

Questions and Comments to the NID Response

Dear Jennifer Hanson and Greg Jones,

I was disappointed in many of your responses to my submittal of unanswered questions from your previous technical memos regarding the hydrological analysis of NID supply and demand, copied directly from your public documents. The original memos produced a lot of controversy. NID promised to address these issues in the Plan for Water. Sadly, instead of addressing these issues and revealing where they are located within your Plan for Water documents, or even when they were discussed, your response evades the issues and projects a condescending and hostile tone precipitating a major breach of trust regarding the model outputs.

The relevance of these issues come from the fact that you plan to use this disputed data in your future modeling of supply and demand for planning projects that impact a community far larger than your customer base. The contrast between the invitation for participation and response to public comment is stark. I have worked with environmental documents during my professional career and answered many public queries. This is one of the worst public responses I have seen.

The first question points out an inactive link. The appropriate response is, “the link has been restored.” Your response goes on to scold the commenter.

“Please note that the District will not be spending time on responding to comments that pertain only to previous analysis. The District will however, consider requests for modifications to the PFW. Please participate in the PFW meetings to understand model development and demand and supply scenario analysis. Many of your comments have been addressed in the meeting numerous times.”

A32 speaks to the inaccurate nature of the metrics determining “growth”, a key factor in modeling demand. Including the statement, “*The review of censuses, Dept. of Finance, General Plan, and UWMP data was **subjective.***” This would render the modeling results **subjective.**

RESPONSE: No response required. Please clarify the intent of your comment.

A major input to your model is regarding “growth” or expansion of service. If this input is subjective, then it is not supported by unbiased facts but by whatever you decide to input. This constitutes a breach of trust regarding the model outputs.

A33 Conservation, demand management, and other demand reducing policies are a water resources planning alternative strategy to be evaluated and compared to other alternatives in **the future Plan for Water process**.

The comment was a request to address this issue in the PFW.

PFW RESPONSE: As noted in multiple PFW meetings, conservation scenarios will be included in demand calculations.

Please list the specific demand reducing policies. Where are they evaluated and compared? I have attended or watched all the Plan for Water meetings since 2018 and have not seen this happen. Just repeating that it will happen does not address the concern.

A35 was regarding instream flows. The non-answer directed the questioner to search numerous documents and stated that some flows have not yet been determined, concluding “however preliminary targets have been included in the model.”

PFW RESPONSE: As noted in multiple PFW meetings, conservation scenarios will be included in demand calculations.

This tone-deaf response does not even address the subject of the question. If flows have not been determined, then how can they be factually incorporated into a model? The refusal to create an environmental water management plan negates any future efforts to integrate the natural and environmental flows. This is contrary to the strategic plan goal of integrated water management planning.

A36 is regarding the water budget model concluding, “*the extent of the analysis is a local decision based on the district’s needs, capacity, and available resources.*”

My comment discusses deliberate manipulation of data to produce a desired result contrary to an unbiased analysis as prescribed in the Draft DWR Handbook for Water Budget Development. NID claimed that they had the freedom to "conduct the analysis however they wanted". (Doug Roderick) according to the handbook. This constitutes another **grave breach of trust in the model outcomes.**

Response: No response needed. ??

An appropriate response would have been to assure the commenter that the prescribed procedures would be followed to the letter and the questionable analysis and results would not be included in future calculations.

Q37 What is the long-term conservation target for raw water use?

A37Conservation, demand management, and other demand reducing policies are a water resources planning alternative strategy to be evaluated and compared to other alternatives in the **future Plan for Water process**.

Comment: Please address this in the Plan for Water.

Response: Raw water conservation will be addressed through by applying drought water contingency reduction to demand and through the analysis of supply and demand strategies which will include conservation measures.

How do you apply drought water contingency reduction to raw water? How is this measured? Please list the supply and demand strategies that include conservation measures for raw water. Where is this located in the PFW documents or meeting minutes? When will these specific actions be addressed?

A43 Response: Demand reduction strategies will be evaluated in Stages 10 and 11 of the PFW process. Finally, this response gives the information that was needed. Why was this information not supplied 11 questions ago? Did a different person Answer this question?

A52 Future scenarios could increase or decrease the unit water demands of a respective land use. Planning assumptions will be updated once changes and/or legal actions have been made to change land use, restrict water use, or further define allowable uses.

Response: Thank you for your comment. As noted in several meetings, several factors will be utilized to calculate demand, including land use.

That is a very general statement that leaves the Demand Input in questionable limbo. At least the response is pleasant. This seems like a different person also.

A56 Response: This comment is in response to previous efforts; we will only be responding to specific PFW comments as those previous efforts will no longer be utilized once the new model is completed.

NID has stated that previous efforts will be the historic data used to build the new model. Does this mean that these extrapolated numbers will not be used in the new model?

Q58: Although three different water scenarios based upon climate change are modeled in the Hydrologic Analysis and used in the Water Supply Analysis TM, no alternative demand scenarios are modeled in the Demand Analysis. Question:

Can HDR explain why there are no alternative demand scenarios in the Demand Analysis.

A58. Two demand scenarios were provided based on a range of environmental flow requirements. Growth, loss, and saturation. Values can be adjusted to develop additional demand scenarios.

Comment: Please address this in the Plan for Water.

Response: This comment is in response to previous efforts; we will only be responding to specific PFW comments as those previous efforts will no longer be utilized once the new model is completed.

Does this mean that these numbers will not be used in the new model?

In conclusion I hope that NID continues to move toward transparency despite the arrogance and hostility that comes through in some of these responses. The lack of definitive growth values, lack of raw water measurement capabilities, and troubling intent of NID to “conduct the analysis however they want” creates significant doubt as to the validity of any outcomes from your model. Program level documents are a long-term process that deserves the open-minded pursuit of comprehensive results, not manipulated data leading to a predetermined outcome. True collaboration comes from a welcoming of new ideas and responses that invite brainstorming ideas from all directions toward a common goal.

It is notable that NID plans to use the Plan for Water as the leadup document toward their water rights application naming Centennial Dam as the project that will impound the 56340x State Water Right. I recommend that the NID Board withdraw the 56340x Water Right Application or face credible doubts about data manipulation and breach of trust regarding the model outputs.

Sincerely, Dianna Suarez