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WATER RESOURCES
WESTERN REGION

Attorney for the City of Boise

**BEFORE THE
DEPARTMENT OF WATER RESOURCES
IN AND FOR THE STATE OF IDAHO**

In the Matter of the Application for)
Transfer of Water Rights in the Name)
of United Water Idaho, Inc., Integrated)
Municipal Application Package)
("IMAP"))
_____)

**CITY OF BOISE'S STATEMENT OF
ISSUES**

The City of Boise submits the following list of issues which were discussed with United Water Idaho (UWID) in meetings and correspondence with UWID between November 26, 2002 and January 17, 2003 but which are not listed or addressed in UWID's January 17, 2003 Summary of Issues Identified by Protestants.

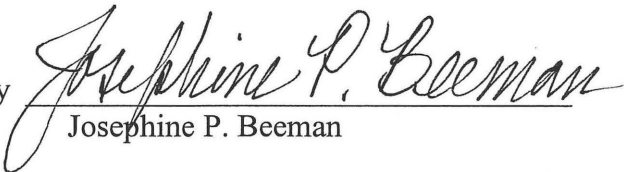
Any confirmation of water rights for current demand and future needs of the residents of Boise must address the City of Boise's interests in those water rights. Those interests include, but are not limited to, the following:

1. A legal or otherwise enforceable interest in the future needs water rights for the City of Boise will provide long term protection of the water supply for the City's inhabitants.
2. The priority and/or quantity of water rights which serve or will serve the City of Boise must not be limited by any sale or lease, exchange or replacement, or other encumbrance of those water rights by UWID.

3. Consistent with the provisions of Idaho Code 42-202B (5) and (6), the portfolio of water rights for the current and future needs of the City of Boise, as encompassed within the department's determination of a planning horizon, can only be sold together, and may not be sold based on a division between current demand and future need water rights.
4. Pursuant to Idaho Code 42-219 and 42-222, the portfolio of water rights for the current and future needs of the City of Boise must be protected from sale, lease, or other transfer to a non-municipal provider in the event a franchisee who has been operating on behalf of the City of Boise no longer serves the inhabitants of the growing community under the franchise agreement.

DATED this 31th day of January, 2003.

BEEMAN & ASSOCIATES, P.C.

By 
Josephine P. Beeman

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of January, 2003, I caused to be served copies of the foregoing **Statement of Issues** by U. S. Mail:

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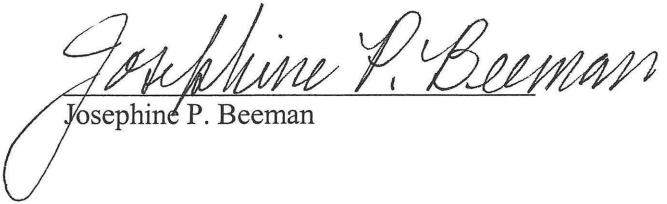
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