

Summary of Water Advocates Comments on SWP

We understand the state made a mistake in requiring the SWP to be built with far insufficient resources (dollars and time). As a result of that mistake, the draft SWP is does not meet the State's water planning needs

- Draft plan does not meet its legal mandate 72-14-3.1
- Using administrative water supply as technical data is misleading
- OSE's water use reporting ignores consumptive uses
- Demand management is omitted; promotes minimal supply increases
- Does not address regional water planning boundaries
- Draft plan ignores the 2003 state water plan and its updates
- Transparency and public participation was minimal
- Climate change is not addressed
- The litany of all conceivable actions and participants is useful, but is not a plan

Recommendations

1. The ISC should post all comments pertaining to its 2018 draft state water plan on its web site, along with its staff's responses.
2. The ISC should, in a noticed open public meeting attended by a quorum of ISC members, invite and hear oral summaries of comments and staff's responses.
3. The ISC should deliberate and determine, in an open public meeting, whether or not the 2018 draft meets its statutory mandate. To the extent it does not, the ISC should direct changes to bring the draft into compliance, integrating public participation as required by §71-14-3.1.
4. Only then should the ISC consider amendment or adoption of the 2018 draft.