

WESTCAS Response to the National Research Council  
Review of Council on Environmental Quality  
*Proposed Principles and Guidelines*  
WESTCAS 2011 Winter Conference  
Fort Worth, Texas  
February 24, 2011

## Review of CEQ P&G - Background

- The White House Council on Environmental Quality (CEQ) issued *Proposed National Objectives, Principles and Standards for Water and Related Resources Implementation Studies (P&G)* – issued December 3, 2009
- Created concerns in water supply community because of the broader scope of applicability
- National Research Council of National Academies of Science requested to review *P&G*.

## Review of CEQ P&G - Background

- Late 2010 NRC issued a prepublication copy of *A Review of the Proposed Revisions to the Federal Principles and Guidelines Water Resources Planning Document*
  - Final document due in 2011
- WESTCAS letter to CEQ dated January 26, 2011, commenting on NRC Review of P&G

# WESTCAS Comments to NRC Review

- Overview

- Much surface water throughout west is delivered and/or stored in regional-scale transmission and storage facilities
- West is one of the fastest growing regions in nation with subsequent increasing demands on water resources
- More stringent and complex environmental regulations
- Financial challenges to growing population on fixed incomes

# WESTCAS Comments to NRC Review

- NRC Finding 1
  - The distinctions among objectives, principles and standards are not clear.
- WESTCAS Comment
  - WESTCAS agrees. *P&G* should include a consistent framework, including terminology throughout document.
  - Hierarchical relationship between terms should be clarified (possibly via flow chart)

# WESTCAS Comments to NRC Review

- NRC Finding 2
  - It is not clear what other agencies, in addition to U.S. Army Corps of Engineers, Bureau of Reclamation, Tennessee Valley Authority and Natural Resources Conservation Service the *P&G* will apply to
  - It is not clear exactly what types of projects the *P&G* will apply to
- WESTCAS Comment
  - WESTCAS agrees that the *P&G* must identify the agencies it is meant to apply to
  - Application of *P&G* to all federal agencies could create confusion, duplication of effort and usurp authority of states under various programs

# WESTCAS Comments to NRC Review

- NRC Finding 3
  - Revisions contain general planning principles and steps that could be part of a planning process, however planning principles are abstract and planning steps are not sufficiently developed for practical implementation.
  - CEQ needs to consider purpose of document, either as general policy guidance, as a decision document specifying planning steps or both
- WESTCAS Comment
  - There should be agreement on the content, framework and language of the *P&G*

# WESTCAS Comments to NRC Review

- NRC Finding 4
  - The National Objective for water resources development and management activities should be stated more clearly and should be followed throughout the document.
- WESTCAS Comment
  - The *P&G* should emphasize that a project meet the National Objective



# WESTCAS Comments to NRC Review

- NRC Finding 5
  - The Water Resources Development Act of 2007 requires that the *P&G* revision ensure the use of the best available economic principles and analytical techniques.
- WESTCAS Comment
  - The *P&G* should use state of the art economic analysis in developing recommendations and requirements

# Final Thoughts

- What is the intent of the *P&G*?
  - Is the *P&G* meant to provide guidance to assist agencies with sustainable water supply planning, or
  - Is the *P&G* mandatory requirements to meet (e.g. NEPA) related to water supply planning?
  - The *P&G* does not apply to routine project operations and maintenance or watershed plans or regulatory activities. Does that mean 402 and 404 permits?
  - Does not apply to non-Federal studies or projects.