IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF SUEZ WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.
MICHAEL R. GALANTE, being first duly sworn upon oath, deposes and states:

1. I am the District Manager of the North Kootenai Water and Sewer District (NKWD) located at 13649 North Meyer Road in Rathdrum, Idaho. I have held this position since 2005.

2. I will be retiring from that position at the end of the month, but I expect to remain active in water rights issues in Idaho.

3. Chris de Groot will take over my position as District Manager at NKWD when I leave.

4. My resume is set out as Exhibit A to this affidavit.

5. In my capacity with the NKWD, I have been extensively involved in water planning issues for decades. I have done so both in connection with NKWD’s water planning and in connection with broader regional and interstate water planning efforts.

6. I also serve on the advisory committee for the Rathdrum Prairie Aquifer Comprehensive Aquifer Management Plan (RPA CAMP). My name is listed in that capacity on page 21 of the RPA CAMP study issued on July of 2011.

7. In addition, I participated in the development of the Rathdrum Prairie Aquifer Future Demand study undertaken by the Idaho Water Resources Research Institute (IWRRI) that was issued in December of 2014 (IWRRI Study). I am listed as a signatory representing NKWD on the Memorandum of Understanding attached to the IWRRI Study.
8. In addition, I have served as a member of the Kootenai County Aquifer Protection District, the Idaho Washington Aquifer Collaborative (IWAC) and the Aquifer Atlas Committee.

9. Finally, I have been actively engaged in dialog with players in Idaho and Washington State addressing interstate water issues. I am actively engaged with other water purveyors in Washington and Idaho.

10. I am aware that SUEZ Water Idaho Inc. (SUEZ) has filed an application to change many of its municipal water rights to add alternative points of diversion and to bring them within the protection of the statute that exempts “reasonably anticipated future needs” (RAFN) water rights from forfeiture.

11. The RAFN quantification process is a valuable exercise that sets Idaho apart from other states, making it a leader in long-term municipal water planning. It adds transparency and oversight to a process that in other states is often undertaken behind closed doors. The restrictions on the sale of RAFN rights ensure that Idaho will avoid the hoarding of water rights and the conflicts among municipal water providers that have plagued other states. These benefits will be lost, however, if municipal providers are not allowed to plan sufficiently far into the future.

12. Securing RAFN rights also provides protection to Idaho water users in the event of interstate water disputes.

13. Although I have not tracked the SUEZ applications closely, I am aware that SUEZ is seeking a 50-year planning horizon and that this planning horizon has been challenged by one of the Protestants as too long.
14. I am not in a position to comment on the validity or accuracy of SUEZ’s forecast. I am in a position, however, to comment on the reasonableness of the duration of SUEZ’s forecast, in light of my work on water issues in North Idaho and Washington.

15. The RPA CAMP study employed a 50-year planning horizon. The IWRRI Study has a 30-year planning horizon. Both of these are reasonable under the circumstances, taking into account the differing purposes of the studies.

16. The RPA CAMP was a region-wide municipal demand forecast. It did not attempt to allocate demand to individual municipal providers.

17. The IWRRI Study sought to allocate that overall regional demand to individual municipal providers. This entailed a mediation process. Given the number of entities at the table and the sometimes conflicting interests involved, 30 years was as far out as the group could agree to go.

18. Importantly, the IWRRI Study did not contain any re-opener provision. It is a fixed 30-year projection of future demand. It is expected that individual municipal providers will proceed with RAFN applications for fixed 30-year periods based on this allocation, without any re-opener provisions.

19. In contrast, I understand that the SUEZ RAFN application calls for a re-opener condition that will allow SUEZ’s future demand to be re-examined periodically, and that adjustments can be made in the event then-current circumstances no longer justify holding the full quantity of water for 50 years.

20. I believe that re-opener provision is important in justifying SUEZ’s 50-year planning horizon. That distinguishes it from the 30-year planning horizon in the IWRRI Study.
and makes it more analogous to the 50-year planning horizon in the RPA CAMP (which could be re-evaluated at any time).

21. In sum, based on my experience in water planning on behalf of various water entities in the State of Idaho, I believe it is essential that municipal providers, such as SUEZ, that serve rapidly growing areas of the State should be allowed to plan for, secure, and protect from forfeiture out-of-state demands sufficient water rights for the long term.

22. Fifty years is a long time. But with a re-opener provision, I do not believe that the 50 years sought by SUEZ is unreasonable or inconsistent with the planning work we have undertaken for water rights in North Idaho.

DATED this 5th day of April, 2018.

By

Michael R. Galante

Subscribed and sworn to before me this 5th day April, 2018.

Notary Public for Idaho
Residing at: Kootenai County, Idaho
My Commission Expires: 03-12-2021
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of April, 2018, the foregoing was filed, served, and copied as shown below. Service by email is authorized by the Hearing Officer’s Order of September 11, 2017 at page 3.

DOCUMENT FILED:

IDAHO DEPARTMENT OF WATER RESOURCES
P.O. Box 83720
Boise, ID 83720-0098
Hand delivery or overnight mail:
322 East Front Street
Boise, ID 83702

SERVICE COPIES TO PROTESTANTS, INTERVENORS, AND INTERESTED PARTIES:

Stephan L. Burgos
Director
Public Works Department
CITY OF BOISE
PO Box 500
Boise, ID 83701-0500
Facsimile: 208-433-5650
sburgos@cityofboise.org
   Hand delivery or overnight mail:
150 N Capitol Blvd, City Hall #1
Boise, ID 83702
(For the City of Boise, intervenor in support)

Abigale R. Germaine, Esq.
Assistant City Attorney
City Attorney’s Office
CITY OF BOISE
PO Box 500
Boise, ID 83701-0500
Facsimile: 208-384-4454
agermaine@cityofboise.org
   Hand delivery or overnight mail:
150 N Capitol Blvd
Boise, ID 83702
(For the City of Boise, intervenor in support)
Chris M. Bromley, Esq.  
McHugh Bromley PLLC  
380 S 4th St, Ste 103  
Boise, ID 83702  
Facsimile: 208-287-0864  
cbromley@mchughbromley.com  
(For the City of Boise, intervenor in support)

John Roldan, P.E.  
Strategic Water Resources Manager  
Public Works Department  
CITY OF BOISE  
PO Box 500  
Boise, ID 83701-0500  
Facsimile: 208-433-5650  
jroldan@cityofboise.org  
Hand delivery or overnight mail:  
150 N Capitol Blvd  
Boise, ID 83702  
(For the City of Boise, intervenor in support)

Warren Stewart, P.E.  
City Engineer  
Public Works Department  
CITY OF MERIDIAN  
33 E Broadway Ave, Ste 200  
Meridian, ID 83642  
Facsimile: 208-898-9551  
wstewart@meridiancity.org  
(For the City of Meridian, intervenor in support)

Dale Bolthouse  
Director  
Public Works Department  
CITY OF MERIDIAN  
33 E Broadway Ave, Ste 200  
Meridian, ID 83642  
Facsimile: 208-898-9551  
dbolthouse@meridiancity.org  
(For the City of Meridian, intervenor in support)
Christopher E. Yorgason, Esq.
Middleton City Attorney
YORGASON LAW OFFICES, PLLC
6200 N Meeker Pl
Boise, ID 83713
Facsimile: 208-375-3271
chris@yorgasonlaw.com
(For the City of Middleton, protestant)

Cherese D. McLain, Esq.
MOORE, SMITH, BUXTON & TURCKE, CHARTERED
950 W Bannock St, Ste 520
Boise, ID 83702
Facsimile: 208-331-1202
cdm@msbtlaw.com
(For the Star Sewer & Water District, intervenor in support, and for the City of Eagle, interested party)

S. Bryce Farris, Esq.
Andrew J. Waldera, Esq.
SAWTOOTH LAW OFFICES, PLLC
PO Box 7985
Boise ID 83707
Facsimile: 208-629-7559
bryce@sawtoothlaw.com
andy@sawtoothlaw.com
Hand delivery or overnight mail:
1101 W River St, Ste 110
Boise ID 83702
(For Nampa & Meridian Irrigation District and Settlers Irrigation District, protesters)
AFFIDAVIT OF MICHAEL R. GALANTE (APRIL 5, 2018)

14149087_2 / 30-147
COURTESY COPIES TO IDWR AND OTHER NON-PARTIES:

James Cefalo
Hearing Officer
Eastern Regional Office
Idaho Department of Water Resources
900 North Skyline Dr., Ste. A
Idaho Falls ID 83402-6105
Facsimile: 208-525-7177
james.cefalo@idwr.idaho.gov

Sharla Cox
Administrative Assistant
Eastern Regional Office
Idaho Department of Water Resources
900 North Skyline Dr., Ste. A
Idaho Falls ID 83402-6105
Facsimile: 208-525-7177
sharla.cox@idwr.idaho.gov

Kimi White
Paralegal
IDAHO DEPARTMENT OF WATER RESOURCES
PO Box 83720
Boise, ID 83720-0098
Facsimile: 208-287-6700
kimi.white@idwr.idaho.gov
Hand delivery or overnight mail:
322 E Front St
Boise, ID 83702

Garrick L. Baxter, Esq.
Deputy Attorney General
IDAHO DEPARTMENT OF WATER RESOURCES
PO Box 83720
Boise, ID 83720-0098
Facsimile: 208-287-6700
garrick.baxter@idwr.idaho.gov
Hand delivery or overnight mail:
322 E Front St
Boise, ID 83702
E. Gail McGarry  
Program Manager, Water Rights & Acquisitions  
U.S. BUREAU OF RECLAMATION  
Pacific Northwest Regional Office  
1150 N Curtis Rd  
Boise, ID 83706-1234  
Facsimile: 208-378-5305  
emcgarry@usbr.gov  
(For the U.S. Bureau of Reclamation, withdrawn)

Matt J. Howard, Esq.  
Water Rights Analyst  
U.S. BUREAU OF RECLAMATION  
Pacific Northwest Regional Office  
1150 N Curtis Rd  
Boise, ID 83706-1234  
Facsimile: 208-378-5305  
mhoward@usbr.gov  
(For the U.S. Bureau of Reclamation, withdrawn)

Paul L. Arrington, Esq.  
Director  
Idaho Water Users Association  
1010 W Jefferson St, Ste 101  
Boise, ID 83702  
Facsimile: 208-344-2744  
paul@iwua.org

Christopher H. Meyer
Michael Galante

3467 N. McMullen Dr. Post Falls, ID. 83854
Cell: 208-661-9182 mikegalante.1@gmail.com

Executive Summary

Experienced general manager with strong leadership and relationship building skills. Project management skills, with strong ability to communicate effectively with customers, employees and business audiences.

Professional Experience

District Manager
April 2005 to Present
North Kootenai Water & Sewer District – Kootenai County Idaho - Full charge manager for 15 public water and 1 wastewater system

Accomplishments

- Board of County Commissioners appointment to the Aquifer Protection District (APD)
- Achieved Professional Human Resources certification (PHR) & SHRM (CP) Certified Professional
- Plan and develop infrastructure improvements to an aging water district - $6.5 mil. In completed projects in 36 months
- Prepare and submit to board of directors annual budget - $3 million revenue
- Acquisition and expansion of existing facilities, doubled District size in 7 years
- Secure Low Interest Loans ($800K @ .25% Int. 30 yr.) ($1.25 mil. 2.25% 20 yr.) for expansion of services to areas adjacent to existing service areas
- Initiated District’s GIS mapping program
- Initiated and worked with engineering consultant to create a Water Conservation Plan
- Plan and install VFD pumping stations, energy saving of 22%
- Initiated and implemented radio read meter program, 50% labor savings on monthly meter reading cost
- Develop and recommend policy to elected board of directors
- Leadership of District’s staff - customer service emphasis
- Daily administration in all phases of business operation
- HR responsibilities, hiring, employee performance reviews, disciplinary action, salary reviews, establish training programs for employees
- Created new Employee Manual - ensure employee understand and adhere to District policies and procedures
- Project planning with engineering consultants
- Resolve legal issues facing the District with legal counsel
- Risk Manager for the District - PRIMA risk management trained/certification
- Inter-agency relationships with Idaho Department of Environmental Quality, Idaho Department of Water Resources, Panhandle Health District, worked directly with these agencies
- Initiated drug testing program – Drug Free Workplace
- Initiated and conducted District’s Safety Program
- Ability to express myself clearly and concisely both in writing and verbally
- Ability to plan, supervise, and coordinate long range projects
- I work well with others to achieve common goals
- Ability to Interpret current legislation, rules and regulations – July 2012 secured renewal of wastewater discharge permit from IDEQ

AFFIDAVIT OF MICHAEL R. GALANTE (APRIL 5, 2018)
14149087_2730-147 Page 15 of 17
Board President/Water Master  
January 1989-March 2005  
Honeysuckle Hills Owners Association - Hayden Idaho – Responsible Charge Operator for public water system supplying 205 active connections  
Accomplishments  
• Responsible for all phases of water system distribution including coordination of repairs, taking water samples, compliance activities  
• Reported to Owners Association Board of Directors on monthly system status  
• Read water meters monthly during spring, summer, and fall  
• Handle customer complaints  
• Coordinated construction activity with engineers and contractors  
• Served as Board President  
• Secured low interest loan from IDEQ for Infrastructure Improvements  
• Coordinated annexation and conveyance agreements from HHOA to NKWSD  

Business Owner  
June 2001 to March 2005  
Advanced Water Technologies dba Kinetico Quality Water – Spokane, Washington  
Owned and managed water filtration company, residential and commercial water filter sales and service  
Accomplishments  
• Increased sales at Kinetico from $250K to $856K in 3 years  
• Commercial filter/softener installations for Northern Quest Casino, The Davenport Hotel, Warrior Restaurant at Fairchild AFB, Anheuser Busch hop farm, Usk Paper Mill  

General Manager/Project Manager  
September 1986 to June 2001  
HZO Well Service – Hayden, Idaho  
Water well installation, pump system contractor for northern Idaho and eastern Washington. Experience in drilling techniques, water system design, installation, wastewater pumping systems  
Accomplishments  
• I had a direct role in increasing company sales from $800K to over $2.5 mil  
• Gained substantial knowledge of geology of northern Idaho and eastern Washington  
• Work with hydro-geologists on drilling projects  
• Effective project manager for commercial and residential water systems & wastewater systems  
• Gained substantial knowledge of pumps, electrical controls, hydraulic valves  
• Worked with engineering consultants on system designs  

Education & Certifications  
Eastern Michigan University – Ypsilanti, Michigan  
Economics/Business  
Bachelor of Science, Economics  
Idaho DWD-3 Drinking Water Distribution Certification, DWT-2 Drinking Water Treatment Certification WWT-OIT  
Wastewater Treatment  
Professional Human Resources Certification (PHR) – Human Resources Certification Institute  
Certified Risk Management – PRIMA Idaho Risk Managers Association
Affiliations

- American Water Works Association
- American Backflow Prevention Association
- CAMP- Comprehensive Aquifer Management Planning, advisory committee for the Rathdrum Prairie Aquifer to the Idaho Water Resource Board
- IWAC- Idaho Washington Aquifer Collaborative – past president
- KCUC- Kootenai County Utility Council (811, Call Before You Dig) board president, current council member
- INSHRM Inland Northwest Society of Human Resource Managers
- SHRM (national) Society of Human Resource Managers
- Idaho Water Users Association
- PRIMA Idaho Risk Managers Association
- Kootenai County – Aquifer Protection District Board

References Available Upon Request