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DEPARTMENT OF
WATER RESOURCES

Attorneys for Applicant SUEZ Water Idaho Inc.

BEFORE THE IDAHO DEPARTMENT OF WATER RESOURCES

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.

AFFIDAVIT OF JOHN S. CHURCH

State of Idaho)
) ss.
County of Ada)

JOHN S. CHURCH, being first duly sworn upon oath, deposes and states:

1. I am president of Idaho Economics, an economic consulting firm located in Boise, Idaho. The firm's mailing address is 12477 West Edna Drive, Boise, Idaho 83713.
2. I am an independent economic consultant and a Lecturer in Economics at Boise State University.
3. I have a Bachelor of Science degree in civil engineering from the University of Washington, a Bachelor of Business Administration degree from Boise State University, and a Master of Science degree in economics from the University of Idaho. Before becoming an economic consultant I was corporate economist for Idaho Power Company, Boise, Idaho.
4. My resume is set out as Exhibit 3 to the *Master Water Plan For the Years 2015 to 2065* ("2065 Master Water Plan") prepared by SUEZ Water Idaho Inc. ("SUEZ"), which is in the record in this proceeding.
5. I have personal knowledge of the facts set forth in this Affidavit.
6. For more than a decade, I have been retained by SUEZ and its predecessor to prepare water demand forecasts, including the economic, demographic, and population forecasting models used to prepare water demand forecasts.
7. Chapter V of the *2065 Master Water Plan* ("Church Forecast") contains the results of my economic, demographic, population, and water demand forecast modeling completed in 2016.

8. In preparing the Church Forecast, I was aware of the provisions of the 1996 Municipal Water Rights Act addressing the establishment of a “planning horizon” and the quantification “reasonably anticipated future needs” (aka “RAFN”).

9. In consultation with SUEZ, I determined that a 50-year planning horizon was reasonable and appropriate for this municipal provider, which is required by law to serve a rapidly growing population within its expanding service area.

10. In my work as an economist with particular expertise in population and demand forecasting in Idaho, I am required to be familiar with local land use planning actions.

11. My development of the Church Forecast relied on my professional familiarity with and knowledge of the comprehensive planning process and the various planning documents of Ada County and the cities within SUEZ’s planning area.

12. I have been informed that one of the Protestants in these proceedings has challenged SUEZ’s 50-year planning horizon as too long, because it is longer than certain other planning documents. I believe that criticism is baseless.

13. The purpose of comprehensive plans is to meet statutory requirements for planning and zoning under the Local Land Use Planning Act. Those plans are not intended to be future need water right planning exercises. For that reason, the duration of the outlook for comprehensive plans is often relatively short (20 years is not uncommon). This is because they control zoning actions today based on desired land use development over the relatively near future. They are not aimed at guessing what land use patterns will be in 50 years. What is designated as low density or open space in a comprehensive plan today may not be so designated in the next iteration of that plan.

14. Likewise, planning for infrastructure (water, sewer, transportation, etc.) is not necessarily a long-term exercise. We will not run out of pipe or concrete. But the amount of water available is fixed and limited. Accordingly, water rights planning by municipal providers is appropriately aimed at the long term. It is not wise to build infrastructure today that will not be needed for 50 years. In contrast, it is not imprudent to acquire and hold water rights today the full quantity of which may not be needed for 50 years.

15. Accordingly, in my judgment, there is no inconsistency between the relatively short planning horizons of planning documents aimed at zoning issues or infrastructure and the 50-year planning horizon sought by SUEZ.

16. Where consistency becomes relevant is with the land use objectives set out in comprehensive plans and the quantification of RAFN. As the 1996 Municipal Water Rights Act has been explained to me, the long-term RAFN quantity must be based on land use densities and other factors that are consistent with the current applicable comprehensive plans. In other words, even if in my professional judgment I am doubtful that an area now slated in the comprehensive plan for agricultural use, open space, or low-density development will remain that way for 50 years, I am bound to honor that planning decision when calculating the quantity of RAFN 50 years out.

17. In preparing the Church Forecast, I was careful to follow the protocol outlined in the previous paragraph. In other words, the Church Forecast is consistent with the land use visions articulated by Ada County and the various municipal entities, as reflected in their comprehensive plans.

18. The Church Forecast is also consistent with the projections of population and number of households through the year 2040 of *2040 Communities in Motion* issued by the

Community Planning Association of Southwest Idaho (COMPASS). The Church Forecast extends the projection of those factors through the year 2065 (also adding a projection of non-agricultural employment) using a modeling tool I created (called the “Church Econometric Model” in the *2065 Master Water Plan*). I used the *2040 Communities in Motion* projections through the year 2040 to calibrate my model. This is explained in greater detail on pages 11-12 of the *2065 Master Water Plan*.

19. My model’s projections are slightly lower than the results of the COMPASS projections of population and number of households through the year 2040. For example, for the year 2040, COMPASS projects the SUEZ planning area population to be 346,269 versus my slightly lower forecast for that year of 345,259. And COMPASS projects the SUEZ planning area households in 2040 to be 150,389 versus my slightly lower forecast for that year of 150,043. Similarly, for the year 2040, COMPASS projects total Ada County population to be 674,144 versus my slightly lower forecast of 663,958, and COMPASS projects total Ada County households in 2040 to be 272,724 versus my slightly lower forecast of 255,676.

20. I also used Traffic Analysis Zone (TAZ) data from COMPASS’s *2040 Communities in Motion* to corroborate my model’s forecast of residential customers by allocating my county-wide forecast of population and number of households to individual TAZs within Ada County through the year 2040. Using COMPASS’s TAZ data and my professional judgment, I adjusted TAZ allocations through 2065, from which I was able to sum the populations and households projected to be within SUEZ’s planning area. This also is explained in greater detail on pages 11-12 of the *2065 Master Water Plan*.

21. Finally, it is helpful to understand that the Church Forecast was not tied to or aimed at measuring demand at full build out. Nor, of course, did the COMPASS forecast project

population at full build out of Ada County. Different areas within Ada County will achieve (or have achieved) full build out at different times. The City of Eagle, for example, has planning documents that contemplate it will achieve full build out in 30 years. Other areas will continue to grow for decades after 2065.

22. The *2065 Master Water Plan* at page 19 contains this observation: “But COMPASS’ projections extend only to 2040, while Prof. Church’s projections go to 2065. Accordingly, for each five-year increment from 2045 to 2065, Prof. Church used his professional judgment, familiarity with the area, his study of the relevant zoning requirements and comprehensive plans, and his knowledge of recent and projected developments to make minor adjustments in the allocation to certain TAZs. In doing so, he was careful to allow each TAZ to continue to grow only until it achieved a reasonable level of “build out” density reflecting applicable planning and zoning for that TAZ. When that maximum density was reached, no further population or households were allocated to that TAZ. Instead, growth was directed to neighboring TAZs (in concentric circles) that had “room to grow.” In this way, Prof. Church ensured that the allocations to individual TAZs for each year were consistent with the zoning and land use plans of each community and accurately reflected reasonable expectations based on most up-to-date information available.”

23. The description in the previous paragraph is an accurate statement of what I did.

24. Consequently, for the reasons stated in the prior three paragraphs, there is nothing “inconsistent” between the 50-year planning horizon in in the Church Forecast and municipal planning documents that project full build out sooner than 50 years.

25. Since completing the Church Forecast in 2016 (with final error correction in 2017), other studies have been released that generally corroborate the conclusion that SUEZ will

be required to serve a steeply growing population.

26. For example, the U.S. Census Bureau recently identified Idaho as the fastest-growing state in the nation, with Ada and Canyon Counties accounting for 50 percent of that growth.

27. A report by Forbes last month found that Boise is now the fastest-growing city in the nation (up from 2nd place last year and 11th place the year before that). That makes Boise's population growth over three times greater than the national average.

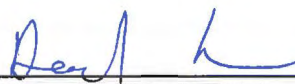
28. These conclusions are, to some extent, anecdotal. They do not precisely match SUEZ's planning area. And they focus solely on population, not the broader and more complex range of factors that were employed in my water demand analysis. Nevertheless, they reinforce the idea that recent developments do not suggest that local growth trends have moderated since I completed the Church Forecast. If anything, my forecast might be too conservative. In any event, these recent developments support the conclusion that a 50-year planning horizon is not unreasonably long for such a rapidly growing area.

DATED this 6th day of April, 2018.

By 
John S. Church

Subscribed and sworn to before me this 6th day April, 2018.




Notary Public for Idaho
Residing at: Boise
My Commission Expires: 9-1-2023

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th 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.

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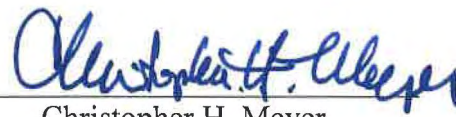
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