

June 19, 2015

Dear MRG RWP Steering Committee participants,

I have recently returned from an awesome raft trip through Cataract Canyon on the Colorado River. Not only did that mean that I missed the last meeting of the Steering Committee but also that I have not been able to review the results of that last meeting as well as the submittals from Laila Burgis. Since comments are due today, I have pulled together some in hopes that they will be considered.

First, below I have included the process followed to review the original. Found in the 2004 Plan, I sent this to the Steering Committee in early March 2015. What it shows is that a lot of money, talent and analysis went into the evaluations. Such evaluations followed the template in the original Regional Water Planning Handbook. The import of including this is to show the background of the alternatives we reviewed this year. It provides credence to the review process, since the Steering Committee had neither the time nor resources to redo that work.

Second, our task was, as Ms. Burgis wrote, "to assess what has been implemented in the past ten years, and for the Committee to offer policy makers its collective recommended strategies as to the highest priority items to focus on during the next five years, which the ISC has defined as the planning horizon for this Regional Plan Update."

We did that by reviewing the list of alternatives in Chapter 10 of the MRG RWP. However, many members have spoken about the challenges for which we must be planning. Larry Webb spoke about the "fact that we're going to grow but we aren't going to be able to grow like before. We have to figure out what we want to preserve." He suggested putting in such a challenge.

The Administrative Water Supply (AWS) does not include, much less address, any such challenge. It does not show a gap between supply and demand in 2010. The current plan showed a substantial gap, which formed the rationale for planning and which has now been removed. Angela Bordegary said that "we want to capture information that wasn't available in 2004." In our update process, we reviewed the current situation with Dr. Bruce Thomson, who was the lead on updating the Water Budget for the region.

Middle Rio Grande Water Budget - Draft

Dr. Bruce Thomson, et al

6/25/2014

Note that the average water budget deficit of 48 KAF/yr for the period 2008-2012 is close to the 40 KAF/yr deficit estimated for the year 2000 by SSPA (2004). Although significant decreases in M&I consumptive use has been achieved and water diversion for irrigation has been reduced the overall water supply for the MRG basin remains out of balance with the demand. It is clear that further measures for reducing basin wide consumptive use will be required to bring the basin into balance based on current water uses. Furthermore, even more aggressive measures will be required in the future to meet the conflicting situations of increased demand due to projected growth and decreased future supplies as a result of long term drought and climate change.

We cannot ignore this.

Bob Wessely provided an overview of the earlier process and handed out a list of items that had not been addressed. We did not review that list, but it still remains extant and should not be ignored by not being included.

In mid-May, I sent the Steering Committee a memo with a list of issues missed by the AWS, additional background information (including the list of issues) and a conceptual path forward. That is the same document as submitted by Bob Wessely in June as Part Three - Water Issues to be Addressed, with the exception of the additional information about the water requirements of the 2003 Biological Opinion, found on page 11, and the cover memo on page 2. Pages 16-29 include additional background information.

While I appreciate that Ron Brown's suggestion that the Water Assembly's submittals be included as public comment, I would urge the Steering Committee to consider them as much more. The RWP Update Handbook allows for this: "The region may provide the state with other studies or data, if available, that the region believes would improve the quantification of water use." Using such additional information, then the update can "continue to focus on identifying strategies (projects, programs, and policies) that will address the gap between supply and demand ... and other water management issues identified by the regions." (Update Handbook) Including such information provides a basis for any actions that might be taken. At least include it as an appendix!

Third, the Conceptual Path Forward (pages 13-15) was meant as a suggestion to accomplish the priorities already selected. Since these strategies had met approval in the original plan and scored well in the update process, my intention was to suggest a route that all could support. If that segment is a problem in terms of including it in the technical data attachment, it can be separated and submitted as a "Recommended Future Strategies" from the Water Assembly. In that way, it would be part of the strategies for the public to provide comment.

Fourth, with respect to the Public Involvement Plan (PIP):

- a. The guiding principles should be included at least as an attachment to the PIP.
- b. To date, there has been little to no public process with the planning update here in the MRG. (By the way, please change "Mid Region" to "Middle Rio Grande." If shorthand is needed, shorten it to MRG.) As noted by Ms. Burgis, the MRCOG appointed the Steering Committee, which has been meeting regularly. I have not seen any press releases about this effort -- not even a web site to submit comments.
- c. As far as the Rio Puerco and Rio Jemez subregions, Ms. Burgis noted in her meeting notes for 6/9/15 that "there was frustration that the steering committee had tried to invite members of these regions to the meeting but were unsuccessful. Several members voiced that they thought the subregions simply were not interested in joining." What is not set out in the PIP are what efforts were made to include their voices. In January, upon hearing that the group would meet every other week, Mr. Sandoval said that he could not participate. While it is true that no one is being reimbursed by the ISC to participate, it is one thing to come a few blocks and quite another to

drive more than an hour. Given that the water and population data is for the region as a whole, the subregions are nearly buried. Rather than us determining what has transpired with their plan, why not ask them to convene a meeting in Cuba and in San Ysidro for them to review and comment on their plan? (I have attached a slimmed down version of their action plan, found in Table 12.2.2.)

d. In addition to holding meetings, I would suggest setting up a web site where comments on the update can be submitted.

e. Rather than considering itself an offshoot of MRCOG, the Steering Committee should consider how additional voices can be added to the group. Note, for instance, the stunning absence of MRGCD in "Projects, Programs, and Policies."

f. As the only public participation event during this planning period, the report from the Water Assembly should be included as an Appendix to the PIP.

Fifth, with regard to the "Projects, Programs, and Policies" list:

a. The group reviewed and updated the MRG RWP alternatives, as reflected in the document entitled "Previous Project Ranking MRG" and attached. We did not review new alternatives or projects, particularly with an eye to the following categories:

- Strategy Type (Project, Program or Policy)
- Strategy Approach (What issue does strategy address)
- Subcategory
- Project Name
- Source of Project Information
- Project lead (Entity or Organization)
- Partners (other entities or participants)
- Time-frame (Fiscal Year)
- Planning Phase
- Cost

While Ms. Sturgis sent a draft of her larger list on May 21, it was never reviewed. The work product should reflect what we reviewed.

b. Mixing the review of the MRG RWP alternatives with projects submitted by some of the Steering Committee members mixes apples and oranges. Those items should be included in a separate worksheet.

c. The Steering Committee was quite clear that it did not want to have the ICIP list included other than with a reference to the web site where it can be found. Yet it is included in the "Projects, Programs, and Policies."

To deal with these issues, I would suggest simply attaching the document we all agreed to in May. I've attached it to these comments.

Respectfully submitted,

Elaine Hebard