



WESTERN STATES WATER COUNCIL

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Web Page: www.westgov.org/hwswc

July 17, 2009

Position #318

Council on Environmental Quality
Attn: Terry Brayman
722 Jackson Place, NW
Washington, D.C. 20503

Dear Mr. Brayman:

Given that we have had a limited period of time in which to respond to the request to comment on the existing Principles and Guidelines (P&Gs), we would offer the following general comments based on our previous positions and the 2008 report of the Western Governors' Association, *Water Needs and Strategies for a Sustainable Future: Next Steps*.

Nearly 28 years ago, the Council wrote in response to a request for comments regarding, "Water Project Planning Guidelines – A Summary of Major Proposed Policy Positions." Now, as then, we oppose "complex, inflexible and difficult and expensive to apply" procedures and "rigid" rules, and support "flexible guidelines to govern water resource planning."

Echoing some of those past comments, we concur that National Economic Development (NED) should be a primary national planning objective, but other benefits should be "recognized and taken into account in project formulation and in determination of the justification to proceed with authorization and implementation." Planning for water projects based strictly on a NED objective "...would not be compatible with existing state water plans and planning efforts in many of the states. If the states are asked to cost share in a project, then the plan must reflect the states' objectives." States should take the lead in all aspects of water resources planning.

"We cannot concur that the plan that has the maximum net economic benefits is necessarily the best plan from a national standpoint. One of the alternative plans may provide greater total benefits and still possess a benefit cost ratio considerably in excess of one-to-one. Further, we cannot agree that all costs in excess of those associated with the plan that has the maximum economic net benefits should be borne by non-federal interests. National interests may be the principal beneficiaries of these additional benefits."

In developing new principles and flexible guidelines, CEQ should carefully consider the Governors' 2008 report, which declares in part: "States have the pivotal role in water planning, as well as allocating and protecting the resource.... To support the state leadership role, the federal government should help by providing...technical and appropriate financial assistance." Further, it is "...paramount to move state and local government participation back into the

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process of federal decision-making.... Developing optimal solutions...will require an integrated approach and greater partnerships among state, local and federal agencies.... Federal agencies should use state water plans: (a) to help determine national water policy and priorities that best align federal agency support to states; and (b) to inform decision making regarding regional water issues.”

Integrated Water Resources Planning (IWRP) should be a primary mission of federal water resources agencies, with a goal of: “(a) changing the way water planning is conducted by encouraging more comprehensive plans developed under state leadership with federal assistance; and (b) reducing inefficiencies caused by the present mode of project-specific responses to competing demands, contradictory actions by multiple state, local and federal agencies, and hastily conceived reactions to the latest real or perceived crisis.”

More consideration needs to be given alternative ways to quantify, evaluate and prioritize funding for water, wastewater, watershed protection and restoration, and public-safety related needs – highlighting the benefits of integrated watershed, river basin, regional and interstate planning and management.

While offering these general comments, we look forward to the opportunity to comment in more detail in the future as new Principles and Guidelines are developed.

Sincerely,



Garland Erbe
Chairman
Western States Water Council