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Mr. Steven L. Stockton
Director of Civil Works
U.S. Army Corps of Engineers
441 G Street NW
Washington, DC 20314-1000

December 8, 2009

Dear Mr. Stockton,

I am writing on behalf of the Interstate Council on Water Policy (“ICWP”) and its Board of Directors concerning the Corps’ “Building Strong Collaborative Relationships for a Sustainable Water Resources Future” initiative. Several of our members attended one or more of the regional conferences and your national meeting last August. We appreciate your providing a forum to discuss critical water resources needs and your “you can do it, we can help” theme.

The ICWP is eager to explore with the Corps and others how the water planning summaries, along with the regional and national discussions, can provide a foundation for recommendations and priorities that will enhance water resources planning. The ICWP recognizes that this national undertaking required tremendous staff coordination, communication, diligence and follow-through; and we commend you for these efforts. Based on extensive discussions among our members, we would like to provide the following observations and suggestions for your consideration. We hope that the report that you and your staff are preparing will provide sufficient opportunity to develop those recommendations.

Building Collaborative Relationships

From the outset, we cautioned that the Corps’ schedule for developing the planning summaries and assessing the planning needs might compromise the opportunity for sufficient engagement by the appropriate state and interstate officials. ICWP continues to be concerned that so much of the work is being conducted internally by the Corps. The final stage of this initiative appears to be proceeding as more of a federal agency analysis (with provision for routine public review and comments), than an open, collaborative effort.

The development of collaborative recommendations should involve more open deliberation, similar to the “shared vision planning” process. We do not believe that sufficient participation has occurred so far, especially not for a broad agreement on strategic action priorities. We recommend that the Corps continue to engage stakeholders in a more open, collaborative deliberation.

Federal Support Toolbox

ICWP anticipates the “federal support toolbox” as one of the primary deliverables from the assessment and we encourage its completion as soon as possible. To date, stakeholders have received few details regarding the process for building the toolbox, or its ultimate contents, location, and accessibility. During the recent ICWP annual meeting in Jackson, Wyoming, Mr. Theodore (Tab) Brown commented that the Corps will conduct follow-up discussions with the states and interstates to determine specific recommendations for inclusion in the toolbox. We strongly encourage the Corps (in cooperation with the other federal agencies) to seek and incorporate the stakeholder input needed to construct a useful toolbox that delivers enhanced water resources planning support. The ICWP is willing to assist the Corps in this effort, as appropriate (e.g., by collecting and summarizing recommendations from our membership regarding the most useful toolbox functions).

National Water Policy Vision Statement

There is diversity of opinion within the ICWP’s membership on the question of whether to pursue a national water vision statement. Some are concerned that developing a national vision statement will divert attention from the more important need to determine how federal agencies and water programs can support and enhance state and interstate water planning. However, other members believe that establishing a national statement will help elevate sustainable water management as a national priority. We developed the following draft statement in the course of evaluating that possibility:

We will manage our waters and watersheds in an integrated and sustainable manner to provide groundwater and surface water of sufficient quality and in adequate supply to sustain our natural systems and strengthen supplies for our homes, farms, businesses and recreation areas. We will enhance the health, safety and welfare of our communities, despite recurring floods, droughts and competition among uses, through science-based planning led by the states and interstates, robust expert evaluation, active collaboration across all levels of government and the direct involvement of a well-informed public.

If there is to be a vision statement emanating from the Corps’ process, the ICWP Board of Directors offers the above statement for consideration, as it reflects deliberation by many officials responsible for state, interstate and local water policy and management.

We appreciate your willingness to consider our perspectives and look forward expanding these discussions during the coming months. The ICWP is committed to building upon our existing relationship and developing more effective ways to collaborate with the Corps in the future. Toward that end, we have sustained contact with Ada Benevides, Tab Brown and others on your staff and look forward to the release of your assessment report.

Sincerely,



Susan Sullivan
Chairman

Copy to: Tab Brown
Ada Benevides
ICWP Directors



PATH TO SUSTAINABLE WATER RESOURCE MANAGEMENT CONSIDERING THE VALUE OF A NATIONAL VISION STATEMENT

NOVEMBER 23, 2009

Purpose: to give voice to the views of state and interstate water officials in the potential development of a national vision for water intended to elevate sustainable water resource management as a national priority.

Deliberation: Many of us remain unconvinced that reaching agreement on such a vision statement will help significantly in the effort to elevate sustainable water management as a national priority; many are concerned that this is a distraction, instead.

Nonetheless, in our effort to evaluate the potential benefit of establishing a vision statement, we recognized that considering its utility would be much easier if we had a draft statement to consider. The following information was summarized from our efforts to identify and prioritize the essential principles we would include in such a vision statement. We have identified several reference sources, several examples to distinguish a “vision statement” from “strategy statements” and listed quite a few additional principles that, while important, couldn’t be included in such a brief, national vision for water.

In the final analysis, we observe that the Army Corps of Engineers is proceeding as if there is consensus on the need for a national water vision statement and has engaged the AWRA in collecting public opinions about what that statement should be. In that context, the ICWP feels a responsibility to offer this draft, representing the deliberation of many state, interstate and local officials responsible for water policy and management.

Draft Vision Statement:

We will manage our waters and watersheds in an integrated and sustainable manner to provide groundwater and surface water of sufficient quality and in adequate supply to sustain our natural systems and strengthen supplies for our homes, farms, businesses and recreation areas. We will enhance the health, safety and welfare of our communities, despite recurring floods, droughts and competition among uses, through science-based planning lead by the states and interstates, robust expert evaluation, active collaboration across all levels of government and the direct involvement of a well-informed public.

Draft Strategy Statements:

1. Integrated Water Resources Management

- We will manage the nation’s water resources by implementing Integrated Water Resources Management. IWRM involves planning and implementation championed by the tribes, states and interstates with financial resources and expert technical support provided by the federal agencies. This collaborative effort involving tribes, federal agencies, states, and local entities along with robust public participation will enable implementation of plans to provide adequate quantities of good quality water for all beneficial/designated uses.

2. Sustainable Path for the Nation’s Water Infrastructure

- A new framework that looks ahead with intention, by reframing the issue from one focused solely on an “infrastructure gap” towards a more sustainable model for funding water and wastewater infrastructure, is needed. (The crisis-driven approach of recent years, based on

the “investment gap” analysis, has proven to be insufficient to meet the growing challenges facing the nation’s water infrastructure.)

- The traditional definition of water infrastructure must evolve to embrace a broader, more holistic definition of sustainable water infrastructure that includes both traditional (man-made) water and wastewater infrastructure *and* natural watershed systems, such as rivers, lakes, streams, groundwater aquifers, floodplains, floodways, wetlands, and the watersheds that serve or are affected by water and wastewater systems.
- Utility and system managers, as well as regulators and governing boards, should ensure that the price of water services fairly charges ratepayers and customers the total cost of providing those services and sustainable water infrastructure requirements.

List of Principles Considered:

- The relationship among the federal government, states and local communities is changing and must be addressed; the federal government’s role in water resources, long seen to be a driving force, must be reevaluated in light of growing state attention and direction of water resource activities.
- Collaboration works best when states take the lead in defining the issues, the needs and the desired outcomes.
- Implementation is most effective when managed by the agency or an organization that is closest to the grassroots and has adequate authority and managerial capacity.
- Manage water for sustainable, long-term goals recognizing both human needs and the health of water-dependent ecosystems.
- Manage surface and groundwater as an integrated hydrologic system, considering water quality and quantity in all phases of the hydrologic cycle.
- Improve government performance by streamlining, consolidating, and integrating programs and by increasing their responsiveness and effectiveness.
- Develop the information and models needed to establish water management priorities based on relative risk, giving consideration to the cost, benefits and uncertainties of management alternatives.
- Invest in and rely on the best science available in setting water policies and making management decisions, including the implementation and operation of projects.
- Improve the quality of public dialogue on water resource issues and alternatives, and consider all affected interests in making water policy and program decisions.
- Use incentives to achieve the desired objectives whenever regulatory mandates can be avoided.
- A watershed-based planning and management approach is required for drinking water, wastewater and stormwater (and other non-point source control) services to ensure integrated, sustainable management of water resources.
- National policy and priorities should be guided by and responsive to state and interstate water plans.
- Existing rights and investments must be protected while we promote an orderly accommodation of “new” uses, including tribal needs, threatened and endangered species, recreation opportunities, etc.
- Funding for water and wastewater utilities should generally rely on cost-based rates and charges that assure the full cost of sustaining the services and related infrastructure are fairly allocated to the customers and other beneficiaries.
- [Note: One of the notable resources is the AWRA summary from the Fourth National Water resources Policy Dialogue, which clearly indicates there is a need “to develop a national vision and overarching principles to guide water resources development activities supported by the federal government.” This conclusion is thought provoking, but no longer appears to be widely accepted.]

Reference Materials include:

- ICWP's National Water Policy Charter;
- WSWC Resolution 319;
- AWRA Summary of the Fourth National Water Resources Policy Dialogue;
- Aspen Institute Report on Sustainable Water Infrastructure in U.S.;
- "Enlibra" Principles from NGA; and
- input provided by ICWP members representing state agencies, interstate water organizations, and water management districts and authorities.

Vision Statement Construction:

1. Vision Statement (short, high-level description of an "ideal end-state")
2. Strategy – Translating the vision by strategic thinking into the various components of an up-to-date water policy
3. List of Principles (crucial concepts derived from reference sources)