATED MUNICIPAL	)	TO UNITED WATER'S STATEMENT
APPLICATION PACKAGE (IMAP) BY	)	OF ISSUES
APPLICANT UNITED WATER IDAHO,	)	
INC.	)	

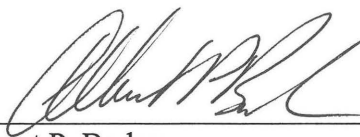
The Boise Project Board of Control and its member districts hereby respond to United Water's Statement of Issues. The following additional issues have arisen as a result of the IMAP application and need to be addressed in this proceeding.

1. Whether the 50 year planning horizon involves speculation?
2. Whether the planning horizon is limited to the actual planning horizon of the affected municipality rather than the planning horizon created by United Water for this proceeding?

3. Whether the 50 year planning horizon violates the local public interest by allowing United Water to lock up water resources of the Treasure Valley?
4. Whether irrigation districts should be providing water for irrigation of the areas which United Water claims it will irrigate, including retrofit of areas currently supplied by United Water?
5. Whether United Water's future demand for irrigation should be set based upon a duty of water for actual ground irrigated rather than by ignoring the water usage on irrigated ground?
6. Whether United Water's integrated points of diversion will harm the Boise Project and its member districts by increasing losses from their water delivery and storage system, including Lake Lowell?
7. Whether United Water's future needs claim is inconsistent with conservation of water in the state, in that no water conservation, xeriscape or other similar measures are factored into the calculations for future needs?
8. Whether United Water's system currently or its actual concrete, approved system expansions can accommodate all of its existing rights, much less its future needs demand?
9. Whether United Water has forfeited or abandoned certain of its paper rights?
10. Whether United Water's existing paper rights are sufficient to meet its reasonable future needs?
11. These protestants concur with the additional statements of issues filed by the other protestants and reserve the right to set forth additional issues.

DATED this 31st day of January 2003.

Barker, Rosholt & Simpson

By: 
Albert P. Barker

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of January 2003, I served a copy of the foregoing
BOISE PROJECT'S RESPONSE TO UNITED WATER'S STATEMENT OF ISSUES, by mail to
the following:

Idaho Department of Water Resources
Western Region
2735 Airport Way
Boise, ID 83705-5082

Christopher H. Meyer
Givens Pursley
P.O. Box 2720
Boise, ID 83701-2720

Cities of Eagle, Kuna, Meridian
& Star and Star Sewer District
Attn: Tammy A Zokan
225 N. 9th Street, Ste 420
Boise, ID 83702

Nampa & Meridian Irrigation District
Attn: Charles L. Honsinger
P.O. Box 2773
Boise, ID 83701-2773

City of Caldwell Engineering Dept.
Attn: Gordon Law
621 E. Cleveland Blvd
Caldwell, ID 83605

Boise Public Works Dept.
Attn: Beth Baird
P.O. Box 500
Boise, ID 83701-0500

Steve Lester
Water Rights Supervisor
IDWR Western Regional Office
2735 Airport Way
Boise, ID 83705

Bureau of Reclamation
Attn: E. Gail McGarry
1150 N. Curtis Road, Ste 100
Boise, ID 83706-1234

Estate of Eleanor I. Chase
Attn: Matt J. Howard
P.O. Box 190012
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City of Meridian Public Works
Attn: Gary D. Smith
660 E. Watertower
Meridian, ID 83642

Pioneer & Settlers Irrigation District
Attn: Scott Campbell
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