



October 28, 2016

Bureau of Reclamation  
Attention: Mr. Darion Mayhorn  
84-51000  
P.O. Box 25007  
Denver, CO 80225-0007  
VIA EMAIL: [dmayhorn@usbr.gov](mailto:dmayhorn@usbr.gov)

Re: Comments of Oregon Water Resources Congress on Draft Criteria for WaterSMART Grants.

Dear Mr. Mayhorn:

The Oregon Water Resources Congress (OWRC) is very supportive of Bureau of Reclamation's (Reclamation) WaterSMART programs and appreciates the opportunity to comment on the proposed Draft Evaluation Criteria for Small-Scale Water Efficiency Projects and the Draft Updated Evaluation Criteria for Water and energy Efficiency Grants.

OWRC was established in 1912 as a trade association to support the protection of water rights and promote the wise stewardship of water resources statewide. OWRC members are local governmental entities, which include irrigation districts, water control districts, drainage districts, water improvement districts, and other agricultural water suppliers that deliver water to roughly 1/3 of all irrigated land in Oregon. These water stewards operate complex water management systems, including water supply reservoirs, canals, pipelines, and hydropower production. About one-half of our members are in Reclamation Projects. Additionally, most of our members have contracts with Reclamation or have been awarded grants under the WaterSMART program which has been greatly beneficial to districts meeting agricultural needs.

### **WaterSMART Initiative**

OWRC strongly supports Reclamation's ongoing WaterSMART Initiative. The WaterSMART programs are an important part of the overall funding package for water resources projects collaboratively developed by local communities, supported with local and state funding, and designed to meet those communities' unique needs while still meeting the goal of water conservation.

### **Small-Scale Water Efficiency Projects**

OWRC was a strong supporter of the Water Conservation Field Services Program (WCFSP) and we continue to believe that it is a key component in supporting irrigation districts' and similar water delivery systems' water conservation efforts. In the past the WCFSP has provided a breadth of technical assistance to irrigation districts and provided partial funding for materials used to pipe and line canals, measurement and other technology, and water conservation plans—all supporting water conservation efforts being implemented by these districts. While we appreciate that Reclamation has recognized the importance of a more streamlined process for small-scale projects that do not exceed \$75,000.00 in requested federal funding; we have concerns that the move away from WCFSP may unintentionally exclude worthwhile projects from districts with limited resources to apply through this new process.

*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.*

Our members believe the management of funds for small-scale water efficiency projects should remain with the Regional Offices in order to retain the close connection between Reclamation and Project managers and ensure that Reclamation's resources are used to best support the management of its Projects. The WCFSP was one of the Reclamation services most appreciated by our members. The regional staff, and particularly the local field office staff, understand the unique operating and delivery challenges of the various Projects, and therefore provide very meaningful support to the managers of those Projects. The collaborative relationship between Reclamation's field offices and local districts has been essential in developing and implementing a variety of water conservation projects.

Since the Small-Scale Water Efficiency Projects program will be replacing the funding for projects under the WCFSP, we encourage Reclamation to include solicitation of feedback from both the Regional offices and the local field offices when ranking applications for funding under this new program. That solicitation will allow for Reclamation's resources to best support priority projects in a particular region. Additionally, it will allow for feedback from the local field offices on how projects will provide increased efficiency and/or effectiveness of water distribution in that region's system. For Oregon, the relationship with the field office is key, because Reclamation does not have a Regional or Area Office in our state.

Additionally, because this program is replacing the funding for projects under WCFSP, it should be receive significantly more funding, at least \$5 million, to meet the myriad of need throughout the regions Reclamation serves. Providing increased funding for small-scale projects will yield more immediate and cost-effective water conservation measures in all 17 Western States.

### **Water and Energy Efficiency Grants**

WaterSMART cost-share grants have supported Oregon districts' efforts to improve water delivery systems, conserve water, and implement innovative projects to meet the water needs in our state. These projects have been a key ingredient to the districts' cooperative efforts with other stakeholders in their respective river basins to address in-stream, water quality, and water supply needs of their basins, without reducing the amount of land to which the districts deliver water, and avoiding regulatory actions by Federal or State agencies. There continues to be more applicants than available funding and additional financial resources are needed to enable local water suppliers to continue their work to conserve water and help meet the Secretary's water conservation goal. With a return of over \$5 for every \$1 of Federal investment, and non-federal match generally exceeding the required amount, this program far surpasses the results of other partnerships between the Federal government and local project sponsors.

The Water and Energy Efficiency Grants (WEEG) has been a useful addition to the WaterSMART program that incentivizes district projects that increase renewable energy while improving water efficiency. We have reviewed the Draft Updated Evaluations Criteria proposed for WEEG and support the comments submitted by Family Farm Alliance and Trout Unlimited. However, OWRC is concerned that Criterion B may inadvertently discount worthy projects that do not have direct impacts to threatened or endangered species. While many of our districts do have federally listed threatened or endangered species within their watershed, we would like to reiterate the importance of allowing for flexibility in Reclamation's implementation of Criterion B. This narrow interpretation could hamper efforts to proactively improve habitat for species of concern that may be listed in the future. It is also particularly important to ensure that projects that dedicate water instream are implemented in accordance with state water law and do not conflict or unintentionally duplicate applicable instream water rights and related rules. If Reclamation's goal is to both increase collaboration of stakeholders and award funding to

creative projects that address water management issues in a basin (whether it is adding to the reliability of water supply due to climate change or addressing habitat concerns) than the evaluation criteria needs to be adaptable to the watersheds across 17 states and be consistent with 17 different sets of water laws and policies.

Thank you for the opportunity to comment on these changes to the WaterSMART program and we look forward to continuing to work with the Bureau of Reclamation.

Sincerely,  
April Snell  
Executive Director