



June 29, 2012

**OWRC Comments on the Federal Climate Change and Water Working Group's  
"Short-Term Water Management Decisions: User Needs for Improved Climate,  
Weather and Hydrologic Information – May 2012 Review Draft"**

Submitted via email to: [david.a.raff@us.army.mil](mailto:david.a.raff@us.army.mil) and [lbrekke@usbr.gov](mailto:lbrekke@usbr.gov)

The Oregon Water Resources Congress (OWRC) is a nonprofit trade association representing agricultural water suppliers in Oregon, primarily irrigation districts, as well as other special districts and local governments that deliver irrigation water. OWRC was established in 1912 to support member needs to protect water rights and encourage conservation and water management statewide. OWRC members operate complex water management systems, including water supply reservoirs, canal, pipelines, and hydropower production, delivering water to more than 560,728 acres of farm land state-wide, roughly 1/3 of all irrigated land in Oregon. About half of our members have contracts with or are in Bureau of Reclamation projects.

OWRC is also a member of the National Water Resources Association (NWRA), and the Family Farm Alliance (Alliance), both of which received an invite to provide feedback regarding the Short Term Water Management Decisions: User Needs for Improved Climate, Weather and Hydrologic Performance Draft Report, using your online feedback form. OWRC has provided our rankings to both organizations for inclusion in their submitted comments. However, upon our review of the underlying document we felt it necessary to send along this letter for clarification and to comment on some areas that don't necessarily fit the feedback form.

First and foremost, we are appreciative of the work conducted by the various federal agencies to develop practical climate, weather, and hydraulic information for water managers to use in identifying and responding to climate change impacts to water resources. Our membership will be interested in the future development of research strategies to meet these needs as referenced in your cover letter. We are presently undergoing similar efforts here in the State of Oregon and our members are always interested in how federal agencies intend to address issues such as these that have likely consequences for our members.

We are encouraged by your intent to keep this document updated and to utilize the various perspectives of water users to make revisions. As that occurs, we would encourage you to use the list of email addresses generated by responses through the Feedback forms as a means for letting parties know of the updates.

OWRC concurs with the identified need for a robust program of streamgauges for short term decision-making (page 7). OWRC has been an active member in a larger coalition working to secure greater funding for USGS Water Data and Science Programs.

***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.***

We also agree with the need for an expanded geographic coverage of forecast products, particularly as state and federal funding has led to discontinuing existing sites. And we also thoroughly agree that there is a need for training on using and understanding the information generated, as well as a common format. Consistent and user-friendly data is essential to provide utility to water managers and water users. However, these apt observations leads us to wonder why there isn't already a common place to find this information and how will other data sets fit into this effort?

We recognize that the report is still in draft form with further review and revisions to be conducted. However, there are a few areas where the lack of detail is concerning as the implications vary depending on what the detail is, particularly relating to the nature of federal agency decision-making. In the spirit of constructive criticism we are providing questions that arose during our review that would be helpful to have addressed in future work.

- Is this document consistent with the Secretarial (Interior) Order on Climate Change? How is this document different?
- How are the needs of other Interior Department agencies addressed in the decision-making process? What is the hierarchy in such issues as man versus fish? Structural versus non-structural? Building versus conserving?
- Are these operation decisions for Federal projects or for state and local projects in a given watershed? Are they for quantity or quality purposes? Intrastate or Interstate?
- How are the legal requirements for Endangered Species Act or Clean Water Act issues addressed to allow for decision-making on the short term?
- How has hydroclimatic information specifically been used as referenced on page 5?
- Lastly, is there any consideration given to cost in the decision-making?

Additionally, given OWRC's ongoing efforts to seek funding for streamgauging programs, we wonder if this effort has or will identify some optimum number of gauges for purposes of the requisite decision-making referenced. Is it a technology issue? The document appears to allude to the set of circumstances that if the same "strategy" approaches continue to be used there will be continued failures to recognize climate in the future of water decision-making.

As an aside, we would point out a concern with this documents failure to include or address, maybe reference the needs of the Native American community in this effort. Oregon and the other Northwest states have a large Native American community that should be involved and benefit from your work.

This report called to memory the recommendations from the National Drought Policy Commission some dozen years ago. Ironically, the Corps and the Bureau were a major part of that effort but the lessons learned do not appear reflected in this document.

We have provided the following excerpted Policy Statement to reiterate those recommendations:

“National Drought Policy should use the resources of the Federal Government to support but not supplant nor interfere with state, regional, local, tribal and personal efforts to reduce drought impacts. The guiding principles of national drought policy should be: Favor preparedness over insurance, insurance over relief, and incentives over regulation; Set research priorities based on the potential of the research results to reduce drought impacts; Coordinate the delivery of federal services through cooperation and collaboration with non-federal entities.”<sup>1</sup>

We raise this policy because nowhere in the document do we see any reference with regard to concerns for economic development in the short-term decision-making process. There are threads throughout the document referencing the value of addressing the natural system impacts, but nothing in this regard. We would add that strong consideration should be given to the idea of building on the Drought Monitor tool that was developed coincidentally during the National Drought Policy Commission effort. We believe there is great value in using the familiar rather than the foreign to move forward in this area.

Chapter 3 appears to be the strongest component of the draft report. Our plan is to make use of the educational material contained in this document and use it with our managers and others in the state and region, particularly in assisting new water managers. And we would like to thank you for the strength of this information. We would like to note, however, concern with message that emanates toward the end of the Chapter. Section 3.4.4 (page 65) states:

"As in most work environments, the personnel interests, beliefs, past experiences, knowledge of staff and managers, and the culture of the office as maintained by the personnel influence attitudes toward the offices' strategies for discharging their responsibilities. Top-down agency guidance and training programs may help to standardize attitudes toward innovations (in capabilities, processes, tools, information) that would alter long standing practices, but substantial grassroots level variation in personnel attitudes toward forecasting may exist. At all levels, insufficient expertise, training, and knowledge of existing or potential forecasts may result in the nonuse of forecasts. Insufficient interaction between forecast producers and users also may limit forecast use, given that such interactions provide a conduit for feedback and user support to aid forecast interpretation. Note that NWS Service Assessments during past floods have identified this factor as a significant factor in undermining proper forecast use and production. Forecast may not be available at the correct time, in the correct format, or for the location or predictand required for an operating decision. Lastly, as described in section 2, agency regulations, directives, and

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<sup>1</sup> <http://govinfo.library.unt.edu/drought/finalreport/fullreport/ndpcfreport/ndpcpreportpg35.htm>

authorities may restrict or prohibit forecast use; in which case, they are a significant factor that may outweigh any others described in this section."

We find this to be rather disturbing indictment buried within this document. At a minimum it seems to suggest that until you – the federal agency partners - get your house in order, success is anything but assured. It simply does not make sense to proceed on the efforts identified in this paper until such corrective actions occur and are continually monitored for success.

In conclusion, we appreciate the efforts put into the 2012 Review Draft and look forward to further revisions and the final water data products that our members can use and benefit from. Although we may have other questions and concerns with some of the material our intention is to continue to be involved and work with your personnel in the region to resolve the issues we have highlighted in this letter.

Thank you again for inviting our national organizations to provide the collective perspectives of their membership and for your consideration of our additional comments.

Sincerely,

A handwritten signature in blue ink that reads "April Snell". The signature is written in a cursive style and is positioned above the typed name.

April Snell  
Executive Director