



Project Overview

❖ Return Flow Credit Plan

San Juan Water Commission

May 6, 2015



RFCP Activities

- Since April 2013 staff has been corresponding with ISC/OSE on SJWC's Return Flow Credit Plan.
- There have been multiple conference calls and discussions with Mike Johnson, Blain Watson and John Whipple.
- On October 22, 2014 the San Juan Water Commission received draft comments on the Draft Return Flow Plan.
- The draft comments were intended to begin discussion of concepts and requirements for administration of Return Flow Credits from the State.



RFCP Recent Activities



- The San Juan Water Commission staff responded to the OSE draft comments on November 19, 2014. The Commission's draft response comments were to identify and clarify the process moving forward.



- In addition, the San Juan Water Commission staff provided draft delineations of the Alluvial Valleys on February 3, 2015 that were proposed on the Administrative Guidelines.



- On April 21, 2015 the San Juan Water Commission staff met with the New Mexico Office of the State Engineer (OSE) staff to discuss the SJWC's draft comments.





RFCP Concepts

- Guidance Document: “Proposed Information Needs and Administrative Guideline for a Return Flow Plan for Permits No. 2883-B and 2883-C” will be the governing documents in the review and approval of Permits 2883 B and C related plans.
- Change in RFCP Rules: The 2009 change in regulations does not allow return flow credits for septic tanks or for irrigation of parks and other large metered areas. The SJWC settlement allows credits for those items.


RFCP Concepts

- Metered Uses on Non-Alluvial Areas: OSE requests SJWC to exclude non-alluvial area return flows based on individual connection meter data. This is possible for those entities that have had their system mapped. OSE has agreed to allow initial RFCP's to be based on aerial photography interpretation. The OSE feels it is imperative to move toward meter located data.





RFCP Concepts

- Large Irrigated Areas: At the discretion of Member Entities and SJWC, large irrigated areas with irrigation specific meters may or may not be included. This includes golf courses, parks, ball fields etc.
 - Five year Increment: OSE wants RFCP supported by 5 years of data. SJWC does not want to require all its members to provide the last five years of data, only those who anticipate needing return flow credits. All other members may report annually and at end of five years be allowed their credit.
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Current Status/Schedule

- OSE Staff is currently reviewing the delineated alluvial areas. There will be continued dialogue between staff and the OSE to address the requirements and concepts the State has submitted.
- Once discussions are complete, staff will work on individual plans immediately.
- Exception - Magnitude of new comments from OSE.
- The intent of the RFCP is to maximize the quantity of consumptive use or maximize the annual diversion amount in the existing permit conditions.

