

NOW is the time to submit your comments to protect the Gila River!

This is your best opportunity to have a meaningful impact on the decision to divert the Gila River. PLEASE submit a written comment.

An environmental impact statement (EIS) for the New Mexico Unit of the Central Arizona Project (diversions on the Gila and San Francisco Rivers) has begun. YOUR COMMENTS can influence the process. This first phase is called scoping and is designed to get public input.

Southwestern New Mexico Audubon has prepared the following list of potential topics to help you make comments. Below the **topics list is additional information about the scoping meetings and other background information.**

Comments must be in writing and submitted by July 20.

By mail: Phoenix Area Office
Bureau of Reclamation
ATTN: NM UNIT EIS
6150 West Thunderbird Road
Glendale, AZ 85306

By email: NMUnitEIS@empci.com (if emailing comments, please use "NM Unit EIS" as the subject of your email)

Online: Use the webform at <https://www.nmuniteis.com/submitting-your-comments/>

POTENTIAL TOPICS FOR COMMENTS

1. **There are other pressing needs for water besides agriculture.**
 - a. Section 212 (i) of the AWSA states that “the New Mexico Unit Fund shall be for the purpose of paying costs of the New Mexico Unit *or other water utilization alternatives to meet water supply demands* in the Southwest Water Planning Region of New Mexico.” Therefore, agriculture should not be the only beneficiary of the funds. The number of irrigators that may benefit from the proposed action is, at most, a few hundred in the four-county region, which has a population of around 60,000.
2. **Other alternatives need to be considered.**
 - a. The identification and evaluation of alternative ways of meeting the purpose and need of the proposed action is the heart of the NEPA analysis. A no-

action alternative, doing nothing, is required to be studied for the EIS, but there are also two solid alternatives that are cost-effective and would provide beneficial use of water in all of Southwestern New Mexico.

- b. The [Deming Water Alternative Report](#) prepared by Western Resource Advocates and Audubon New Mexico describes water conservation and efficiency improvements that are a better alternative than the proposed action or no action. The projects would be the cheapest, fastest and best water supply strategy to meet the needs of the largest municipality in the region.
 - c. The Grant County Regional Water Plan is a critical project for the region that would provide water security to the majority of residents in Grant County -- in Tyrone, Silver City, Arenas Valley, Santa Clara, Bayard, Hanover and Hurley. It has only received a small portion of its needed funding.
 - d. The [Southwest Regional Water Plan](#) of 2017 lists nine other water projects to address local water issues that are in need of additional funding.
3. **The proposal will threaten the natural flow of the Gila and the flora and fauna that depend on it.**
- a. The 2014 peer-reviewed [Flow Needs Assessment](#) published by The Nature Conservancy concluded that diversion of the types of flows allowed under the Consumptive Use and Forbearance Agreement (CUFA) would “have direct negative effects on many ecological processes.”
 - b. There are seven threatened or endangered species that rely on this habitat, among which are amphibians, reptiles and birds. Altered flow regimes would seriously affect the spawning success of the spikedace and loach minnow, and the proposed diversions could threaten movement of fish upstream, with potential loss of genetic diversity.
 - c. Significant habitat, including critical habitat for endangered species, has developed along several of the unlined irrigation ditches, but the proposed actions emphasize increasing capacity and lining portions of these ditches. The potential impact of the proposed changes to the ditches should be thoroughly studied.
 - d. Expansion of the existing ditches could lead to significant loss of habitat along side them, and access roads along the ditches would prevent the recovery of any damaged habitat.
 - e. The proposed diversion structures are not adequately described. A comprehensive and accurate EIS cannot be done when there is no design for the Gila diversion and the location is not even identified. A concrete diversion across the Gila River flood plain could have very detrimental effects on the fish that depend on the river.

- f. The existing diversions already dewater the Gila River during portions of the year. Larger conveyances will lead to earlier and more far-reaching dewatering.
4. **Pumping groundwater could have devastating unintended consequences.**
 - a. Adequate hydrologic and geological studies have not determined that aquifer storage and recharge is even feasible.
 - b. The riparian area near the proposed wells depends on adequate levels of groundwater in order to support the cottonwood trees.
 - c. Groundwater levels for wells on other farms could inadvertently be lowered.
5. **The proposal does not take into account the potential effects of climate change.**
 - a. A yield analysis has not been done that would confirm that water would be available for the proposed actions on the Gila or San Francisco Rivers. Stream flows are expected to decrease due to climate change. The Consumptive Use and Forbearance Agreement (CUFA) provides for most of the diversion to take place during historic snowmelt run-off, but snow melt is occurring earlier every year, and there could be years in the future with no snow pack.
 - b. Increased evaporation could alter projections for storage reservoirs and aquifer recharge.
6. **The proposed action is grossly unfair to the rest of the population in the four county region who are supposed to benefit from the \$66 million in AWSA funds.**
 - a. At most, a few hundred farmers, and perhaps as few as fifty, will benefit from the proposed action. Over 60,000 people live in the region and they will receive no benefit. Many of the people in our region suffer from water insecurity.
 - b. Although the proposal seeks to use funds that are restricted to construction (\$44 million) some of the proposed projects, such as Weedy Canyon reservoir, exceed the amount of available funds. Will other AWSA funds be used for these?
 - c. Will the \$66 million portion of AWSA funds be exhausted to pay for Operation and Maintenance of the proposed action and will taxpayers be ultimately responsible for those costs?
7. **Agricultural costs and benefits are not identified.**
 - a. Land ownership is poorly defined. Will the largest landholder in the Gila Valley, Freeport McMoRan, be the major beneficiary?
 - b. What will be the cost of the water and have any potential customers been identified?

- c. What crops will be grown with the additional water? Will the current farmers be willing and able to switch their farms over to high value crops that will provide enough economic return to justify the added costs?
 - d. There are much larger agricultural areas in the four-county region, Luna County and the Bootheel of Hidalgo County (as well as on the lower Rio Grande and in Northern Mexico) than the farms proposed to receive AWSA water. Would the AWSA-watered farms be able to compete with these in the regional marketplace?
 - e. Will there be a sufficient labor pool for increased agricultural production? The population of the four-county region is decreasing, especially in Catron and Hidalgo counties.
 - f. The average age of farmers, 58 years, is increasing nationwide and probably locally. Will farming remain a viable occupation in this area?
8. A cost-benefit analysis should include non-diversion alternatives such as the Grant County Regional Water Plan and the Deming Water Alternative Report.

The Gila Conservation Coalition has prepared a number of other potential topics for comments. Their fact sheet can be found [here](#).

General guidelines for submitting comments:

- Comments should be clear, concise, and relevant to the analysis of the proposed action.
- Comments that are solution-oriented and provide specific examples will be more effective than those that simply state that you oppose the proposed project.
- Comments that contribute to developing alternatives that address the purpose and need for the action are also effective.

You can also submit written comments at scoping meetings.

- The scoping meetings are an open house format. At the scoping meetings there will be handouts plus nine posters describing the project and process. You can also view the posters and handouts [online](#).
- Staff from the NEPA contractor, BOR and ISC will be on hand to answer questions. However, your questions and their responses will not be a part of the public record. Therefore, it is imperative that you submit your comments in written form. You can write them on forms at the scoping meetings and turn them in there or through the three methods detailed above.
- There are meetings in Arizona and New Mexico. A complete listing of the meeting places can be found at <https://www.nmuniteis.com/public-meetings/>. Regional meetings are listed at the bottom of this email.

Scoping meeting locations

SILVER CITY, NEW MEXICO: MONDAY, JULY 9, 2018, 4-7 PM

RALLY AT 3PM

Grant County Veterans Memorial Business and Conference Center, Multipurpose Room
3031 Highway 180 East
Silver City, NM 88062

CLIFF-GILA, NEW MEXICO: TUESDAY, JULY 10, 2018, 4-7 PM

Cliff High School, Old Gymnasium
622 St Hwy 211
Cliff, NM 88028

GLENWOOD, NEW MEXICO: WEDNESDAY, JULY 11, 2018, 4-7 PM

Glenwood Community Center and Library
14 Menges Ln
Glenwood, NM 88039

VIRDEN, NEW MEXICO: THURSDAY, JULY 12, 2018, 4-7 PM

Virден Community Center
110 Richmond Ave.
Virден, NM 88045

BACKGROUND INFORMATION

What is Happening?

- The New Mexico Central Arizona Project Entity (NMCAPE), a group of 14 local Southwestern New Mexico governments, soil and water conservation districts, and irrigation districts are proposing to divert the Gila and San Francisco Rivers and build a New Mexico Unit (NM Unit) of the Central Arizona Project (CAP). The proposed action would involve construction of diversion structures, pipelines and storage.
- The NMCAPE has submitted statements of purpose and need and a proposed action to the Bureau of Reclamation (BOR)
- The BOR for the Lower Colorado Region and the New Mexico Interstate Stream Commission (ISC) are the lead agencies preparing an environmental impact statement (EIS) according to the National Environment Policy Act (NEPA)
- Public comments must be obtained before preparing a draft of the EIS.

What is being proposed?

- Diversion structures would be built on the Gila River and on the San Francisco River to provide water for new storage ponds for about 4000 acre-feet (AF) in the Cliff-Gila Valley, 500 AF in the Virден Valley and 1,900 AF near Alma.
- Pumping facilities would be built for associated storage ponds.

- Some segments of existing ditches would be lined and their capacity increased.
- Groundwater wells capable of pumping 500 gallons per minute would be dug at nine locations in the Cliff-Gila Valley.

How is the proposal justified by the NMCAPE?

- “The **purpose** of the proposed action is to develop a NM Unit of the CAP to allow for consumptive use of water from the Gila River, its tributaries or underground water sources in southwestern New Mexico, diverted in accordance with the CUFA and pursuant to the terms of the AWSA.”
- “The **needs** for the proposed action are to (a) develop water for delivery at the times, locations, and in quantities that will improve agricultural use, and (b) provide capability for future expansion for authorized beneficial purposes.”