

MIDDLE RIO GRANDE WATER ASSEMBLY

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Comments and concerns regarding the Updated Regional Water Planning Handbook

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Bob Wessely, president of the Middle Rio Grande Water Assembly, submits these comments regarding the Updated Regional Water Planning Handbook on behalf of the Water Assembly. We believe the comments are applicable to all sixteen water planning regions.

As participants in the Upstream Downstream process, we agree on the need for a common technical platform as mentioned in the Updated Handbook. However, numerous issues still exist that should have been better addressed than they are in the Handbook. We have identified ten key issues.

1. **Climate Change** – Included in the common technical platform should be a common methodology for regions to address the significant impacts and uncertainties of climate change, already being experienced.¹
2. **“Administrative Water Supply”** – Creating an additional, conceptual category of water will only add confusion to an already complex issue while making comparisons nearly impossible.
3. **Demand Equals Supply?** – The assumption that historical withdrawals are equal to demand strains credulity, ignoring a whole host of variables and variabilities.
4. **Demand Equals Withdrawals?** – Accounting for withdrawals rather than depletions can count each drop of water multiple times and distorts reality for any region.
5. **Incomplete Accounting** – Current accounting considers only withdrawals for human beneficial uses, ignoring open water evaporation and riparian evapotranspiration. Not including such non-human uses renders planning within a budget of little value.
6. **Spatial Extent of Regions** – Most regions include multiple watersheds and span large distances. Single supply and demand numbers for an entire region are meaningless except where supplies and demands are practically co-located.
7. **Local Government Buy-In** – Lack of requirement for each of the local governing bodies in the region to accept and implement the updated plan reduces the likelihood of the plan having any impact.
8. **Process Ambiguity** – Rather than react, the regions need to be engaged from the outset, establishing with the state the necessary timeline, data needs, and other requirements for their update.
9. **Time Line** – To date, the state has yet to announce an overall schedule for its activities and those expected from the regions.
10. **Water Rights** – Failure to consider ownership interests in water in planning will make implementation extremely difficult.

We look forward to seeing these concerns addressed.

¹ *West-Wide Climate Risk Assessment: Upper Rio Grande Impact Assessment*, Bureau of Reclamation, December, 2013