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RECEIVED

APR 09 2018

DEPARTMENT OF
WATER RESOURCES

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 HAL SIMMONS

State of Idaho)
) ss.
County of Ada)

Hal Simmons, being first duly sworn upon oath, deposes and states:

1. I am employed as the Planning Director in the Boise City Planning and Development Services Department. My business address is 150 N. Capitol Blvd., 2d Floor, Boise, Idaho 83702.

2. As the Planning Director for the City of Boise, I oversee the City's planning and zoning programs, including the City's comprehensive planning. The most recent update of the City of Boise's original 2011 comprehensive plan, *Blueprint Boise*, is dated March 27, 2017 ("Boise Comp Plan"). The Plan's primary purpose is to provide a blueprint that will help shape the City's land use planning and zoning decisions. Every zoning application is measured against the Boise Comp Plan to ensure that it is in accordance with the current vision of where the City is headed. That is a primary purpose of a comprehensive plan.

3. The Boise Comp Plan describes itself as a vision statement that looks out ten to 20 years. That does not mean that the City does not care about what happens after 20 years, or that land use planning and development issues will cease to exist in 20 years. In fact, the City typically prepares major updates or even whole plan replacements every 10-15 years, thus extending the planning horizon well before the initial 20-year horizon has expired. The City's population and boundaries will continue to grow beyond 20 years; therefore, long-range planning by utilities and other major service providers is vital to the long-term sustainability of the City.

4. The Boise Comp Plan does not, and is not intended to, dictate the planning horizon for SUEZ Water Idaho Inc.'s ("SUEZ") reasonably anticipated future needs municipal

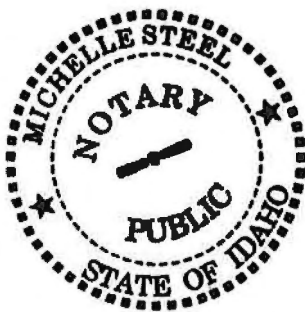
water rights. It also does not, and is not intended to, dictate SUEZ's municipal water planning area or its reasonably anticipated future municipal water needs.


5. SUEZ is the City's primary supplier of municipal water. SUEZ's current certificated service area encompasses nearly the entire Area of Impact for the City. It is imperative for the City's future that SUEZ secure water rights sufficient to supply the City's needs at full build-out. Thus, while SUEZ's 50-year planning horizon sought in the IMAP is longer than the term of the Boise Comp Plan, it is not inconsistent.

DATED this 9th day of April, 2018.

By 
Hal Simmons

Subscribed and sworn to before me this 9th day April, 2018.




Notary Public for Idaho
Residing at: Boise, Idaho
My Commission Expires: 9/2/2023

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th 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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