

**National Drought Policy Commission**  
**Master log of Public Comments**  
**March 8 through March 31, 2000**  
**Section 1 of 2**

Last Revised, April 10, 2000

1. Received 3-14-00

"Dear National Drought Policy Commission:

Although the Commission cites a finding of the "Need to Address International Drought-related Issues" on page 30 of its draft report, I fail to find any substantive recommendation on this point. If, in the opinion of the Commission, a separate specific recommendation is not warranted, then perhaps some further emphasis on international cooperation included among the other draft recommendations would suffice to keep this aspect from being overlooked during future planning and implementation.

Respectfully submitted,  
Amy Sebring  
4121 Claudia Dr.  
Corpus Christi, TX 78418  
361-937-4177"

**Distributed to: Goal 2, Ray, Jim , Doug for analysis, DATE: 3-17-00**  
**Flagged for : Roseann, Diana, Goal 5 may have an interest here.**

2. Received 3-17-00

"Comments on the draft report of the National Drought Policy Commission

Recommendation Number 1 suggests the President direct federal agencies to take specific actions and that congress should "adequately fund programs to address needs not met by current programs." Recommendation number 5 states that a detailed implementation plan will include "specific steps to maximize customer satisfaction" and that federal agencies and departments be provided with funding needed to carry out the recommendations of this report. Several times in the report, reference was made to USDA constituents not being able to receive the disaster relief dollars until months after the crop disaster. I admit the program regulations is one of the reasons for this delay. However,a major reason for the delay is inadequate staffing of the USDA agencies which is the result of inadequate funding. Therefore, I believe that any funding authorized by Congress should include dollars designated

specifically for administrative and personnel needs.

Recommendation Number 3 suggests that risk management strategies be developed and incorporated in drought preparedness. Further, recommendation number 4 endorsed that "Congress and/or the President acknowledge and encourage natural resource stewardship and self help." I admit that crop insurance is greatly lacking in the needed coverage for all constituents. However, I strongly encourage, that on the order of self-help, USDA constituents be required to purchase basic crop insurance for USDA program participation. This was required several years ago and the number of those purchasing crop insurance hit all time highs. However, as the years have passed, this requirement has fallen on the way side, with producers being able to sign a waiver for the purchase of crop insurance.

Recommendation Number 5 advises that there should be a "periodic in-depth evaluation of federal drought related programs to determine the degree of customer satisfaction, the extent of the gaps that exist between program goals and service delivery and other circumstances that may hinder effective operation." I believe that if a review of the programs is performed, that State and county level employees should be included in the process as they see first hand the problems and issues restricting program delivery and customer service.

Respectfully submitted by:  
Jackie M. Stonfer, Program Chief  
Pennsylvania State FSA Office  
jackie.stonfer@pa.usda.gov"

**Distributed to Goal Teams 1,3, 4 and 5 for respective analysis, DATE: 3-17-00  
Note: It appears the writer substituted "Recommendation" for "Goal" in the comments.**

3. Received 3-17-00 @ 3:45 P.M., EST

Drought Committee

In your drought document, there was only cursory mention of one of the most valuable hydroclimatic monitoring systems currently run by any government agency with no mention of continuing support or expansion of that system. That is the SNOTEL system run by the Natural resources conservation service of the USDA. While streamgaging and BOR/COE got mention for additional support and funding, this system which provides data and products that allow all agencies the potential of predicting drought months in advance was somehow neglected in your recommendations. If you are truly concerned with the impacts of drought

in the western US, this system, above all other operational systems should be expanded. By the time you measure it in the water in the stream (while important), you have no warning, drought has happened. Monitoring snowpack allows for several months of lead time... time for preparation, mitigation, etc. I strongly encourage you to include wording in your document specifically regarding this most valuable program - that it should be expanded and enhanced.

Sincerely,

Randall P. Julander  
rjulande@utdmp.utsnow.nrcs.usda.gov

**Distributed to Goal 2 team, Ray Motha, Jim Laver, Doug Le Comte for analysis, DATE: 3-21-00.**

**Flagged for Warren Lee**

4. Received 3-17-00 @ 11:33 P.M., EST

You put forth a lot of studies but put real people on you panels who have actually lived and farmed through a drought and when you offer the low interest loans to farmers have people in your offices that can do the paperwork. We had to take a loan at higher interest because the local person couldn't do the job and meet the deadline.

Clanahan Beth ,bic@hiplains.net

**Distributed to Goal 4 team, Warren Lee, Curtis Carlton, Lorine Boardwine for analysis, DATE: 3-21-00.**

5. Received 3-18-00 @ 5:30 P.M., EST

Hi, We have a beef cow calf operation that has suffered the last few years from drought and from the commodity market. We have lost about \$140,000.00 in the past 5 years and each year hope that it will turn around and get better. It is to the point that we would be much better off to abandon farming and move on. It is not in our blood to quit. We are afraid to stop producing as what will the people here do if a natural disaster strikes and shuts down the food transportation line. On top of it all, the last thing we need to do to be ready for a natural disaster is to fix the windmill, a \$2,000.00 project. Is there any help out there for us.

Soon to collapse

Robert George Dunn  
6693 Mapleridge Rd.  
Alger, Mi 48610-9735  
[dunnfarm@ejourney.com](mailto:dunnfarm@ejourney.com)  
517-836-2285

**Distributed to: Warren Lee, Ray Motha, Leona Dittus for analysis, DATE: 3-21-00.  
Flagged for ALL: Anybody have any suggestions for this person ? (Note: this does not  
appear to be a comment specifically related to the 3-8-00 draft report )**

6. Received 3-18-00 @ 11:14 P.M., EST

The Commission recommendations appear valid. For those ag areas that already rely on irrigation for crop production, do these goals still apply? Suggest they also be used in the fight against Exotic Pest, such as the Mexican-Fruit Fly.

Bob Leonard, Executive Director, Fallbrook Chamber of Commerce

"Chamber Welcome Desk" , fallbrook@primemail.com

**Distributed to Goal 2 Team, Ray Moth, Jim Laver, Doug Le Comte for analysis, DATE: 3-21-00.**

**Flagged for John Flowers , EPA**

7. Received 3-21-00, 10 AM

Attached are the comments by Commissioner Susan Combs, Texas Department of Agriculture. Her signed letter is being mailed to you today.

[llemmon@agr.state.tx.us](mailto:llemmon@agr.state.tx.us)

Lola Lemmon, Safety Coordinator  
Producer Services Division  
475-1611

March 21, 2000

Ms. Leona Dittus, Executive Director  
National Drought Policy Commission  
USDA/FSA/AO  
1400 Independence Ave., SW  
Mail Stop 0501  
Washington, D.C. 20250-0501

Dear Ms. Dittus:

In reviewing the National Drought Policy Commission Report “Preparing for Drought in the New Millennium,” I have the following comments:

One of the most positive aspects of the proposed drought policy is the implementation of preparedness plans and mitigation measures. Funds invested in this manner are of greater long-term benefit and more cost-effective than the expenditure of federal funds for emergency relief.

Increased public awareness is a vital part of any proactive approach to drought response. Information regarding water conservation techniques in urban settings while providing training within the agriculture community for the planting of drought-resistant and/or tolerant crops contribute to this awareness.

The research and analysis of information is of significant value in predicting drought conditions and monitoring the potential impact on governments and individuals alike. Having access to prediction information will enable farmers and ranchers to alter their planting and/or livestock systems to include the more drought-tolerant/resistant plants and species, which, in turn, will lessen the impact on the many entities dependent on the agriculture industry.

I would further recommend expanded research in areas that will create more water for needs during a drought such as brush control, cloud-seeding, desalinization and canal lining.

Risk management, as part of an overall plan of mitigation and planning, could result in a more positive and cooperative working relationship between the agricultural community and the government. As outlined in the Australian Drought Policy Review Task Force report, farmers would assume greater responsibility for managing their particular risks while the government, by funding drought management and risk management training and providing tax incentives, would create an environment more conducive to a planning and mitigation approach. However, the risk-management approach should not disregard the value of properly implemented federal crop insurance and other forms of federal assistance such as emergency haying and grazing of CRP acres. The current crop insurance program should be extended to permanently cover livestock and revised to expedite response to applications for assistance and payment of claims.

It is doubtful that a handbook will move the general public to action with regard to drought response. Such funds would be better spent for implementing emergency drought preparedness measures with cost-share incentives by appropriate agencies and/or groups or much-needed research as mentioned above. This might include hands-on training and assistance in planning and mitigation to help farmers and ranchers decide the best risk-management strategies for their individual operations (i.e., drought-tolerant crops/species, crop insurance, conservation systems, etc.). Similar training can assist communities in determining their own priorities as they relate to drought issues and protection of environmental resources.

Thank you for the opportunity to comment.

Sincerely,

Susan Combs

Commissioner

**Distributed to: Goal 2 Team for Paragraphs 3 & 4,  
Goal 3 Team, Jane Pease, Beth Osborne, Diana Marquez for Paragraph 4  
Goal 1 Team for Paragraph 5 .  
DATE: 3-21-00**

8. Received 3-23-00,  
Attached are the comments by Commissioner Gus R. Douglass, West Virginia  
Department of Agriculture. His signed letter is being mailed to you today,  
March 27, 2000.

March 23, 2000

Ms. Leona Dittus, Executive Director  
National Drought Policy Commission  
USDA/FSA/AO  
1400 Independence Ave., SW  
Mail Stop 0501  
Washington, D.C. 20250-0501

Dear Ms. Dittus:

The following are my comments relative to *Preparing for Drought in the New Millennium*:

As the Agriculture Commissioner of West Virginia and chair of the State Soil Conservation Committee which develops policy for the Soil Conservation Agency and Soil Conservation Districts, there is a great need for redirection within USDA. West Virginia has had to deal with many natural disasters, including tornadoes, floods and drought.

After the first two disasters, FEMA (Federal Emergency Management Agency) was on the scene immediately to meet the needs of the citizens and the community. But, when it came to the recent drought, USDA was woefully lacking in their reaction time. A good example is the financial assistance appropriated six months ago to assist the farm community is just now reaching them.

Fortunately, here in West Virginia, the Governor and the Legislature met and immediately made available \$11 million to provide emergency assistance to the livestock industry. We would have lost the livestock community if we had not been able to encourage and provide these people immediate assistance to enable them to perpetuate their enterprise though to another grazing season. I do compliment, USDA's Farm Service Agency, as they were the catalyst to help us determine the individuals who needed assistance and the amount of assistance necessary.

In summary, my recommendation is that USDA be given the authority and the motivation to react immediately to move monies to the industry in a drought situation, or give FEMA the authority to react not only to floods and natural disasters such as tornadoes, but also

to drought

Thank you for permitting me to comment

Sincerely,  
Gus R. Douglass  
Commissioner

**Distributed to Goal 4 Team, Warren Lee, Curtis Carleton, Lorine Boardwine for analysis,  
DATE: 3-27-00.  
Flagged for Goal 5 interest**

9. Received 3-23-00 @ 12:33 P.M., EST  
A telephone call from: Mr. Leonard Logan  
Farmer  
Fort Plain, N.Y.  
(518) 993-2279

Recipient:  
Ms. Leona Dittus, Executive Director  
National Drought Policy Commission  
USDA/FSA/AO  
1400 Independence Ave., SW  
Mail Stop 0501  
Washington, D.C. 20250-0501

Mr. Logan expressed concern about the fact that a great deal of money is spent by the Federal government to subsidize Federal crop insurance. He suggested that farmers be given the option to have the government funds used to either subsidize crop insurance premiums or to help establish an irrigation system, whichever is more beneficial for the individual. He felt that with the money the government would spend in four years to subsidize his crop insurance he could pay for an irrigation system which would greatly prepare him for any future droughts. In this scenario, if the farmer did not purchase crop insurance, he/she would not be eligible for a crop disaster payment. Mr. Logan stated he would provide the Commission with a written statement he prepared regarding crop insurance and had already submitted to the Farm Service Agency.

**Distributed to Goal 3 Team, Jane Pease, Beth Osborne, Diana Marquez for analysis,  
DATE: 3-27-00.**

10. Received 3-27-00 @ 12:00 P.M., EST

Ms. Leona Dittus and Commissioners;  
Below are some of the comments I have on the draft report prepared by the

Commission:

I like the report and believe that it has very valuable information in it. I support the creation of a National Drought Council to oversee drought policy and preparedness issues. The Council could effectively "achieve a coordinated approach to drought mitigation and response" (Page 4, draft report) and assist programs, such as the National Drought Mitigation Center, to improve the overall readiness of the country for drought situations.

Other than for a drought affecting the Marshall Islands in 1998, I am not aware of the Stafford Act ever being used for a drought situation. Yet it is being offered as a possible solution. Is this truly a solution for the future? There might be a need to state the expectations of when the Stafford Act would be used. Also, it is my impression (but I could be mistaken) that 10 or 15% of the money from the Stafford Act must be used for mitigation purposes. This could be an excellent source of valuable funds needed by states and communities to implement drought mitigation measures. Perhaps that should be mentioned...if my understanding is correct.

Technological solutions are not mentioned much in the report. Will there be support for technology? One area that is mentioned, but not given much attention, is graywater. This is a great idea, but will need support in order to be accepted around the country. Another technology is desalinization. Was the Commission aware of the very good report on desalinization in the December 1999 issue of Water International? It highlighted global examples and successes, including the fact that Florida has over 100 desalinization plants in operation now. It also included a list of recommendations to the U.S. government that are very relevant to the Commission. It is these technologies, as well as the individual entrepreneurs like those heard during the testimonies that should be encouraged by the NDPC. For example, after a visit to the Scottsdale, AZ Water Campus, the Commission could have identified specific recommendations to support similar "mitigation" projects around the country.

The mission of the National Drought Mitigation Center solely deals with drought issues. Currently, the NDMC funding is with a special grant through the CSREES in USDA. I feel that the report can be stronger in recommending stable and increased funding for the NDMC. Grouping us into a recommendation (2.8) for increased funding to established agencies that have multiple responsibilities diminishes the crucial role of the NDMC, and the volatility of its funding situation. I believe that an additional recommendation as stated by David Stooksbury, State Climatologist for Georgia, on February 3, 2000, would be more appropriate: "Increased, stable, long-term support for a national drought education and planning assistance program through the National Drought Mitigation Center located at the University of Nebraska-Lincoln."

Education and improved public awareness are identified as two important components of a national drought policy, yet the specific recommendations made regarding these components are not very strong and success is not assured. Again, a statement of support for the NDMC would be one specific recommendation. However increased and stable funding is important for the NDMC to effectively accomplish these aspects of its mission. The NDMC would work very closely with the National Drought Council and all agencies and local entities to address these components.

Thank you for this opportunity to present my comments to the Commission. I look forward to the final report and to its reception by Congress and the White House.

Michael Hayes.

Michael Hayes  
National Drought Mitigation Center  
239 L. W. Chase Hall  
Lincoln, Nebraska 68583-0749  
(402) 472-4271  
<mailto:mhayes2@unl.edu>

**Distributed to Goal Teams 5 (Paragraph 1), Team 4 (P 2), Team 2 ( P 3) Team 1 ( P 6), for analysis, DATE: 3-27-00.**

11. Received March 28, 12 PM

**Comments on the NDPC report, Preparing for Drought in the New Millennium, draft report March 8, 2000.**

**Submitted by Donald A. Wilhite, Director, National Drought Mitigation Center, University of Nebraska, Lincoln, NE 68583.**

**Comments:**

1. Page 1. The first paragraph. I find this paragraph lacks clarity. For example, it is true that it is difficult to identify and quantify drought impacts because it is hard to separate direct from indirect losses and to assign quantitative values to social and environmental impacts. And, there are complex economic factors that confound separating drought losses from other external factors. Regarding the second and third sentences, one doesn't necessarily follow from the other. I am not sure that hydropower plants are necessarily designed on the basis of capacity to produce power during a severe drought. These facilities are located at reservoirs that are designed on the basis of many factors, but often flood control and irrigation. Of course the inability to produce

power during a drought year is identified as a loss of revenue for that facility. If power must be produced from another facility, whether nuclear or coal, it is likely to be at a higher cost. There are always winners and losers with the occurrence of any natural hazard event.

Inaccurate reporting of studies in paragraphs 2 and 3. Unclear to which report you are attributing drought losses. You cite my study/report of June 1984 to the NSF, which was of the 1974-77 drought period. However, you make reference to losses to the 1953-56 drought. Were those taken from my report? You also mention federal drought response costs of \$6.5 billion—these figures could be attributed to my study which cited \$7-8 billion. Also, the primary drought years in question were 1974, 1976, and 1977. Most of the federal dollars provided through congressional appropriations occurred in 1977. Your citation mentions 1977-78 drought costs. I would not include any reference to 1978 since the 1977 drought ended in April for much of the country and certainly by the fall months for the remainder. I would also disagree strongly with the “extraordinary federal expenses” over the 1952-88 period of half a billion dollars. Did someone just take the peaks in expenditures from congressional appropriations related to drought and average them? There are significant costs each year through crop insurance, disaster payments, etc. during this period. If the value isn’t known, I would suggest not trying to include one.

It is also important to draw a distinction between federal expenditures because of drought (whether congressional appropriations or federal expenditures) and losses. FEMA estimates annual losses resulting from drought at between \$6-8 billion. I think that it is critical that this figure is mentioned along with the reference for federal government costs.

In paragraph 3, the report cited was titled “Drought and Natural Resources Management in the United States: Impacts and Implications of the 1987-89 Drought.” This report was not prepared for the Natural Hazards Research and Applications Information Center, rather it was prepared by Riebsame, Changnon, and Karl. Riebsame was a member of the staff of this center at the time.

2. Page 2. The first sentence is poorly phrased. It reads as though these studies have been poorly done with the statement “these well-intentioned efforts have produced a patchy approach to reduce the impacts of drought.” These reports were produced to document actions and losses associated with drought, i.e. post drought evaluations. The point is all we have available to us to assess the impacts and responses to historical drought events are a few sporadic reports completed by different researchers following different methodologies. Some have made recommendations on how improvements could be made in improving this nation’s response to drought. This nation has not had a systematic post-drought evaluation process and so those studies that have been done are “event” specific with no common methodology. A critical point that the NDPC should consider including in the report is that a long series of reports and statements beginning in the mid to late 1970s have recommended significant changes in how we approach drought, including the need for a national policy and plan. However, these recommendations have been largely ignored. I have documented these recommendations, if you are interested. These recommendations provide even more fodder to the recommendations that the NDPC is making at this time.

3. Page 4. Drought snapshots. . .The drought events listed should be expanded and made more regionally inclusive. First, the 1930s drought years affected more than 60% of the nation, yet it is referred to as largely a Great Plains phenomena. Second, the 1950-54 period should be expanded to include 1956 as this drought event moved northward affecting much of the central U.S. The mid 1960s drought event is omitted (it is mentioned later in the report), this is the drought of record for the Northeastern states. I would also like to see a reference here or somewhere that indicates that drought occurs somewhere in the U.S. every year and, on average, about 12% of the nation is in severe to extreme drought each year.

4. Page 5. The bullets following the definition are misleading. First, drought is a temporary aberration, in contrast to aridity that is a permanent feature of climate. The first bullet misrepresents this concept. Droughts are characterized by two factors, the intensity of the moisture deficiency and the duration of the event. The term “persistent” can be misleading because droughts may last for a period of a few months to years. The last bullet is not necessarily true, depending on the type of drought you are referring to. Meteorological drought, depending on how it is defined, may occur even though because of timing or precipitation effectiveness, it may have little or no impact on crops, etc.

Paragraph 5. National drought policy must also be able to distinguish between true droughts and those that are occurring because normal water supply has been overextended because of non-sustainable development.

5. Page 6. Stored Water and Natural Water Droughts. First paragraph, replace “One type” with “Stored water” to improve clarity. The reference to these types of droughts primarily affecting urban areas and agriculture “near rivers” is inaccurate. Much of the nation’s municipal and agricultural water supplies are obtained from ground water.

6. Page 9. Since this section is just reporting on some examples from states, regional entities, localities, and tribes, it seems inappropriate to refer to these as “program assessments,” since no attempt is made to evaluate the effectiveness of these programs. It would also be helpful to congress to provide an overview of the National Drought Mitigation Center’s program in this section since it has been congressionally funded for six years and primarily addresses issues of planning, mitigation, monitoring, research, training, and outreach/public awareness, all important ingredients to the national drought policy that congress directed the NDPC to derive.

7. Page 18. Reference to the inset information about the NDMC. I know that witnesses at public hearings and others have indicated the high value of information received from the NDMC for a variety of purposes, i.e., planning, monitoring. I would like to see the last sentence modified to include reference to a broader range of services and information provided by the NDMC. We are not just a referral service–this is a minor aspect of our overall program, but we are well networked with other specialists and provide referrals when appropriate.

8. Page 23. 2<sup>nd</sup> paragraph. It is my understanding that the only drought event that has received Presidential declaration was in Guam and/or the Marshall Islands, therefore the Stafford Act is not useful for drought events.

9. Pages 24-28. The programs of the National Drought Mitigation Center are focused primarily on the following tasks: monitoring/early warning; research; drought planning; training; public education via our information clearinghouse; advising policy makers; and international activities. For example, we have (1) organized and conducted 9 training workshops on drought planning since 1997 (5 in the U.S., 1 joint workshop between U.S. and Mexico, and 3 international workshops) for over 700 persons; (2) received over 250,000 hits during February 2000 on our web site (information clearinghouse); (3) worked with states and other government entities on drought planning activities; (4) served as technical headquarters for the Western Drought Coordination Council; (5) developed the 10-step planning process methodology used by governments at all levels throughout the world for preparing a drought plan; and (6) promoted drought planning and preparedness activities with foreign governments and U.N. and other international organizations. Although this section addresses most of these areas, no mention is made of our very successful program. Why is that?

### **Comments on Recommendations**

I continue to have concerns about the lack of specificity of many of the points associated with the recommendations. I don't think Congress will know how to implement these recommendations in many cases, what legislation is being suggested, what funding levels in support of existing or new programs is adequate, etc. Lack of specificity will likely lead to inaction.

10. Under 1.1, (first bullet) the components of a drought plan mentioned are directed more at a drought plan directed at water supply planning. What about impacts on agriculture and other sectors? We recommend that drought plans contain 3 components: monitoring/early warning/prediction; risk and impact assessment; and mitigation and response actions. Within these three areas, all of the components mentioned in the report, plus others, would be addressed.

(Second bullet) Risk or vulnerability assessments need to be completed by each sector for all drought prone areas. This bullet implies that the National Drought Council will assess vulnerabilities.

11. 2.2 Since the NDMC already has a comprehensive information clearinghouse which links to over 250 web sites and with over 1000 linked to it, the Commission should recommend providing additional resources to expand information on our web site. Our web site received over 250,000 hits during February. The recommendation to "establish" a clearinghouse suggests that no information clearinghouse currently exists.

12. Recommendation 3. Is something missing in the wording? Develop and advocate **incorporating** comprehensive risk-management strategies into drought preparedness **plans**.

If you have questions regarding any of my comments, please let me know. I would be pleased to elaborate on any of the points that I have made. Best of luck as you near the checkered flag.

**Distributed to: Goal Teams 1, 2 for analysis, DATE: 3-29-00**  
**Flagged for : ALL may have an interest here.**

12. Received March 28, 5 PM

Hello Leona,

It was a pleasure meeting you at the Western States Water Council meeting earlier this month.

I have a few minor technical corrections for the Commission's draft report. A formal letter from our Director will follow, essentially thanking the Commission for its work and its recognition that the USGS stream gaging network needs to be expanded.

The corrections:

-- Page 11, 3rd paragraph under "Stored Water"

Most commonly known as 1976-77 and 1987-92 droughts. Alternatively, specify water year or calendar year.

-- Page 14, 4th paragraph

Suggest delete reference to pending legislation to create a state drought management function. The bill in question was a spot bill, in other words, a placeholder introduced with the intent of being amended. The author intended to have a vehicle available for some type of drought relief measure, if water year 1999 continued to be dry. California is now at essentially normal levels of rainfall and snowpack, so the need for the spot bill has evaporated. The bill is not active, and there is no actual movement to create a state drought management function.

You might want to instead mention that California's Urban Water Management Planning Act requires water purveyors serving more than 3,000 AF annually or more than 3,000 connections to prepare plans demonstrating how they would respond to cut-backs of up to 50% in their supplies, in the event of a drought, natural disaster. etc. Plans are required to be updated every 5 years and are to be submitted to us (the California Department of Water Resources).

-- Page 16, 2nd to last paragraph

Strictly speaking, "potable water emergency" with respect to large cities in Southern California is misleading. The only large city on the brink of a potable water emergency was Santa Barbara, although measures such as construction of a temporary pipeline prevented it from becoming a water haulage situation. A better wording would be: With the exception of the City of Santa Barbara and surrounding smaller communities during the 1987-92 drought, droughts have not .....

Good luck on your report.  
Jeanine Jones  
CDWR Drought Preparedness Manager  
(916) 653-5272

**Distributed to: Goal 1, for analysis, DATE: 3-29-00**

13. Received March 28, 6 PM through Roseann Gonzales, USBOR

From: Woody Widmark <[widmarkw@mail.ssd.k12.ak.us](mailto:widmarkw@mail.ssd.k12.ak.us)>

HI MY NAME IS WOODY WIDMARK (TRIBAL CHAIRMAN OF SITKA TRIBE OF ALASKA). OUR TRIBE IS LOCATED IN SITKA, ALASKA (SOUTHEAST ALASKA OR PANHANDLE).

IF I MAY, I WOULD LIKE TO MAKE A FEW COMMENTS DURING THE PUBLIC REVIEW PERIOD.

ON PAGE 6: (1ST PARAGRAPH)

FOR YEARS, FARMERS AND RANCHERS, NATIVE TRIBES..... AND SO FORTH. I WOULD LIKE TO COMMENT ON "NATIVE TRIBES". IN ALASKA, THE TRIBES ARE CALLED ALASKA NATIVE TRIBES AND THE "LOWER 48" TRIBES ARE CALLED AMERICAN INDIAN. WHAT I'VE HAVE SEEN WHEN CONSULTING WITH TRIBES, THE PHRASE "ALASKA NATIVE/AMERICAN INDIAN" TRIBES. OR "TRIBE(S)" IS SUFFICIENT..... ARE THE TRIBES FEDERALLY RECOGNIZED? WHAT ABOUT "TRADITIONAL COUNCILS?"

ON PAGE 34 (LAST PARAGRAPH)

THE ULTIMATE OBJECTIVE IS THAT ALL WATERS USERS AT ALL LEVELS OF GOVERNMENT.....AND SO FORTH. AT ALL "LEVELS OF GOVERNMENT".....DOES THAT MEAN FEDERAL, STATE AND TRIBAL GOVERNMENTS?

PAGE 37 (2.5) "NATIVE TRIBES" .....I DON'T LIKE THE TERM.....

EITHER ALASKA NATIVE/AMERICAN INDIAN TRIBES OR JUST (FEDERAL RECOGNIZED) TRIBES WILL DO.....

PAGE 39 5. COORDINATE DROUGHT PROGRAMS AND RESPONSE.

(2ND PARAGRAPH)

DOUGHT AFFECTS A WIDE ARRAY OF CONSTITUENTS, AMONG THEM FARMERS, RANCHERS, NON-FARM BUSINESSES, TRIBES,.....ETC.

I DO LIKE THIS LANGUAGE BECAUSE IT JUST STATES

"TRIBES" .....GOOD JOB.....

EVEN THOUGH, I'M FROM AN AREA WHERE THERE IS A LOT OF RAIN (RAIN FOREST)/TONGASS NATIONAL FOREST.....I FEEL THE TERMS "NATIVE TRIBES" IS INAPPROPRIATE AND WHEN SPEAKING OF TRIBES, ARE THEY FEDERAL RECOGNIZED? OR NOT? OR IN ALASKA WE HAVE TRADITIONAL COUNCILS AS WELL.....THANKS FOR YOUR TIME.

**Distributed to: Goal 1, for analysis, DATE: 3-29-00**

**Flagged for : ALL for interest in Alaska Native/American Indian Tribes**

14. . Received March 28, 5 PM

FROM: RobertKlink@bia.gov

I've read your subject report and have the following comments:

Page 2- Robert Miller---- "Past" President of IAC.

Page 3- last paragraph- Add "tribal"to read.... in anyway with tribal or states' water rights

Page 15- delete one Becker County, Minneasota (listed twice)

Page 18- third full paragraph -suggest replacing Oregon with Alaska to read.... Florida to Alaska...

Metlakatla Reservation on Annette Island near Ketchikan needs a soil survey update.

A tabular list of the 86 drought related programs would be helpful. Table should have a column with a short "one phrase" description of program, and a second column with category(ies).

Page 19- add "and FY 2000 funds" to read only one program with specific authority and FY 2000 funds for drought planning...

Page 28- 1st full paragraph-- ad a comma and remove "and' to read New species, welcome and unwelcome, that only exist....

Page 29- rewrite 1st paragraph under Need to Address... to read " changing soil composition and properties".

last paragraph- change wording to read 'no longer a phenomenon dependent on drought and concentrated in large national forests....

Page 39- There is a need to add an explanation concerning FACA, what does it mean and why the exemption is prescribed in Recommendation 5.1 .

Thanks for the chance to respond & comment by March 31st.

**Distributed to: Goal 1,4, 5 for analysis, DATE: 3-29-00**

**Flagged for : ALL for interest in Alaska Native/American Indian Tribes**

15. Received 03/28/00 03:42PM

[dave\\_lund@harvard.edu@inter2](mailto:dave_lund@harvard.edu@inter2)

Ms. Dittus, for a report of recent research results regarding the 16th century megadrought in the U.S., see the March 21, 2000 issue of Eos, a weekly publication of the American Geophysical Union.

The article is entitled "Tree-ring data document 16th century megadrought over North America" (front page article).

- Dave Lund

**Distributed to: Goal 2 Team Ray, Jim , Doug for analysis, DATE: 3-29-00**

16. Received March 29, 2000,

Dear Ms. Dittus:

Susquehanna River Basin Commission (SRBC) staff has reviewed the Draft Report entitled "Preparing For Drought in the New Millennium" by the National Drought Policy Commission. The SRBC's comments on this Report are attached. Thank you for the opportunity of commenting on this document. Please keep the SRBC apprised of the availability of any future drafts or additional opportunities for input into the National Drought policy formulation process.

Sincerely,  
Stephen A. Runkle  
Hydraulic Engineer  
Susquehanna River Basin Commission

**SUSQUEHANNA RIVER BASIN COMMISSION**

**Comments on Draft Report entitled  
"Preparing for Drought in the New Millennium"  
by the National Drought Policy Commission**

**March 27, 2000**

Commission staff has reviewed the Draft Report entitled "Preparing for Drought in the New Millennium. The Commission agrees with the Report's principle recommendation that Congress pass a National Drought Preparedness Act that would establish a National Drought Council. The primary function of the Council would be to ensure that the goals of national drought policy are achieved.

However, the Commission does not agree with the recommended composition and chair of the Council. The Council should not be chaired by the Secretary of Agriculture. This gives a predetermined bias that agricultural droughts are of paramount importance to the Nation and that the urban-suburban and environmental impacts from drought are subservient to agricultural

interests. Far too many examples and case studies mentioned in the Report outline agricultural impacts and response measures resulting from drought. Additionally, the Report's examples and case studies emphasize western versus eastern drought impacts and response actions. No case studies or examples are given which discuss drought impacts and response actions from the northeastern and mid-western metropolitan corridors.

This Commission notes that the composition of the National Drought Policy Commission does not include representatives from the U. S. Department of Energy, Environmental Protection Agency, and other environmental interests. While the Report's recommendations rectify this, the bias is already incorporated into the Report. In addition, with the exception of the Metropolitan Water District of Southern California, urban and suburban representation is lacking and representation from the eastern and mid-western metropolitan corridors is non-existent. If the proposed Council's structure is skewed in this manner, a major percentage of the Nation's population will not be represented. As was noted in our previous comments, the former Water Resources Council should be used as a model for the proposed National Drought Council.

In general, we do agree with the responsibilities assigned to the National Drought Council as described in Section 5 of the Recommendations. A primary function would be to coordinate delivery of existing and new drought programs and available assistance programs to the regions and states. This Commission notes that within the last 10 years, drought related federal programs have been fragmented among 88 separately funded programs. Therefore, future coordination at the federal policy level is essential. Certainly, some of these programs can be combined for greater efficiency.

We also sadly note from the draft Report that fewer than five states have an individual designated as drought coordinator, and only about 20 states have a multi-agency drought task force to coordinate drought management activities within the state. The states need to take a more active part in drought management and drought response activities.

Another vital function for a National Drought Council is to assist regional, county and local governments in developing drought contingency plans and drought preparedness, and in implementing critically needed supplemental water supplies to avoid shortfalls. It is understood that River Basin Commissions fall under the regional government designation and play a key role in regional drought coordination and management activities. Funding for planning and implementation of water resource solution alternatives (both supply and demand side) is critically needed. Adequate metropolitan and municipal water supplies must be assured for future generations.

Another essential role for the National Drought Council is to insure that a viable National Drought Monitoring Network of gages is developed and maintained to monitor key hydrometeorological parameters. Adequate funding is imperative to sustain this Network in order to provide the real-time drought monitoring information necessary for accurate and timely drought triggering. These key hydrometeorological parameters include precipitation, streamflow, groundwater levels, reservoir levels and soil moisture indexes. In a recently completed Report, the Susquehanna River Basin Commission has documented significant gaps in the existing streamflow and ground water monitoring network of gages within the Susquehanna River basin

and has recommended improvements to this network to facilitate effective drought monitoring. Increasing the federal cost share in funding the National water resource gaging programs would go a long way toward improving the National drought monitoring capability.

Recommendation 3 of the Report would develop and advocate comprehensive risk-management strategies and incorporate these in drought preparedness plans. This is a worthy goal, but most sub-recommendations and case studies in the Report involve agriculture. One sub-recommendation is included for small business. Why not include recommendations to develop reservoir and ground water aquifer risk management plans to solve regional water resource needs for all types of water users?

This Commission strongly supports the need to address environmental concerns and impacts resulting from drought. Toward that end the Commission has developed reservoir release management plans for use during times of drought. Reservoir releases from Commission owned storage in basin reservoirs are triggered at critical low flow levels to help protect fish and aquatic life and sustain downstream uses. Continued federal funding for these cutting-edge instream flow studies and implementation projects is critically needed. A viable National Drought Council could insure that these research and implementation measures are supported without interruption.

The Report emphasizes the need for public education to enhance drought preparedness and implement water conservation strategies. However, the report candidly notes that there is little federal assistance available for such programs. A National Drought Council should be empowered with the mandate and resources required to correct this deficiency.

On page 18 of the Report it is noted that drought planning and mitigation strategies are a significant part of the Western Drought Coordination Council and Delaware River Basin Commission programs. However, this Commission has, over the past year and a half developed a Drought Coordination Plan for the basin to coordinate drought management activities among the signatory agencies. The next stage of the Plan will develop strategies to mitigate environmental impacts resulting from drought. These strategies employ detailed instream flow need assessments that are cutting edge technologies in environmental drought management. These Susquehanna River Basin Commission accomplishments should be acknowledged in the Report.

**Distributed to: Goal 5, P's 1, 2 & 4; Goal 1, P's 7 & 11; Goal 2, P 8; Goal 3, P 9 , for analysis, DATE: 3-29-00**

**Flagged for : Deanne, P 3, John Flowers, EPA, P 10**

17. Received March 29, 2000

Ms. Dittus:

A copy of the comments with the Chairman's signature will follow by fax.

**Transmitted via Facsimile: (202) 720-9688**

Ms. Leona Dittus, Executive Director  
National Drought Policy Commission  
USDA/FSA/AO  
1400 Independence Ave., SW, Stop 0501  
Washington, D.C. 20250-0501

Dear Ms. Dittus:

Thank you for the opportunity to comment on the draft report of the Commission. As drought adversely impacts the economy of a small state such as Hawaii, it is imperative that we move from a crisis management mode to a risk management mode, which this draft report recommends. I would like to offer the following comments:

1. Recommendation No. 5.2, creation of the "National Drought Council" - the chair of this body should be an agency with broader national interests because drought impacts affect not only agriculture but also encompass potable and industrial water supplies, environmental resources, forest fire hazards, and small businesses. The Bureau of Reclamation may possibly be a more suitable agency to chair the Council.
2. Recommendation No. 5.3, funding for the Council - Congress should provide direct funding to the Council for operational costs in addition to the various federal agencies with drought response programs.

Sincerely,

JAMES J. NAKATANI  
Chairperson, Board of Agriculture

cc: Shaun McGrath, Western Governors' Association  
Governor Benjamin J. Cayetano  
Timothy Johns, Commission on Water Resource Management

**Distributed to: Goal 5, items 1, 2 for analysis, DATE: 3-29-00**

18. Received March 29, 2000

March 24, 2000

Ms. Leona Dittus, Executive Director  
National Drought Policy Commission  
USDA/FSA/AO  
1400 Independence Avenue, SW  
Mail Stop 0501  
Washington, D.C. 20250-0501

Subject: Comments on the Draft Report of the National Drought Policy Commission  
Delaware River Basin Commission

Dear Ms. Dittus:

Thank you for the opportunity to comment on the draft report of the National Drought Policy Commission. In reviewing the March 8, 2000 version of the draft report, we note that most of our previous comments on the December version have been addressed. We support the proposed National Drought Council as a catalyst for improved coordination of drought information and mitigation activities. We also support the recommendation for drought coordination at the regional and river basin levels.

Although we understand that you are assembling a document that addresses issues at a national scale, the following are additional comments for your consideration:

1. On page 9, Drought Snapshots From 20<sup>th</sup> Century America: The 1961 - 1966 drought in the northeast should be listed. It was the drought-of-record for many parts of the region. The accumulated rainfall deficit during the period was over 40 inches - or a full year's worth of rain!
2. Under Regional Entities on page 15: Drought mitigation programs in the Delaware River Basin have been responsible for preserving billions of gallons of reservoir storage while maintaining stream flows during drought periods. This is an example of interstate cooperation within a river basin which serves the water supply needs of 17.5 million people. The Delaware River Basin Commission, established by a federal/interstate compact, has served the coordinating role in negotiating drought mitigation programs in the basin. Because of what other regions can learn from this experience, this successful example deserves some mention in this section of the report.
3. On the bottom of page 16 and top of page 17: Although federal water agencies may sell space in existing federal reservoirs, this may entail re-allocation of storage for multi-purpose reservoirs. This may be a complex and expensive process where flood control storage is reduced in favor of water supply storage.
4. Under Goal No.1, item 1.1: We believe that improved stormwater management should be mentioned as contributing to drought mitigation. Though it may not appear directly related to drought, it is part of comprehensive water management and helps to retain runoff and promote infiltration.

Please contact Rick Fromuth (extension 232) of our staff if you have any questions. We feel that your report and recommendations will make positive contributions to drought mitigation efforts.

Sincerely,

Carol R. Collier  
Executive Director

DRBC Commissioners

**Distributed to: Goal 5, Item 2; Goal 1, Items 3 & 4 for analysis, DATE: 3-29-00  
Flagged for : Deanne, Item 1, Bill Werick, Item 3**

**19.** received March 29, 2000

Thank you for sending me the Report and I am pleased to have the opportunity of providing a few comments as relate to water-short and drought stricken of several of our Western States. These comments are in the form of an attachment to this e-mail communication.

Sincerely, Joseph A. Warburton, PhD.  
Secretary/Treasurer NAIWMC  
Also owner of ranch property in Nevada.

#### COMMENTS: REPORT OF THE NATIONAL DROUGHT POLICY COMMISSION

I am pleased to have the opportunity to make a few comments on the Drought Report recently prepared for presentation to Congress and the President.

Coming from a State of the Union which is constantly forced to address problems of water supplies, the amounts available, its quality and the attendant issues related to wildlife and endangered species, as well as being the State which presently qualifies as the most rapidly growing in population, it is important for us to be concerned greatly about methodologies which can assist in making more fresh clean water available to our communities.

It is noted, in particular, that the Bureau of Reclamation has the 17 western states as its principal region of concern in such matters. As pointed out on Page 14 of Commission's report, we see that this Agency was authorized under Public Law 102-250 to assist states, tribes, localities and nonprofit entities in developing comprehensive plans for drought mitigation. It is noted in particular that one Section of this Public Law, namely Section 206(b) is not mentioned or addressed by the Commission. This Section of the Law authorizes the Secretary of Interior to conduct Precipitation Management Technology Transfer Programs to help alleviate problems caused by precipitation variability and droughts in the West, as part of a balanced long-term water resources development and management program. This is to be done by consultation with State, Tribal and local water, hydropower, water quality and in stream flow interests on a 50-50 cost shared basis.

Since many areas of the Western States, in particular the States of Nevada, New Mexico and Texas are experiencing water shortages continuously for the reasons mentioned above, it is not at all clear why the Commission has not taken advantage of this Section of Public Law 102-250 in recommending a continuing implementation of such a Congressionally approved program which these States and others in the West, are ready and willing to participate in on a 50-50 cost shared basis.

It is noted on page 14 of the Commission's report that the Bureau of Reclamation had requested only \$500,000 for planning purposes and no funding for solving the water shortage problems in a pragmatic manner. The \$3,000,000 earmarked by Congress in FY2000 for "leasing of water for specified drought related purposes..." provides no help, for example in Nevada, where such leasing is not possible because the Bureau of Reclamation possesses no water which could be leased in those areas of the State most affected by drought. In addition, all of the limited stream flows and ground water supplies are fully appropriated in some of the relevant States to local governments, corporations and individuals.

It is also noted on page 14 of the Commission's Report, that the Bureau of Reclamation has again requested only \$500,000 in its FY2001 budget, presumably for planning purposes only.

The US Department of Agriculture Small Watershed Act only allows for help in watersheds of 250,000 acres or less. The Western States needs are for Watersheds of 2500 square miles or more.

Again on page 22 of the Commission's Report, it is stated that Public Law 102-250 provides emergency response assistance including emergency well drilling in the 17 Western States. This also is of little or no value in those Western States where all of the ground waters are already appropriated, and no such drilling of new wells is permitted by State Engineers. Again there is a failure to recognize Section 206(b) of this Public Law which provides for alternative methods of increasing available water supplies to those regions affected by water shortages.

#### ENVIRONMENTAL CONCERNS:

Water shortages caused by droughts have devastating impacts on aquatic and terrestrial environmental resources. This is certainly true in those watersheds alluded to above where wildlife species and endangered species, such as the cutthroat trout in Nevada lakes, are being heavily impacted.

As noted by the Report, these sensitive and endangered species of fish and wildlife are characteristically found in low population densities as found in west Texas, east New Mexico and in Nevada.

Drought also has repercussions on the morphology and hydrologic function of stream channel networks and this is particularly true for example, on the lower reaches of Walker River in western Nevada where the river has deteriorated to become meandering small streams producing water which is too warm for cold water fish species to survive or to spawn. Again, recognition of Public

Law 102-250, Section 206(b), followed by adequate appropriations by Congress will, in cooperation with the States affected, have the capability of reducing these problems to manageable levels.

The creation of a "super-agency" to solve the drought problems of the United States is certainly not a viable approach as noted by the Commission in its recommendations on page 38 of the Report. However, a recommendation to all of the pertinent Agencies to pro-actively determine where, in the nation, drought problems exist which relate to their authorized programs, would go a long way to solving water shortage problems in a pragmatic manner rather than creating more and more multi-agency planning groups. Individual States already know where their drought related water problems are located and, in many cases are only too willing to participate in relief measures such as those spelled out in Section 206(b) of Public Law 102-250.

**Distributed to: Goal Teams 1 P's 3,4,9 Goal 2, P's 11,12; Goal 5 , P 13 for analysis,  
DATE: 3-30-00**

**Flagged for : USBOR, P's 3-9, USDA, P 8; EPA, P's 10-12**

**20.** received March 29, 2000

To: National Drought Policy Commission (NDPC)

From: Leonard Boulas and Jack Truby, Colorado

Date: 05/09/00

Re: Comments on the Commission's Draft Report "Preparing for Drought in the New Millennium"

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## **BACKGROUND**

As background, both of the authors of these comments have been involved with Drought in Colorado for over twenty years both as members of the State's Emergency Management Agency, and as members of the State's Drought Response Organization. Both were co-authors of the State's original Drought Response Plan, and even after retirement from state service have continued to be involved on a routine basis. Both were instrumental in the development and implementation of the Western Drought Coordination Council, as well as, in the development of several of the Council's work products. They have a wealth of experience in dealing with all facets of Comprehensive Emergency Management (Mitigation, Preparedness, Response, and Recovery) across a wide range of natural and man made disasters. Both have worked closely with FEMA and predecessor agencies.

## **REPORT COMMENTS**

### **1. GENERAL COMMENTS**

We applaud the efforts of the Commission and its staff in developing the report, and feel that the report findings provide an accurate picture of the current drought management environment and the issues involved in producing a National Drought Policy. We agree with many of the report's

recommendations, although we have significant concerns with some aspects of the report as we indicated in our specific comments.

## **2. SPECIFIC COMMENTS**

A. Page i. we agree with recommendation concerning consolidation of Drought Programs, and the formation of a National Drought Council, but feel the justification for the recommendation provided is flawed. FEMA currently for Federal Emergency Management Programs reports to many different congressional oversight committees. The fact is it could be done, but in doing so, you would lose the expertise of the other federal agencies that currently have programs. The issue is more the need for a lead federal coordinating agency, than for all the existing programs to be consolidated under one agency (note comment on page 2 of the report).

B. Page 20. We feel the Commission should have made recommendations (endorsements) concerning the several risk management strategies that were identified and considered, rather than postponing this for future study.

C. Page 23. The report description of the Stafford Act and FEMA does not give due credit to the uniqueness of this legislation, and FEMA's disaster consequence management expertise and coordination capabilities both of which could be significant management tools in a National Drought Policy. This may be due to FEMA and its predecessor agency, FDAA, reluctance to address drought, which they have considered more of an economic downturn than a physical disaster. It is also noted that there is an Emergency Declaration provision in Stafford in addition to the Disaster Declaration provision. The Act also has a Fire Suppression Declaration provision, and authority for FEMA to task federal agencies to carry out the purposes of the Act. Criteria would have to be developed for use of this Act in a Drought Emergency/Disaster and perhaps the Act would need to be fine tuned to deal with a drought, but its use should be considered. After all, it already exists.

D. Page 31. The statement on this page provides the basic premise the recommendations are based on in bold print. We would argue that "Mitigation" not preparedness should be the cornerstone of a national drought policy as it is for FEMA's Comprehensive Emergency Management Program, which addresses all other natural disasters. We feel the emergency management community has moved beyond preparedness (which is an on going activity) to consideration of mitigation as being the most important building block to reduce long term losses. It may be that the Drought hazard preparedness has not moved as far as preparedness for other natural hazards and therefore needs to be emphasized at this time. If so we would suggest the that the wording be changed to "Mitigation and Preparedness", giving mitigation its rightful emphasis.

E. Page 31. We would note it is hard to hold a Council responsible for its actions or its inaction unless it is statutorily created and funded. If not, there really does need to be a lead-coordinating agency (an Executive Agency) which is held responsible and which can use the council as a vehicle to insure closure to essential needs.

F. Page 32. We agree there is much more that can and should be done in the area of Water Resources Management and Policy preparedness activities as they pertained to drought, and that these efforts should be integrated with current drought response activities. The fact is it is not one or the other, but both that are needed. We have held for a long time that long-term drought mitigation is a Water Resources Management and Policy issue.

**G. Page 38. We consider this to be our most important comment and therefore have highlighted it in bold print. We applaud the actions of USDA to step into the breach as the lead-coordinating agency for drought when no other federal agency wanted this role. In addition, for the work it has done on drought as a whole, and to staff the commission. We however strongly disagree with the recommendation that the Secretary of**

**Agriculture chair the National Drought Policy Council. We feel the track record of USDA in rapid response to its current drought programs as noted in the report have been less than satisfactory.**

**The issue is that the lead federal coordinating agency for drought should be an agency that has considerable experience in integrating the efforts of the federal family of agencies and brokering their services to achieve program goals. This agency should be proactive, action oriented and responsive to the needs of local and state governments as well as the public. Based on our experience over the years we consider the federal agency best suited to fill this role with a proven record of accomplishment is FEMA. We therefore recommend that FEMA be designated the lead federal coordinating agency for drought and the FEMA Director chair the Council. Someone has to hold the various federal agencies "feet to the fire" to insure that things are done and actions are taken. We feel FEMA is better suited to do this than USDA. This would not detract from USDA's significant ongoing role in drought monitoring, and assessment, as well as agricultural drought response. The potential success or failure to move forward on a National Drought Policy will depend highly on the agency designated to carry forward this important work.**

We thank the Commission for the opportunity to comment on the draft report and have provided our input in the spirit of what we believe are constructive comments for the Commission's consideration.

**Distributed to: Goal Team 5, Items 2A, C, E, G. Goal 3, Item B. Goal 1, Items D, F . Goal 4, Item C. for analysis, DATE: 3-30-00**

**Flagged for : USDA, FEMA**

21. received March 30, 2000

Here is the testimony I prepared to deliver at the Billings Drought Hearings. Please let me know if you have any trouble reading it, and make sure it is distributed to Commission members. This testimony is the heartfelt view of many of us in the climatological community that have worked for many years to improve drought monitoring and response in our country.

I will also send a printed copy on official letterhead for you to have in your files.

Please confirm the successful receipt of this testimony.

Best wishes to you and the members of the National Drought Policy Commission.

Sincerely,

Nolan Doesken  
Colorado Climate Center

Department of Atmospheric Science  
Colorado State University  
Fort Collins, CO 80523

(970) 491-8545

February 17, 2000

Dear National Drought Policy Commissioners:

I deeply regret that the high cost of travel to Billings, Montana makes it impossible for me to present my concerns to you in person. I hope that you will hear in my written words the deep conviction that I hold regarding drought monitoring, research and response.

First, here is some background information. I am the Assistant State Climatologist for the State of Colorado and have served in that capacity since 1977. I have been an active participant in Colorado's Water Availability Task Force since it convened in 1981 when the Colorado Drought Response Plan was first implemented. While Colorado and most of our neighboring states have enjoyed a relative abundance of water since 1982, the topic of drought and what we can do about it remains one of endless concern.

In what I am about to say, please know that my words are not just my own. They represent the attitudes of many of us here at the Colorado Climate Center, the members of the Colorado Water Availability Task Force, the members of the Western Regional Coordinating Committee 102 (Climate Data and Analysis for Application to Agriculture and Natural Resources) and the members of the American Association of State Climatologists which I represent. The basis for my comments is the 23 years of drought monitoring and research with which I have been personally and directly involved and the greater experience and wisdom of the members of the organizations listed above.

### **Drought – A Hard Thing To Get A Grip On**

Among the various natural disasters, drought is perhaps the most difficult to deal with. Rather than being an event – a disaster that strikes quickly, leaves its mark, and moves on – drought is a non-event. It is the cumulative effect of snows that don't fall, or spring or summer storms that strike elsewhere. Historically, drought tends to sneak up on us, disguised as sunny, dry weather. As such, it does not lend itself to typical emergency response strategies. While being a non-event, it is indeed costly. Drought reaches into the very fiber of community life.

As you know, there are various levels of drought preparedness and response. Through wise adaptation to climate and its variability, the worst impacts from drought can be lessened. However, the natural variations in climate; some potentially predictable and others not; will always affect local and regional water supplies and ecosystems to the extent that "normal activities" will be disrupted, modified or even halted.

## **The Role of Drought Monitoring**

Drought monitoring is the process by which we gather current information locally, regionally, or nationally on the various components of the hydrologic cycle. We compare the current conditions with the full range of conditions that have occurred in the past. Then, using any of a number of analytic tools, we assess the areas, durations and severity of drought and relate this to current or imminent impacts. Drought monitoring has been going on in our country in some shape or form from the very beginning of organized weather observing networks in the 1800s. Drought monitoring is an essential ingredient of any comprehensive response plan or mitigation strategy. Historic studies provide information on how often to expect drought of any specified area, duration and severity, while ongoing monitoring activities describe current patterns of drought.

## **Precipitation – The Key to Drought Monitoring**

The water content of accumulated snowpack, streamflow, reservoir levels, soil moisture, evaporation and vegetation greenness are all a part of the natural water balance and can be measured and assessed to provide important information on drought conditions. However, the single most important observation that relates to all of these others is the measurement of precipitation. If patterns of precipitation, both rain and snow, are accurately measured over time and space, reasonable estimates of the other variables can be made. As such, the basic measurement of precipitation is the simplest and the single most useful measurement for drought monitoring.

## **The National Weather Service Cooperative Observer Program – The Best National Data Source For Drought Monitoring**

Unknown to many in our country is a long-standing network composed primarily of volunteer citizens who day in and day out measure precipitation and temperature for the National Weather Service in urban and rural areas all across our country. This network of observers is known as the **Cooperative Observer Program**. It is managed by the National Weather Service (<http://www.coop.nws.noaa.gov>) and consists of one or more reporting sites in practically every county of every state. With sound measurement procedures, durable instrumentation, carefully indexed station information, and archived data available anywhere in the country, this data source has proven itself time after time as absolutely invaluable in the monitoring of drought conditions and other climate anomalies. For decades, data from this program have been used in the computation of the Palmer Drought Severity Index. More recently, local, regional and national computations of the Standardized Precipitation Index are also being generated from data provided to the National Weather Service by the Cooperative Observer Program.

The total number of locations monitoring precipitation on a daily basis is close to 10,000 which allows assessments of drought conditions on the county scale. A sizeable fraction of these stations date back 30 to 100+ years, providing remarkably consistent information over time and

an essential historical perspective from which to assess areas, durations, intensities and return frequencies of drought. No other source of nationwide data exist that can even come close to providing both a localized and historical perspective – essential information for well-planned drought response.

The entire program from data collection down to archival and dissemination is carried out nationally for just a few million dollars each year – a remarkably small amount considering the national scale of this program. In addition to supporting drought monitoring, the data are also used for many other valuable applications ranging from crop yield projections to flood predictions and water quality assessments. Countless businesses and government agencies rely on data from the Cooperative Observer Program. Much of our nation’s infrastructure in terms of roads, bridges, foundations and roofs have been designed and built based on information determined from the many years of climate data collected and saved from the Cooperative Observer Program. This Program is essential not only for drought monitoring but also for the workings of our country.

Despite its obvious importance and its low cost, the National Weather Service’s Cooperative Observer Program remains largely unknown or taken for granted. Even within its host agency, the National Oceanic and Atmospheric Administration (NOAA), the program has gradually slipped in priority over many years. **THIS IS A CRYING SHAME!!** The NWS Cooperative Observer Program, because it has been around for so many decades and because it seems so low-tech in an age where technology drives so much of our daily lives, has nearly dropped out of view. Yet, because of its low-tech, historically consistent long-term nature, it now emerges as the single most important data source for national drought monitoring and a very important component in global change studies.

### **The Cooperative Observer Program – A Time for Revival**

I appeal to all of you on the Commission to learn more about the Cooperative Observer Program and then speak out boldly on its behalf. A recent report by the National Research Council Committee on National Weather Service Modernization (“Future of the National Weather Service Cooperative Observer Network”, 1998, National Research Council, National Academy Press, Washington D.C.) reviewed this remarkable nationwide volunteer program and provided specific recommendations for sustaining and improving it. With careful planning, and with only modest efforts to modernize data collection, communications, data analysis, archival and dissemination, much more timely and spatially detailed information on U.S. drought will be available now and for decades to come. This network, now 110 years young, deserves a revival! It has earned it. It deserves the renewed support of its own agency, NOAA, and it merits the enthusiastic support of the many other agencies and departments, such as the U.S. Department of Agriculture, the U.S. Department of the Interior, the Federal Emergency Management Administration and all the other groups, who continue to rely on this wonderful source of data.

- This is the right time to improve the level of funding for this program so that dilapidated equipment can be replaced, so that data communications can be improved, and so that data dissemination and archival can be accomplished more efficiently.

- This is the right time to raise the priority of this low-cost program within the Department of Commerce, NOAA and the National Weather Service.
- This is the right time to improve the recognition of its participants so that they (both volunteers and National Weather Service personnel associated with the program).can see and understand the importance of what they are doing and the many applications of the data they are helping collect.
- This is the right time to enlist the support and cooperation of federal agencies like the USDA, USDI, FEMA and other agencies and businesses across the country who utilize this great national resource to again
- This is the right time to make the Cooperative Observer Program strong and alive again.

Thank you for your time and your attention. If you would like more information about the NWS Cooperative Observer Program and how its data are used in drought monitoring and research, I would be happy to provide you with more information. I wish you the best in your efforts to carry this message forward to Congress and the citizens of this country. If there is anything that I, and the organizations that I represent, can do to help you in your efforts, please let me know.

Sincerely,  
 Nolan J. Doesken  
 Assistant State Climatologist  
 Colorado Climate Center

cc: G. Taylor, President, American Association of State Climatologists  
 R. Motha, USDA-WAOB  
 R. Leffler, NWS Cooperative Program Leader  
 D. Jensen, Chairman, WCC-102  
 J. Brislawn, Chairman, Colorado Water Availability Taskforce

**Distributed to: Goal Team 2 from " "The Role of Drought Monitoring " to the end for analysis, DATE: 3-30-00**

22. received March 30, 2000

Leona,

These comments were sent to me, so I'm forwarding them for inclusion in the comment process. Marsha is a California Division of Water Resources planner serving on an IPA with the Bureau of Reclamation.

Leon

Prillwitz, 3/27/2000

## **Comments on draft Preparing for Drought in the New Millennium**

The Commission was asked to advise Congress on how best to:

integrate federal drought laws with state, local and tribal programs;  
improve public awareness; and  
coordinate drought mitigation measures.

I did not find much guidance or new information along these lines in the review draft. My reading of the draft document indicated that the primary emphasis is on reducing agricultural losses related to drought.

Also, the orientation did not include most of the circumstances we face here in the West, since by definition "dryness during a normal dry season or in an arid climate is not "drought."

In California, a semi-arid state, the successful interaction between agricultural interest and urban and environmental stakeholders during water short times is critical to surviving during both wet and dry years. By definition and orientation, California seems to be excluded from any drought program consideration.

Since we have a well developed process here for general water management planning (through Reclamation's Central Valley Improvement Act and the State of California Urban Water Management Planning Act), a key link for water shortage planning and coordination is through these mechanisms. These linkages could be highlighted in the document as a positive connection for planning and implementation of drought programs.

Furthermore, the water purveyors that deal with water management and drought contingency planning here in California are "districts" or "agencies" independent of counties, in most cases.

I don't know if the matrix of the 47 federal programs dedicated to drought will be included in the final report, but I hope it will be.

As I read the recommendations, I wondered upon which findings they were based. For example, the commission decided that consolidation of all federal drought programs under one federal agency should not be done. Upon what did they base this decision?

Based upon the difficulties of this Commission, I question whether the recommendation for the formation of a National Drought Council is a wise way to go. I think an alternative would be to further empower the National Drought Mitigation Center to continue and expand their work with perhaps the formation of an advisory committee to that institution (if they don't have one already.)

The recently published publication of the NDMC: A Methodology for Drought Planning, provides a simple step-by-step approach that can be adopted quite easily by water providers throughout the country. We will be providing a copy to all of our contractors this year as part of

their information package for making revisions to their water management plans. Work like this should be supported and distributed generously to the public.

**Distributed to: Goal Teams 1, P's 5 & 10. Goals 4 and 5 , P's 8, 9. for analysis, DATE: 3-30-00**

23. received March 30, 2000

March 30, 2000

Ms Dittus:

These comments are from Tony Haffer, Meteorologist in Charge, NWS Forecast Office Phoenix, AZ. I attended, and briefly participated in, the NDPC meeting held in Scottsdale, AZ, on March 1st.

At the March 1st meeting I suggested the Commission consider modifying the wording in recommendation 2.2 to explicitly endorse the importance of having regional- and/or state-level information delivery systems. My primary point was to avoid establishing just one national level delivery system (a single point of failure) in favor of a number of smaller delivery systems.

I'm flattered my suggestion was acted on. However, I feel the resulting wording currently contained in the Report for recommendation 2.2(b) could be modified further to more clearly state the concept of regional- and/or state-level delivery systems.

It is felt that a number of regional information networks are best suited to reflect differences in drought conditions and impacts at the state and local levels. In addition, it would be easier for regional interests to keep their system current than it would be for many entities to manipulate one very large and complex system. In addition, one could argue that it is more likely that state and local entities will use, and update, an information network in which they have a vested interest.

Please consider the following rewording of recommendation 2.2(b):

"(b) We recommend the Congress authorize, and the Administration implement, a means to effectively communicate drought conditions and impacts to decision makers at the federal, state, and local levels

across the Nation. An information delivery system should be implemented and be comprised of a number of regional, near real-time product and data networks, integrated in an appropriate fashion to accurately reflect regional and state differences in drought conditions. Such a configuration will provide the most efficient access to, and increase the availability of, weather, water, soil and climate data and information to key decision makers."

Thanks to the partnership among federal, state, county, and private sector interests in water management, Arizona has recently implemented such a communication system. While born out of a desire to more efficiently communicate weather and water information during critical flood episodes, the Arizona system will also be used to provide critical drought information to decision makers at all levels within the State.

The system, tagged the Arizona Flood Warning System, is operational, but in its infancy. Never-the-less, it would be our pleasure to demonstrate the utility of this system to Supervisor Morriss, Mayor Campana, or any of the other Commissioners at their leisure.

Thank you for the opportunity to provide input to such a significant effort.

Tony Haffer  
602-379-4607 ext. 222  
602-267-8051 (fax)

**Distributed to: Goal Team 2 for analysis, DATE: 3-30-00**

24. received March 30, 2000

Attached are comments concerning the draft National Drought Policy Commission Report. The comments were sent to Michael Neyer, Director of Indiana's Division of Water and a member of the Ohio River Basin Commission, for review.

Judith Beaty  
Head Basin Studies Section  
Department of Natural Resources, Division of Water

Comments on the National Drought Policy Commission Draft Report

The draft report entitled “Preparing for Drought in the New Millennium” prepared by the National Drought Policy Commission does an excellent job of explaining and addressing the various issues related to drought. We agree, in general, with the report’s assessment of the situation of drought planning in this county; and we agree with many of the proactive planning concepts and subsequent recommendations in the report. We support a shift in policy from emergency response to planning and mitigation measures.

We accept the premise that we can reduce this nation’s vulnerability to the impacts of drought, and thus reduce the need for emergency relief, **by making preparedness the cornerstone of national drought policy**. We especially believe that good science, public education, and resource stewardship are the most important factors in reducing and/or mitigating impacts of drought.

We strongly support the following specific goals and recommendations contained in the report:

- Improve accuracy and frequency of drought predictions that are disseminated in a timely fashion for decision makers.
- **Promote planning activities that lead to preparedness by: 1) defining pre-determined, objective triggers for specific actions; and 2) anticipating conflicts between different water users and establishing a decision-making mechanism for how shortages will be met.**
- Increase efficiency in coordination and communication of drought programs and responses. This is particularly important when the people who are responsible for responding to drought may not be the same from drought to drought.

Accordingly, we recommend:

- That a **drought impact assessment team of federal, state, and other experts be established** who are responsible for analyzing the causes and aggravating factors contributing to drought and its impacts after drought events occur.
- That a **comprehensive information clearinghouse be established** (such as the National Drought Mitigation Center) to provide users with complete access to drought monitoring, prediction, impact assessment, preparedness, and mitigation measures and to link information from federal and nonfederal sources.
- That the **National Drought Mitigation Center be provided with an adequate annual budget to support continuation and improvement of their drought-related work.**
- That a long-term, continuing National Drought Council should be established to coordinate federal and nonfederal interests, needs, programs, and stakeholders.

That the appropriate federal agencies, in cooperation with the National Drought Council, **develop a handbook of emergency drought preparedness measures for widespread public distribution.**

**Distributed to: Goal Teams 1 and 5 for analysis, DATE: 3-30-00**

**25. Irrigation Association letter of March 15 , 00**

**Distributed to: Goal Teams 1 and 2 for analysis, DATE: 3-30-00**



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MAR 20 2000

# THE IRRIGATION ASSOCIATION



8260 WILLOW OAKS CORPORATE DRIVE • SUITE 120 • FAIRFAX, VIRGINIA 22031-4513 • (703) 573-3551 • FAX (703) 573-1913 • [HTTP://WWW.IRRIGATION.ORG](http://www.rrigation.org)

March 15, 2000

Ms. Leona Dittus  
Executive Director  
National Drought Policy Commission  
United States Department of Agriculture  
1400 Independence Avenue, SW  
Washington, DC 20250-0501

Dear Ms. Dittus:

In my capacity as Executive Director of the Irrigation Association (IA), I am writing to provide comments and suggestions on the draft report of the National Drought Policy Commission. As you may know, officials of the IA, which represents over 1500 manufacturers, distributors, and designers of irrigation equipment throughout the United States recently discussed our views at length with Pearlie Reed, Ron Marlow, Warren Lee, and Gary Margheim. I am pleased to report that our views were very well received.

First, as you are probably aware, agriculture is the greatest user of our nation's water supplies. Indeed, according to the Census Bureau, of the 25% of the country's renewable water supplies withdrawn each year from aquifers, streams, and lakes, agriculture uses over 80%. Accordingly, identifying and deploying better water management practices by agricultural users will not only help preserve today's water supplies, it will help conserve substantial amounts of water in the future, thereby directly attacking possible drought shortages. **We suggest that efficient irrigation technologies should be featured as a prime and immediately available technique for avoiding or at least minimizing drought problems, particularly in light of efficient irrigation's demonstrated contribution as a sound water management practice.**

Put another way, the utilization of more efficient irrigation technologies will substantially enhance water quantity as well as quality through both water conservation and reductions in nonpoint source pollution. For example, between 1988 and 1994, the number of farm acres irrigated increased 2.9%, yet the amount of water applied dropped 5.4%. This is due in large measure to the fact that agriculture invested in more efficient irrigation technologies. Our research reveals that the reduction in the amount of water applied each year by agriculture adopting more efficient irrigation practices equals the water needed for the personal use of every man, woman, and child in the nation's 29 largest cities. More water conserved obviously equals more water available.

We agree completely with the basic premise of the Commission's recommendations that asserts that the nation's vulnerability to the impacts of drought can be reduced by making preparedness the cornerstone of national drought policy. The logical extension of that premise is that it is critical to look at the problem both in the short-term – what can and should be done today – and in the big picture – what types of long-term solutions can and should be undertaken. **Clearly, prevention of the problem can ensure that sufficient water is available in the future, while at the same time slashing the need for disaster aid after the fact; the draft affirms this stance clearly by stating as a preeminent goal the importance of moving away from the need for emergency relief. Again, efficient irrigation practices represent a reasonable mitigation tool prior to both "stored water" and "natural water" droughts.**

Unfortunately, it did not appear that the draft sufficiently identified means such as efficient irrigation that can help in the campaign to prepare for serious drought emergencies despite proven successes in conserving substantial amounts of water and the potential for drought prevention.

Modern irrigation technology allows the agriculture industry as well as landscape and golf course interests to apply water more efficiently, taking into consideration time of day, local topography and soil conditions, the size and configuration of the area requiring irrigation, and weather.

Where the draft continues that "investments on the front end in preparedness will save money over the long run," we heartily concur. **Funding to provide farmers a way to purchase irrigation equipment prior to a drought, or tax incentives designed to encourage the purchase and installation of more efficient means of irrigation either through modifications to existing equipment or through deployment of new, modern, and more efficient technology, is consistent with the draft's proactive recommendations.**

In addition, we suggest that **ameliorating possible wastes of water by poor irrigation performance can be accomplished by assessing the efficiency of existing systems and recommending corrections through water audits.**

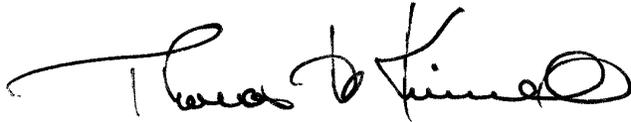
Although inefficient irrigation can cause water loss, more water is wasted currently by overwatering than by any other cause. Accordingly, **education of farmers on water scheduling and budgeting would go a long way in preserving limited supplies. We believe that an organization like the National Resources Conservation Service is well positioned to assume a leadership role on the education issue.**

Page 3

**Finally, I strongly encourage you to revise the conclusions to identify efficient irrigation as one of the mitigation activities specifically cited that “can reduce vulnerability to drought events.”**

Thank you for your consideration of these important issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas H. Kimmell". The signature is fluid and cursive, with a large initial "T" and a distinct "K".

Thomas H. Kimmell  
Executive Director



*The Commonwealth of Massachusetts*  
*Executive Office of Environmental Affairs*  
*100 Cambridge Street, Boston, MA 02202*

*JW*  
MAR 20 2000

ARGEO PAUL CELLUCCI  
GOVERNOR

JANE SWIFT  
LIEUTENANT GOVERNOR

BOB DURAND  
SECRETARY

Tel. (617) 727-9800

Fax (617) 727-2754

<http://www.magnet.state.ma.us/envir>

March 10, 2000

Leona Dittus  
Executive Director  
National Policy Drought Commission  
United States Department of Agriculture  
1400 Independence Avenue, SW  
Room 6701-S, STOP 0501  
Washington, D.C. 20250-0501

Dear Ms. Dittus:

The Georgia Department of Natural Resources invited me to provide comments to the National Policy Drought Commission on how drought policy and issues relate to Massachusetts. I would like to share some thoughts and comments on how federal agencies can help mitigate drought response and ensure drought preparedness in the Commonwealth of Massachusetts. I would also like to take the opportunity to commend your Commission's efforts on reaching out to other federal and state officials to discuss drought policies and issues.

The Commonwealth of Massachusetts is considered a "water-rich" state. Under normal conditions, regions across the state annually receive between 40-50 inches of precipitation. However, Massachusetts can experience extended periods of dry weather, from single season events to multi-year events.

In the 1990's, Massachusetts has seen inconsistent patterns of precipitation levels and increasing demand for water, which has motivated state agencies to concentrate on developing measures for managing drought preparedness and response. It is in this context that I make several recommendations, on how federal government can help states with drought preparedness and drought response, to the National Drought Policy Commission:

1. We recommend that a single point of contact be identified on the federal level to coordinate more efficiently between state and federal governments. That contact would be able to supply the following information:



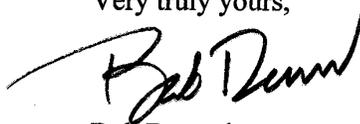
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Leona Dittus  
March 10, 2000  
Page 2

- Available federal funding and information about how to access their funds;
  - A contact list of relevant federal agencies and personnel associated with those agencies;
  - Basic public information or education material on drought would be helpful. Public educational materials that explain the “science” of drought prediction, geographic extent, duration and predicted ending and to explain it in terms the affected public can understand;
  - The coordinator will also serve as a distributor of resources from outside the stricken region.
2. We recommend the federal government to serve as a regional coordinator on multi-state interactions. This is especially significant in New England where many watersheds are in multiple states.
  3. We recommend federal funding to support thorough drought preparedness and programs to handle emergency drought situations. Funding would support contingencies for emergency transport of water, public health issues and threats from fire.
  4. We recommend that an *active* program of federal subsidies and incentives is needed for those who choose to mitigate or avoid drought losses through pro-active water management measures. Federal drought management programs are currently focused on reacting to disasters. Farmers, industry, citizens and other groups cannot afford pro-active drought mitigation measures and state agencies do not have adequate programs and funding to help them.

Thank you for your attention to these issues. By working together we can plan for and mitigate the extended periods of dry weather, which will inevitably occur.

Very truly yours,



Bob Durand

26. Massachusetts letter of March 10,00

**Distributed to: Goal Team 1, Item 4. Team 5, Items 1-3 for analysis, DATE: 3-30-00**

27. Received March 30,00

Dear National Drought Policy Commission,

Thank you for the opportunity to review and comment on the draft National Drought Policy. In November 1998, I attended one of the National Drought Center's conferences and was surprised that only two environmental representatives had been invited. This year, I was surprised that environmental organizations such as mine were unaware that a draft National Drought Policy was available for public comment. A friend happened to pass on the Drought Commission's website and that is how I came to learn of this draft policy.

While the draft document mentions the environmental consequences of drought, I strongly urge the Commission to investigate at a much deeper level the impacts droughts have on ecosystems and wildlife throughout the United States. For instance, in California, the Sierra Nevada Ecosystem Project, authorized by Congress in 1993 and comprised of scientists from a number of disciplines, concluded that the Sierra Nevada aquatic and riparian ecosystems are the most altered and impaired habitats in the Sierra -- due to dams, diversions, flumes, grazing, timber, and residential development.

California has already lost 80% of its salmon and steelhead populations since the 1950s, 96% of its Pacific Flyway wetlands, 99% of its native grasses, 89% of its riparian woodlands, 94% of its interior wetlands, 95% of the spawning habitat for spring run salmon, and 98% of its valley oaks. A sustained drought would have a devastating effect on ecosystems that have been denied their historic water supplies due to the 1,400 federal, state, and private dams that have been erected in the state [1993 Public Trust Report by California State Lands Commission].

In developing sustainable water supplies throughout the country, Friends of the River strongly urges the National Drought Commission to emphasize water conservation and recycling as the most economical and environmentally sound water supply options. The United States Geological Survey reports that Americans are using 20% less water per capita than they did in 1980. Despite such positive numbers, this nation can do much, much more to tap the potential that conservation and recycling holds for reliable, sustainable water supplies.

Finally, Friends of the River requests that the National Drought Commission seriously consider the report issued by the World Commission on Water in the 21st Century. \* The Commission, supported by the World Bank, revealed that more than half the world's major rivers are going dry or are terribly polluted, contributing to 25 million environmental refugees a year -- for the first time exceeding the world's number of war-related refugees (21

million).

The report goes on to state that the main reason is lack of coordinated management of watersheds and specifically pinpoints the worsening problems on the Colorado River. The Commission recommends comprehensive regional planning (including across national borders) as a way to provide sufficient water for growing populations while saving the environment.

Thank you for the opportunity to comment. I regret that more environmental voices will not be heard as you finalize your report. Friends of the River strongly urges the National Drought Commission to expand its outreach efforts to include environmental groups as well as low-income populations.

Sincerely,

Betsy Reifsnider  
Executive Director  
Friends of the River  
915 20th Street  
Sacramento, CA 95814  
(916)442-3155, extension 212

Report is available (80 + pages, executive summary) at :  
<http://watervision.cdinet.com/visionreport.htm> (full report)  
<http://watervision.cdinet.com/execsumm.htm> (Ex. Summary)

**Distributed to: Goal Team 1, P 4. Team 5, P 6 for analysis, DATE: 3-31-00  
Flagged for EPA, John Flowers**

28. received from the Southern Governor's Association March 31, 2000

March 31, 2000

Ms. Leona Dittus, Executive Director  
National Drought Policy Commission  
USDA/FSA/AO  
1400 Independence Ave., SW  
Mail Stop 0501  
Washington, D.C. 20250-0501

Dear Ms. Dittus:

We are writing to comment on the National Drought Policy Commission's draft report entitled "Preparing for Drought in the New Millennium."

We support the draft report's overall emphasis of moving drought policy towards planning, preparedness and research to reduce the impacts of drought while maintaining a safety net for emergency relief.

However, there are three changes that we believe are important to make to the report in order to best prepare for drought in the new millennium. Specifically, we believe: (1) that it is critical to include nonfederal participation and full representation of all regions of the country on both the National Drought Council as well as the "interim group" that will coordinate drought programs before Congress acts on the commission's final report; (2) that the National Drought Council be charged with identifying and closing gaps in the availability of federal programs to the various regions of the country; and (3) that the report should call for a crop insurance program that is reasonably available to all farmers in all areas of the country if it is to be used effectively as the primary risk-management tool for farmers. Below please find a brief discussion of these important issues.

#### Regionally-Balanced Nonfederal Participation

The commission's draft report suggests that Congress create a National Drought Council with both federal and nonfederal representation to improve coordination of drought programs at all levels. The commission should take this one step further by specifying that the nonfederal members (meaning both state and local governmental entity representatives) be chosen using a method that ensures balanced regional representation. The composition of the National Drought Policy Commission is a good starting point since it appointed nonfederal representatives from various levels of government and gubernatorial commissioners from both the East and West. This model should be duplicated and expanded.

The draft report also suggests that the President establish an interim group composed of representatives from appropriate federal agencies. While we appreciate the need for immediate action, we strongly urge the commission to make room in this interim group for nonfederal interests. Since Congress may not be able to act on the commission's report this session, the interim group could be the coordinating authority on federal drought policy for at least a year. Without the input of nonfederal interests, the interim group's actions would be much less effective and very likely to be changed once the more representative final council is created.

In addition to offering meaningful roles for nonfederal, state participation, both the National Drought Council and the "interim group" will be significantly more effective if they evenly represent the interests of all distinct regions of the country - not just East and West. To accomplish this goal, we recommend that nonfederal members be chosen by a group representing their interests. For example, state members would be chosen with the input of the National Governors' Association, the Southern Governors' Association and other regional governors' associations. SGA Comments on Drought Report

March 31, 2000

Page 2

Lastly, it is important that the final report articulate that the National Drought Council's role is to encourage federal-state cooperation but not to exercise authority over the states' programs. Through cooperation and coordination, with financial incentives, the goal of planning and preparedness to reduce the impact of drought can be achieved.

#### Closing Program Gaps

We commend the commission for its thorough review of federal drought programs and support the efforts to close the gaps identified, some of which create unequal access to federal tools to address drought. We urge the commission to recommend that, along with the effort to close gaps between program goals and service delivery, the National Drought Council be charged with the responsibility of identifying and closing those gaps that result in certain regions having less access than others to federal assistance in preparing for drought and report annually to Congress on their progress. For example, the Corps of Engineers, which is very familiar with water resource issues in the East, should have a program specifically targeted and funded to address drought needs in the East much the same way as the Bureau of Reclamation's drought programs have dealt with drought needs in the West.

#### Crop Insurance Reform

We recognize that crop insurance reform is a complicated issue and agree that it should be left to a body with more direct expertise than this commission. However, the commission can and should state that if the primary risk-management tool for farmers is going to be crop insurance, then Congress must devise an insurance program that would make it practicable and prudent for all types of farmers in all areas of the country to obtain coverage.

In conclusion, we strongly urge the commission to incorporate into its final report these recommendations for stronger nonfederal, regionally well-balanced participation in drought coordination, to continue to identify and close gaps in the availability of federal programs in different regions, and to provide universal access to crop insurance. Thank you for your attention to these issues.

Sincerely,

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Mike Huckabee  
Governor of Arkansas

---

Roy Barnes  
Governor of Georgia

**Distributed to: Goal Team 5, Item 1 & 2. Team 3 , Item 3 for analysis, DATE: 3-31-00**

29. received March 31, 2000

**Missouri Dept. of Natural Resources Comments on the 8 March 2000 draft NDPC  
report to Congress and the President:  
“PREPARING FOR DROUGHT IN THE NEW MILLENNIUM”**

**Comment 1** - Missouri DNR recommends that the proposed national drought policy, programs and initiatives not be regulatory in nature but rather supportive of existing and future state efforts, as well as federal/state cooperative efforts. Missouri DNR requests that the NDPC document be modified to clearly indicate that the NDPC is not recommending federal mandates which supplant existing state water laws or supercede state water rights.

Throughout the report, the phrase “national drought policy” is used. As it is used within this report, this phrase is ambiguous and is left open for interpretation. This phrase should be defined more clearly so that Congress can clearly understand the recommendation as to what is and is not meant. MDNR recommends that this national drought policy and the NDC emphasize cooperation and coordination, and not new regulatory responsibility. As a general observation, the report does not go far enough in explaining how the National Drought Council will operate. The NDPC report should recommend that the federal laws and programs be reviewed and modified so that they are more complementary with existing and future state efforts.

**Comment 2** - Missouri DNR recommends that the National Drought Council and Interim Council be composed of only sovereigns: federal, state, local and tribal government representatives. Representation should include all regions of the country and types of government organizations that deal with drought issues.

**Comment 3** - Missouri DNR recommends that language be added to the report that each state shall be the primary point-of-contact for the federal agencies/NDC unless the state has designated another entity. The report should identify the protocol for communication between federal agencies and local governmental entities in order to ensure proper communications at all levels and prevent the NDC from inadvertently circumventing state authority, which can result in local governments receiving conflicting information.

**Comment 4** - Missouri DNR recommends that language be added to the report that clearly indicates support for state funding to carry out the drought initiatives identified in the report (planning, data gathering, information dissemination, mitigation, technical and financial assistance). DNR also recommends that the report state that unfunded or underfunded federal mandates not be a part of the NDC policy. Planning, data gathering, information dissemination, mitigation, technical and financial assistance, and public education are all necessary activities.

**Comment 5** - Missouri DNR supports and commends the NDPC's recommendations on technical and financial assistance and technology transfer, public information dissemination, creation of a comprehensive information clearinghouse, and research, monitoring and prediction efforts. Each of these is a vital component in successfully addressing drought planning, mitigation and management. Missouri DNR recommends that language be added to the report that supports and encourages state to state cooperative efforts.

**Distributed to: Goal Team 1, Comments 3 & 5. Team 5, Comments 1, 2 & 3 , Team 4, Comment 3 for analysis, DATE: 3-31-00  
Flagged for Chris Kadas , Beth Osborne, Sarah Carlson P 1**

30. Received March 31, 2000

I have reviewed the document PREPARING FOR DROUGHT IN THE NEW MILLENNIUM and respectfully submit the following comments.

My name is Larry Farwell and I have worked for local, state, Federal water agencies since 1986. I have extensive experience with water shortages on the local, state, national and international

levels. In 1989 I designed and implemented a rationing program for the 75,000 people served by the Goleta Water District (Santa Barbara, County, CA). From 1991 until 1993 I was co-leader of the Water Shortage Planing Team, California Department of Water Resources. We wrote legislation requiring water agencies to prepare shortage plans, developed model plans and guidebooks, conducted training workshops for the 300 largest CA water agencies, and evaluated the submitted Shortage Plans. Between 1993 and 1996 I was part of the Water Management Team at the USBR. We wrote criteria for Water Management Plans, developed tools to assist with plan preparation and evaluated submitted Plans. I have also assisted cities in Kansas, Arizona, Nevada, British Columbia and Spain to prepare for and respond to water shortage emergencies.

I believe that the document PREPARING FOR DROUGHT IN THE NEW MILLENNIUM needs to be re-focused. First, a clear discussion of the differences between weather variability and extraordinary drought needs to be included. Second, water agencies need to quantify current reliable supply and peak demand so that the impact of diminishing supply (reservoir siltation, groundwater contamination, etc.) and increasing demand due to increasing population can be modeled.

The Australian approach offered a new perspective but was not mentioned in the final recommendations. In fact, although the reader is left with the concept that conservation and reclamation are good the real issue of matching demand with supply is almost completely missing.

The document is so lacking in specifics that no real guidance or substance is developed. I find it surprising that the similarities between droughts and floods, hurricanes, and earthquakes and never explored. Numerous reports have recommended that we stop building in flood plains, adopt building codes that reduce earthquake damage and adopt zoning that restricts activities in high-risk areas - are these not worth mentioning and applying to water shortages. Not once were such basic concepts as climate-appropriate landscape, locating high-water use business in water-rich areas, or maintaining a reliable supply by limiting new demand discussed.

However there were pages of discussion about the need for more Federal economic assistance - especially for agriculture. What has happened to the biblical concept of storing the bounty during times of plenty in order to survive lean times. There was no mention of the vast areas that are not appropriate for the types of agriculture they now (attempt to) support. The 90 day growing season found in many of the USBR projects in the northern States makes the farms unable to cope with weather variability. And, agriculture is a risky business (regard Hopi corn) and should perhaps be limited in areas with high weather variability. That might even reduce our over production to the point we could stop paying farmers not to farm.

The document includes many special interest opinions but avoid many of the real issues.

The report needs to develop some clear guidelines and responsibilities. The following comments are over-stated for brevity.

2. Weather variability is not drought.

3. Each water provider and business owner should be prepared for 'at least' the drought of record.
4. Droughts of record should not be considered emergencies and the government should not bail out the ill-prepared.
5. Disasters (dam failures, severe earthquakes, etc.) should involve the Federal Emergency Management Agency and Federal financial assistance.

Water providers and businesses (which includes agriculture) should each have a water shortage plan and update it regularly.

An agency or business that does not prepare a detailed plan, and does not implement the plan when appropriate, should not receive technical or financial assistance.

As has been clearly demonstrated in California, plans must be done from the bottom up - from the local water agency all the way up to the State level. This is the only way that environmental needs, water-use priorities and transfers can be determined.

The document PREPARING FOR DROUGHT IN THE NEW MILLENNIUM should call for specific actions. These actions can be implemented immediately by utilizing the diverse water shortage planning information and model plans that are available. This information can be quickly consolidated and made available to water agencies throughout the United States. Technical assistance can be provided at workshops and over the internet. Agencies unable or unwilling to make water shortage planning a priority should be publicly warned - resulting in unpleasant impacts on their bond ratings and insurance rates.

Please notify me of future meetings and documents. This is a vital economic and health issue in which I wish to continue my involvement.

**Distributed to: Goal Team 1, P's 4, 9 & 10. Team 2, P 8, Team 4, P 8 for analysis, DATE: 3-31-00**

31. Received March 31, 2000

Dear Mr. Brown:

Thank you for the opportunity to review the NDPC Report. It is an excellent summary of national needs in this important area.

I would like to make you aware of a program recently initiated by the Texas A&M Agriculture Program involving the Texas Agricultural Experiment Station, Texas Agricultural Extension Service, and Texas Forest Service. We are in the process of developing an internet-accessible drought information system that will provide near real time information on:  
- precipitation, minimum and maximum temperatures, and other relevant weather parameters needed to calculate the potential evapotranspiration of major crops and vegetation types in Texas.,

- simulated growth and development of the major crops in all the relevant crop production regions of the state. Like the weather data, this information will be available at a sub-county level using weather inputs from both weather radar/National Weather Service sources and regional agricultural weather station networks,
- fire danger maps for forests and rangelands,
- software and data needed to make site-specific estimates of irrigation demands by crops and urban landscapes,
- software and data needed for site-specific estimation of drought/weather impacts on crop and grazing land yields, including use of both historical and predicted weather information,
- Extension Service and USDA recommendations for drought mitigation, and
- Links to both short- and long-term weather forecasts.

Based on our research in preparation for this effort, I would suggest that few states and no federal agencies are currently capable of providing the information of the type we soon hope to make available to the public in Texas.

You may wish to add the following recommendation to the report.

2.2c We recommend that Congress authorize and the Administration implement cooperative state-federal drought/weather information systems through Land Grant universities, State Cooperative Extension Services, the U. S. Department of Agriculture, and the National Weather Service. These systems would be designed to provide land managers with the information and training they need to predict and mitigate the agricultural effects of drought at the farm and ranch level.

I would be glad to provide additional information about the newly initiated Texas program if you would like to contact me at 979-862-7139 or [cajones@tamu.edu](mailto:cajones@tamu.edu).

C. Allan Jones  
 Assistant Vice Chancellor,  
 Agriculture and Life Sciences  
 Associate Director,  
 Texas Agricultural Experiment Station  
 Texas A&M University  
 113 Administration Building  
 College Station, Texas 77843-2142  
 (409) 862-7139 Fax: (409) 845-9938  
[cajones@tamu.edu](mailto:cajones@tamu.edu)

**Distributed to: Goal Team 2 for analysis, DATE: 3-31-00**

32. Received March 30,00  
March 30, 2000

Leonna Dittus, Executive Director  
National Drought Policy Commission  
US Department of Agriculture  
1400 Independence Ave., SW  
Mail Stop 0501  
Washington, D.C. 20250-0501

Dear Mrs. Dittus:

Thank you for the opportunity to comment on the March 8,2000 draft report of the National Drought Policy Commission. The context of my comments is that of managing a large urban water utility in a semi-arid region where we experience cyclical droughts. Denver Water is the wholesale and retail water provider to over 1,000,000 people within a 324 square mile service area. Since the founding of our public agency in 1918, we have coped with serious droughts as well as serious floods. The droughts seem to occur in 20 –22 year cycles, so preparing for them is not new to us.

Overall, there are some ideas in the draft report that we liked very much, and some we find troubling. Our comments will be listed by page order.

First, I commend the statement in the Foreword that the Commission's recommendations are not intended to interfere in any way with state's water rights, and that the comments should be considered in light of the need to protect the environment. This is extremely important and it is good to include that statement at the outset.

I also applaud your efforts to recommend preparedness as the cornerstone of national policy instead of reaction and response. At Denver Water, we believe that part of responsible water management is preparedness for drought.

On page 7, second bullet, there is a comment that many agriculture producers do not have the knowledge or resources to develop and implement a water conservation/drought plan. We believe that anyone doing business in a semi-arid area ought to make drought preparedness as much a part of the business plan as purchasing new seeds or tractors. Ignorance or refusal to get business savvy should not be criteria for qualifying for government assistance.

We applaud your statement on page 15 that developing a plan for responding to drought is of little value unless the plan is implemented. The concept of having drought drills, somewhat like fire drills, to train new staff is a really fine idea.

March 30, 2000  
Page 2

On page 20, second bullet, there was a suggestion from someone in the hearings that the federal government should subsidize premiums for crop insurance, although at different rates than under the current program. We disagree with any more federal subsidies in semi-arid areas where crops are being grown without respect for the water resources available. Any subsidies should be extended only to crops that are generally compatible with the amount of rainfall expected in an average year given the climate of the section of the country in which they are planted.

On page 27, under “Need for Training and Technical Assistance,” there is a phrase about adopting water conservation measures year-round. We have found in Denver that our year-round water conservation program has reduced water demand over the last 20 years. Even though the population of our service area has increased from about 840,000 in 1980 to 970,000 in 1998, the total water we deliver has stayed relatively flat at around 77 billion gallons per year. We attribute much of this to our water conservation efforts. This is especially important because natural rainfall here is only about 13-15 inches annually.

Further, we would strongly encourage any federal program of training and technical assistance to set criteria for qualifying for federal dollars. The criteria should include local or regional standards at least equal to the water efficiency requirements in the National Energy Policy Act of 1992. There are current efforts in Congress to repeal these standards. Since newer highly-efficient plumbing products use much less water than old less-efficient ones, it is logical that these highly-efficient products should be required in all new construction, and certainly in all new and renovated properties in drought-prone areas.

In the Conclusions segment, starting on page 29, there is an apparent strong bias toward agriculture, which is understandable in light of the fact that much of agriculture grows food. However, we are also somewhat concerned that the general focus of the entire report is on agriculture instead of equally focused on urban, agriculture and environmental needs.

The remaining bullets on pages 29-30 are very good conclusions and we support them.

We support the recommendation on page 31 urging Congress to pass a National Drought Preparedness Act which would establish the National Drought Council. Even though this federal and non-federal partnership will have some obstacles to overcome, it seems to be the best way to make our nation better prepared for drought. We urge Congress to require both federal and non-federal members on the Council.

We favor Recommendation 1.1 on page 32, particularly the objective of having a drought preparedness and public education plan in place for water users at all levels of government, as well as in the private sector.

March 30, 2000

Page 3

We are also in favor of Recommendation 2.2, that a national clearinghouse such as the National

Drought Mitigation Center be established and funded to link information from various sources and provide it to those who need it.

We have concerns, however, with Recommendation 3. The concept that proper risk management means crop insurance is wrong. Insurance does not manage or reduce the risk—it just spreads it more widely. Even though many Americans are growing food, we are concerned that many agriculturists are growing the wrong food for the water resources available in their respective regions, and no amount of technical assistance or crop insurance in preparing for drought will solve this problem. This is especially true as water supplies decrease in quantity (for the population served) and deteriorate in quality. A different kind of technical assistance is needed. We suggest that the concept of risk management require that only certain kinds of businesses in various regions can qualify for crop/livestock insurance.

Recommendation 4.4 seems to be the only reference to drought relief for cities. This is particularly troublesome for the smaller cities and towns. We suggest adding more substance to the recommendations for cities, and not referring to them in the broad general category of “non-agricultural.” This term is not descriptive of all the issues to be faced by communities, business, tribes and Mother Nature herself. Also, this term gives us the impression that the document is mainly an agriculture-oriented document, with the concerns of cities and business as an after-thought.

Recommendation 5 again shows a bias toward agriculture and away from cities. Having the interim coordinating group chaired by the Secretary of Agriculture sets a preference for agriculture over the needs of cities (Recommendation 5.1 on page 38). Instead, we suggest that the Commission recommend that the head of the Federal Emergency Management Agency chair both the interim group as well as the Proposed National Drought Council (Recommendation 5.2 on page 39).

Overall, we applaud the research, public involvement and reporting work done by the National Drought Policy Commission. You, your staff, and your volunteers have done a monumental job. With a few changes, you will have a broader base of support for your recommendation to Congress. Thank you for your attention to our suggestions.

Sincerely,

H. J. Barry, III, Manager

cc: Honorable Dan Glickman, Secretary of Agriculture  
n:/Drought Policy

**Distributed to: Goal Team 1, Page 2, P's 2& 6 . Team 2, Page 3 P , Team 3, Page 2 P 1 & Page 3, P 2. Team 4, Page 3, P 3, Team 5, Page 2, P 5 & Page 3, P 4 for analysis,**

**DATE: 3-31-00**

33.

In reviewing your drought report, the USDA Natural Resources Conservation Service SNOTEL Data Collection Network is only briefly mentioned, and is not mentioned under the recommendations to "provide an adequate annual budget to support continuation and improvement of their drought related work". Many of the agencies mentioned use SNOTEL data and our water supply forecasts and products for their weather forecasting, reservoir operations, etc.

Snowpack is the primary element for predicting droughts in the West. The NRCS SNOTEL Network and Water Supply Forecasting Program allows us to accurately predict summer streamflows (water supplies) 4-6 months in advance. We are in the process of installing 5 new SNOTEL this summer for early flood warning and forecasting water supply conditions (droughts). The 20+ years of experience in collecting SNOTEL data has allowed us the capability to do this efficiently. The knowledge and experience gained by this program could also be expanded elsewhere in the country, as you mention under the SCAN Network.

We continue to develop new products to mitigate drought effects here in Idaho:

- During the El Nino year of 1998, because of the strong correlation with the Southern Oscillation Index (ENSO), we published streamflow forecasts for certain rivers in November for the following summer runoff season.

- The report mentions the Palmer Drought Index, however, due to the importance of snowpack and reservoirs in the irrigated West, we developed a better measure, the Surface Water Supply Index (SWSI), which combines reservoir storage and streamflow runoff. Here in Idaho, we have met with our local users (irrigation districts, USBR, etc.) and determined the threshold level when shortages for irrigated agricultural water supplies will occur. This index is also used as drought trigger mechanism in some states. Here is a link on our Web page for more information about this index:

<http://idsnow.id.nrcs.usda.gov/snow/water.htm>

Bank loan officers are requesting this SWSI information prior to approval of loans to farmers when water supplies are marginal or shortages may occur. Similar type of index and supply/demand scale could possibly be expanded to non-irrigated lands elsewhere in the country using soil moisture as a variable.

Your report also discusses public education and information and the need for readily and easily available information for users. We have struggled with this in the past as well. Some success stories follows:

- Near real time SNOTEL data is available in easily understood format with comparisons to 30 year averages. Link to today's SNOTEL Update report: <http://idsnow.id.nrcs.usda.gov/snow/snotel/update.htm>

- News media interviews - since Jan. 1, 2000, I have provided about 30 TV, radio and newspaper interviews about drought, lack of snowpack and water supply information in Idaho. SNOTEL data and water supply is carried daily or weekly in newspapers throughout Idaho to keep our users aware of current and changing snowpack/water supply conditions (drought). We are careful how we mention the word "Drought" because of the major effects it can have on farmers, ranchers, rafting, hydropower, forest fires, etc.

The information provided by the NRCS SNOTEL and Water Supply Forecasting program is used to reduce the vulnerability to droughts and for better management of our water resource. If this information were not available, the effects of droughts in the West would be much more severe. These data and products provides farmers, recreationists, and other water users throughout the state with accurate water supply information and lead-time to plan accordingly: planting fewer acres, planting crops that require less water, forest fire potential, length of river rafting season, etc. This type of analysis and correlations should be expanded here in the West as well as elsewhere in the country.

Also, have you considered a national committee/policy of such to look at both sides of the coin, floods and droughts? Some of the analysis and programs as mentioned in the report could be used to mitigate effects from both events.

Ron

Ron Abramovich  
Water Supply Specialist  
Phone: (208)378-5741, ext. 2 Fax: (208)378-5735  
<http://idsnow.id.nrcs.usda.gov>

**Distributed to: Goal Team 2 for analysis, DATE: 3-31-00**

34. Received March 30,00

March 30, 2000

Ms. Leona Dittus, Executive Director  
National Drought Policy Commission  
USDA/FSA/AO - Mail Stop 0501  
1400 Independence Ave., SW  
Washington, DC 20250-0501

Dear Ms. Dittus,

I am pleased to provide the following material in response to the National Drought Policy Commission (NDPC) report - "Preparing for Drought in the New Millennium." The National Water and Climate Center feels that the NDPC report provides an excellent assessment of the pervasive effects of drought on the United States. Drought, and the importance of water, have been an integral part the economic viability of this country since the turn of the 20th century. For over 65 years, the USDA's Natural Resources Conservation Service, Snow Survey and Water Supply Forecast (SS/WSF) Program has played a key role in assessing water supply and drought throughout the West. We hope the comments provided strengthen your report and provide the citizens of the U.S. with information needed to mitigate the effects of drought. Suggested wording is shown in bold italics.

Specific Comments By Section:

Localities - Page 16, Paragraphs 1 and 2

As noted in the report, the current weather and climate networks do not systematically collect and distribute the data necessary to assess drought for specific areas nationwide. It is suggested that additional emphasis be placed on establishing and maintaining a data collection and distribution network which provides local users access to weather and climate information required to assess the many facets of drought.

Tribes - Page 18, Paragraphs 1, 2 and 3

It should be noted that the NRCS has established a long-term presence on Tribal lands to address a wide variety of natural resource management issues. Each NRCS office has SS/WSF personnel who work closely with Tribal representatives to establish data collection sites, data collection procedures and methods to interpret NRCS Water Supply Forecasts. Training of Tribal personnel is a critical component of this process. In recent years, reduced funding has limited the effectiveness of this program. No specific wording is provided here, however this may be useful as this activity evolves.

Federal Programs - Page 19, Paragraph 3

It is suggested that a portion of the following information be integrated with the third paragraph on page 19 of the NDPC Report. In 1935 Congress authorized the USDA's Snow Survey and Water Supply Forecast Program (SS/WSF) through Public Law 46. The program provides agricultural water users and other water management groups in the western states area with water supply forecasts to enable them to plan for efficient water management. The program also

provides the public and the scientific community with a database that can be used to accurately determine the extent of the snow resource for 12 western states and Alaska. The SS/WSF program collects and interprets data as a service and an aid to agricultural interests, particularly those served by, or affiliated with, soil, water, and other conservation districts. Information collected by the NRCS for these agricultural users is also made available to other Federal, State, and private agencies and to the general public without charge.

#### Mitigation - Page 20, Paragraph 5

The following sentence is suggested at the end of paragraph 5:

. . . The annual appropriation is \$100 million. The Snow Survey and Water Supply Forecasting Program of the USDA has provided key snowpack data for the arid Western U.S. where snowpack scarcity translates directly into low streamflows, dry soils and drought. Approximately \$6,000,000 of federal funding supports this private, state and federal cooperative effort which has been operational since 1935.

#### Monitoring/prediction and operational products, Page 36, Section 2.1

Based upon the high quality information provided by the NRCS SNOTEL network during the past 20 years, it is suggested that the SNOTEL network be included in the following recommendation.

"We recommend that Congress authorize and the Administration develop and implement a plan to coordinate in cooperation with states and expand, modernize, and maintain a system of coordinated observation (U.S. Geological Survey streamgaging, SNOTEL, SCAN, COOP) networks (based on the National Drought Council's study described above) that meets the needs of all stakeholders, with priority given to filling the gaps on tribal lands and in rural America."

#### Monitoring/prediction and operational products, Page 36, Section 2.2(b)

We endorse the concept of a Unified Climate Access Network (UCAN) to serve the drought user community. The NRCS National Water and Climate Center has had measurable success working with the NOAA National Climate Data Center and six Regional Climate Centers in developing the Internet infrastructure necessary to deliver climate data and information to any user with an Internet connection. Once implemented, the UCAN concepts have application in delivery of streamflow information through a Unified Water Access Network (UWAN).

#### Research, Page 37, Section 2.8

Based on the SS/WSF 65 year history in the area of data collection and water supply forecast innovation and product development, it is suggested that the USDA/NRCS be included in the recommendation for an adequate annual budget to support continuation and improvement in drought related activities.

"In recognition of the products and resources of the National Drought Mitigation Center, National Science Foundation, U.S. Geological Survey, National Oceanic and Atmospheric Administration, Natural Resources Conservation Service, Agricultural Research Service, U.S. Forest Service, Bureau of Reclamation, and Department of Energy, we recommend that Congress provide an adequate annual budget to support continuation and improvement of their drought related work."

Summary:

We appreciate this opportunity to comment on the NDPC draft report. The NWCC staff is available to answer any questions you may have by calling 503-414-3107 or visiting our Center's homepage located at <http://www.wcc.nrcs.usda.gov>.

Sincerely,

JON G. WERNER  
Director, National Water and Climate Center

cc:

Richard Van Klaveren, Director, Conservation Engineering Division, NRCS, Washington, DC  
Don Woodward, National Hydrologist, CED, NRCS, Washington, DC  
Warren Lee, Acting Director, Resources Inventory Division, NRCS Beltsville, MD  
Dan Conrad, Team Leader, Operations Management & Oversight Div., NRCS, Washington, DC

**Distributed to: Goal Team 2 for analysis, DATE: 3-31-00**

### **35. Received 3-31-00**

Subject: LTP – Special Program, Draft Drought Policy    Date: March 29, 2000

To: Leona Dittus, Executive Director                      File Code: 300-15  
National Drought Policy Commission  
USDA  
1400 Independence Avenue S.W.  
Washington, DC 20250-0501

We have reviewed the Draft Report from the National Drought Policy Commission. The report is comprehensive and addresses many aspects of drought including awareness, planning, and response.

We offer the following comments in the development of National Policy:

#### **General – Available Assistance**

The draft report presents a rather hard-to-follow format listing numerous laws, legislation, programs, etc. A change in format or organization should help in this area. The various agencies

need to be separated in order to better define specific areas of responsibility. A chart or table might help in this regard.

### **Specific – NRCS Program Assistance**

NRCS utilizes the 1996 Farm Bill Programs for drought relief assistance where possible. Some examples of the program assistance are:

- Environmental Quality Incentive Program (EQIP) – NRCS technical staff work with producers to modify contracts where necessary to reschedule practices.
- Conservation Reserve Program (CRP) – When emergency haying or grazing is approved for CRP land, NRCS technical staff can work with producers to develop haying or grazing plans in approved counties.
- Food Security Act – NRCS State Conservationist can grant variances to conservation compliance plans or can revise plans with producers to include cover crops to reduce the effects of wind and water erosion.
- Emergency Conservation Program (ECP) – NRCS provides technical assistance to producers for practice implementation including emergency livestock pipeline, watering facilities, and silt removal from existing ponds.
- Emergency Forestry Incentive Program (FIP) – From drought of prior years, NRCS made available funds in emergency cost share for replanting trees lost due to dry conditions.

### **General – Technical Assistance**

The draft identifies that preparedness is the key element to reduce the impact of drought. In agriculture this relates to the need for technical, educational, and financial assistance. Most USDA conservation programs are designed to protect natural resources. Planning and installation of conservation measures are needed to have the tools and infrastructure on-farm needed to address those times when drought occurs.

Equally important is the operation maintenance and implementation of management measures. This can only occur when individual landusers are well informed and can take actions in response to drought conditions. Technical assistance programs need to be the cornerstone of any drought program.

### **Specific – Ongoing Technical Assistance**

The primary NRCS role during droughts is technical assistance and information to landowners and managers. NRCS also provides various scenarios to better manage for risk during periods of adversity. Most of the NRCS assistance falls in the following categories:

- Working with farmers on improving irrigation systems to conserve and better manage the available irrigation water. Some farmers have a need for retrofitting their irrigation systems.
- Encouraging farmers to practice crop residue management to reduce soil temperature, increase water infiltration, and help reduce the potential for wind erosion.
- Working with ranchers to assess and manage grazing and water resources. A common assistance is designing water lines for better water distribution to more completely utilize available forage or replace water sources that have been depleted.
- Encouraging ranchers to practice risk management and reduce herd size before the drought forces a mass sell off.
- Cautioning absentee owners to check water supplies to ensure adequate drinking water for herds.
- Distributing information on drought management alternatives.
- Monitoring dry hydrants in rural areas and, where necessary, locate other sources of water for fire control. In addition, landowners should give fire and police access to land in case of emergencies. Landowners should be encouraged to install adequate fireguards and fire breaks, especially along public roads.

### **General – Research and Modeling**

The draft also recommends an increase in research efforts to more adequately predict drought. Along with this is the need for additional tools in modeling which, when drought is predicted, can provide those alternatives that would have the least economic and social impacts. Users could then make decisions that would provide for the continued protection of natural resources.

### **Specific – Better Predictive Tool**

Everyone – farmers/ranchers, agency staff, local water supply managers and others – need some type of early warning predictive tool that will give some indication of the future drought potential and impacts on resources under different scenarios. The predictive tool would need to use local rainfall and resource characteristics such as soils, vegetation. This predictive tool should be available to farmers and ranchers to provide additional information in their farm and ranch management decisions.

For example, consider a rancher with rangeland in poor condition. If the predictive tool could predict future forage production with normal rain or various levels of drought, this would give the rancher better insight on herd management. The rancher may further reduce the herd if cattle prices are favorable and predictions of poor future forage production.

NRCS is partnering with Texas A&M Experiment Station and others to develop a computer simulation model to make predictions of future drought conditions from local resource conditions and weather station data. The results would be on a web site and provide real time predictions.

NRCS is in the position to provide various scenarios to better natural resources in respect to forecasting risk. Producers will need to evaluate their water needs based on current rainfall and predicted needs. Prudent judgment is necessary to access markets and remain flexible.

### **General – Emergency Relief**

The draft recognizes that even with drought planning, emergency relief will still be needed. This needed to be well coordinated and timely to be effective.

### **Specific – Emergency Relief and Drought Management Philosophy**

Drought is a natural phenomenon, which can have disastrous result affecting natural resources, economics, animal well being, crop production, and the human condition. The results of which require both time and careful management to recover.

Droughts and dry times are a factor in most farming and ranching operations. Other than fire, a long-term drought is probably the most damaging element faced by producers. Drought not only affects the fundamental resources, but it has a demoralizing effect on those who work in agriculture. Further, the adversity is multiplied throughout the economic sector as the agricultural base continues to be impacted.

Landowners and operators need better tools in order to predict future management options in assessing drought impacts. Forecast models need to be developed which will allow producers to more accurately simulate various drought scenarios. This could be developed as an early warning system to aid in impact assessment. Producers could use this model to predict crop water needs, forage inventories, crop and animal prices, and other criteria. The overall goal would be to promote better management of resources while reducing economic adversity.

### **Long and Near Term Environmental Impacts**

There is deep concern about the impact of another drought in 2000 and subsequent years. If drought conditions continue, dust storms from wind erosion will be a reality, affecting both rural and urban life. The conservation systems currently installed have been severely tested from the past droughts and another drought will make the land more susceptible to wind erosion. Many areas are already experiencing some dust in the air from wind erosion and dust storms in west Texas.

Additionally, poor cover on the land will ultimately affect the quality of runoff entering the receiving streams and drinking water supplies even in areas not directly affected by drought. Certain parts of the nation could face a siltation and sedimentation crisis in some reservoirs. It is

vitally important the vegetative cover be maintained on all watersheds, but imperative on those impacting drinking water.

Farmers and ranchers should be encouraged to keep as much cover on the land as possible at all time and seasons of the year.

One final point to consider. Both research and experience has demonstrated that manipulation or management of certain species of noxious brush and weeds can free up significant amounts of water for other uses. In addition, reestablishment of native grasses will increase water yield. This concept has broad offsite benefits to water supplies and watershed yields.

Thank you for the opportunity to comment on the Draft Policy.

/s/

JOHN P. BURT  
State Conservationist

cc: Pearlle Reed, Chief, NRCS, Washington, DC  
Warren Lee, Director, RID, NRCS, Washington, DC  
Charles Adams, Acting Regional Conservationist, South Central Region, Fort Worth,  
TX

**Distributed to: Goal Teams 1, 2, 4 for analysis, DATE: 4-3-00**

36. Received 3-31-00

To: Leona Dittus

From: Kimberly Miller

Date: March 31, 2000

Re: OMB comments on NDPC report

P.5, fourth bullet

Adverse impacts from drought also occur in natural, undeveloped or unimproved areas and should be included.

“...harm to livestock, ~~or~~ wildlife, **or natural habitats....”**

P. 7, first paragraph, first sentence

The report advocates a “broader application of new techniques” but doesn’t give any examples of what these new techniques might be.

P. 7, second bullet in second set

The report states that less than 10 percent of farmers and ranchers receive technical assistance related to water conservation or drought. This sounds unrealistically low, given that a significant percentage of farmers irrigate and likely receive some technical assistance from USDA in implementing their irrigation plan and system. We hope that USDA provides water conservation assistance in conjunction with any irrigation assistance.

P. 11, first paragraph, second sentence

“...the Department of Agriculture and farmers through Cooperative Extension offices, ~~Farm~~ **USDA** Service Centers, and....”

P. 12, fourth paragraph, first sentence

It seems it would be quite useful to describe some of the basic, inexpensive elements of drought planning the researcher discussed.

P. 13, second paragraph

The report says that there are 560 federally recognized tribes and then references 306 in the contermino

P. 13, sixth paragraph

On page 13, paragraph 6, delete "and described the bureaucratic quagmire associated with the Bureau of Indian Affairs". This view may be held only by seven referenced tribes in one region. BIA has ongoing programs that assist tribes with Integrated Resource Management Planning and with Water Management, Planning and Pre-development that support analyses of water quantity, water quality, and resource conditions. Also, BIA's Irrigation operations and maintenance program supports 16 Indian irrigation systems, including water storage and delivery.

P. 13, last paragraph, second sentence

The report falsely states that information such as soils surveys and stream gaging is needed to gain access to Federal assistance.

OMB sent a FAX this morning with another comment that Kimberly Miller forgot to include in her Mar 31 e-mail. It is summarized below in the same format she used before. Please include with the rest of OMB's comments.

P. 15, third paragraph, first sentence.

Add an "er" to hind to make it "hinder"

P. 15, third paragraph, second sentence.

The major gap already identified in the Bureau of Reclamation's Drought Program is that the requests for planning assistance far outweigh available funds and that the law does not allow the Bureau to provide financial assistance to the requesting entities. Change the sentence to read: "For the Bureau of Reclamation's Drought Program, requests for planning assistance far outweigh available funds and the program provides technical assistance only, not direct grants.

P. 15, third paragraph, fourth sentence

Delete the first part of the sentence which states that USDA's "local and tribal offices reach just a small number of the people needing and requesting assistance because of limited resources...." There are over 5600 USDA county offices with over 35,000 employees, who provide assistance to over a million people annually.

P. 17, first paragraph

CRP should not be included as a drought-related program. Emergency haying and grazing (assuming that's why CRP was included) is not the primary purpose of the program.

P. 18, first paragraph, second sentence

It would be helpful to mention the agencies involved in the Federal interagency drought effort.

P. 20, first paragraph, last sentence.

Delete. This is unjustified and unbalanced. If it's "too little" the farmer should have bought higher coverage. Crop insurance payments are not tardy and are normally distributed within 30 days of the farmer filing a notice of loss.

P. 20, second bullet

Delete. This offers no valuable guidance and is nothing but a request for higher premium subsidies.

P. 20, third bullet

Delete. This offers no understanding of insurance unless the "payments" refer to premiums paid by the farmer, reduced for greater use of risk management tools.

P. 21, first paragraph, sixth sentence

Describe the undesirable effects associated with reservoir expansion.

P. 22, first sentence

Funding for the Emergency Conservation Program and the Emergency Watershed Protection Program are dependent upon emergency supplemental appropriations. Change the sentence to read:

"Additional emergency relief is often provided through emergency supplemental appropriations."

P. 23, second paragraph

The Stafford Act and its implementation by the Federal Emergency Management Agency (FEMA) is an effective, proven model for organizing and providing emergency assistance during most catastrophic natural disasters. ~~One of the factors that makes this program successful is that FEMA can draw monies from a standing fund to pay for disaster assistance.~~ [I'm not sure what is meant by "standing fund." FEMA does not draw funds from a standing fund. Rather, FEMA must estimate in advance its disaster needs and seek an annual discretionary appropriation from the Congress.] FEMA can provide disaster unemployment assistance, truck in water, and .....

P. 25, first paragraph, fifth sentence

After "prosper" add " further altering the natural balance of the ecosystem."

P. 26, Wildfire Section

The report doesn't distinguish between normal wildfires, which are a natural part of many ecosystems, and so-called drought-related wildfires. Unless that is possible to do, this section shouldn't be included in the report.

P. 27, second paragraph, first sentence.

Resource Conservation and Development Councils are independent, nonprofit organizations and not part of USDA.

P. 33

Insert: 1.6 Federal land management agencies should include drought contingency elements in their land management plans.

P. 34, 2.2

Instead of setting up new clearinghouses and information systems, the government should use already-established organizations such as the National Drought Mitigation Center and the United Climate Access Network.

pg. 37, 3.4

Congress should ~~authorize a standing fund similar to that available under the Stafford Act~~ **consider providing resources** for non-farm drought emergencies that affect tribes, communities, businesses, and the environment, but that does not duplicate Stafford Act authority. [I am concerned that this concept of a "standing fund" is not entirely understood by the report drafters. And if it is, then they may be misunderstanding the basis for FEMA's disaster funding. The Stafford Act authorities require appropriations to fund disaster relief. There is no "standing fund" of resources that can be drawn on to fund disaster relief except monies that are made available by appropriation.]

P. 37, 4.1

Delete. No offsets are mentioned for this proposal. Also, the integrity of the programs would be compromised by an indefinite authorization for funding, as opposed to the current situation where funding is appropriated only when emergencies are identified.

P. 38, 5.1, fourth sentence

Why should the Council be exempt from FACA? The reasoning should be included.

**Distributed to: All Federal members for analysis, DATE: 4-3-00**  
**Flagged for: Deanne, All**

37. Received 3-31-00

March 31, 2000

Ms. Leona Dittus, Executive Director  
National Drought Policy Commission  
USDA/FSA/AO  
1400 Independence Ave., SW  
Mail Stop 0501  
Washington, D.C. 20250-0501

Dear Ms. Dittus:

On behalf of the Western Governors' Association, I would like to commend the National Drought Policy Commission for its draft report, *Preparing for Drought in the New Millennium*. I am a Commissioner on the Texas Natural Resource Conservation Commission, and was designated by Governor Cayetano, the WGA Chairman, to represent the Association on matters before the National Drought Policy Commission.

Through this report and its recommendations, we believe the Commission would successfully fulfill its mission of presenting Congress with an effective new vision for a national drought policy. If enacted, it would go a long way toward improving drought management in the United States.

The report includes a number of important recommendations, including funding for streamgaging and other monitoring programs, an appropriately strong focus on preparedness and mitigation, and many significant proposed changes to response programs including a dedicated emergency fund for drought. Additionally, we agree with the collaborative approach envisioned with the proposed National Drought Council, and believe it could be an appropriate entity to take on the complex public policy challenges associated with drought.

We believe the report might be improved in a few areas, and offer the following specific comments for your consideration:

On pages 6-7 under the heading "Stored Water' and 'Natural Water' Droughts," the report discusses differences between stored water systems and natural water systems. The discussion

neglects to take into account that the allocation of water lies within the jurisdiction of the states. Further, given state water law, the bullets are misleading or erroneous. We recommend:

- a. In the third paragraph, amending the first sentence to read, “Those who share stored water are ~~rarely~~ not affected as greatly by less than normal precipitation...”
  - b. Delete the five bullets.
  - c. Add new language at the end of the first paragraph on page 7 after the sentence, “In addition, concern for protection of environmental resources must be considered.” The new language would read: “The allocation of water is the primary responsibility of states, and the Commission does not intend for any of its recommendations to diminish the right of states to control water through state law.” This language is consistent with the directive to the NDPC on this matter contained in the National Drought Policy Act.
1. On page 10 under the heading “Regional Entities,” the report briefly mentions the work of the Western Drought Coordination Council (WDCC). The report refers to the WDCC in a few other areas, and justifies some of its recommendations based on the WDCC’s report, *The Western Drought Experience*. The National Drought Policy Act specifically directed the Commission to collaborate with the WDCC in order to consider regional drought initiatives and the application of such initiatives at the national level. We believe it would be relevant and appropriate to provide further discussion of the WDCC in the NDPC report, including the WDCC’s goals and objectives, the membership of the Council, and mention of *The Western Drought Experience*— the report drafted and approved specifically for the NDPC. Additionally, we would like to see the Commission encourage Congress to consider the WDCC’s report and the consensus recommendations for future actions it contains.
  1. Additionally, we recommend that the ‘Regional Entities’ section of the report mention the 1996 WGA report, *Drought Response Action Plan*, which includes a number of recommendations on national drought policy (including one that led to the creation of the National Drought Policy Commission).
  1. On page 21, under the heading “Response,” the second paragraph states, “Approximately 47 federal programs have an element of drought-related response, primarily for agricultural droughts.” We recommend adding language following that sentence as follows: “This number, however, is deceiving as many programs are authorized but not funded. Other programs are not easily accessible due to overly-burdensome and bureaucratic eligibility criteria.” We further believe that the Commission should include a specific recommendation (probably under recommendation 4 on page 37) for Congress to review each authorized federal program, including their eligibility criteria and regulations, and make a determination to either continue or eliminate the program. For programs continued, funding should be made available, and the eligibility criteria made fair and easily understood.
  1. At the bottom of page 25 and the top of page 26, the report refers to the Western Water Policy Review Advisory Commission. This report was very controversial, and was

strongly opposed by many organizations and entities including a number of western states. We agree with the point of the discussion in the Commission report, namely to support collaborative processes with broad stakeholder group involvement. To add balance and diminish the controversial nature of the WWPRAC, we suggest specifically referencing the ‘Enlibra Principles’ as a model which has been advanced by the western governors to encourage and facilitate broad collaboration on natural resource matters.

1. On page 30 under “Findings,” the last finding should be amended to read, “Some federal drought-related programs are neither authorized nor funded at the level needed to deliver effective services. Furthermore, their eligibility criteria and cost-sharing requirements may unduly restrict participation. ~~by tribes, farmers and ranchers, and others with limited resources.~~” This change clarifies that the eligibility criteria are not only restrictive to those ‘with limited resources,’ but are in some cases restrictive to state and local governments as well.
1. Recommendation 2.2 on page 34 calls on Congress to establish a clearinghouse, “such as the National Drought Mitigation Center...” and under recommendation 2.8 on page 35 asks for an adequate annual budget for the NDMC (along with funding for federal programs). The governors recognize the important work of the NDMC and support their continued funding. Additionally, the governors strongly believe that the NDMC is a model that should be replicated in other universities and research institutions across the country to build more local and regional understanding and capacity with regard to drought. The Commission should therefore recommend that Congress build that regional capacity and drought expertise through funding multiple research institutions and universities in various areas of the country. (This change of focus is supported in the body of the Commission report in the third paragraph on page 18.)
1. Recommendation 4 on page 37 is entitled, “Maintain a safety net of emergency relief that rewards stewardship of natural resources and self help.” This wording has two potential interpretations that could be problematic: 1) it could imply that the current safety net of emergency relief already rewards stewardship and that should be maintained; and 2) that the Commission is recommending that emergency relief only reward stewardship. To clarify the meaning and to bring in the concept of transitioning to incentive-based response, we suggest the following: “Maintain a safety net of emergency relief, but provide a transition to programs that provide incentives for that reward stewardship of natural resources and self help.”
1. Recommendation 5 proposes creation of the ‘National Drought Council.’ We support this concept, with a few modifications, and would suggest that the Commission report mention the WDCC as a model. The WDCC report’s first two recommendations support this concept.
1. We object to the language on page 38 under 5.1, “In the interim, we recommend that the President immediately establish a federal agency coordinating group, chaired by the Secretary of Agriculture, to begin appropriate implementation of the recommendations of this report.” An interim group should not exclude non-federal representatives. If FACA

is the concern, non-federal governmental organizations should be included. The Memorandum of Understanding that led to creation of the WDCC is the model of how this can be accomplished. Since that MOU is still active, perhaps all that is needed is to expand the signatories on that MOU. Additionally, the interim group should have co-chairs, one representing federal agencies and the other representing non-federal entities. Again, we would point out the successful experience with the WDCC using this structure.

1. Recommendation 5.2 on page 39 should be amended to read: “We recommend that the Council be co-chaired by the Secretary of Agriculture representing federal agencies, and by a non-federal member elected by the non-federal members on the Council to represent the non-federal interests. The Co-Chairs will report to Congress and the President annually on the activities and recommendations of the National Drought Council. “

If you have any questions regarding these comments, please contact me at 512-239-5500 or Shaun McGrath of the Western Governors’ Association at 303-623-9378. Again, we commend the Commission for your effort in producing a report that we believe will go a long way in serving as both impetus and guide toward development of an improved national drought policy.

Thank you for this opportunity to provide you comments on the National Drought Policy Commission’s draft report.

Sincerely,

John M. Baker, Jr.  
Texas Natural Resource Conservation Commission  
Lead WGA Representative to the NDPC

cc: Governor Ben Cayetano, WGA Chairman  
WGA Governors  
Governor Roy Barnes  
Senator Pete Domenici  
Representative Joe Skeen

**Distributed to: Goal Teams 4, 5 for analysis, DATE: 3-31-00**  
**Flagged for: All , Deanne**

38. Received March 31,00

Ms. Dittus:

My name is Russell Vose, and I am the Arizona State Climatologist. I am writing to echo the Tony Haffer's comments on Recommendation 2.2 in the

NDPC Report. Tony makes the point -- and I believe rightfully so -- that it is imperative to recognize the importance of regional climate information networks in the assessment of drought impacts. It's not that I disagree with the notion of monitoring these problems from a national scale and using a nationally managed network. Rather, I believe it's important to also incorporate information from the numerous weather networks that are well managed and maintained, but not necessarily by the federal government. These networks can provide considerably greater detail in a spatial and temporal sense, and thereby give decisionmakers even more accurate information. For example, the state of Arizona has approximately 400 observing stations operated by federal agencies. But there are probably at least another 800 in the state that are maintained by state, county, and local agencies. In a state such as Arizona, where both temperature and rainfall can vary dramatically over short distances, these additional stations really clarify the picture.

Thanks for the opportunity to provide input on the report.

Russell S. Vose  
Office of Climatology  
Arizona State University  
Box 871508  
Tempe, Arizona 85287-1508  
Phone: (480) 965-0750  
Fax: (480) 965-1473  
E-mail: [rvose@asu.edu](mailto:rvose@asu.edu)

**Distributed to: Goal Team 2 for analysis, DATE: 4-3-00**

39. Received March 31, 00

San Diego County Water Authority Comments on  
Draft Report of the National Drought Policy Commission  
March 30, 2000

Thank you for the opportunity to comment on the Draft Report of the National Drought Policy Commission (Commission). At the December 1, 1999 public hearing in Los Angeles, the San Diego County Water Authority (Authority) submitted a written statement to the Commission containing recommendations as to the Federal role with respect to drought preparedness and response. After review of the March 8, 2000 draft report of the Commission, the Authority provides the following additional comment related to a section in the report on international drought-related issues and specifically the description of the emergency connection between the United States and Mexico:

**Comment: Revise section “Need to Address International Drought-Related Issues” to more accurately describe the emergency connection between the United States and Mexico located in the San Diego-Tijuana region.**

In the discussion on international drought-related issues, it is important to mention the emergency connection between the United States and Mexico, but we suggest that the description be revised due to inaccuracies.

It is mentioned that the Cities of San Diego and Tijuana developed the connection – it was the Mexican and US Sections of the IBWC, as the lead binational agency, who developed the emergency connection. USIBWC worked closely with the Authority, as facilitator of the effort for the US agencies involved (US Bureau of Reclamation, Metropolitan Water District, Authority, City of San Diego and Otay Water District). It is actually the water systems of the Otay Water District and Tijuana that are connected. In addition, emergency water can only be delivered from the US to Mexico. The following is a brief description/history regarding development of the connection:

#### ***Emergency Deliveries of Colorado River Waters for Use in Tijuana***

*The emergency water supply connection between the United States and Mexico was built in 1972 to allow Mexico to “wheel” their Colorado River treaty water through the United States to Tijuana in an emergency situation. Tijuana was facing drought conditions in the Tijuana River watershed and required emergency deliveries to avoid a serious shortage of water. The connection was utilized for 11 years, prior to completion of the Acueducto Río Colorado–Tijuana in 1983. IBWC Minute Number 240 established the original conditions upon which the deliveries could be made and identifies the annual volumes of emergency deliveries to be approximately 14,500 acre-feet. Deliveries through the connection also occurred for short durations in the early 1990’s. The water is transported from the Colorado River to Tijuana through the Metropolitan Water District Aqueduct and then the distribution systems’ of the San Diego County Water Authority and Otay Water District. The connection at the border was built by the United States and paid for by the Mexican government. The San Diego County Water Authority facilitated the effort for the United States agencies.*

*Representatives from both countries are now working together to make necessary modifications at the connection to maximize deliveries to Tijuana in a drought or other water emergency. Modifications have been identified on both sides of the border and the Mexican government is now working to identify the funding source for these improvements. This is an excellent example of the two countries working together in a pro-active manner to ensure water supply reliability.*

It should also be noted that, the State of Baja California, not the City of Tijuana, is currently responsible for maintaining the distribution and treatment system for the City of Tijuana. The Comisión Nacional del Agua controls all water resources for the Republic of Mexico.

Thank you again for the opportunity to comment on the draft report. Please contact Dana L. Frieauf, Senior Water Resources Specialist, at 619-682-4172 if you have any questions regarding the any questions regarding the Authority's comments.

**Distributed to: Goal Team 2 & 5 for analysis, DATE: 4-3-00  
Flagged for Deanne, Diana M., & Roseann**

40. Received March 31, 00

Comments from Jerry Alanko FSA 202-690-1003

General Comment:

As part of a larger natural disaster outlay report, the Draft Report should address the need to monitor and annually compile drought related expenditures; by program, region, and crop. Historic information would be useful in projecting costs and budgeting for future disaster assistance.

Comments by program area, page and paragraph reference. (Revise as indicated by red-line and strike-out)

Noninsured Crop Disaster Program

Page 12 Bullet 3

“Federal Crop insurance covers only the “primary” crops grown ~~and does not~~. The Noninsured Crop Disaster Assistance Program extends to other crops and crop policy exclusions ~~or~~ although no standing programs provide assistance to livestock producers.”

Page 23 Risk Management. Second paragraph

“Federal crop insurance covers all major crops in nearly all locations. ~~but does not~~ The Noninsured Crop Disaster Assistance Program extends to all vegetable and other crops n all locations ~~not does it~~ but does not cover livestock.”

Page 37 “Develop and advocate comprehensive risk-management strategies into drought preparedness”

~~“There is no similar program for others who are at particular risk from drought.”~~

### State and county emergency boards and ECP

“Risk Management” ”Response”

P 25

“A similar structure exists...” “When a state governor or tribe gets a request...” “The Secretary sends the request...” “From there, it goes ~~back~~ to the State Emergency Board...”

During the 1999 drought in the mid-Atlantic and southeaster states, the Department of Agriculture ~~under the secretarial disaster designation~~ could only provide assistance through the Emergency Conservation Program and under the secretarial disaster designation process loan applications pending congressional appropriations. (NOTE: ECP not triggered by Secretarial designation)

Page 26

“The 1996 Flood Control Act...” “The preferred approach in providing such surplus water is for a state or subdivision of a state to enter into a contract..”

QUESTION: Can tribes enter into a contract?

### Recommendations

2. “Forge closer ties among scientists, economists and managers so that historic drought costs can be utilized in future budget projections and scientists ...”

Page 38 Non-agricultural emergency response, 4.4

#### COMMENT

Consideration should be given to amending the Stafford Act to:

1. allow assistance to agricultural enterprises  
basis for agricultural response in Federal Response Plan

**Distributed to: Goal Team 2,3 and 4 for analysis, DATE: 4-3-00**

41. Received March 31, 00

The following comment regarding the National Drought Policy Commission's draft report was received, by telephone, by Leona Dittus, on Friday, March 31, 2000, at 3:00 p.m.

Lawrence J. Charanza

12958 E. State Highway 21  
Bryan, TX 77808-9312  
Phone: 979-589-3238 (3285)

Comments focused on drought programs administered by the Farm Service Agency. Publicity makes it appear, to the general public, like farmers are getting all kinds of help when in fact they aren't. Farmers really do not want a hand out and he would prefer that farmers get help to prepare for disasters and are then required to stand on their own when a disaster occurs.

He is a farmer/rancher in two counties in Texas. Current disaster assistance programs such as the Livestock Assistance Program (LAP) and the Non-insured Crop Disaster Assistance Program (NAP) take way to long to get the money out to producers and then it is not anywhere near what the farmer lost. For example, on his two farms, he received only \$698 under LAP but felt he should have received about \$6,000. For hay loss on one of this farms in 1999, he just recently received \$2028 but felt he should have received about \$12,000. The yield used to compute the payment was only 1 ton per acre which he felt was way to low. He has not received his 1999 NAP payment for the other farm yet. Farmers need money quicker so they can pay for seeding costs.

Mr. Charanza feels Congress should provide more dollars for these assistance programs as it appears they have plenty of money for everything else.

**Distributed to: Goal Team 3 & 4 for analysis, DATE: 4-3-00**

#### **42. Received 3-31-00**

"LYLE BENNETT" <LBENNETT@mail.dep.state.wv.us>

I would like to make the following observations and suggestions:

1. Stream flow and groundwater level data is essential in tracking the onset of drought conditions. The USGS operates and maintains a nationwide system of flow gaging stations. Funding at the 100 % level should be provided to USGS to keep their gaging stations in operation.
2. In West Virginia, the state National Guard provides a great service to drought stricken communities. They should be included in drought management policy decisions.
3. As the United States population continues to expand so do the demands on the limited water resources available. We should recognize that future droughts of short duration may create a greater strain on water supplies than longer droughts did of the past. With the ever increasing consumption of water supplies, the use of predictive modeling within river basins might provide better drought preparedness.

4. I noticed that little attention was given to water quality issues. The impacts from industrial and municipal discharges during flows below the 7Q10 can have a devastating impact on the environment. Aquatic impacts, affects on water quality regulation and protection, and riparian rights all become issues that need coverage in a drought policy. I would encourage a stronger role for the Environmental Protection Agency and possibly the U. S. Fish and Wildlife Service on the National Drought Council, so that these concerns will be addressed.

5. If a National Drought Council becomes a reality, it should be given the authority necessary to carry out the requirements established through the National Drought Policy Act.

"LYLE BENNETT" [LBENNETT@mail.dep.state.wv.us](mailto:LBENNETT@mail.dep.state.wv.us)

**Distributed to: Goal Team 2 , 4 & 5 for analysis, DATE: 4-3-00**

**Flagged for EPA**

43. Received March 31,00

NORTHERN CHEYENNE TRIBE  
P.O. BOX 128  
Lame Deer, Montana 59043

March 31, 2000

Ms. Leona Dittus, Executive Director  
National Drought Policy Commission  
USDA/FSA/AO  
1400 Independence Ave. SW, Stop 0501  
Washington, DC 20250-0501

Dear Ms. Dittus:

The Northern Cheyenne Tribe is submitting the following comments and recommendations concerning the national drought policy.

1. Tribal governments need the authority to declare an emergency themselves. Example one part of the reservation may experience drought while the other part may be alright but because a reservation has multiple counties it will qualify because of 300,000 acre rule.
2. Reservations are sovereign nations and therefore need to have a government to government relationship with all federal agencies.
3. The Northern Cheyenne Tribe is requesting funding for training and technical assistance program funding to gather drought related information, devising strategies and developing local tribal solutions.
4. The Tribe needs soil data, range inventory data and stream-gaging for basic planning as well as drought planning.
5. Montana tribes contribute to Montana's economy. Twenty five percent (25%) of the cattle in Montana is owned by Indians yet the State does not consult with tribes on agricultural issues

Sincerely,

Signed

Norma Gourneau, Vice-President  
Northern Cheyenne Tribe

**Distributed to: Goal Team 1, 2 & 4 for analysis, DATE: 4-3-00**

44. Received 3-31-00

Good morning. My name is Thomas Gackstetter and I am employed by the Los Angeles Department of Water and Power (LADWP), the largest municipally-owned utility in the nation. In my capacity as the Water Conservation Coordinator, I was asked to provide testimony to the National Drought Policy Commission during the public hearing held last December in Los Angeles. It is in the context of that testimony that I offer the following comments on the Commission's draft report.

The National Drought Policy Commission's draft report, Preparing For Drought In The New Millennium, is very thorough and certainly reflects all of the hard work of the Commission's members.

From the Los Angeles perspective, my comments center on conservation as a drought mitigation factor. As one of its conclusions, the draft report states "Mitigation activities such as water conservation, reuse of wastewater, pricing strategies, and the identification of back-up water supplies – can reduce vulnerability to drought events." This has certainly been the experience of the LADWP and I feel is an important point to make in a national drought policy. Sustained conservation in preparation for a drought rather than in response to the effects of one. This tenet is a main driver in LADWP's conservation programs, and I believe in many other conservation programs in California as well.

However, that point is not well-reflected in the report's first recommendation. Though it includes planning and implementation of mitigation measures (including the provision of incentives), the recommended planning concerns only how to respond to a drought rather than to include how to prepare for one. LADWP's decade of conservation programs have helped to "drought proof" Los Angeles and comprise an important element of drought planning. Drought mitigation should include a recommendation of sustained conservation efforts. Federal financial incentives should be made available for not only drought planning but ongoing mitigation efforts as well.

Thank you for the opportunity to provide these comments. Please feel free to contact me directly if you have any questions.

Thomas Gackstetter  
Water Conservation Coordinator  
Los Angeles Department of Water and Power  
Voice: 213 367-0936 Fax: 213 [367-1055](tel:367-1055)  
[Thomas.Gackstetter@water.ladwp.com](mailto:Thomas.Gackstetter@water.ladwp.com)

**Distributed to: Goal Team 1 for analysis, DATE: 4-3-00**  
**Flagged for Ane, Peter**

45. received March 31, 00

[fmay@dps.state.ut.us](mailto:fmay@dps.state.ut.us)  
(Fred May)

Leona,

Please include me in future e-mails [fmay@dps.state.ut.us](mailto:fmay@dps.state.ut.us). I attended the WGA drought meetings in Albuquerque last week. I prepared a State Drought Mitigation Plan and a County Drought Mitigation Plan, which I presented at that meeting. Dr. Fred May, Utah Hazard Mitigation Planner, Utah Division of Comprehensive Emergency Management.

I have reviewed the Draft Report of the National Drought Policy Commission, on behalf of our agency, and feel quite comfortable with it. A few recommendations are:

p. 14, paragraph 1, line 2.

.....response rather than preparedness AND MITIGATION.

p. 14, paragraph 5 - Utah Discussion

Add - The Utah Division of Comprehensive Emergency Management emphasizes State and local drought mitigation planning and has completed a State Drought Mitigation Plan and, also, a county drought mitigation plan for its most drought-susceptible county, San Juan County, involving county-wide interviews, including Native American communities, resulting in about 70 recommendations that would result in drought resistance.

p. 18, paragraph 2.

Add - In Utah, the Navajo Nation has participated in the San Juan County Drought Mitigation Planning effort, including each Navajo Chapter.

P. 19, paragraph 2, line 6.

comprehensive plans. UTAH RECENTLY COMPLETED A STATE AND A COUNTY DROUGHT MITIGATION PLAN MADE POSSIBLE THROUGH PL102-250 FUNDING.

P. 21 - paragraph 5; end of paragraph.

technical publications." WE ALSO HEARD THAT THERE MAY BE UNCERTAINTY IN THE APPLICATION OF DROUGHT INDICES, SUCH AS THE PALMER DROUGHT SEVERITY INDEX, IN ROCKY MOUNTAIN AREAS. THERE NEEDS TO BE IMPROVED TECHNICAL GUIDANCE IN THE APPLICATION OF DROUGHT INDICES FOR PURPOSES OF DETERMING DROUGHT HISTORIES, CYCLES, MONITORING, AND FORECASTING.

p. 23, paragraph, end of paragraph 6.

available to them. THERE IS A NEED TO EVALUATE CHANGING DROUGHT RISK, AS MORE AND MORE AGRICULTURAL LAND IS CONVERTED TO URBAN RESIDENTIAL USE. SOME COMMUNITIES THAT HAD MUCH AGRICULTURAL RISK IN RECENT YEARS, NOW HAS LESS AND WILL HAVE YET LESS AS TIME PASSES. YET, THIS CHANGE BRINGS ABOUT AN INCREASE IN RISK TO URBAN AND RESIDENTIAL AREAS.

p. 27 - Add a new title.

## MEDIA AWARENESS

THERE IS A NEED TO EDUCATE THE MEDIA IN THE EARLIEST STAGES OF DROUGHT, AND AS TIME PASSES, SO THAT LOCAL ECONOMIES ARE NOT IMPACTED UNNECESSARILY DUE TO INACCURATE OR SENSATIONALIZED REPORTING THAT CAUSES POTENTIAL VISITORS TO THE AREA TO AVOID DROUGHT IMPACTED AREAS. FOR THE MOST PART, DROUGHT INITIALLY IMPACTS AGRICULTURAL ASSETS AND NOT THE STANDARD OF LIVING IN

COMMUNITIES. TOURISTS CAN BE INFLUENCED TO TRAVEL TO OTHER LOCATIONS, FURTHER IMPACTING THE ECONOMIES OF COMMUNITIES. THE MEDIA CAN BE PARTNERS IN OVERCOMING DROUGHT IMPACTS THROUGH PROPER EDUCATION AND AWARENESS. LOCAL GOVERNMENTS SHOULD HAVE ON HAND MEDIA AWARENESS PACKETS TO BE DISTRIBUTED FROM THE EARLIEST STAGES TO PRECLUDE SUCH UNNECESSARY PROBLEMS.

**CONCLUSIONS:**

- There is a need to identify changes in drought vulnerability as more agricultural land is converted to urban residential use. Some future drought vulnerabilities are being altered from agricultural to urban/residential.
- The media must be included as drought mitigation and response partners, using accurate reporting of drought vulnerability to reduce economic impacts on local governments.
- Native Americans should be included in State and local drought mitigation planning initiatives so that they can benefit from emphases developing within local governments and within their tribal governments.

**Distributed to: Goal Teams 1, 2 & 3 for analysis, DATE: 4-3-00**