



Oregon Water Resources Congress

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February 5th, 2010

Submitted via email to Ada.benavides@usace.army.mil

Ada L. Benavides
Program Manager
U.S. Army Corps of Engineers
441 G St. NW
Washington, DC 20314-1000

Subject: OWRC Comments on "Building Strong Collaborative Relationships for a Sustainable Water Resources Future: National Report Responding to National Water Resources Challenges"

Dear Ms. Benavides:

The Oregon Water Resources Congress (OWRC) is submitting comments on the "Building Strong Collaborative Relationships for a Sustainable Water Resources Future: National Report Responding to National Water Resources Challenges" draft dated December 2009. The Oregon Water Resources Congress (OWRC) represents irrigation districts, water control districts, and other local government water suppliers throughout the State of Oregon. OWRC members operate and maintain water supply systems that include reservoirs, canals, pipelines, and hydropower generation facilities production; and deliver water to 536,784 acres of land, 1/3 of all irrigated land in Oregon. This irrigated land yields a bounty of agricultural goods that are shipped around the world, including cherries, apples, pears, watermelon, onions, potatoes, hazelnuts, wheat, grass seed and other seed crops, and nursery crops.

As water suppliers, OWRC members are acutely aware of the need for increased funding, comprehensive data, and technical assistance for water resources planning and management. We appreciate the U.S. Army Corps of Engineers' recent efforts to assess states' water planning needs and identify potential areas where states and federal agencies can collaborate and leverage scarce financial resources to address mutual concerns. The efforts undertaken by the Corps to initiate a national dialogue about planning and managing our nation's water resources are laudable and represent an important step forward in addressing critical water needs. However, several aspects of the report are problematic to OWRC members, primarily the lack of funding to support proposed activities, lack of focus on addressing critical water resources challenges, and over emphasis on developing a national water vision.

The report states that the most common recommendation was the "need for funding to address water resources challenges," yet the recommendation "Water Resources Investment Strategies" is listed fifth and lacks any specific suggestions for meeting this

The mission of the Oregon Water Resources Congress is to promote the protection and use of water rights and the wise stewardship of water resources.

need. As noted throughout the report, maintaining and developing critical water infrastructure is very expensive to accomplish and often funded ad-hoc rather than through a long-term reliable funding stream. Irrigation districts and other water suppliers face multitudes of infrastructure repair, enhancement, or replacement needs that are often highly complex and cost prohibitive for a district to address without state or federal funding assistance.

OWRC concurs with the report's assessment that there needs to be long-term funding opportunities for water infrastructure projects. However, we are disappointed that proposed actions for developing water resources investment strategies lack any detail about how the funding would be developed, prioritized, or managed. All of the proposed actions for increasing water resources funding, (ranging from data collection to promoting legislative or administrative actions to increase appropriations for existing programs) require additional financial resources, which could serve to divert funding from existing successful programs. Developing concrete and reliable funding for water infrastructure improvements should be one of the first proposed actions since it is one of the most critical needs and also supports a healthy economy.

The report adequately summarizes key water resources challenges but fails to propose concrete actions to address the most critical needs. The critical needs identified in the report, (such as aging infrastructure and the ability to manage extreme events, including impacts from climate change), will have severe repercussions if they are not addressed soon. Collecting information and the development of a "Federal Support Toolbox" mentioned throughout the report are a step in the right direction but the report does not detail what the Toolbox will contain, how the program will be funded, or how the information will be compiled, managed, and used. Failures in water infrastructure or disaster planning have severe repercussions and require more immediate action than data compilation and coordination between agencies and states. Funding for integrated water resources planning and implementation at the state, regional, and local level is crucial to preventing loss of life and property and ensuring reliable water supplies and as such should be the number one priority.

While OWRC wholeheartedly agrees with the report's assessment of various water resources challenges, we do not agree that development of a national water vision is the solution. The need for the development of a national water vision, led by the Corps, is heavily emphasized throughout the report, but does not appear substantiated by summaries from the various listening sessions. On the list of states' top needs, the exploration of a national water vision is listed last, yet it appears second on the list of recommendations. As noted in the report, Western states are "fiercely independent" and view themselves as the "primary water planners." Oregon is no exception and while federal involvement in the form of funding and technical assistance would be welcomed, federal management of the planning process would not only be controversial but could damage ongoing planning work at the state and local watershed level.

OWRC is concerned that some of the proposed actions will usurp the state's role in water management and hamper Oregon's successful watershed planning program.

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Oregon is currently embarking on a statewide integrated water resources strategy, led by the Oregon Water Resources Department, and already has a robust watershed planning program, managed by the Oregon Watershed Enhancement Board. Providing funding and technical assistance for these state and regional planning efforts without a federally-driven process would better serve Oregon than proposed nationwide efforts. We recognize that not all states have established planning programs but a federally imposed one-size-fits-all model is not the solution to addressing critical water needs.

Further, while the report repeatedly mentions the need to build stronger collaborative relationships, there is little mention of the other federal agencies and programs with water resources responsibilities and expertise. In Oregon, and in other Western states, the Bureau of Reclamation has a large role in water management, yet they are not included as co-equal partners in the proposed actions for developing a national water vision. It is also troublesome to have a specific organization, the American Water Resources Association, listed as a partner with the Corps in developing a national water vision. This fails to recognize other important groups that are equally invested stakeholders in the development of a successful effort to meet our nation's water resources needs. No single nongovernmental entity should be given such a prominent role in water resources planning.

A national vision to "drive the Nation's water future" is irrelevant if the highway of water infrastructure to achieve that vision is broken. During this time of gradual economic recovery, it is crucial that we strategically invest America's financial resources in addressing critical needs, such as aging infrastructure and increased water demands, rather than spending money on new programs that are not critical and could damage existing successful collaborative water planning efforts. Developing a national water vision as a federal priority pales in comparison to the magnitude and severity of water resources challenges in Oregon, the West, and the nation as a whole. Action is needed to address these challenges, not further discussion.

The water resources challenges facing our nation need attention and we commend the Army Corps of Engineers for their efforts to develop partnerships and collaborative solutions. However, we remain concerned about the lack of details (such as funding, priorities, and stakeholder involvement in the planning process) on how to address our nation's most critical water resources needs.

Thank you for your consideration of our comments.

Sincerely,



Anita Winkler
Executive Director