

Nampa & Meridian Irrigation District

1503 FIRST STREET SOUTH NAMPA, IDAHO 83651-4395
FAX # 208-463-0092

Phones: Area Code 208
OFFICE: Nampa 466-7861
SHOP: Nampa 466-0663

14 October 2010

Idaho Water Resource Board
Treasure Valley CAMP
Neely Miller
322 East Front Street
PO Box 83720
Boise, ID 83702-0098

RE: Draft "Treasure Valley Future Water Demand": Requested Changes

Dear Treasure Valley CAMP Committee:

Thank you for the opportunity to review and comment on the "Treasure Valley Future Demand" document produced by WRIME for the Idaho Water Resources Board.

I submit this letter to request changes to the document as a member of the Treasure Valley CAMP Advisory Committee and am a Director of the Nampa & Meridian Irrigation District ("NMID"). I have full authority from the NMID Board of Directors to request these changes.

1. Delete References to NMID

Please delete all references to NMID and any discussion and use of information provided by NMID. There are several reasons for this request.

First, WRIME's document incorrectly characterizes and uses information provide to IDWR and/or WRIME staff. At page 2-7, in a discussion of "domestic irrigation water," the document contains the statement that: "NMID provided how much water is delivered into the canal and provided data on the pumping capacity to deliver water." "Without existing meters on the pumps, actual water usage is estimated based on available data." NMID's Water Superintendent provided WRIME staff examples of 2-3 deliveries of water from NMID canals to 2-3 pump stations. This is the only information NMID provided to WRIME. These 2-3 deliveries represent a small fraction of NMID's deliveries to pressurized systems for residential and urban irrigation uses. More importantly, Most of NMID's deliveries to subdivisions for residential uses are not pressurized. Therefore, this limited data cannot be used, alone or in conjunction with other data, estimates or analytical methods, to estimate "domestic irrigation water" use or demand within the Treasure Valley, much less in NMID.

Page 2 of 3
14 October 2010
Idaho Water Resource Board
Treasure Valley CAMP
Neeley Miller

Later, at page 3-3, the document explains that, WRIME estimated "recreational water use rates" using "land use acreages and NMID's water use data." NMID provided WRIME no data related to "recreational water use," however that term may be defined in the document.

This limited water use data was provided to WRIME only as examples. Given this clearly inaccurate and inappropriate use, as outlined in the preceding paragraph, NMID requests that all references to, discussion of, and uses of the information NMID provided be deleted. Such use of the information will inevitably lead to inaccurate and misleading characterizations and projections of water use within NMID and the Treasure Valley, creating confusion and a poor basis for planning and policy development.

Second, the document suggests that NMID's continuous flow delivery system is inefficient and should be modified to an "on-demand" system. The assertion that NMID's delivery system is inefficient is entirely false, and it is impossible for NMID to simply "switch" to an on-demand system. Publishing a document with these assertions will create unnecessary confusion and consternation among NMID landowners.

Third, there are numerous irrigation water delivery entities in the Treasure Valley, each with unique water rights and delivery characteristics. NMID has its own unique history, characteristics, operational parameters and requirements. NMID should not be either highlighted in the document, or discussed as representative of irrigation delivery entities.

Fourth, the TV CAMP process appears to be moving in the direction of recommending that natural flow water rights, storage contracts and water delivery systems should be modified and controlled through the Idaho State Water Plan. The direction TV CAMP is taking is contrary to state law, the water rights NMID holds in trust for its landowners, and NMID's obligations and prerogatives in operating its irrigation system. NMID opposes the effort to use the TV CAMP process to accomplish these changes, and does not wish to be associated with any document that supports it.

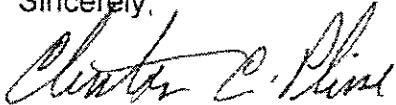
2. Postpone Further Development of the Document

The document makes numerous projections that neither I, NMID, its consultants, nor TV CAMP participants have been able to fully understand or analyze. The document should not be developed any further until we have had such an opportunity and it has been peer reviewed. This request is warranted, given what we have seen in the document (described above) and in the TV CAMP process in the short time since the process began, and the even shorter time since the document was disseminated for review.

Page 3 of 3
14 October 2010
Idaho Water Resource Board
Treasure Valley CAMP
Neeley Miller

Thanks again for your consideration.

Sincerely,



Clinton C. Pline, Director
Nampa & Meridian Irrigation District

cc: File
Each Director
Secretary/Treasurer
Water Superintendent

