TIER-2 CRITERIA FOR A NM UNIT OR A WATER UTILIZATION ALTERNATIVE
[1010 total points possible]

Southwest Planning Region Municipal Conservation Fund

1. [570] If the proposal would extend the water supply through conservation, or increase the supply through development of new water,
   a. Describe the location and verify the ownership of and legal access to lands related to the proposal. [0 to 30 points]

The City of Deming is proposing a Southwest Planning Region Municipal Conservation Fund to benefit residents in the Catron, Grant, Hidalgo, and Luna four-county region. Project locations are not yet determined, and therefore, ownership of and legal access to lands are not applicable for this proposal. Once conservation projects are selected for funding from the proposed Conservation Fund, then ownership and legal access to lands can be verified.

Water is a valuable resource, and the extended drought has caused greater stress on the water resources. As the region continues to grow (as projected by the regional water plan), water conservation will play a critical role in ensuring that the area is able to meet future water demands. Because the strategies used in water conservation involve measures such as water rate structures, leak detection, meter replacement, and public education, legal access to lands will not be an issue.

b. Identify the source of the water to be put to use. [0 to 10 points]

Conservation measures will preserve local groundwater resources, which are currently being mined. Water conservation is an important aspect of regional water planning, as it allows the region to make efficient use of and extend existing resources. Given that groundwater aquifers, many of which have very low natural recharge rates, provide the largest source of water supply in the Southwest planning region, a reliable long-term supply depends on using these resources wisely (DBS&A, 2005).

c. Describe and quantify whether and how the proposal would extend the water supply through conservation, or increase the supply through development of new water in the Southwest Planning Region. [4 points for each 10 AF up to 500 points]

Groundwater resources are currently being depleted at an unsustainable rate in the Southwest planning region, such that the communities of Santa Clara, Bayard, Deming, and Silver City will not be able to meet demands through 2040 using existing wells. By decreasing demand through water conservation, existing supplies can be extended to meet growing demands. (DBS&A, 2005).

Conservation programs extend the water supply in two ways: (1) by reducing the amount of water that must be pumped, treated, and delivered to meet a particular need, and (2) by reducing consumptive uses (depletions) associated with a particular use. For example, indoor water conservation initiatives (low-flow plumbing fixtures and appliances) reduce overall household or business use because less water is delivered to meet the same demand. However, consumptive use is not materially reduced because there are few evaporation or other losses that affect return
flow in indoor use. The water saving benefit is that less water is pumped and treated. Per capita demand, which is often the measure used by municipalities to demonstrate success of municipal conservation programs, reflects the amount of water diverted per person, not how much water is returned to the system through return flows or infiltration to the aquifer.

Conservation measures that reduce the amount of water diverted reduce the amount water pumped from the aquifer and therefore extend supplies. Although in some cases less water is returned to the aquifer, treatment and pumping costs are reduced and water use is more efficient.

Reduction in consumptive uses results in greater net water savings. The best example of this is xeriscaping, which reduces the amount of irrigated turf around homes and businesses. A large percentage of the water used for outdoor watering is consumed by the plants or lost to evaporation and therefore never returns to the aquifer. By reducing this type of use, significant water savings occur. These savings are also reflected in per capita use.

The purpose of the proposed Conservation Fund is to assist municipalities in funding projects that extend supplies by reducing consumptive uses and net water losses, and improving efficiencies in water use by reduced diversion.

Many of the larger municipalities in the Southwest planning region already have conservation ordinances and inverted rate structures in place to encourage efficient water use; however, based on reviews of water use in the region and surrounding communities, and on program examples from around the country, the Southwest New Mexico Regional Water Plan concluded that some communities in the planning region could achieve significant water savings—as much as 38 percent—through an integrated application of a conservation program (DBS&A, 2005).

As a part of the Southwest region’s water planning process, the projected increase in municipal demand in the Southwest planning region between 2000 and 2040 was approximately 2,500 acre-foot per year (ac-ft/yr) under the low growth scenario and 6,600 ac-ft/yr under the high growth scenario. The plan estimated that a conservation program that uses tools such as rate structures and public education could reduce demand to 150 gpcd in cities and communities that include commercial uses and to 100 gpcd in residential-only areas.

With all communities in the planning region reducing demand to less than 150 gpcd for municipal and 100 gpcd for residential use, the overall reduction in demand was estimated to be about 33 percent of the municipal/public supply diversions for the region. Under the low growth scenario, total demand in 2040 would be reduced by about 3,900 ac-ft/yr, from a projected 11,740 to 7,840 ac-ft/yr. Under the high growth scenario, the region could reduce total water use by about 5,340 ac-ft/yr, from a projected 15,840 to 10,500 ac-ft/yr (DBS&A, 2005). According to the Regional Water Demand Study for Southwest New Mexico, Catron, Grant, Hidalgo and Luna Counties (AMEC, 2010), implementation of water conservation measures by water suppliers in the four-county area could result in a 2,811-ac-ft/yr reduction in municipal demand by 2020 and up to a 4,269-ac-ft/yr reduction by 2050 (AMEC, 2010).
d. Demonstrate how the proposal would meet AWSA and CUFA requirements. [up to 30 points] (see www.AWSAplanning.com for AWSA and CUFA documents.

The proposed Southwest Planning Region Municipal Conservation Fund supports the Arizona Water Settlement Act (AWSA) Stakeholder Consensus Goal of “utilizing AWSA in a cost effective manner to balance historical and future demands against uncertain supply, while protecting the environment.” The Conservation Fund will be used to assist communities in conserving existing supplies, which will extend the existing supply and help the communities meet projected demand without adding additional infrastructure or tapping into additional water supplies. Because the proposed Conservation Fund will assist southwestern New Mexico communities in meeting future water demands, it meets AWSA requirements.

The Consumptive Use and Forebearance Agreement (CUFA) describes the terms and parameters for New Mexico AWSA diversions without objection of users downstream. The proposed Conservation Fund will be used to assist Southwest planning region communities in using their existing water supplies more efficiently and does not call for a water diversion. Since there are no diversions proposed as a part of this project, there should not be any objections from downstream users. As such, the proposed Southwest Planning Region Municipal Conservation Fund meets CUFA requirements.

2. [40] Describe the proposal and its technical viability.

a. Include any (or reference publically-available) technical and engineering studies completed and demonstrate how these studies support the proposal. [up to 20 points]

A water conservation program can be used as a long-term supply option, and water utilities that have used this option have had positive results, in some cases to the point of averting water and wastewater system expansions (Vickers, 2001). Tampa Bay Water in Florida developed and evaluated its best management practices (BMPs) for reducing indoor and outdoor water demand and determined that the region would save 33 million gallons per day in the following five years based on these BMPs (AWWA, 2006). As discussed in Section 1.C, the Southwest New Mexico Regional Water Plan specifically recommended conservation as a means to protect and extend water supplies to meet future demand.

Conservation measures can be implemented by water suppliers as well as by the end users. Water suppliers can directly reduce water use by improving operations to reduce leaks or water waste. Use of treated municipal effluent for landscape irrigation results in efficient use of water because less water is pumped from the aquifer to meet this type of demand.

Other programs create incentives for customers to reduce their use. An increasing block rate structure that increases the cost to the customer as more water is consumed creates an incentive to reduce use. Reducing indoor residential use through incentive programs to install low-flow toilets or update fixtures can also reduce per capita water use. Xeriscaping significantly reduces net consumption because water is not lost to evaporation or consumed by the plants.

The Southwest Planning Region Municipal Conservation Fund funding process will include a project review team that includes representatives from the four counties. The project review team, in cooperation with the Interstate Stream Commission (ISC), will develop a simplified set
of criteria for project review that ensures maximum benefit in terms of conserving finite resources. Using these criteria, the project review team will evaluate the proposals and select conservation projects, subject to review and approval by the ISC. It will be important to direct resources to projects that assist in reducing the amount of groundwater being pumped to meet demand.

The advantage to having a set of local representatives review the project proposals will be the resulting coordination with the local regional planning process, which is less likely to result from working at the state level. The planning departments from the four counties already work closely with multiple water suppliers and are well positioned to educate and encourage the systems to work together to prioritize conservation projects. This process will allow conservation to move forward at the local level with input from local governments regarding priorities. This will also help improve conservation awareness. Levels of funding available will depend on how much funding is initially awarded to capitalize the fund.

b. Include any (or reference publicly-available) hydrologic, ecologic, or geotechnical studies completed and demonstrate how information included in these studies specifically supports or detracts from the proposal. [up to 20 points]

According to the Regional Water Demand Study for Southwest New Mexico, Catron, Grant, Hidalgo and Luna Counties (AMEC, 2010), implementation of water conservation measures by water suppliers in the four-county area could result in a 2,811-ac-ft/yr reduction in municipal demand by 2020 and up to a 4,269-ac-ft/yr reduction by 2050.

According to the Southwest New Mexico Regional Water Plan (DBS&A, 2005), a successful municipal water conservation plan will incorporate several strategies to meet its goal, including water conservation ordinances, public education, indoor conservation, gray water recycling, and reuse of municipal wastewater.

Both of these studies specifically recommend conservation as a way to extend water supply for the municipalities in the Southwest planning region and therefore directly support this proposal.

The City of Deming has a wastewater effluent recycle and reuse system currently in place. Some of this water is purchased by Luna Energy; the remainder is used to irrigate the City golf course, the cemetery, and City-owned farmland (DBS&A 2009). This is an example of a potential project to improve efficient water use. The City would like to expand this system to include additional parks and recreational facilities and is requesting funding for this project in a separate application.

The cities of Lordsburg, Silver City, and Deming currently have water conservation based rate structures in place, as well as other measures used to encourage water conservation (DBS&A 2005). The implementation of additional conservation strategies will lead to significant further reductions in municipal demand.
3. Quantify estimated costs.

   a. Quantify the proposal’s estimated costs, including planning, design, and/or construction, and administration or oversight. [up to 10 points]

The project does not include design or construction costs. The application requests $1.4M over a four-year period to capitalize the fund. The requested funds are intended to allow the fund to continue to earn money (and therefore be self-sufficient) and grow so that it can fund conservation projects without requesting additional funds from the State. The amount of funds available on an annual basis will depend on the fund investment approach, market conditions at the time of capitalization, and conditions placed on the fund by the state regulations.

Project funding study and implementation plan: The participating municipalities will be required to develop the detailed implementation strategy for the project. This document will contain the more detailed information requested in Section 3.a. of this application. This process and resulting report will require staff time, some consulting expertise in fund investment and structure, development of legal instruments to meet state requirements, and development of an annual budget for the program. It is anticipated that the municipalities will provide significant in-kind contributions in staff time; however, it is likely approximately $25,000 to $50,000 will be required to develop this plan.

The project funding study and implementation plan would provide the following information:

- Optimal level of capitalization funding to support at least four projects per year (one project per county)
- Assessment of the need for a dedicated staff person to implement the program
- Evaluation of need to request additional funds
- Process for project approval from the ISC
- Annual budget including administrative and operational costs
- Legal and governance structure

b. If applicable, quantify the proposed project’s on-going administrative, operational, and maintenance costs. [up to 10 points]

The project implementation plan (Section 3.a) will develop the information requested in this section.

The primary ongoing financial burden on local governments associated with implementing water conservation ordinances and public education programs will be labor (DBS&A, 2005). The staffing and time required to implement these efforts include the following:

- Drafting and implementing a water conservation ordinance requires a staff member to oversee the process and maintain the effort.
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- Utility staff need to be trained and made available to undertake water waste enforcement duties. Existing field staff could be trained and sworn in as water waste officers if they have several hours available each week.

- Rate structuring requires staff time to develop and implement the new rate structures. Billing has to be retooled in order to bill using the new rates.

- Public education generally requires at least a part-time person devoted to outreach to the public and in the schools.

The larger municipalities that may already have some of these structures in place could use resources for enforcement, additional public education efforts, additional conservation measures, and/or rebate programs for water-efficient appliances and xeriscaping (DBS&A 2005). It is anticipated that local governments will rely on existing staff to accomplish the tasks outlined above. These entities will incur additional costs if new staff must be hired. It would be possible for local governments to pool resources to hire an individual at the County of the Council of Governments to take care of fund administration.

The annual salary for the manager of this program, should an outside person be hired, will depend on grade and seniority associated with the position when it is advertised as well as the experience and qualifications of the person hired. Such a salary could range from $35,000 to $50,000 or higher. The project implementation plan would include a salary survey to identify the appropriate range for this position.

c. Describe environmental compliance activities, and quantify the costs for environmental mitigation and restoration related to the proposal. [up to 10 points]

Increasing water conservation supports sustainable water use, which is beneficial to the environment. The project most directly contributes to long-term sustainability, protection of finite groundwater resources, and improvement of water management practices, all of which indirectly benefit the environment. There will be no costs associated with this project for environmental mitigation and/or restoration since there will be no detrimental effect on the environment.

The cities of Lordsburg, Silver City, and Deming currently have water conservation-based rate structures in place, as well as other measures used to encourage water conservation, although these measures do not have a compliance component (DBS&A, 2005).

It is anticipated that the rate of decline of the aquifers will decrease because less water is pumped from the aquifer to meet current demand. Projects that propose to irrigate turf with water that was previously discharged to surface lagoons (typically lined, or having a clay layer) will not reduce the amount of water returning to the aquifer. The amount of water returning to the aquifer from the surface discharge of wastewater depends on the discharge point and the amount of evaporation once it is discharged. Because less water will be pumped, no decline in aquifer levels would be expected.

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d. Quantify the AWSA funding sought for the proposal and for the pendency of the proposed activity's or project's duration. [up to 10 points]

The project does not include design or construction costs. The application requests a total of $1.4M over a four-year period to capitalize the fund.

The cities of Lordsburg, Silver City, and Deming currently have water conservation-based rate structures in place, as well as other measures used to encourage water conservation (DBS&A, 2005). No water conservation projects ordinances must be complied with to implement water conservation.

4. [40] If proposal impacts, beneficially or adversely, the environment of the Southwest Planning Region, the Gila River, its tributaries or associated riparian corridors, use the best available science to:

a. Describe and quantify how the proposal might impact the project site and environment, particularly state and federally-listed species. [up to 10 points]

This project considers increasing water conservation and could have only a positive effect on the Gila environment by decreasing water use and thereby decreasing stress on the Gila River ecology. The project most directly contributes to long-term sustainability, protection of finite groundwater resources, and improvement of water management practices, all of which indirectly benefit the Gila environment. There will be no impact to any state or federally-listed species as a result of the proposed Conservation Fund project. Benefits to federally listed species are not known, because projects that would be funded have not yet been identified.

Project-specific benefits could be determined once the fund is operational and applications are received. At this time, no project sites are identified.

b. Describe and quantify the proposal's efforts to mitigate possible adverse impacts on the environment, particularly riparian areas and state and federally-listed species in the Gila Basin and at the specific location of the proposal. [up to 10 points]

Because there will be no adverse impacts on the environment as a result of the proposed Conservation Fund project, mitigation efforts not be needed. The proposed project will not have any adverse impact on riparian areas or on any state or federally-listed species.

c. Describe and quantify how the proposal may benefit the environment, particularly riparian areas and state and federally-listed species in the Gila Basin and at the specific location of the proposal. [up to 10 points]

The proposed Conservation Fund project will benefit the environment by reducing the demand on existing water resources, which will promote sustainable use of existing water supplies. The project most directly contributes to long-term sustainability, protection of finite groundwater resources, and improvement of water management practices, all of which indirectly benefit the Gila environment. Specific projects funded through the proposed Conservation Fund could have local benefits in terms of reducing pumping in riparian areas. However, projects have not yet been developed, or mapped, so project specific benefits are not yet known.
d. List any environmental statutes, rules, or regulations that may apply to the proposal, and demonstrate how the proposal implementation will comply with such laws, rules or regulations. [up to 10 points]

No environmental statutes, rules, or regulations apply to the Conservation Fund proposal. Specific projects may be required to comply with state, federal and local regulations. However, projects have not yet been developed, so project-specific compliance requirements are not yet known.

5. [70] Describe any economic or cost analysis information and data for the proposal:
   
a. Quantify estimated economic benefits including environmental, recreation, value of water itself, value of the water to the regional economy, increased economic growth, protection against loss of jobs, agriculture, ranching, local economic sustainability or growth, or other. [up to 10 points]

Water conservation is an important aspect of regional water planning, as it allows the region to make efficient use of and extend existing resources. By decreasing demand through water conservation, existing supplies can be extended to meet growing demands (DBS&A, 2005). Additionally, conserving water reduces the use of fresh water sources, which reduces production and treatment costs, in addition to the costs of developing new infrastructure such as drilling new wells. Conservation of water will save these communities money, allowing them to focus their resources on creating economic growth in the region. Farmers who use groundwater benefit from stabilizing aquifer levels because pumping costs (which can be a large factor in the economic viability of small farms) will not increase due to water level declines.

Project-specific benefits will be articulated by the applicants seeking funds from the Conservation Fund. Such project details will include project location, costs to implement, anticipated water savings, environmental benefits, and interface with other ongoing water planning and conservation projects.

One measure of the value of water savings from conservation for a city is the reduction in the number of water rights that must be purchased to meet demand. For example, assuming that future demand increases by 100 feet, the city could purchase 100 additional acre-feet of water to meet that demand. However, if through conservation and water efficiency the city can meet that future demand with existing supplies, it no longer has to purchase the 100 acre-feet of water rights. If water rights sell for $2,000 an acre-foot with a 10 percent transaction cost, a municipality can save $210,000 through water conservation.

b. Quantify estimated costs including planning, design, and/or construction, environmental compliance, operation, maintenance, repair, and administrative costs or other. [10]

The primary financial burden to municipalities would be the labor costs, for drafting and implementing water conservation ordinances and training staff. The actual costs of the individual projects funded by the Conservation Fund will be the increased administrative tasks associated with managing the fund and reviewing projects. It is anticipated that additional staff may be hired by local governments. However, it may be possible for the local governments to pool resources and hire one individual to be employed by the local Council of Governments or
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by the County to take on the day to day management of the fund and simultaneously function as a conversation coordinator for the region. The proposed project will not include any environmental compliance costs.

More detailed discussion of costs for developing and administering the Conservation Fund are included in Section 3 of this application.

Costs associated with specific projects, for example leak detection and repair or meter replacement, would be included in the application to the fund for those conservation activities. However, this application from the City of Deming does not propose specific conservation projects. Rather it is to capitalize the fund that would be the financing mechanism for specific conservation projects.

c. Identify the source of local contributions and demonstrate the commitment and ability to pay any local cost-share for project proposal, including any applicable exchange costs [1 point for every % of project cost to be borne by local sponsor up to 50 points]

Annual municipal budgets or state matching funds will likely be the sources of local contributions. In addition, in-kind funding in the form of salaries will contribute to the local match. It is anticipated that one municipality from each county will contribute staff time to participate in planning and implementation of this project.

Assuming a salary of $60,000 per year and a requirement of 40 hours per staff person for a total of 160 staff hours, the local in-kind contribution would be $4,600 for the planning and implementation of the conservation fund. Assuming that the planning phase costs (i.e., to draft the project funding study and implementation plan referred to in Section 3) approximate $50,000, the local contribution is approximately 10%.

Local communities will be required to pay for a percentage of the total cost of their individual projects as local cost-share, although the percentage has not yet been defined. Local cost share for projects funded through the Water Trust Board is 20 percent. The level of funding available for local projects will depend on how much funding is initially awarded to capitalize the fund and the number of projects funded each year. Applicants will be required to identify the source of their local cost share when they submit applications to the Conservation Fund for specific conservation projects.

6. [120] Describe how the proposal addresses the needs of a particular group or groups or interests on the issues of

   a. Historic uses, traditions, cultures, and customs. [up to 10 points]

The proposed project objective is to achieve sustainable water use to meet municipal demand, so that the traditions, cultures, and customs that have given rise to the current uses and allocations of water can be protected. Other, non-municipal water uses (such as agriculture) will benefit from the proposed Conservation Fund project, since decreasing aquifer withdrawals will preserve the groundwater resources for current uses as well as for future demands resulting from population growth and economic development.
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b. **Current and future demands for water in the Southwest Planning Region.** [up to 20 points]

During the Southwest regional water planning effort municipal conservation and management was identified as a priority alternative for how best to meet projected water demand with available supplies (DBS&A, 2005). Both the regional plan and subsequent studies have estimated significant water savings that would result from more thorough implementation of water conservation measures in the region (AMEC, 2010). Both Deming and Silver City have water conservation plans that identify conservation measures that the communities would like to implement, but the communities need funding for their implementation. The Conservation Fund will benefit not only Deming and Silver City, but also the smaller communities within the four-county area that currently have even fewer resources to devote to conservation. Non-municipal water users (such as agriculture) will also benefit because a reduction in groundwater withdrawals will decrease the current stress on water levels, potentially causing them to stabilize or even recharge, thus reducing pumping costs for farmers. The proposed Conservation Fund project will preserve the groundwater resources of southwestern New Mexico, ensuring that the region has enough water resources for current uses as well as for future water demand increases that will result from projected population growth and economic development.

c. **Flood control.** [up to 20 points]

The proposed Conservation Fund project will not impact flood control.

d. **Fire protection, prevention, or suppression.** [up to 20 points]

The proposed Conservation Fund project will conserve municipal water resources in the participating communities, which will help to ensure that there are adequate water resources for fire protection.

e. **Recreation.** [up to 20 points]

The proposed Conservation Fund project will have a positive impact on recreation since water conservation measures, such as wastewater effluent recycling, are used to irrigate municipal facilities such as golf courses, parks, and other recreational facilities, ensuring a reliable, long-term source of water supply for these uses.

f. **Environmental protection and/or enhancement.** [up to 20 points]

The proposed Conservation Fund project will increase the implementation of water conservation measures in the region. Local governments could opt to pursue conservation projects, such as reuse, that could be designed specifically to enhance local riparian environments. The project most directly contributes to long-term sustainability, protection of finite groundwater resources, and improvement of water management practices, all of which will indirectly benefit the environment.

g. **Any others.** [up to 10 points]
7. [40] List those supporting the application, including federal, state, and local government entities; Indian nations, tribes or pueblos; irrigation or conservation districts; non-profit organizations; and other entities. Provide letters or resolutions of support for the application. [up to 40 points]

The City has received two letters of support for the final application (attached).

8. [30] Describe whether the proposal would benefit one or more than one of the counties in the Southwest New Mexico Planning Region – Catron, Grant, Hidalgo, and/or Luna Counties. [10 points/county up to 40 points]

The proposed Conservation Fund project will impact all four of the counties in the Southwest planning region (Catron, Grant, Hidalgo, and Luna), in addition to each of the municipalities located within these counties. All southwestern New Mexico residents will benefit from the conservation projects that will be implemented as a result of funding this project, as water conservation will extend the life of the resource for the entire region.

As the region continues to grow, water conservation will play a critical role in ensuring that the area is able to meet future water demands.

9. [50] Describe whether the proposal would support economic growth or benefit one or more than one of the following interests in the Southwest New Mexico Planning Region – agricultural, ranching, municipal, recreational, or other (specify). [10 points/interest up to 50 points]

Many of the water studies completed in the Southwest planning region have identified municipal conservation as a key strategy for ensuring that supplies can continue to meet future demand. Both Deming and Silver City have water conservation plans that identify conservation measures to implement as the funding becomes available. The Southwest New Mexico Regional Water Plan identifies many municipal conservation strategies that water suppliers could implement (DBS&A, 2005).

Non-municipal water uses (such as agriculture, ranching) will benefit as well because water levels in the areas of the Mimbres aquifer that are most stressed will be allowed to recover as a result of the decrease in groundwater withdrawals. This reduction will preserve the groundwater resources for the current uses, as well as for future water demand increases that will result from the projected population growth and economic development.
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References


December 12, 2011

Lawrence Brookey, Public Works Director
City of Deming
PO Box 706
Deming, NM 88031

RE: Letter of Support for Deming’s AWSA Tier 2 Conservation Fund Proposal

Dear Mr. Brookey:

On behalf of the Gila Conservation Coalition, I am writing to express our support for the City of Deming’s Arizona Water Settlements Act Tier 2 Conservation Fund proposal to provide funding to municipalities in Grant, Luna, Hidalgo and Catron counties to implement municipal conservation programs that will reduce net depletions to our aquifers and extend the life of our water supplies.

I thank you for the opportunity to provide support to this critically important proposal.

Sincerely,

[Signature]

Allyson Siwik
Executive Director
November 27, 2011

Members of the AWSA Tier 2 Evaluation Committee:

The membership of the Gila San Francisco Water Commission has reviewed the City of Deming project proposal and voted unanimously to support it. The Commissioners understand that they have supported more projects than can be implemented with the available resources, however they continue to be committed to keeping the AWSA water in the Southwest Water Planning Region of New Mexico and using the available money to do so as well as support other water supply demands in the region. After you have evaluated and ranked the Tier 2 projects, the GSFWC will make recommendations to the ISC relative to the projects by resolution.

Thank you for your consideration of this letter of support.

Vance Lee, Chairman
Gila San Francisco Water Commission