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DEPARTMENT OF
WATER RESOURCES

BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO

IN THE MATTER OF:

**ACCOUNTING FOR DISTRIBUTION
OF WATER TO THE FEDERAL ON-
STREAM RESERVOIRS IN WATER
DISTRICT 63**

**CITY OF BOISE'S STATEMENTS OF
CONCERN**

In accordance with the October 22, 2013 Notice of Contested Case and Formal Proceedings, and Notice of Status Conference ("Order"), the City of Boise ("City"), by and through its attorneys of record, Perkins Coie LLP, hereby submits the following statements of concern to the Idaho Department of Water Resources.

The City holds numerous water rights with points of diversion in Water District 63. Accordingly, the water right accounting method for Water District 63 has the potential to significantly impact how and when the City is able to exercise its water rights. For example, the ability of the U.S. Bureau of Reclamation to continue to provide winter maintenance stream flows on the Boise River under the current accounting method is critical to the City. Boise River flows impact the operation of the City's wastewater treatment facilities, and loss or fluctuations of flow may also impact the City's aesthetic, economic, recreational, cultural, wildlife and tourism interests. The City's participation and decisions in the Snake River Basin Adjudication were made with the understanding that the current accounting process would be utilized going forward.

The City has no modifications to the current accounting method to propose at this time, and hereby reserves the right to propose modifications and/or offer support for the current accounting method at a later date through its participation in this proceeding.

Respectfully submitted,

DATE: December 3, 2013

PERKINS COIE LLP

By: 

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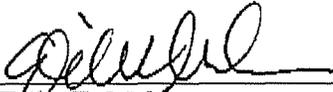
Attorneys for City of Boise

CERTIFICATE OF SERVICE

I, the undersigned, certify that on December 3, 2013, I caused a true and correct copy of the foregoing to be forwarded with all required charges prepaid, by the method(s) indicated below, in accordance with the Rules of Procedure, to the following person(s):

Idaho Department of Water Resources
322 West Front Street, 6th Floor
Boise, Idaho 83702
Phone: (208) 287-4947

Hand Delivery
U.S. Mail
Facsimile: (208) 287-6700
Overnight Mail



Erika E. Malmén



Facsimile Cover Sheet

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If there are any problems with this transmission, please call 208.343.3434

1111 West Jefferson Street, Suite 500
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Date: December 3, 2013

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Sender:	Telephone:	Facsimile:
<i>Erika E. Malmen</i>		

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