

MIDDLE RIO GRANDE WATER ASSEMBLY
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Draft Response to Interstate Stream Commission Regional Water Planning Program
Middle Rio Grande Regional Water Plan
February 9, 2016 -- Public Meeting #1 of 3

The Water Assembly Board assigned a six-person team to review and critique the draft MRG Regional Water Plan components. The team members met to assimilate their findings.

The bottom line is that we were disappointed. We saw no evidence that the many comments and suggestions we submitted were considered. Even the Steering Committee's own decision on its product, one of only two that the region has any control over according to the Update Handbook, was ignored. We believe it to be disingenuous to assert there was or is intended to be any kind of meaningful public involvement. In addition, the imposed planning axioms preclude useful planning for the MRG's water.

The Water Assembly, formed through a public process in 1997, has the established purpose "to assure effective implementation of the Middle Rio Grande Regional Water Plan through an open, inclusive, and participatory process so as to achieve the common interests of the people and stakeholders of the region for a sustainable water future that balances water use with renewable supply in accordance with the stated goals of the Plan." True to its mission, the Water Assembly tried to actively participate in the 2015 round of "planning." On February 13, 2015, we provided our draft *Guiding Principles for Updating Our Regional Water Plan*. We see no evidence in the draft plan that the contributed information was considered. Indeed, there appears to be no process to include comment on the report or during the public meetings.

As background, the Water Assembly partnered with the Water Resources Board of the MRCOG to host more than 100 meetings in the three counties to develop the 2004 plan, openly defining the mission, the public welfare statement, goals and objectives, the alternatives, the recommendations, and the final 2004 plan. In contrast, for the 2016 plan, there was no campaign to announce the initiation of a water plan update, nor were funds allocated for outreach or to engage the public. Instead, the Mid Region Council of Government's (MRCOG) Water Resources Board established a Steering Committee for the purpose of preparing an update to the Region's 2004 Water Plan. The Steering Committee met ten times between January and June 2015 to prepare a draft Progress Report of the 2004 Plan, ranking projects accomplished and those remaining. "Meetings were not publicly advertised due to budget limitations but were open to the public, and representatives of interested groups frequently attended the meetings" (draft PIP). This approach clearly fails needs for public advertisement and engagement. The Progress Report was and still could be the basis for a broader public discussion.

Planning is not list making, nor is it squeezing products from an unusable set of data, as is the approach used in the 2016 plan. That is, the ISC's set of draft components ignores the "elephants in the room" for a MRG water planning:

- It ignores the lack of water rights adjudication and quantification throughout the region
- It presents a grossly simplified water budget having significant structural deficits
- It ignores major water demands, including ESA water demand that can exceed 90,000 acre feet per year in drought years under the currently extended Biological Opinion
- It ignores potentials of significant drawdown of groundwater supplies during extended periods of drought, such as are projected to occur under most climate change models
- It ignores values of the citizenry, and is urban centric
- It omits consideration of future promises in regional projections
- It ignores climate disruptions in stationarity assumptions
- It ignores related issues, such as energy, land use, transportation, etc.
- It omits tools, including data, as to how the region can help to avoid pending compact failure

It is clear that the amount of water available to the MRG Region, and in all of NM, has been and is becoming more and more erratic and scarce, and that uncertainty is the granddaddy of all constraints, which can only be addressed by a comprehensive and well-funded planning process, directly involving the public. The current draft plan is neither useful nor a plan that will ensure sound water management for the MRG or compliance with compact requirements. We recommend that the ISC's set of draft components now be declared to be complete as-is. We further recommend that the process undergo a complete revision to produce the necessary planning for our region.

Specific recommendations

While the above is not an exhaustive list, addressing such issues would begin to create a useful regional water plan. That would make more sense than submitting a list of projects as is currently contemplated. And could engage the public in a meaningful exercise. Currently, the plan does not define real problems so why bother participating. Moving forward, our suggestions include planning as to how to engage the public in a real process that addresses the elephants.

The statewide regional water planning governance study group posted its first draft of recommendations on the Water Dialogue's website, <http://nmwaterdialogue.org/library/water-governance/governance-study-group-issue-papers>. Because of all the issues raised with the current round, the GSG decided that the beginning point for their recommendations was after this current round of "planning" is over. We agree. Let's declare it over.

- Wrap up the ISC Update program by June 30, 2016.
- Put draft RWP documents on line, making it clear that they are ISC-written and only draft.
- Integrate the State-derived data into the State Water Plan and finalize that too.

Reform the Planning Process

Reform / Regenerate the process from the ground up -- A big problem is not knowing what we don't know. There is no sense to spending money, time and good will of participants on a product which has no value. What's needed is a river basin or aquifer approach dealing with problems, solutions and actions aimed at addressing how we will live within our means. And a process that allows for the highest potential for success, not mediocre, or worse, no outcomes.

Bring real problems to the table, within the hydrologic unit, and include energy, culture, etc., to broaden reach. Values should be driving alternatives, along with science.

Under a new process, we should

- * begin with a public process, broader than water, include the social, cultural, economic, and complete ecological in terms of ecosystem functions. Water is not an isolated object to be managed
- * devise a decision-making process that incorporates this broader vision into current strategies for water management
- * include the recharge system in the uplands (no mention of management strategies to take care of water where it begins its journey on the land surface)

Consider a different planning approach, such as that Holistic Decision-Making Process on page 26 of The Practice of Holistic Decision Making in Regional Planning Programs — The Confederated Tribes of the Colville Reservation Case Study (2002), <http://www.aboutlistening.com/sustainability-planning/colville-case-study>.

To be involved, participants must have a sense of vital commitment and desire to contribute to the goals, and through coordinating of the efforts, to grow.

The product should build upon the 2004 Plan, and address the elephants remaining since then. The process must include all users and uses, including the future as it faces climate changes.

The Plan should prepare the region to incorporate the findings of the Statewide Water Assessment.