

New Mexico Interstate Stream Commission

Summary of Comments on the Draft Updated Regional Water Planning Handbook: Guidelines to Preparing Regional Water Plans in New Mexico

The Interstate Stream Commission received 15 sets of comments on the *Draft Updated Regional Water Planning Handbook: Guidelines to Preparing Regional Water Plans in New Mexico*.

Comments were received from:

- John R. Brown
- CDM Smith Inc.
- Claudia Borchert
- Elephant Butte Irrigation District (EBID)
- Elaine Hebard
- Paul van Gulick, Program Manager, Eastern New Mexico Water Utility Authority (ENMWUA)
- Jemez y Sangre Regional Water Planning Council (JyS)
- Leslie Kryder
- Lower Rio Grande Water Users Organization (LRGWUO)
- New Mexico Chapter of The Nature Conservancy (TNC)
- Gerald Schultz, New Mexico Resource Conservation and Development (NM RC&D)
- New Mexico Water Dialogue (NMWD)
- Steve Harris, Rio Grande Restoration
- Sigmund Silber
- Bob Wessely

This document provides a summary of the comments received, organized by general type of comment.

The comments reflect a variety of opinions about the proposed approach. One commenter characterized the standardization of the regional approach to fit within the broader statewide planning as “excellent improvements,” and another “commends the ISC/OSE for identifying the need for regional water plans to have common technical assumptions.” Other commenters state that the Draft Template is “a good start, but merits further review and modification.” While some claim that “the state is taking over regional planning,” others do not conclude that. One

reviewer stated that the “approach is sound but may benefit from a bit more explanation as to what the intent is.”

In line with the latter suggestion, and based on the process already begun, the ISC plans to convene an informational meeting, inviting open to representatives from each region, to provide additional information about the approach to allow for greater clarity in the ISC/OSE’s state and regional water planning goals. At this meeting, ISC staff will respond to comments and questions and explain further the underlying rationale for the approach outlined in the Handbook.

The major themes that were reflected in the comments follow.

Role of the regions and the state. Several commenters expressed concern that having the state prepare major portions of the regional plans represents a significant departure from previous planning efforts and that the regional concerns and unique supply, demand, and legal issues would not be adequately considered in a state-prepared document. There was concern that

- Such a large state role in preparing the updates represents a different approach than what was proposed at the time that legislative funding was requested and secured.
- The state does not have adequate resources and funding to take on such a large role in preparing the regional plans.
- The regions know their supply and demand issues much better than the state.
- There was no mention of a process for regions to review and comment on the state reports.
- The regions would be providing input on supply and demand, but they would not have a budget to do the work, and this would create a financial burden for the regions.
- The state will not be able to provide neutral legal opinions because in some cases there is ongoing litigation between the state and regional entities. The regions need to be involved in preparing or at least reviewing the legal section updates.

Public participation in development of the updated Handbook. Concern was expressed that there was not ample time for groups to meet and discuss their comments and suggestions on the Draft Handbook. Disappointment was expressed that the revised Handbook was developed without participation from the existing regional water planning groups and that while earlier communication had indicated that the regions would be involved in the template update, that did not happen.

There were also comments regarding appropriate participation on the regional groups that will guide the process. It was suggested that the revised Handbook recognize the existing regional water planning groups and that a clearer definition of steering committee roles and

responsibilities be provided. Conversely, it was suggested that having regional steering committees guide the process could take away from a common technical platform, if each steering committee wants to pursue a different methodology. There were some suggestions regarding inclusion of other constituencies, such as universities, and the need for Steering Committee members to be knowledgeable about water planning issues and to be capable of working in a cooperative environment and listening to public opinion. It was suggested that regions who share a common basin meet together periodically and that adequate funding for public involvement be provided to the regions. A public involvement plan for each region was suggested.

Process for completing updates: There were comments requesting clearer guidance and schedules, as well as a workable process for the interaction of the regional groups and the state. Concern was expressed that there be sufficient time for regional groups to review documents and provide input and for them to complete their tasks. Some were concerned that completion of the state and regional updates in less than 2 years is not a realistic goal. There was also a request for clarification of the process for acceptance of the plan updates.

Clearer guidance on what to include in the update versus a full regional water plan. Some comments indicated that there was a need for clearer explanation that these documents will be updates of the previously approved water plans, as the template still describes all of the sections in a full regional water plan. One reviewer expressed the confusion as “. . . whether there will be an “updated regional plan” or simply an “update” to the existing regional plan.”

Methodology for quantifying supply, demand, and gaps. Comments regarding the supply portion of the template expressed concern about the use of averages when we are regularly seeing extremes, and there was concern that the template did not emphasize prolonged and severe drought. Concern was also expressed regarding the need to consider the longevity of supplies and potential subsidence even in stream-connected basins, which can also be mined. Other commenters suggest that different methodologies for quantifying supply should be considered, such as evaluating the condition of the watershed. Commenters recommended basing supply on recent studies such as the Bureau of Reclamation *Colorado River Supply and Demand Study*, which affects San Juan-Chama supply.

Several comments indicated that demand should be evaluated as depletions rather than withdrawals. It was mentioned that ISC and OSE already track depletions for compact compliance and water rights, so those numbers could be used. It was also suggested that the template is too specific and there should be more flexibility in the methodology that the state uses to estimate supply and demand. Some suggested that the state bring together work groups to look at methodology. It was also suggested that demand projections should consider agricultural transfers that are needed for already permitted water rights.

Riparian depletions and water for the natural environment. Some commenters suggested that the non-inclusion of riparian depletions was a major omission in the plans. There was concern that the plans need to include programs for wetlands and river management as other western states do and that instream flow and water from the natural environment is an important part of planning that is missed in the template.

Strategies for meeting future demands. It was suggested that focusing on water projects is not broad enough and that there should be more emphasis on demand reduction, conjunctive management, water quality management, river management, and other types of programs. Some commenters suggested that the strategies need a better link to the original plans and that adaptive management and review of changed conditions is important. It was also suggested that the Handbook include a process for ongoing evaluations and reporting of implementation progress.

Other scope considerations. Various suggestions were made regarding an expanded technical scope. For example, suggestions were made regarding more detailed approaches to climate change and how it will affect supplies and demands and more focus on water quality management, comprehensive data management, and inclusion of modeling. Additionally, there were suggestions for including broader statements on visions and goals and for additional consideration of regional values and the importance of communication. It was suggested that frequent reference in the water code to public welfare and conservation shows a need to expand planning beyond supply-demand disparities and that the template needed to put greater emphasis on the many ways to conserve.

Editorial and organizational edits. Many of the comments provided suggestions for different wording, organization, formatting, or emphasis.