

August 23, 2011

New Mexico Interstate Stream Commission

Attn: Craig Roepke

P.O. Box 25102

Santa Fe, NM 87504-5102

Email: craig.roepke@state.nm.us

Subject: Gila San Francisco Water Commission Water Distribution Project Proposal  
Reconsideration Request

Dear Mr. Roepke:

Catron County respectfully requests reconsideration of the Gila San Francisco Water Commission Water Distribution Project Proposal by the ISC evaluation committee for the following reasons:

*FAILED B – "...relies on AWSA project being completed separately to meet a water supply demand".*

All projects that do not already exist must necessarily rely on completion of prior actions in some form or other; projects do not come into existence fully-formed. Thus almost all AWSA projects are in some way reliant on other AWSA projects being completed separately. There is no point in constructing physical water delivery systems (e.g. ditches, pipes) without a source of actual water to deliver, and a significant percentage of the year there can be no water to deliver without diversion construction and water storage. Nothing within AWSA precludes an AWSA project being reliant on another AWSA project's completion to meet a water supply demand.

Distribution management of a portion of the 14,000 acre feet of AWSA waters logically promotes the most efficient and equitable distribution of AWSA waters; the equitable distribution of interstate waters is in fact called for by New Mexico State Statute and by policy adopted by the New Mexico Interstate Stream Commission and approved by the Office of the Governor of the State of New Mexico. Distribution management already exists for CAP waters that are banked for AWSA purposes and unless all AWSA waters are never to be used by individuals on-the-ground within the Gila Basin, by extension distribution management must exist in order to fulfill the variable and short-term water supply demands of these agricultural users beyond the large AWSA projects proposed.

*FAILED C – "Does not address environmental impacts."*

It is difficult to understand how to address environmental impact when the proposed distribution management system would have no direct environmental impact on the Gila environment in itself. Secondary impact could potentially involve an increase in total private agricultural acreage due to increased irrigation water availability; however Catron County does not believe it is within the authority of ISC or the New Mexico Unit to usurp the authority and responsibility of the Office of State Engineer to address the environmental impact of agricultural water rights and water use.

Submitted by: Lif Strand

Submitted for: Hugh B. McKeen and Gila San Francisco Water Commission