



Comments on the Interagency Climate Change Adaption Task Force Draft National Action Plan:  
Priorities for Managing Freshwater Resources in a Changing Climate  
July 15, 2011

Thank you for the opportunity to comment on the *Draft National Action Plan for Managing Freshwater Resources in a Changing Climate*.

The Oregon Water Resources Congress (OWRC) was established in 1912 as a trade association to support member needs to protect water rights and encourage conservation and water management statewide. OWRC represents non-potable agricultural water suppliers in Oregon, primarily irrigation districts, as well as water control districts, and other special districts and local governments that deliver irrigation water. The association represents the irrigation districts, water control districts and similar public and private entities that operate water management systems, including water supply reservoirs, canals, pipelines, and hydropower production.

OWRC members have been leaders in water conservation and water efficiency, investing significant amounts of money to upgrade and modify their water delivery systems to reduce water loss and to improve water delivery so that their water users can better manage their water needs and improve their water use efficiency. The total investments have been in the millions of dollars in an effort that started long before the specter of climate change was raised, as a sound business decision and because of their commitment to improving stream flows – consistent with what we have describe as “the Oregon Way” for entities delivering agriculture water in Oregon.

Irrigation districts and similar entities are key components in western states’ water operations. River systems in the West are widespread, and without water delivery systems most of the land in the West would not be able to access water for irrigation, domestic, manufacturing, or the other beneficial uses of water. The delivery systems move water long distances, in some cases several hundred miles, to get the water to the points of use. The delivery systems are complicated with pumps, siphons, pipes, canals, storage reservoirs, regulating reservoirs, headgates for different purposes and many other components.

While OWRC appreciates the magnitude of the effort to develop a freshwater management plan, we believe that this action plan falls short of addressing the full uses and needs for freshwater in the United States. The stated goal, “Government agencies and citizens collaboratively manage freshwater resources in response to a changing climate in order to assure adequate water supplies, to protect human life, health and property, and to protect water quality and aquatic resources” neglects the importance of water to economic health and economic development for the nation and for other socio-economic needs for water to support human activities.

Freshwater is not only important in relation to water quality, fish and wildlife, and related habitat. It is critical for human consumption and as part of our daily lives – for life itself, for the economic functions that support society (and provide the money through private investment or taxes to support public investment in the kinds of activities anticipated by this Plan), for recreation and for hydropower generation. The Plan may mention some of these needs in passing, but some are not mentioned at all, and the Plan does not truly address these needs as part of the management of the nation’s fresh waters.

***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.***

The Plan does not recognize the importance of freshwater flows for hydropower generation, the main source of power for the Pacific Northwest. While there is debate about dams in rivers, there is a general acknowledgement that hydropower is critical to the Northwest's economy and life style and is a green, renewable power source. Any freshwater management program in the Pacific Northwest must recognize that fact. An abundant freshwater supply is critical to the continued supply of hydropower to serve all types of power needs in Oregon and the Northwest.

The Plan focuses on an *adequate* water supply starting in the Executive Summary and carrying on throughout the document. We believe this is not the appropriate goal for a national plan. The real need is a plan that focuses on an *abundant* water supply. An adequate water supply is the bare minimum to meet current needs without recognizing the likelihood of increased needs for water based on an expanding and evolving economy and social structure, plus natural population and economic growth. Planning for an adequate water supply implies a stagnant perspective that seems rooted in a belief that the U.S. cannot afford to expand or should not expand – that we must make do with what we now have. It also ignores the developing technologies for managing water and developing “new” water (such as reuse, desalinization). It does not accommodate the needs for water that new activities may carry with them. An example of this last point is the evolution of solar technology which requires huge amounts of water in the manufacturing process – water that ultimately supports the national goal to develop green energy sources. It implies that the highest, best priority for water is to maintain and protect fish, wildlife, and related habitat, and water quality to protect human life with no regard for the need for water for economic stability and growth, for providing food to meet a growing population and, to support research and innovation.

This document can be easily read as an effort by the Federal government to insert itself more aggressively in water allocation decisions, a role that has long been the purview of the states. A successful federal freshwater management plan must be solidly based on the states' role of managing water within their respective boundaries. No federal policy or document can assume that the Federal government can or should trump that long held principle in water management either explicitly, by implication, or as a side-effect of any federal agency or office issuance of a policy document. There needs to be clear recognition of the states' roles and responsibilities in managing water in their states, a supporting description of how this document and Federal activities in implementing the document will honor the states' role, and provisions for the states to be full partners with the Federal government in this effort.

The Introduction to the Plan describes the Plan as .an “overview of the challenges that a changing climate presents for the management of the Nation's water resources...” but we think the Plan falls short of full acknowledgement of those challenges. The Plan does not include a complete description of the forecasted impacts of climate change that bear greatly on future freshwater needs and water availability in Oregon and elsewhere in the West.

The Overview on Climate Change section does not recognize the shifting land use patterns that have been forecast in climate change models. Water demands will shift to meet the changing water needs that accompany the changing land use patters (e.g., a change from agriculture to urban uses or vice versa will change the time of year water is needed and may change the amount of water needed)

While there is mention of changing precipitation patterns and of reduced snowpack in the Plan, the Plan does not recognize the full impact of those occurrences on the West. It does not address how the nation will replace the water storage and flood control functions now performed by the snow pack. Without that stored snow, stream flows will change to higher flows during the times rain falls and will drop drastically once the rain stops falling as there will be no stored snow to melt and run off into the

streams. We will also lose the snowpack's function of flood control through its gradual release of water into the streams.

In most of Oregon, the impact will be far reaching. It could mean a drastic change in stream flows that may have significant impact on fish and wildlife. It will eliminate the storage of precipitation when it falls so it can later be used to irrigate during the growing season. It will reduce water availability for recreation activities. And it could possibly create water shortages for municipal and industrial uses that rely on water runoff from snowmelt and glaciers. The rain will run-off directly into streams without any means to hold back heavy rains and their resulting run-off to avoid flooding. It is extremely short-sighted and is a dangerous threat to all the water users, owners of land at risk of flooding, and water users to not recognize the need to secure water storage to replace the storage function and provide the infrastructure to reduce the risk of flooding property and destroying fish habitat, stream banks and wetland that is now being provided by snowpack.

There is a need for storage (above and below ground) that can capture water when it is available and release it when it is needed – for stream flow augmentation, fish passage, habitat restoration, irrigation, domestic consumption, recreation, industrial use, or any other use for water. (The environmental uses could become even more important as snowpack is lost.) And the protection of property and life from flooding losses in non-coastal areas cannot be left out of the climate change discourse.

We believe that the heavy reliance of this Plan on water efficiency does not adequately recognize other actions and technology that are important tools to ensuring the nation has an abundant water supply. Our members support water efficiency and water conservation both in principle and in practice. They have been leaders in water conservation and water efficiency, both in their water delivery systems and working with their irrigation water users to improve their water delivery systems from piping canals to installing more efficient on-farm water delivery sprinklers. Water efficiency cannot by itself ensure an abundant supply of water to meet all of Oregon's needs. Oregon and Oregonians have been actively conserving water and promoting water efficiency since the '70s and even before. As a result, we may not have the same margin for the impact of increased conservation and efficiency as other states that have not been as actively engaged in water conservation.

Water efficiency is an important piece of any freshwater management program, but it cannot be elevated above all other components such as storage, technology, and development of "new" water sources through reuse, desalinization, and other evolving technologies. The impact of water on the economy of the NW in general and Oregon in particular cannot and should not be submissive to water use efficiency in the Principles and Standards or any other water management, water supply, or water project development documents from the Federal government.

We appreciate the effort behind Supporting Action 17 to provide support for river basin commissions to incorporate integrated water resources management into their planning efforts. We believe the focus on large regional commissions fails to recognize the existence of other proven successful models for watershed planning. While a large commission may be appropriate for some basins, non-federal community based watershed planning that is driven by and accomplished by local communities at the watershed level may be appropriate in other basins. Oregon has a long history of *locally driven and managed watershed councils* successfully engaging the stakeholders in a community to define the water needs, develop plans to meet those needs, and implement those plans. These programs are successful because they work at watershed basin levels that allow the community to become involved and that collectively result in positive results for watershed throughout Oregon. The bigger commissions that are the subject of the Action may work for some river basins, but we believe the

smaller, community driven planning efforts are more effective and deliver improvements in their watersheds more quickly than the larger commissions.

The Plan does not include any recognition of the costs to administer and implement it. The Plan seems to assume that all other actors in the federal system and federal budget process will see this as the priority for allocation of resources instead of recognizing that the Plan is part of a very diverse and very complicated fiscal picture for the nation both at the macro level and at the level of meeting the nation's water needs. Is it just assumed that federal agencies involved in freshwater activities will simply shift their priorities and staff assignments to this effort? In that case, what happens to the principle responsibilities for managing the existing federal investment in water systems for the Bureau of Reclamation (as an example)? Or is there a belief that this Plan can be implemented as part of the ordinary course of business for agencies -- something that is hard to accept given the budget cuts the agencies have been taking in the last several appropriations and the likelihood of more cuts in each of the next several years as Congress and the Administration work to meet commitment to reduce the Federal budget?

There is no attempt to identify the costs to state and local governments to implement this plan nor is there an acknowledgement of the role they have played to this point in addressing water needs in their jurisdictions. As noted elsewhere, water supply management is a state responsibility, but this plan is written as if the Federal government will take over this role through a new set of requirements and guidance issued by federal agencies. The states will incur costs related to the implementation of this plan, but do not have resources for those costs. Will the Federal government reimburse the states for these costs or is there an expectation that the states will shift their budget priorities to cover these costs?

Similarly, there is no recognition of the private sector's ongoing investment in water management and the role the private can and should play in meeting the nation's water needs. In an era of shrinking federal, state and local governments and budgets, the private sector will be a key partner. There is no acknowledgement of that reality or of the need to include the private sector in this effort both as a funding source and as a partner in conservation and supply development.

It is not clear how the different Federal agencies and other governmental agencies will move forward in the Plan. How will new programs be developed or existing programs modified? What is the mechanism to avoid duplicate efforts? How will other levels of government, the private sector, and stakeholder be involved in moving this Plan forward or will they be involved? How and by whom will regulatory and policy changes be identified and how will the costs for those changes be covered?

Without a candid presentation of the budget impacts (state, federal and local governments, and private sector), the document fails on a couple of fronts. There can be no true evaluation of the benefit of this program with the costs, even an analysis that is not a cost-benefit analysis, but an analysis of how to allocate federal dollars among all competing budget needs. The document fails the transparency test as well when it lacks a key component of any plan -- the cost of the plan. At the same time, there is no full evaluation of benefits of moving forward with this plan. It seems to rely on the belief that the public will readily accept that climate change by itself serves as enough justification for the Plan and whatever costs the plan carries with it. There is no ability to evaluate in any way other than an emotional or political level whether the investment by the Federal government and other governmental entities in the proposed research, data collection and evaluation, infrastructure protection, etc. should prevail over other federal investments in water or even other non-water activities. In the end, is this really just a document about planning to plan that gives the Federal government priority over the management of water across the nation? What happens if the needed funding to truly implement this

Plan is not made available? Who will decide what current work will not be done by agencies as the shift work effort to the Plan? With what input by affected stakeholders? With what oversight?

As a major policy issue for this Plan (and all other water management efforts by the many Federal agencies involved in water) where does the Plan provide for an evaluation of the appropriateness of trying to sustain ecosystems based on the climate that support fish, wildlife and ecosystems in general as we now know it instead of switching our efforts to working with the ecosystems that fit with the changed climate? All the planning seems to be an effort to sustain what we have now, but there comes a point when a changing climate simply cannot sustain what now exists, when stream flows will not be sufficient to maintain a specific fish species because of lack of water or because of changes in temperature of the water. A plan that is intended to serve as a long-term plan must include action items to assess and define adaptation over time to recognize that we cannot return the environment to what it was many or a few years ago (or even to what it is now years down the road). Otherwise the plan becomes stagnant and becomes a document that is usable only at one point in time and becomes quickly outdated. To be viable, it must recognize that a human society cannot undo what has happened in nature (whether as a result of human activity or naturally) and that our investments are misplaced trying to avoid the changing environment.

Again, thank you for the opportunity to submit comments on behalf of the Oregon Water Resources Congress.

Sincerely,



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