

Hicks-Ray Associates



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TO: WESTCAS Membership
FROM: Fred B. Hicks and Tom Ray
SUBJECT: Principals and Standards

We've often joked that the whole issue of "Principals and Standards" would put even a person afflicted with insomnia fast asleep. But this is a classic case of an issue that appears boring and even irrelevant today, but one which will impact the way that water resources are managed for generations to come. The worst scenario that we can imagine is for people to ask, "how did this happen," once the process has been completed.

Fortunately, WESTCAS, along with a number of other water resource organizations, are deeply involved in the "Principals and Standards" issue. Kelly Collins has taken the heroic first step of drafting out the WESTCAS response which we have attached for your review and comment. The "P&S" comment period doesn't end until April 5th so there is time for people to review Kelly's draft and add their own thoughts.

A hearing yesterday in the House Transportation and Infrastructure Committee focused on a review of the performance of the Corps of Engineers in implementing the reforms mandated in the reauthorization of the Water Resources Development Act of 2007. But much of the discussion focused on the take-over by the White House Council on Environmental Quality of the entire process.

You will recall from earlier WESTCAS reports that CEQ has taken management of the "P&S" issue away from the Corps and is managing the process on behalf of virtually all Federal agencies that deal with water resources. This includes the Corps, The Bureau of Reclamation, USGS, USEPA, Fish and Wildlife Service, BLM, and just about anybody else you can think of.

The main thrust of "P&S" is to determine the balance must be struck between the environmental impacts of water projects and the traditional cost-benefit economic calculations that are currently used. The "P&G" draft from CEQ contains a bias towards non-structural approaches and so far the process of implementing the new standards has been far from transparent.

Bottom line is that if you are concerned about a single agency of the Executive Branch imposing rules that will impact how water projects are permitted and built in the years ahead, you need to become involved by reading and commenting on Kelly's draft.

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