



**Oregon Water Resources Congress Comments Regarding
EPA's Draft Fiscal Year 2011-2015 Strategic Plan
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The Oregon Water Resources Congress (OWRC) respectfully submits the following comments regarding EPA's Draft FY 2011-2015 Strategic Plan. Our comments on the Draft FY 2011-2015 Strategic Plan are limited primarily to Goal 2: Protecting America's Waters. OWRC represents irrigation districts, water control districts, and other local government water suppliers throughout the State of Oregon. Oregon districts operate and maintain water supply systems (federal and non-federal) that include reservoirs, canals, pipelines, and hydropower generation facilities; and deliver water to 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, nursery crops, and other crops.

OWRC supports EPA's efforts to make America's water systems more sustainable and secure and EPA's plan to partner with local authorities to improve water infrastructure. However, we urge the agency to take a more comprehensive approach to water quality by including multi-purpose water delivery systems along with systems designed solely for drinking water. We also want to ensure that the agency's plan to implement state watershed plans does not adversely impact ongoing watershed planning efforts in Oregon.

The following comments are organized by the section of the Plan to which they apply.

Introduction

In the Introduction section, page 6, delaying discussion of Strategic Plan "consultation and coordination activities" to the final plan document creates uncertainty and concern about federal authority usurping state responsibility of water planning and management. Given how important partnerships are to Goal 2 and the other four goals, this omission is troubling and lacks the transparency and inclusive spirit that the EPA Strategic Plan espouses throughout the document. Leaving this detail to the final plan also deprives the agency of the valuable insights that can be gleaned from the public comment phase on coordinating with federal, state, tribal, and local government entities.

This omission seems to contradict the emphasis elsewhere in the document about partnerships and thus leaves us wondering about the real commitment to partnerships, consultation, and coordination. We agree that these three components will be key to EPA's ability to move forward with its Strategic Plan, but the missing discussion in the Introduction is such a glaring blank as to create what is, at best, a mystery, and at worst, a lack of confidence about commitment to and transparency in the working relationship with partners in the actual implementation of the Plan.

When drafting this part of the Introduction for the Final Plan, we hope that EPA will acknowledge the role that entities other than those mentioned elsewhere in the Plan as partners (states, territories, and tribes) are important contributors to improving the Nation's water quality. Many of those other entities are local governments and water suppliers that deliver water for domestic use and agricultural use and are the entities responsible for implementing the policies and building the projects that improve water quality, with a large part of the costs of these efforts being born by their customers, not by the Federal government.

Goal 2: Protecting America's Waters

Water Supply Supports Water Quality

We agree with the sentiment on page 12 that "sustaining the quality and supply of our water resources is essential" to our nation's health and prosperity. However, ensuring adequate and reliable water for the production of food and fiber is an equally critical need. This is an issue affecting national security, economic vitality and environmental health, particularly in addressing climate change impacts to water. Promoting the construction of infrastructure for drinking water only, as mentioned on page 12, will only address part of the water quality needs of Oregon and the nation, neglecting the needs of agriculture and other water users.

Improvements in water quality hinge on a reliable water supply and robust infrastructure to store and deliver water. Oregon's infrastructure is currently inadequate to meet our diverse water supply needs and improve water quality in key rivers and streams. Oregon historically has abundant water and snowfall in the winter months but is dry in the summer when water needs are greatest. Decreased stream flows in the summer exacerbate water quality concerns, including water temperatures that can prove detrimental to endangered fish and aquatic habitat. Moreover, both agricultural and instream water uses must compete with the drinking water needs of a growing population.

A multi-pronged approach that includes funding for innovative water conservation and water supply techniques and technologies, and a robust delivery infrastructure is needed to meet diverse needs throughout the water year. Technologies such as aquifer storage and recovery allow water users to withdraw water in the winter when supplies are abundant, store it underground, and then use the water in the summer when it is most needed. Techniques such as this can avoid summer appropriations that can degrade water quality through decreased stream flows and also benefit municipal and agricultural water users. Innovative water infrastructure projects can ensure water quality for ecological needs while at the same time meeting the growing human needs for water supply.

OWRC agrees that ensuring water supply involves different approaches including water conservation. Our member irrigation districts are on the forefront in implementing innovative water conservation and infrastructure projects with the support from existing EPA programs. Districts have been valuable partners in EPA's State Clean Water Revolving Fund Program, successfully leveraging federal, state, and local funds to improve water quality, increase water conservation, reduce energy use, and develop renewable hydroelectric infrastructure. Activities such as piping previously open canals can improve water quality by reducing sediment and other contaminants, regulating temperature, and increasing instream flows for fish and wildlife habitat.

Additional funding for these types of “green projects” should be an integral part of the EPA’s strategy to protect America’s waters and to mitigate and adapt to climate change related impacts to water. For example, the Oregon Department of Environmental Quality’s (DEQ) Intended Use Plan for the FY 2010 Clean Water State Revolving Loan Program Update #2 dated May 6, 2010, lists four irrigation districts projects with funding equal to 20% of the ARRA funding received by DEQ to meet the required “Green Project Reserve.” (A full copy of the report is available at: <http://www.deq.state.or.us/wq/loans/docs/IUP2010Update2.pdf>).

Furthermore, as implementers of these projects it is also crucial to include irrigation districts along with other local, state, tribal, and federal entities involved in water quality projects in EPA’s development of “green” infrastructure and watershed-based practices.”

Watershed Planning

As active partners in watershed projects, our district members are concerned about EPA’s plan to develop state watershed implementation plans, mentioned on pages 11-13, and how these may impact existing watershed planning efforts. Oregon already has a robust watershed planning program and does not need new federal planning requirements. There are over 600 watershed councils in Oregon with an array of conservation and restoration projects that could be derailed or delayed by the imposition of new federal planning requirements. As active partners in these efforts, irrigation districts have a large stake in ensuring that these important projects continue. In states where they already exist, it is unnecessary and a waste of scarce public resources for EPA to develop and impose new watershed planning programs. Furthermore, based on previous EPA documents, we are concerned that EPA may be overstepping its responsibility and authority and does not fully understand the potential detriment to existing and successful state watershed planning programs. EPA needs to remain cognizant of the difference between water quality management and water resource management, which complement each other but remain distinct, and the separate state and federal roles in managing.

States like Oregon can benefit greatly from financial and technical assistance from EPA in local and regional watershed planning efforts to improve water quality. However, in a time when our nation is struggling to return to the path of economic prosperity, we cannot support the creation of a new federal watershed planning program for those states that have existing, productive watershed planning programs as is the case in Oregon. OWRC believes that federal participation in watershed planning, whether through planning activities, technical assistance or water infrastructure funding, should be channeled through existing state and federal programs, rather than to create uncertainty and new cumbersome federal requirements that can derail important projects already underway. We also believe that funding that is used for multi-purpose water infrastructure projects yields greater societal and economic benefits than single purpose projects, like drinking water, alone.

Climate Change Adaption

The lack of adequate water infrastructure is even more problematic as Oregon develops strategies to adapt to climate change related impacts to water supplies. Oregon is exceptionally vulnerable to climate change because its rivers and aquifers, and much of its economy, are dependent on the plentiful arrival and timely melting of mountain snow pack. Climate change impacts are already apparent in many areas of the state, with annual snowpack down approximately 30 percent and spring runoff is arriving earlier, leaving less water for the summer growing season.

Modernized multi-purpose infrastructure systems are needed to address changes in timing and quantity of rainfall and snowmelt that may necessitate capturing, storing, and delivering water in different ways than before. Water conservation is also a key part of the adaption strategy but must be coupled with infrastructure that can manage and deliver water as climate conditions change. Climate change adaption funding is needed help districts and other water suppliers develop innovative water management tools and infrastructure projects to truly sustain and protect America's waters.

Federal financial assistance is necessary to secure and protect Oregon's water supply for current and future generations. Adapting to climate change heightens the need for improved water infrastructure systems at a time when state and local governments can least afford to fund critical projects. However, without innovative water conservation techniques and multi-purpose water supply and delivery mechanisms, growing human demands for water will continue to place great stress on the state's watersheds and aquatic ecosystems. EPA's strategic plan must therefore address agency financial support for local water supply improvements that provide the greatest range of public benefits. Investing in water infrastructure is a wise use of scarce financial resources because it creates quality jobs now and ensures the future availability of water supplies that fuel the economic engine of America and improve water quality.

We commend EPA's effort to develop a five-year Strategic Plan and its goal of protecting America's waters. However, we feel that the inclusion of funding for multi-purpose water infrastructure and clarifying the role of EPA in state watershed planning would make this plan more comprehensive and better sustain the diverse water needs of America.

OWRC appreciates this opportunity to provide input on EPA's Draft FY 2011-2015 Strategic Plan. We look forward to working with the agency to protect Oregon's water resources.



Anita Winkler
Executive Director