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June 8, 2010

The Honorable Nancy Sutley  
Chair  
Council on Environmental Quality  
722 Jackson Place, N.W.  
Washington, DC 20503

Attention: Robyn Colosimo  
[rcolosimo@ceq.eop.gov](mailto:rcolosimo@ceq.eop.gov)

Dear Ms. Sutley:

The Western Coalition of Arid States [WESTCAS] is an organization of over 100 water resource agencies, consulting engineering firms and other water industry professionals from California, Arizona, New Mexico, Texas, Colorado, and Nevada whose focus is providing sustainable water resources for the arid west. Our members deal every day with a growing population, decreasing water supplies, and all of the complex regulatory requirements that are inherent in operating a western water agency in the 21<sup>st</sup> century.

The WESTCAS membership has been closely following the Council on Environmental

Quality work on Principles & Guidelines

(P&G) issue and also the other water resources issues related to possible Executive Orders currently under consideration. WESTCAS participated in a "listening session" with John Carson and Terry Breyman at the CEQ offices in April and in a recent meeting with Robyn Colosimo hosted by the National Water Ways Alliance. WESTCAS very much appreciates these opportunities to learn more about CEQ's plans and time-line for P&G and the other issues.

WESTCAS would like to share with you a comment illustrated by the recent National Academy of Science (NAS) testimony on P&G held last week and by Ms. Colosimo's comments at the National Water Ways Alliance meeting. In the first instance, we note that most of those invited to testify at the NAS hearing represent groups associated with the core mission of the Corps of Engineers. The reason for this is clear in that

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P&G was under the supervision of the Corps from 1983 to 2009 and its guidance dramatically impacts organizations concerned with navigation and flood control. On the other hand, at her recent briefing, Ms. Colosimo remarked that a number of Federal agencies, including the Bureau of Reclamation, US Fish and Wildlife Service, FEMA, and others were becoming much more involved in the P&G issue.

While WESTCAS members work with these agencies on a daily basis, we are concerned that many of the groups that are currently in the forefront of providing stakeholder input on P&G may not be. This is not to suggest that the Corps-oriented groups who testified at last week's NAS hearing shouldn't be doing so. But we do want to urge you and your staff at CEQ to ensure that state, regional and local organizations with wide-ranging experience with federal agencies beyond the Corps, are appropriately included in the P&G process.

WESTCAS is encouraged that CEQ is planning expert workshops later this year to receive input from this wider range of stakeholders. May this letter serve to offer the knowledge and experience of our WESTCAS membership as you move forward with these workshops and with other opportunities to provide meaningful input. Our organization includes some of the largest water, wastewater, and flood control districts in the western United States. Their experiences particularly qualify them to comment on how P&G and the other issues before you will impact their dealings with the wide spectrum of Federal agencies required to follow P&G guidance.

We appreciate the patience and hard work demonstrated by CEQ to engage and consider the concerns of diverse stakeholders. As this process continues, I hope that you will include WESTCAS and its membership in this important process.

Sincerely,



Robert Hollander

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