



American Water Works Association
Government Affairs Office

Dedicated to Safe Drinking Water

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March 31, 2000

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

Leona
Dear Ms. Dittus:

Attached are the American Water Works Association's formal comments on Preparing For Drought In The New Millennium. The broad scope of the National Drought Management Commission's composition, particularly the inclusion of individuals familiar with drinking water utilities, and the impacts of drought on the provision of potable water was critical to the development of sound recommendations by the Commission.

AWWA looks forward to continuing to work with the USDA and other federal programs in the near future as the Commission's recommendations are implemented, especially the timely initiation of the National Drought Council. It is very important to continue to build on the National Drought Management Commission's success and maintain a federal – non-federal stakeholder dialogue in the drought preparedness arena.

If you have any questions regarding AWWA's comments, please contact me or Steve Via at 202-628-8303.

Best regards,

Tom Curtis
Deputy Executive Director

TC/sv

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Final
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Formal Comments on
America's Approach to Drought in the New Millennium
National Drought Policy Commission (NDPC)
February 3, 2000 Federal Register Page 5306

The American Water Works Association (AWWA) is an international, nonprofit, scientific and educational society dedicated to the improvement of drinking water quality and supply. Founded in 1881, the Association is the largest organization of water supply professionals in the world. Our 56,000 plus members represent the full spectrum of the drinking water community: treatment plant operators and managers, environmentalists, scientists, academicians, and others who hold an interest in water supply and public health. Our membership includes approximately 4,000 water systems that supply water to roughly 80 percent of the people in the nation.

AWWA is currently in the midst of formalizing the association's policy on water resource management. A central tenant of that policy is that sound water resource planning and management must provide an adequate supply of high-quality water for people, while giving careful consideration to regional water resource conditions, environmental impacts, and project costs. Conservation of water by practicable means, reduction of pollution, effective water treatment including reuse are all viewed as key components of this policy position.

AWWA is vitally interested in sound water management at the local, state, and national level and strongly supported the National Drought Policy Act of 1998 establishing the National Drought Policy Commission (Commission) to develop a report on how to better coordinate Federal and State drought response. AWWA was gratified to see that once the Commission was formed, the process has been timely and that the Commission Report will go forward to Congress while management of the east coast drought of 1999 is still fresh in everyone's collective consciousness.

The east coast drought of 1999 was a clear example that drought management is not just an issue in arid regions of America, but a resource management issue that can impact virtually every community in the nation. In its statement to this Commission on September 23, 1999, the American Water Works Association highlighted a number of the themes raised in the recommendations developed for the Commission's review by the Commission's Working Groups which are key to sound water management; AWWA would like to re-emphasize these themes:

- Priority focus on availability of adequate quantities of safe drinking water.
- Planning and preparation; sound proactive resource management for water quantity and quality.
- Sound emergency response systems to address the physical, social, and economic impacts of drought when available water supplies are inadequate.
- Inclusion of efficient water use as a key component of water resource management.

- Water use education.
- Optimizing existing management tools and programs at all levels of government.
- Information exchange, so that communities, states and agencies just entering the water resource management arena can learn from the experiences of others.

These themes appear to be consistent with the NDPC draft vision statement and its underlying principles.

What type of information do you need for responding to the drought?

Accurate and reliable prediction of drought conditions, and dissemination of that information, has been sorely lacking over the years. Individual entities such as water utilities have generally been at the mercy of the State regulatory agencies, or left to their own devices to assimilate indicator information, analyze it, and predict the future. Historically, river flows have been the best source of information for predicting impending water shortages at the local level, but the U. S. Geologic Survey has apparently been forced to systematically reduce its network of river gaging stations for economic reasons, thus further impeding the ability of local water utilities to manage water resources proactively during drought conditions.

There has been no central source of reliable prediction of impending (short-term or long-term) drought conditions to our knowledge; if such information has existed, it has not been communicated to the impacted users on a reliable basis.

What needs do you or your organization presently have with respect to addressing drought conditions?

There seem to be large gaps at the federal level in the areas of drought prediction and notification. We would urge that expanded emphasis be placed at the federal level on drought preparedness and planning rather than, or perhaps in addition to, emergency response and disaster relief. This would require improved drought prediction capabilities and communication strategies.

What do you see as the Federal role with respect to drought preparedness? drought response? Should Federal emergency assistance be contingent on advance preparedness?

The Federal government has extensive information collection, aggregation, and dissemination capability. It should be an active leader in supporting drought research and technology transfer and informing and facilitating local, State and regional drought preparedness. Federal incentives to implement drought preparedness planning and impact-reduction activities offer a significant opportunity for long-term reductions in demand for drought emergency assistance. The NDMC's draft report offers some useful suggestions, including:

1. Enhance training, financial incentives, and technical assistance for incorporating drought considerations into farm and ranch, business, water supply and land-use plans and risk management.

2. Participation In cooperative partnerships with stakeholders to develop tools and strategies for more effective planning as well as for implementation of plans and impact-reduction measures.
3. Greater collaboration and coordination among federal agencies, universities, and private institutions that gather and analyze drought-related data.
4. Establish a point-of-contact for easier access to drought information and integrating drought monitoring, assessment, and prediction from a variety of sources.
5. Maintain, modernize and expand climatological observation networks.

Are there any ways you feel that the Federal Government could better coordinate with State, regional, tribal, and local governments in mitigating or responding to droughts?

The NDMC draft report recognizes that while there is a wide array of federal programs focused on drought mitigation and response, identification of applicable programs and identifying the appropriate channels to reach federal resources is difficult. Integration of service would benefit State, regional, tribal, and local governments preparing and responding to droughts.

What lessons have you or your organization learned from past drought experiences that would be beneficial in the creation of a national drought policy?

As with most water quality and water quantity related issues, the initial focus of drought management efforts, and water use restrictions, often seems to be on public water systems. It should be understood that these systems often are not the largest consumer of water in a given watershed, and the Commission should ensure that all demands are considered in formulating policy or guidance for minimizing the effects of drought.

It should also be recognized that conservation practices in all sectors of the economy better prepare both urban and rural communities manage water more effectively and avoid the severity of some drought impacts. Drought response management should also balance the relative impacts of water use control strategies on communities / economic sectors that practice conservation and those that do not.

Summary

The NDPC has made excellent progress on a very complex issue in a very short timeframe. The NDPC wrestled with and identified a solid list of next step activities that will begin the process of building an effective, integrated federal presence in drought management. Inclusion of a diverse spectrum of stakeholders including, municipalities and drinking water suppliers, was an important component of the Commission's success, and should be a component of subsequent follow-through on the NDPC recommendations. While it is important that drought preparedness coordination continue to advance through improved federal coordination, it is equally if not more important that the National Drought Council be established as quickly as possible and represent the diverse range of stakeholders that were included in the National Drought Policy Commission process.



Wayne Taylor, Jr.
CHAIRMAN

Phillip R. Quochoytewa, Sr.
VICE-CHAIRMAN

March 29, 2000

Ms. Leona Dittus, Executive Director
National Drought Policy Commission
USDA/FSA/AO
1400 Independence Ave., SW
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Dear Ms. Dittus,

**RE: "Preparing for Drought in the New Millennium"
DRAFT Report of the National Drought Policy Commission**

Thank you for the opportunity to comment on the DRAFT Report of the National Drought Policy Commission entitled "Preparing for Drought in the New Millennium." The Hopi Tribe has been engaged in the preparation of a Drought Contingency Plan for the past two years. We believe that our experience provides us a strong foundation from which to make comments about this report.

Firstly, the Hopi Tribe commends the National Drought Policy Commission in emphasizing preparedness for drought, rather than focusing on drought recovery and compensation. As is rightly pointed out in this report, the costs of focusing on drought recovery and compensation are enormous, and do nothing to inoculate the affected entities against future losses. Preparedness for drought, while costly in the short run, should reduce losses from drought, thereby saving tax dollars.

The Hopi Tribe also commends you on having a Tribal representative participating in the development of this report. While we have never discussed these issues with Robert Miller, I am sure that given his position with the Intertribal Agriculture Council, he will have brought the Commission's attention to the diversity of viewpoints amongst Tribes about drought, and Tribal needs related to drought preparedness. Certainly, the document reflects the cross-section of needs, beliefs, and effects of drought on Tribes. It is our hope that the National Drought Policy Commission will continue to actively seek Tribal input, and maintain Tribal representation on the Commission.

MAR 31 2000

The Hopi Tribe also agrees with the Commission's recommendation to not consolidate all federal drought preparation and response programs into one federal agency. It has been our experience that the three agencies most concerned with drought: FEMA, Reclamation and Agriculture, have very different strategies and abilities with regard to this subject. (NOTE: The Hopi Tribe has Memorandums of Understanding with the Bureau of Reclamation, Natural Resources Conservation Service, and Federal Emergency Management Agency (FEMA).)

The Bureau of Reclamation, for example, has been an excellent partner on a government-to-government basis in the development of the Hopi Drought Contingency Plan.

The Department of Agriculture, through the Natural Resources Conservation Service, has been an excellent partner in working with individual producers, whether farmers or ranchers, in drought mitigation activities. Specifically, we are referring to the successful implementation of the Emergency Watershed Protection initiative in mid-1999 in two range units on the Hopi Reservation.

FEMA, on the other hand, appears to be better positioned to respond to emergency situations which are more sudden, i.e. flooding, tornadoes. Its ability to respond to a creeping disaster like drought is not as strong. We have observed that FEMA's regulations specify that their responsibility is to the States, and that Tribes are not directly specified. Other agencies have started interpreting the term "States" to mean "States and Tribes", in response to Executive Orders directing them to work more closely in a government-to-government relationship with Tribes. It does not appear that FEMA has taken this step, nor have we been notified of an Executive Order directing them to work more closely with Tribes. Therefore, the Hopi Tribe would suggest that either through a change in the authorizing regulations, or through Executive Order, FEMA be encouraged to work more closely with Tribes.

With regard to the specific goals to be accomplished by the recommended National Drought Council:

1. Incorporate planning, implementation of plans and mitigation measures, resource stewardship, environmental considerations, and public education as the key elements of effective national drought policy.

The Hopi Tribe fully supports this goal. It has been our experience in developing a Drought Contingency Plan for the Hopi Reservation, that in many cases, good resources management/stewardship is the key to effective drought preparedness. For example, if livestock are rotated on a regular basis, the vegetation will be better able to sustain itself, and withstand a period of intense drought. However, good livestock rotation depends on a variety of water sources to encourage the livestock to move away from watering holes. Having strong grass coverage and a good distribution of water provides a better environment for livestock and for wildlife, while reducing environmental degradation.

There are elements within the current drought legislative structure, however, that prevent good resources management/stewardship. For example, providing a better water distribution system can be funded under the Bureau of Reclamation's drought authority, as long as it is a temporary measure. Permanent infrastructure installations are not fundable under this mechanism. Frequently it is as expensive to put in place a temporary measure as a permanent measure. So to accomplish goal #1 of the National Drought Council, a change in the Reclamation Drought Authority, and perhaps other authorities, will be necessary.

2. Forge closer ties among scientists and managers so that scientists understand which monitoring, research, data collection, modeling, and other scientific efforts are needed to reduce drought impacts and improve public understanding of those impacts.

The Hopi Tribe would like to make two comments with regard to this goal:

- a) Many Tribes do not have access to scientific data, and/or cannot afford the monitoring costs, to be able to monitor for drought on their lands. For example, during the course of the development of the Hopi Drought Contingency Plan, various data sources available on the internet were discovered and integrated into the plan. Recently, while testing the internet monitoring components of the plan, we discovered that the most useful data now costs money. One site was requiring \$75/wk to access the data, and another site was requiring \$40/wk. This means that to access the most necessary data, the Hopi Tribe is looking at an expenditure of \$115/wk, or \$5,980 annually. This is an enormous cost for a small Tribe, like the Hopi Tribe, to absorb.

Additionally, another site does not produce data from November-March each year. This means that the Hopi Tribe, which depends on winter precipitation for the soil moisture to germinate the corn each year, does not have data about soil moisture until we are almost into planting season.

- b) Scientists tend to have a "rational" way of viewing drought, which is effectively a form of ideology. The Hopi people have a very different view of drought, based on cultural experience developed through millenia. It is important that the National Drought Council be prepared to take into account a variety of points of view about drought when consulting their various constituencies, and when implementing drought programming, whether planning, mitigation, or emergency relief.

3. Develop and advocate comprehensive risk-management strategies into drought preparedness.

None of the strategies advocated in this document are applicable to the situation of Hopi people. Crop insurance is simply not an appropriate strategy for subsistence agriculture. We did try to discuss with the Farm Service Agency about whether, if through

anthropological or other data, the Hopi Tribe could demonstrate the dollar value of the subsistence crop, the farmers could qualify for drought relief. However, we were unable to get a definitive answer to that question.

4. Maintain a safety net of emergency relief that rewards good stewardship of natural resources and self help.

This is an excellent idea, providing incentive to land managers to be good land managers, although it may be difficult to operationalize. One can ask the question, particularly in light of the Risk Management discussion in the document, about how cities like Phoenix or Los Angeles can be demonstrated to be good stewards of their natural resources. It is an easy enough question to answer when evaluating ranchers, for example, but far less easy in an urban environment.

5. Coordinate drought programs and response.

The Hopi Tribe supports the concept of program coordination between federal agencies. It is possible, however, that the implementation of this policy may cause an increase of bureaucratization, at least in the short term. Already, the processes in place to access drought relief are too bureaucratic and cumbersome to actually provide relief. During the severe 1996 drought event, the Hopi Tribe applied for drought relief through the Bureau of Reclamation. By the time the paperwork was processed, the Palmer Drought Index said that the Hopi Reservation was out of drought, so the Tribe was immediately made ineligible for relief funding. This decision by the Bureau of Reclamation did not take into account the long-term effects of such a severe drought event, or the impact of its own processes on the ability of the Hopi Tribe to obtain relief.

It is my hope that the National Drought Policy Commission finds these comments useful. I look forward to a productive working relationship. Please keep the Hopi Tribe informed as to developments.

Sincerely,



Wayne Taylor, Jr.
Chairman
The Hopi Tribe

cc: Ms. Roseann Gonzales, Bureau of Reclamation Service Center
PO Box 25007, Denver Federal Center, Bldg. 67, 14th Floor
Denver, CO 80225-0007

Arnold Taylor, Sr., Manager, Dept. of Natural Resources
Bev Suderman, Natural Resources Planner

47. Distributed to Goal Teams 1, 2, 3, 4 & 5 ALL have a comment



INTERNATIONAL BOUNDARY AND WATER COMMISSION
UNITED STATES AND MEXICO
UNITED STATES SECTION

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:

Thank you for providing us the opportunity to review the Draft Report of the National Drought Policy Commission entitled "Preparing for Drought in the New Millennium".

The report as prepared contains information which addresses the various complex elements and issues involved in drought forecasting preparedness and mitigation. As Mr. Carlos Marin presented at your Austin, TX meeting in January the Commission is involved in various drought issues which fit your Commission's plan.

Again thank you for considering our agency in this process and if you need any further assistance in the future please do not hesitate to call me at 915-832-4104 or contact Mr. Carlos Marin at 915-832-4157.

Sincerely,



John Bernal
Commissioner

48. Distributed to All (short and general)

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March 31, 2000

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Via FAX: 202-720-9688

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William I. Plank
Patricia A. Buckley (a)
Roger C. Steele (a)

Dear Ms. Lowe:

Thank you for the opportunity of offering comments on the 3/8/00 draft of "Preparing for Drought in the New Millenium."

Virginia
Del. Vincent F. Callahan, Jr.
Gloria Taylor Fisher (*)
Dennis H. Treacy
Del. John A. Rollison, III (a)
Mary Ann Patterson (a)
Michael D. Clower (a)

We would like to offer the sentence below to follow the citation of the Interstate Commission on the Potomac River Basin under Regional Entities on page 10 of the draft document.

West Virginia
Michael C. Casile
Del. Harold K. Michael
F. Scott Rotruck (*)
William D. Brannon (a)
Larry C. Smith (a)
Phyllis M. Cole (a)

The coordination involves the development and maintenance of a drought preparedness plan and the annual exercise of that plan in order to refine its relevance and bring newly hired and replacement personnel from the several jurisdictions and water suppliers up-to-date on this critical issue of regional water resources management.

The importance of this issue is the subject of the last paragraph on page 15 of the draft document.

Federal
Jean R. Packard (*)
Daniel J. Weiss

Sincerely,

Executive Director
Joseph K. Hoffman
General Counsel
Robert L. Bolie

Roland C. Steiner, Ph.D., P.E.
Associate Director for Water Resources

(*) - Executive Committee
(a) - Alternate Commissioner

for Erik Hagen (who testified at the Washington, D.C. hearing)

Celebrating 60 Years of Leadership and Service

Created with an interstate compact by an Act of Congress, the ICPRB mission is to enhance, protect, and conserve the water and associated land resources of the Potomac River basin and its tributaries through regional and interstate cooperation.

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March 31, 2000

Ms. Leona Dittus, Executive Director
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Dear Ms. Dittus:

On behalf of the North American Interstate Weather Modification Council, I would like to comment on the draft report of the National Drought Policy Commission. I urge the final report to include a recommendation in the research section to fund research on weather modification technologies.

Weather modification projects can help minimize the severity of droughts when they occur in two ways. First, weather modification technologies can help produce rain or snow during times of drought. Second, they can be used during normal climatic seasons to build up water supplies that can be used when droughts occur. The technologies are environmentally safe and cost effective. In one watershed in Nevada, water can be produced for as little as \$4 an acre foot.

In Public Law 102-250 (which the draft report mentions in several places), Congress authorized the Bureau of Reclamation to conduct a precipitation management technology transfer program. Section 206 (b) of that act authorizes the Bureau to conduct cost-shared field studies to validate and quantify the potential for appropriate precipitation management technology to augment stream flows. In addition, both the Bureau and the National Oceanic and Atmospheric Administration (NOAA) have authority to conduct weather modification research. Both agencies funded such research for years, but ended the effort in the 1990s.

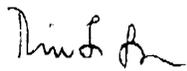
We believe the weather modification research programs at the Bureau and NOAA should be reinstated and funded. In the last few years there have been important developments in the fields of computer modeling, cloud physics, remote sensing and chemistry. These improvements promise to make weather modification technologies more effective. In turn, they can help limit the impacts of droughts.

We propose adding the following subsection to the research recommendations in the draft report:

2.9 We recommend that the appropriate federal agencies fund competitive research grant programs to develop weather modification techniques and technologies, designed to mitigate the impacts of droughts. Furthermore, we recommend that the Bureau of Reclamation utilize section 206 (b) of Public Law 102-250 to create a Precipitation Management Technology Transfer Program. This will enable states, local governments and Indian tribes to study technologies to augment stream flows.

If you have any questions, or need more information, please do not hesitate to contact me. Thank you for your consideration.

Sincerely,



Richard L. Spees

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March 31, 2000

Ms. Leona Dittus, Executive Director
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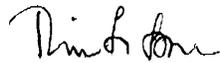
Dear Ms. Dittus:

On behalf of the Consortium of Regional Climate Centers, please find our comments and proposed additions to the National Drought Policy Commission Draft Report.

As you can see, our suggested changes focus on the importance of monitoring droughts on a regional basis. They also highlight the role of the Regional Climate Centers to handle that task.

If you have any questions, please feel free to contact me.

Sincerely,



Richard L. Spees

Attachments

Proposed Changes to the Recommendations of the NDPC Report

1. Spelling change on page 34 section 2.2(b). United Climate Access Network should read Unified Climate Access Network.
2. On page 32, section 1.1, first bullet, there is a sentence which begins "Each drought plan should include:" followed by a list of 5 items. We believe there should be a sixth item, *(6) a drought monitoring and warning system, organized on a regional basis through the existing Regional Climate Centers and intergrated nationally with NCDC and USDA through UCCAN. This would integrate a near real-time climatic/hydrologic data acquisition, transmission, storage, retrieval, and analysis system with high quality climatic/hydrologic databases.*

Rationale for this Requested Addition

1. Decision-makers must have access to adequate data, which is converted to useful information in near real-time.

Adequate data may or may not be available. If it is not available, then new sites must be established and integrated with the existing data sources. If adequate data do exist, they are often from a variety of networks, and these data need to be integrated into a single, reliable source.

These data must also be quality controlled before they are made accessible. To be made useful, the data must also be placed in a wide variety of user selectable historical contexts. A few examples are: comparing today's data with historical means and extremes; comparing the current trend with similar trends in previous years (how does this drought compare with previous droughts?); and, looking at the rate of change of conditions leading up to the present situation. Both of these requirements are dependent upon immediate access to the complete historical databases.

2. Presentations of climatic/hydrologic data and information in print, on television, and via the Web are fundamental to educating and involving the public. They must be timely, accurate and understandable.

In addition to being placed in a proper historical perspective, the current climatic/hydrologic conditions must also be connected to the impacts on human endeavors under these conditions.

3. Such a monitoring system can be readily modified to provide warnings as well.

Study of the historical records can yield a range of "trigger points" that are specific to different endeavors. Thus, as conditions approach these historically based thresholds,

a warning can be given to decision-makers to intensify their awareness of impending adverse consequences.

4. Here are some excerpts from the NDPC Report which further validate this request.

“Accordingly, the Commission's vision is of a well-informed, involved U.S. citizenry and its governments prepared for and capable of lessening the impacts of drought—consistently and timely.” Page 3

“It must be flexible enough to include a variety of drought situations, but specific enough to distinguish between those situations which are true drought emergencies and those that are normal cyclical conditions.” Page 5

“In addition, many people testified to the significant lack of weather and streamflow gages and data in general that are needed to substantiate, review, and make decisions about their applications for agricultural assistance.” Page 11

“Some tribes indicated that they lack access to snow amount, soil moisture, and stream flow information needed in planning and for triggering emergency response efforts.” Page 13

“Such programs should help address the needs of farmers who told us that they rely on irrigation systems and need detailed, localized information (soil moisture, temperature, wind, humidity, evapotranspiration rates) for irrigation scheduling.” Page 17

“And we heard that drought information and data are often complex and, for the most part, are not currently presented in a standardized format. Such data can also be difficult to find and interpret.” Page 18

“Many witnesses at our hearings and written comments submitted independently to the Commission indicated a need for an accessible “gateway” (point of contact) where high-quality, standardized, comprehensible current information and historical data are managed.” Page 18

“We heard often during our deliberations that a key element in successful drought preparedness is public education.” Page 24

“Effective plans should also be designed based on cost and performance and incorporate staged responses to incipient droughts at pre-defined trigger points.” Page 29

“Drought-related data can be better marshaled, interpreted, and disseminated to all parties with an interest in drought, including the media and public at large, so that citizens and experts in drought management alike can gain the knowledge they need to help lessen the impacts of drought.” Page 30

"Easy access is needed to information on nonfederal and federal programs related to drought monitoring, assessment, and prediction. Effective drought monitoring requires information on climate and water supply conditions, including information on precipitation and temperature, soil moisture, stream flow, reservoir and groundwater levels, and snow pack." Page 30

Provision of these Capabilities

There is an existing resource that brings specific expertise to meet the above needs. It is the three-partner system comprising the National Climatic Data Center, the six Regional Climate Centers, and the Nationally Recognized State Climate Offices. The focus of activity for the drought monitoring and warning system will be on the RCCs. Each of them have experience in near real-time data acquisition from the Cooperative Observer Network, and many have experience with other federal and local networks. Some also have experience with determining sites for new data acquisition platforms, specifying platform components, setting up the platforms, acquiring data from the platforms, and quality controlling the incoming data before they are stored in an online database. The RCCs also work cooperatively with the NRSCOs who operate state networks. All RCCs actively integrate and quality control climatic data from a variety of data sources (networks) and produce textual, graphical, and mapped products, which are available on the Web.

This three-partner system also has strong ties to USDA's National Water and Climate Center, which operates the SNOTEL and SCAN systems. NWCC also helped fund and create the Unified Climate Access Network with the RCCs. NWCC is working with the USGS to link the hydrological and climatological databases through UCAN.

The following are suggested additions to the Conclusions section.

- The experiences of the Western Drought Coordination Council provided significant insight into the level of detail and types of information needed to support drought mitigation. The recommendations of the WDCC (attached) provide an excellent prototype of the envisioned regional and state emphasis.
- The impacts of drought are manifested most clearly and forcefully at the state and regional levels. What is needed most is a coordinated *national system of regionally specific* activities, and a similar regional coordination of state and locally specific activities. Experience shows that this approach most effectively addresses the real needs expressed by the user community.

The *italicized* section (b) is recommended for insertion into Recommendations section 2.2. The previous section (b) is relabeled section (c). An alternative wording is provided below.

- 2.2 (a) We recommend that Congress authorize and the Administration establish a comprehensive information clearinghouse 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.
- (b) *We recommend that Congress authorize and the Administration provide resources to utilize the existing Regional Climate Centers Program, and affiliated State Climate Offices, to serve as the regional locus of activities for climate and drought monitoring, and coordinate internal regional cooperation.*
- (c) We recommend that Congress authorize and the Administration implement a nationwide information delivery system—such as the Unified Climate Access Network (UCAN)—reflecting regional and state differences, to increase access to and availability of weather, water, soil, and climate data and information.

Alternative language

- (b) We recommend that Congress authorize and the Administration augment the Regional Climate Centers Program to serve as the regional locus of activities for climate and drought monitoring, in close cooperation with State Climate Programs, and to provide internal regional coordination.

March 31, 2000

Leona Dittus
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Dear Ms. Dittus:

I testified at your Los Angeles hearing on December 1, 1999, along with numerous other water agencies and environmental representatives. The messages that we were collectively trying to give you that day appear to have been ignored or dismissed by the Commission and have not been incorporated into your draft report.

I am writing today to ask that the Commission reconsider adding these important principles. They are summarized briefly as follows:

1. The Commission should specifically reference the federal water efficiency standards in the Energy Policy Act and stress the national benefit of maintaining those standards.

A federal standard is important not only to water conservation goals environmentally but is important also to keeping the costs down of needed new public infrastructure systems for water and wastewater. A full third of indoor water use is in the bathroom; it only makes sense to drought-proof the country by eliminating wasteful fixtures, particularly in drought-prone areas. If the Commission is reluctant to support maintaining the federal standards, it should at least recommend at a minimum that no drought disaster relief funding be provided to states which do not have these efficiency standards enforceable on the state level.

2. Where federal dollars are expended for water supply and treatment projects, water efficiency must be practiced as a condition of federal funding.

Water conservation strategies must be long-term programs and not just short-term drought-related actions. The report recognizes the need for drought preparedness BEFORE the drought. However, the report stops short of recommending that federal funding be provided only if conservation and drought planning takes place. Much like the



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916/552-5877

www.cuwcc.org

implementation of the National Flood Insurance Program, the Drought Management program should not "bail out" districts and localities without the *quid pro quo* of proper conservation plans and programs being put in place afterward. Certainly, long-term conservation planning helps soften the impact of droughts when they occur and provide the supply buffer needed for consumers. California's conservation programs were conceived in drought but have become a stable part of the water supply mix even in wet years.

3. A uniform set of measures helps coalesce and standardize conservation activity.

The Drought Commission's report should give some specific examples of urban and agricultural water "drought-proofing" and not leave the issue of appropriate actions or programs to a future federal entity or Council. An important principle for the Commission to articulate is their view of a minimum, threshold level of conservation program activity. In addition to a minimum definition, creative, sustainable opportunities for "drought-proofing" should be encouraged and explored by the Commission.

4. The consensus-driven, collaborative approach has been successful.

This is a critical issue in the creation of any national drought coordinating council. Environmental participation was missing from your commission, and this omission needs to be rectified specifically in your recommendations. Without the collaboration of stakeholders, true success cannot be achieved. And without a complete set of stakeholders at the table, true success is virtually doomed.

Thank you for considering my comments. If I can provide any further information, please let me know.

Sincerely yours,



Mary Ann Dickinson
Executive Director



Ms. Leona Dittus, Executive Director
National Drought Policy Commission
USDA / FSA / AO
Room 6701 South - Mail Stop 0501
1400 Independence Avenue, SW
Washington, D.C. 20250-0501

Dear Ms. Dittus:

On behalf of the Western Urban Water Coalition I am commenting on the draft report of the National Drought Policy Commission, dated March 8, 2000. The Western Urban Water Coalition is an organization of the largest western urban water utilities serving water to over 30 million people in cities including: Denver, Las Vegas, Los Angeles, Oakland, Phoenix, Reno, Salt Lake City, San Diego, San Francisco, Seattle, Tucson and others.

We strongly support the over arching message of the report, focusing on front-end planning and preparedness. We agree that federal dollars for response can be trimmed down if appropriate planning is conducted before a drought occurs. We also support expanded communication and simplified dialog among weather forecasters, policy makers and the general public.

There are a few recommendations that we want to underscore and offer some additional comments. With respect to the need for coordination among federal agencies to facilitate improved service delivery for states, regions, counties and cities, our coalition considers this issue to be among the most important. Federal technical and financial assistance to help communities develop drought contingency plans, prepare drought communications and train staff in ways to involve the public in resource allocation decisions is at the crux of this whole effort. One of the mechanisms obviously would be through the proposed National Drought Council and the interim federal agency coordinating group. We would strongly encourage timely appointment of the Council, and that it includes non-federal participants. Both urban water utilities and state water resources agencies can provide state-of-the-art assistance, share what works and doesn't work, and can be a productive partner in service delivery. One of the key issues from the states perspective, however, is that the National Council does not in any way create a conflict with existing water rights. Coordination and assistance are needed and appropriate, but federal involvement should not preclude states and other water rights holders from implementing their own water allocation priorities and contingencies.

Funding is another important issue, as it would appear greater emphasis on drought planning programs (such as with the Bureau of Reclamation and the Army Corps of

Paul
MAR 31 2000

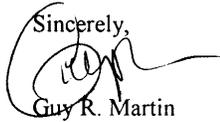
1600 West 12th Avenue, Denver, Colorado 80254 Telephone (303) 628-6500 Facsimile (303) 628-6509
607 Fourteenth Street, N.W., Suite 800, Washington, D.C. 20005-2011 Telephone (202) 508-1414 Facsimile (202) 434-1690

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Engineers), and data collection activities (i.e. USGS stream gages), would necessitate some reduction in other program costs in these agencies. We would caution the commission to involve those stakeholders who may have anticipated specific budget levels in the upcoming federal budget, of any potential changes that may result from some of these recommendations. I believe we are all working toward mutually beneficial goals, and we should try to avoid any potential budgetary conflicts if possible.

Regarding the need for closer networking among scientists and managers on monitoring, research, data collection, and modeling, we would suggest this recommendation be expanded to recognize the value of states and large utilities in this effort. While much of the effort and focus of the report is on agricultural issues, the WUWC has many members who have state-of-the-art technical and assessment capabilities that would be helpful to your stated goal. Overall, we believe there is a missed opportunity to link the resources of the urban water sector with the agricultural water sector. While the end water use may be different, the techniques necessary to plan for, conduct, assess, monitor, and implement conservation practices to alleviate drought impacts covers all sectors. There are many case studies of successful approaches tested in urban settings that may be transferable to agricultural sites, and we would strongly encourage including this in one of the recommendations.

We appreciate the magnitude of the commission's effort and welcome the opportunity to be helpful and to participate in the future.

Sincerely,

Guy R. Martin



New Mexico Cattle Growers' Association

2231 RIO GRANDE BLVD. N.W. • ALBUQUERQUE, NEW MEXICO 87104
P.O. BOX 7517 • ALBUQUERQUE, NEW MEXICO 87194
TELEPHONE (505) 247-0584 • FAX (505) 842-1766 • EMAIL NMCGA@RT66.COM

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 New Mexico Cattle Growers Association (NMCGA) and its membership, I am writing to express my support of the draft report of the National Drought Policy Commission. The NMCGA represents livestock producers in New Mexico and other Western states, and we recognize the need for a way to prepare for droughts, rather than just moving from crisis situation to crisis situation.

The NMCGA supports the idea that all federal drought coordination should remain dispersed through several agencies, so the largest number of people can benefit. Moving all drought preparation and response to one federal agency would be impractical because of all the different parties affected by a drought.

We also support the coordination of federal actions and assistance be coordinated with ongoing state, local and tribal programs. Decisions made and programs administered at the local level are the most successful, because people at the local level know best what their area needs. Decisions that are handed down from Washington are typically hard to implement because they are not specific to different areas. There is a lot of variation between the arid climate of New Mexico and Arizona and the humid South Carolina coast, and one program cannot be applied to both areas and succeed.

By addressing the problems that are caused by a drought now, solutions and actions can be developed. Education on daily water conservation should be a main focus of drought policy. By conserving water, people can help avoid water shortages in the first place.

Thank you in advance for your consideration, and I look forward to seeing the final document.

Sincerely,

Caren Cowan
Executive Secretary

MAR 31 2000

JIMMY R. BASON, PRESIDENT, Hillsboro, NM • PHIL H. BIDEGAIN, FIRST VICE PRESIDENT, Tucumcari, NM
BRUCE DAVIS, VICE PRESIDENT AT LARGE, Eagle Nest, NM • DON CULLUM, SW VICE PRESIDENT, Lordsburg, NM
DON L. (BEBO) LEE, SE VICE PRESIDENT, Alamogordo, NM • DAVID SANCHEZ, NW VICE PRESIDENT, Espanola, NM
BILL SAUBLE, NE VICE PRESIDENT, Maxwell, NM • R.B. WHITE, SECRETARY/TREASURER, Albuquerque, NM
CAREN COWAN, EXECUTIVE SECRETARY, Albuquerque, NM



*Sustainable Agriculture
Protecting The Environment
& All Its' Creatures*

NEW MEXICO WOOL GROWERS, INC.

805 N. Richardson, • P.O. Box 220
Roswell, New Mexico 88201
505/623-1699 Office
505/257-6788 Director FAX & Phone

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 New Mexico Wool Growers, Inc. (NMWGI) and its membership, I am writing to express my support of the draft report of the National Drought Policy Commission. The NMWGI represents livestock producers in New Mexico and other Western states, and we recognize the need for a way to prepare for droughts, rather than just moving from crisis situation to crisis situation.

The NMWGI supports the idea that all federal drought coordination should remain dispersed through several agencies, so the largest number of people can benefit. Moving all drought preparation and response to one federal agency would be impractical because of all the different parties affected by a drought.

We also support the coordination of federal actions and assistance be coordinated with ongoing state, local and tribal programs. Decisions made and programs administered at the local level are the most successful, because people at the local level know best what their area needs. Decisions that are handed down from Washington are typically hard to implement because they are not specific to different areas. There is a lot of variation between the arid climate of New Mexico and Arizona and the humid South Carolina coast, and one program cannot be applied to both areas and succeed.

By addressing the problems that are caused by a drought now, solutions and actions can be developed. Education on daily water conservation should be a main focus of drought policy. By conserving water, people can help avoid water shortages in the first place.

Thank you in advance for your consideration, and I look forward to seeing the final document.

Sincerely,


Ron L. Merritt, Jr.
President



**New Mexico Public Lands Council
P.O. Box 1633
Roswell, NM 88202**

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 New Mexico Public Lands Council (NMPLC) and its membership, I am writing to express my support of the draft report of the National Drought Policy Commission. The NMPLC represents livestock producers in New Mexico and other Western states, and we recognize the need for a way to prepare for droughts, rather than just moving from crisis situation to crisis situation.

The NMPLC supports the idea that all federal drought coordination should remain dispersed through several agencies, so the largest number of people can benefit. Moving all drought preparation and response to one federal agency would be impractical because of all the different parties affected by a drought.

We also support the coordination of federal actions and assistance be coordinated with ongoing state, local and tribal programs. Decisions made and programs administered at the local level are the most successful, because people at the local level know best what their area needs. Decisions that are handed down from Washington are typically hard to implement because they are not specific to different areas. There is a lot of variation between the arid climate of New Mexico and Arizona and the humid South Carolina coast, and one program cannot be applied to both areas and succeed.

By addressing the problems that are caused by a drought now, solutions and actions can be developed. Education on daily water conservation should be a main focus of drought policy. By conserving water, people can help avoid water shortages in the first place.

Thank you in advance for your consideration, and I look forward to seeing the final document.

Sincerely,


Bud Eppers
President





NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OFFICE OF THE SECRETARY
2040 South Pacheco Street
Santa Fe, New Mexico 87505
phone: (505) 827-5950
fax: (505) 827-1150

Jennifer A. Salisbury
CABINET SECRETARY

March 30, 2000

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 National Drought Policy Commission draft report. Our comments are as follows:

Note: These comments are cross-referenced to the draft report, *Preparing for Drought in the New Millennium*.

1. Ref p. 39: We recommend Congress act to establish a National Drought Council for the coordination of drought programs and responses. For the interim, we recommend the president name the Secretary of Agriculture and pick one state governor to serve as co-chair over a federal agency coordinating group that will begin the process of implementing the recommendations in the report.
2. Ref. p.8, 35, 36: We recommend the funding for drought research not be limited to the National Drought Mitigation Center in Lincoln, Nebraska. Rather, we believe additional funding should be developed to support technical decisions (such as water supply, climatology, and biotic stress) being contemplated by state and local drought planners.
3. Ref. p.4, 27, 29, 34: We recommend forest resource stewardship programs be recognized and considered as drought mitigation and preparedness programs. Well managed forest lands are less prone to catastrophic fires. When wildfires occur in healthy forest stands, suppression options are broader. These programs are truly proactive and have long-term benefits. In some instances, wildfire can cause significant residual environmental damage to watercourses. This recommendation is tied to a request for increased funding and a strong public information campaign espousing the benefits of forest lands being managed in a diverse, ecologically sustainable fashion.

Ms. Dittus
Page 2
March 30, 2000

4. Ref. p. 10 (fourth bullet): We recommend amending the fourth bullet to read as follows:
Drought does not occur until there are adverse impacts, and these impacts can be reflected in various ways such as harm to crops, pastures, forests and woodlands; harm to livestock or wildlife; impacts on the water supplies upon which people depend; or economic impacts on the water supplies upon which people depend; or economic impacts to drought-stricken businesses or communities.

Drought has adverse impacts to forest health far beyond wildfire. Even native trees are susceptible to drought induced mortality and are weakened by drought to the point that insect epidemics occur.
5. Ref. p. 22, 29: We recommend a portion of the applied research and technological outreach funding include the development of peer reviewed criteria that will help resource managers select the proper drought monitoring model(s) for the wide ranging decisions they face. For example, the Palmer Drought Index has value for a number of areas and activities but does not work well after partial relief has occurred but the soil remains dry. The Wildland Fire Assessment System provides reliable information but may not provide all the answers needed to explain drought phenomena. Published criteria would help provide drought managers defensible answers and go a long way toward explaining which factors are most important for their location.

If you have questions regarding the following comments, please do not hesitate to contact me at (505) 827-5950.

Sincerely,



Jennifer A. Salisbury

57. Distributed to Goal Teams 1, 2 & 5



ROGER WATERS
PRESIDENT
PETER DARLSON
VICE PRESIDENT / OPERATIONS
JIM DRZPATEK
VICE PRESIDENT / PLANNING

NATIONAL URBAN AGRICULTURE COUNCIL

March 29, 2000

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

Dear Ms. Dittus:

After a careful review of the draft document dated 3/8/00, Preparing for Drought in the New Millenium, NUAC is pleased with the thoroughness and overall content. There are a couple of areas, however, that appear to be lacking and deserve consideration, especially in these planning stages.

It is NUAC's opinion that preparedness consists of far more than awareness and education. Training is perhaps the most essential aspect of drought preparedness. This lies at the heart of NUAC's message. Knowing what to do is one thing, but implementing it is quite another. If the Federal government is serious about drought preparedness, then they should be willing to put a considerable amount of effort and money toward training programs. Furthermore, future programs for all Federal agencies should include funding in their out-year budgets (line item) for training and implementation.

In like manner, it only makes sense that the Commission encourage all of the agencies that have participated in the formation of this document, governmental and non-governmental, to create implementation methodologies and training programs. There is a need to build up what may be called "institutional memory" within all levels of governmental and non-governmental agencies. Training and implementation should be kept current regardless of who is filling what position. Drought preparedness must become part of the everyday vernacular and our water use habits must follow the lead.

In regards to water reclamation and conservation, it is NUAC's opinion that these programs are nothing more than stopgap measures unless the water usage they offset is somehow kept in reserve. A water conservation program alone can be a huge deterrent to drought if managed properly, but it takes vision, it takes insight, and it takes discipline on the part of water

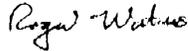
NATIONAL URBAN AGRICULTURE COUNCIL

managers to stop the overselling of water. Water managers need training and education as much or more than the general public. Their "bad" habits can be more detrimental than the public's when it comes to the reliability of the water supply in a drought situation.

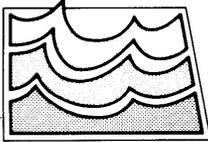
The report talks about the establishment of a National Drought Council to coordinate federal and nonfederal interests, needs, programs, and stakeholders. This Council should be comprised of a strong balance of non-governmental entities such as NUAC, AWWA, USGA, ASIC, ASI A, and some of the leading research institutions. Mention is also made of a research "summit" of multi-disciplinary, geographically diverse representatives. Considering our unique perspective on the issue, NUAC would like to be invited to participate in such a summit.

Again, NUAC is encouraged by the present draft document and hopes that the above comments will further solidify the planning efforts. We have great interest in the issue of drought preparedness and look forward to providing more assistance in the future.

Yours very truly,



Roger Waters
President



North Dakota State Water Commission

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March 28, 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 have reviewed the draft report "*Preparing for Drought in the New Millennium*," and offer the following comments:

First, we fully support the idea that all drought preparedness planning efforts and decisions be left to the states and local interests. This is very important, as the State of North Dakota will not concede or compromise its right to manage and protect its own land and water resources as it sees fit. In addition, this is the best approach to take in developing effective drought preparedness strategies, because state and local entities undoubtedly understand their vulnerabilities, resources, and local priorities better than anyone else.

We also support the coordination efforts by the proposed National Drought Council, as this appears to be a positive step toward making the federal drought assistance programs more efficient and accessible. If the National Drought Council is able to effectively coordinate between federal agencies offering drought assistance with state and local entities seeking assistance, the time of recovery in the event of a drought would be greatly reduced. This would be a valuable extra level of support for states and local governments in situations where their drought preparedness strategies were not entirely effective. However, coordinating efforts by the National Drought Council would only be supported if they were not intrusive or counterproductive to state or local planning strategies.

An area of concern identified by State Water Commission staff included the language on page 39, under 5.1, which reads "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 this report." We recommend that the proposed interim group include non-federal representatives, which would make it a more acceptable approach to state and local entities.

DAVID A. SPRYNCZYNATYK
MAR 31 2000

GOVERNOR EDWARD T. SCHAFER
CHAIRMAN

DAVID A. SPRYNCZYNATYK, P.E.
SECRETARY & STATE ENGINEER

Also related to the Council, on page 40, under 5.2, we recommend that the Council be directed by Co-Chairs. One of the Co-Chairs being the Secretary of Agriculture, and the other, a non-federal Co-Chair elected by non-federal interests.

Finally, clarification is needed in the second paragraph of the "Response" section on page 25 where it reads "Approximately 47 federal programs have an element of drought-related response, primarily for agricultural droughts." It should be added that not all of these 47 federal programs are funded, and therefore, all 47 programs cannot provide assistance to state and local interests if needed.

We appreciate your consideration of our comments regarding the National Drought Policy Commission's draft report "*Preparing for Drought in the New Millennium*."

Sincerely,



David A. Sprynczynatyk
State Engineer

DAS:PF/322

59. Distributed to Goal Teams 1, 4, 5

February 20, 2000

President Bill Clinton
1600 Pennsylvania Ave. NW
Washington, D.C. 20500

04-4149743
FSA-NRCS

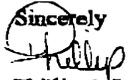
President Bill Clinton

We are just a small family owned and operated trucking company. Our business, is solely supported by the farmer's and when they can't survive because of the water distribution cuts then we can't survive either.

Yes, the farmers get government subsidy loans, but we don't. We are asking that you give the farmers the water they need to farm the land, that feed our country..

THE LORD WILL PROVIDE THE WATER WE NEED FOR IRRIGATION TO FEED THIS COUNTRY, REMEMBER THE FISH AND ANIMALS ARE NOT HUMAN LIVES.

I have always said that if all of you in Washington meaning Congress persons and Senators (not your aides) would come to the Westside of the San Joaquin Valley and irrigate a crop for about three days in the month of August and see where this food comes from, and the process it goes through, from seed to market, you would look at farming from a different light.

Sincerely

Phillip & Jacquie Rasey
Valley Carrier

60. Distributed to Goal Team 4



Wednesday, March 29, 2000

Leona Dittus
National Drought Policy Commission
1400 bIndependence Ave., SW., STOP 0501
Washington D.C., 20250-0501

Dear Ms. Dittus,

I was glad to receive the draft report from the NDPC, Preparing for Drought in the New Millennium. Our company was honored to speak to the Commission last September and share some of the new technologies available to government agencies, farmers, and homeowners. As I read the draft, I see the word "mitigation" show up throughout the report. This is a good thing because it implies taking action before problems arise. Unfortunately, I do not see the words "technology" or "water conservation" very often.

As the NDPC moves forward in addressing the serious impact that drought conditions have on this country, I hope that it will also be a major force in disseminating critical information regarding new water and water conservation technologies. As our wells go deeper and the major aquifers dry up across the country, I hope the pace of the NDPC can keep-up with the problem. Based on the progress made during this past year, with this recent draft as the indicator, I would have to say some acceleration is warranted.

If you have recommendations for us as far as meetings, events, papers, or other means of disseminating information please make us aware of them.

Best wishes for continued progress at the NDPC.

Regards,

Kent Corley
Communications Director

APR 5 2000
pal

50 Old Courthouse Square, Suite 606 • Santa Rosa, CA 95404 • (707) 528-9283 • FAX (707) 528-3391
www.driwater.com • E-mail: driwater@driwater.com

61. Received April 5, 00 . Distributed to Goal 1



STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT
JAMES C. BURNS, JR.
EXECUTIVE DIRECTOR

March 30, 2000

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

Dear Ms. Dittus:

Thank you for the opportunity to respond to the draft report of The National Drought Policy Commission, *Preparing for Drought in the New Millennium*. I commend you for welcoming input from the Mississippi Department of Economic and Community Development. The Department is the state's lead agency for economic development.

After careful review of the report, I offer the following comments:

1. The acknowledgement that the country has no consistent, comprehensive drought policy is the first step in rectifying the situation.
2. A long-term National Drought Council established by Congress is an appropriate vehicle to bring continuity to the development of a national drought policy.
3. A shift in policy from emergency response to planning and mitigation measures will lessen the impact of drought on individuals, communities and the environment.
4. Partnerships among nonfederal governments, the federal government and private interests will be necessary to develop the tools and strategies for

APR 1-5 2000

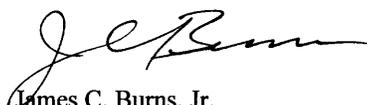
Ms. Leona Dittus
Page 2
March 30, 2000

formulating and carrying out appropriate drought preparedness and mitigation plans.

5. Effective plans should build in flexibility to allow for the diversity of conditions across the country to avoid a "one size fits all" approach.
6. Drought preparedness and mitigation plans should have clearly identified objectives and be monitored to ensure those objectives are being met.
7. Drought planning should be an on-going process.
8. The United States Department of Agriculture and other federal agencies involved in assisting people with drought activities need to provide their services effectively and expediently.

Should you have questions, please call me at (601) 359-6622.

Sincerely,



James C. Burns, Jr.
Executive Director

JCB:DB:ao

cc: Donna Simmons



TEXAS SHEEP & GOAT RAISERS' ASSOCIATION

P. O. Box 2290 • San Angelo, Texas 76902
Phone (915) 655-7388 • Fax (915) 655-2255

President Mike Jernigan Iranan	First Vice President Jule Richmond Blanket	Second Vice President Glen Fisher Sonora	Office Manager Sandy Whittlely San Angelo
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March 29, 2000

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

RE: Preparing for Drought in the new Millennium, Comments on Draft, dated 3/08/2000

To Members of the National Drought Policy Commission:

The members of Texas Sheep and Goat Raisers, located primarily in western Texas, an arid region frequented by drought, are well acquainted with the problems associated with drought, both from an economic and a natural resource standpoint. We stand in favor of drought management and planning. We also stand in favor of protecting states water rights, as long upheld by the courts and in protecting individual property rights. We also support less government and would prefer a program that is less "top down" in its approach.

We believe there are significant programs within the federal agencies and a significant cost savings can be offered by coordinating, streamlining, and perhaps even the elimination of minor or duplicated programs. A National Drought Council may be the mechanism, provided the council does not become just another level of bureaucracy and provided that its charter or mission statement recognizes states water rights and individual property rights. These programs and agencies may already have adequate funding if it is used more efficiently, and would caution against funding without effective cost/benefit analysis. We would ask Congress to reexamine some of the public laws and programs, in order to determine the need for expansion or reduction of the applicability of those laws or programs.

We do not believe it is feasible or practical for all water users to have a drought management plan and water users as referred to in the Recommendations, Section 1.1 and that all users should be better defined. All Federal agencies and facilities should participate and Congress should make that part of their authorization. A Presidential directive should not be required nor a request needed. Public education is vital to any drought planning, but should be funded to the states to manage on a local level. Drought States like the western part of Texas and the southwestern United States need to take the lead in educating the more rainfall prone parts of the country.

The monitoring/ prediction and operational products called for in Recommendations, Section 2, we feel could be handled by the existing NOAA, National Weather Service, US Geological Survey, and perhaps others and delivery by one of these without creating another

agency, like United Climate Access Network , for delivery. In fact, recently, the NWS eliminated information from its agricultural forecast. Information that should be included or reformatted into a more user friendly form. We support research, but suggest that it not provide an avenue for ever expanding the size and budget of agencies as less is more efficient and cost effective.

We support an improvement in the crop insurance program. One that includes livestock, exotic animals and pasture land and the use of other risk management tools. As referred to in Section 3 of the Recommendations.

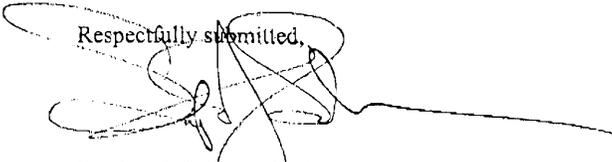
We would support a fund similar to the Stafford Act for non-farm drought emergencies. However, we would not favor borrowing from the Commodity Credit Corporation, as mentioned in Recommendations, Section 4 and would hope for a faster response time while still maintaining the "bottoms up" approach provided by current USDA programs. A single, simple trigger is needed; after all, there is no question in the event of a hurricane, tornado, flood, or earthquake, but drought is no less burdensome financially, it only takes longer to occur.

We support good stewardship, and incentives for such, but rewards for good stewardship as mentioned in Recommendations, Section 4, are complicated, hard to define and often, in the eye of the beholder, different, depending on the education, experience, and special interests of the beholder.

We would support better coordination and integration of programs and response as mentioned in Recommendations, Section 5. This would make the programs and response more effective and more cost efficient. We support the creation of a Drought Council, chaired by the Secretary of Agriculture, to coordinate interests, needs programs and stake holders. We would mention that federal interests should be non federal interests, first and foremost. We do not believe the Council or an interim coordinating group should be exempt from FACA but would agree that the requirements of sections 8 and 10 of FACA, regarding attendance, chairing, called meetings, and control, would render the Council cumbersome if not impossible. We would support open meetings, free testimony and annual reports to the President and to Congress. We would hope that the Council would focus first on existing drought programs and try to make them more efficient, before looking to create new ones.

Lastly, we would comment that approximately two weeks to comment on the report is inadequate.

Respectfully submitted,


Stephen J. Salmon, Chairman
Natural Resources Committee, TSGRA

Cc. Members of the Texas Delegation



Kenny C. Guinn
Governor

THE STATE OF NEVADA
WASHINGTON, D.C. OFFICE
HALL OF THE STATES
444 North Capitol Street, Suite 209
Washington, D.C. 20001

Michael Pieper
Director
(202) 624-5405
(202) 824-8181 Fax

April 4, 2000

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

Dear Ms. Dittus:

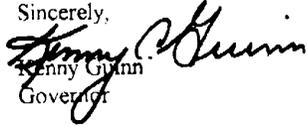
I would like to suggest two additions to the National Drought Policy Commission (NDPC) Draft Report. Both of these recommendations build on successful drought related programs currently in operation in Nevada.

First, I believe the NDPC should highlight activities of the Regional Climate Centers in monitoring droughts and other climatic conditions. Droughts are regional in nature and therefore it is important that drought conditions be tracked, processed and assessed regionally by local observers. The six regional climate centers, gather data from a wide range of sources – a more extensive network than utilized by the National Oceanic and Atmospheric Administration. At the same time, they have the historical database and knowledge of their region to assess the data. This critical role in drought monitoring should be recognized and supported in the commission's report.

Additionally, many states have weather modification programs to enhance water production and mitigate the impact of droughts. For years the federal government supported these programs with research and operating funds, but the federal support ended last decade. To take advantage of new developments in computer modeling, cloud physics and chemistry, the federal research and operations programs should be reinvigorated. In Nevada, the winter cloud seeding project produces water at a cost of \$4 an acre foot. Our nation cannot afford to ignore technologies that could reduce the severity of droughts.

Attached for your review are two paragraphs that I would like to suggest be added to the NDPC report in the recommendations section. Thank you for your consideration.

Sincerely,


Kenny Guinn
Governor

Add the following subsection to the Recommendation Section 2.2

(C) We recommend that Congress authorize and the Administration provide resources to utilize the existing Regional Climate Centers Program, and affiliated State Climate Offices, to serve as the regional locus of activities for climate and drought monitoring, and coordinate internal regional cooperation.

Add the following new section to the "Research" Recommendations:

2.9 We recommend that the appropriate federal agencies fund competitive research grant programs to develop weather modification techniques and technologies, designed to mitigate the impacts of droughts. Furthermore, we recommend that the Bureau of Reclamation utilize section 206 (b) of Public Law 102-250 to create a Precipitation Management Technology Transfer Program. This will enable states, local governments and Indian tribes to study technologies to augment stream flows.



NAVAJO MOUNTAIN
SOIL AND WATER CONSERVATION DISTRICT

P.O. Box 768
Kayenta, AZ 86033
Telephone: (520) 697-8482
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March 20, 2000

Mr. Warren Lee
Resource Inventory Division NRCS
5601 Sunnyside Ave.
Beltsville, MD 20205-5475

Dear Mr. Lee,

At our March Board Meeting we reviewed the Draft of the "Preparing for Drought in the New Millennium" report being developed by the National Drought Policy Commission. Page 9 narrates provisions for American Indians. We are appreciative of having the American Indian considered. However, we feel that the narrative is very vague. We would like to have the commission consider developing language in each of the Assessments and Needs listed on the Contents for American Indians. Some of the Assessments and Needs may be merely having language that will simply have tribal nations included immediately after states, county, cities, etc. Since this is such a short turn around time, are comments are very limited. We would like to have the opportunity to spend the necessary time to carefully review the Assessments and Needs so that American Indians will have the National Drought Policy work for them.

Should you have any questions please contact me at (520) 697-8482.

Respectfully,

Keith Bennett
President

File

Mike Somerville, SCT, NRCS, Phoenix, AZ
Roseann Rice at the Blue Water, ALE, NRCS, Phoenix, AZ

65. Received April 3, 00. Distributed to Deanne, Flagged for Roseann, Warren

I want to commend the National Drought Policy Commission for an extremely well-researched, intelligent report on the nation's drought policy and associated improvements required to improve response to future drought episodes in the U.S. I especially concur with the need for better coordinated drought information aimed at those most vulnerable to drought (i.e., farmers/ranchers, etc.) and tearing down barriers that prevent the awarding of timely technical/financial drought assistance to those who need it most.

I have only one noteworthy comment:

* Page 38, Recommendation 3.1:

I believe that the Commission's recommendation "that Congress authorize a study to evaluate different approaches to crop insurance,..." does not go far enough in addressing this problem. As the report states, the Commission heard numerous testimonies concerning the stated need for extending crop insurance coverage to include crops and livestock. I think this recommendation would have a stronger impact and actually better reflect the sentiment of the Commission if it directly recommended Congress to authorize a study to "evaluate the extension of crop insurance coverage to include all crops and livestock,..."

Thanks for this opportunity to comment.

Regards,

Brian R. Vance
Oklahoma Water Resources Board
405/530-8866

66. Received 4-6-00, Distributed to Goal 3 Team

STATE OF CALIFORNIA

PETE WILSON, GOVERNOR



OFFICE OF THE DIRECTOR
Governor's Office of Emergency Services
P.O. Box 419047
Rancho Cordova, California 95741-9047
916-262-1816 Fax 916-262-2837



March 31, 2000

Mr. Shaun McGrath
Western Governors' Association
600 17th Street
Suite 1705 South Tower
Denver, CO 80202-5452

Dear Mr. McGrath:

Enclosed is our review and comments regarding the submitted draft document "Preparing for Drought in the New Millennium, Draft Report of the National Drought Policy Commission, March 8, 2000." We found the document informative and welcomed the opportunity to comment.

In California we place great emphasis on coordination among state agencies committed to emergency and disaster responsibilities including day-to-day activities. If emergency conditions reach the level at which the Governor declares a State of Emergency, the state emergency organization's response is directed through the Office of Emergency Services. In order to ensure State and Federal coordination during any future drought situation, we would like to see the Federal Emergency Management Agency serve as a major participant in drought preparedness activities.

Thank you for the opportunity to comment on the report.

Sincerely,

DALLAS JONES
Director

Enclosure

c: Department of Water Resources

Emergency Planning Document Review

Title: Preparing for Drought in the New Millennium, Draft Report of the National Drought Policy Commission, March 8, 2000

Reviewer: Donald Pinegar, OES Plans Unit

General Observations

The paper discusses a full range of drought situations from farm losses to loss of drinking water to major metropolitan areas. The major emphasis is on developing a new or revised National Drought Preparedness Act (page 37), establishing a National Drought Council with the Secretary of Agriculture as the lead for agricultural emergency response (page 38).

The Chair of the commission preparing the report was the Secretary of the U.S. Department of Agriculture (USDA). The FEMA Human Services Division Director represented the federal disaster and emergency community while the New Mexico Director of Emergency Management represented state emergency services interests.

The report criticizes the existing system, stating in part "From a national perspective, these well-intended efforts have produced a patchy approach to reduce the impacts to drought. And despite the major role that the federal government plays ... no single federal agency is in a lead or coordinating position regarding drought" (page 7). This statement is made, despite FEMA's clear coordinating role in disaster response and mitigation. Little discussion of the shared responsibility exists between FEMA and USDA regarding mitigating droughts and emergency response and the actual federal programs. Drought prone states have aggressively developed specific programs as needed to address a variety of drought caused disasters.

The report focuses on drought action planning in a general way but has no detailed structure to ensure that all individuals participate in an effective way. Reference is made to the CALFED program in California but there is no description of its operating practices that might be useful for comparison.

Also, the report could identify who the different levels of "drought contingency planners" are. It is clearly a ramp-up group whose numbers climb as the situation grows more dire. The Emergency Management community needs to exercise its legal responsibility to prepare for, respond to, recover from, and mitigate the effects of drought disasters.

Specific Comments

Reference to the "dry hydrant" (page 30) should be changed to distinguish between "dry barrel fire hydrants", which are sometimes referred to as dry hydrants, and the described uncharged pipe. Technically, hydrants have multiple outlets so the "dry hydrant" might better be described as a "dry water valve" which is connected to a water source.

The authors should consider changing references from "drought planning" or "drought planners" to "drought contingency planning" or "drought contingency planner." This is important unless we are planning to create a drought.

67. Received April 6, 00 via fax . Distributed to Goal 4, Cover Letter, P-3 of the 2 ND page; Goal 5, P 3; Goal 1, P's 4 & 5

To: Leona Dittus

From: Victoria Greenfield

Subject: CEA Comments on “Preparing for Drought in the New Millennium”

Date: April 3, 2000

Thank you for the opportunity to read and comment on the Report of the National Drought Policy Commission (NDPC), we received a copy late last week and apologize for the delay in responding. CEA has two very general comments.

- We commend the NDPC for taking a long-term view, but find that the report provides insufficient basis for comparing and prioritizing the various recommendations. In particular, there is no systematic cost-benefit analysis. Without this framework, it is difficult, if not impossible, to determine how to allocate resources efficiently across options. The list is helpful, but not as helpful as it could be. Some mention of expected costs, expected benefits, and priorities would add considerable value. (If this is not possible, we suggest explicitly noting that this kind of analysis is beyond the scope of the report.)

In the insurance discussion, we suggest adding something on incentives—some farm producers may not purchase insurance because they recognize that the government typically provides some form of ex-post disaster assistance. Knowing that this assistance is likely, they lack adequate incentives

68. Received April 3, 00, Distributed to all, Goal 3 , P 3

Jesse Aber

Montana DNRC

Leona -

our comments from Billings were not specific enough. The comments are in BOLD & ITALICS following the respective pertinent passage from the draft.

Thanks, once again for coming to Billings with the NDPC hearings. It was nice to meet you also. I know I would have got an earful if I had stayed,

with. I did have some good conversations with people at the Ft. Belknap Reservation last fall regarding stock water and pasture conditions. But BIA

quit coming in 1994 or so. I need to reach out to them again. Anyway, here are some more comments. I hope that they are not too late - my boss wanted

I had a good conversation. She agreed with me that the federal agencies need

drought response / planning entity. Other than a mandate from the administration and USDA to encourage and reward proactive drought long-term

an extensive policy implementation oversight bureaucracy. It is healthy to review response post-drought to determine effectiveness of response, etc.

Comments from State of Montana – 3/30/2000

Maintain a safety net of emergency relief that rewards good stewardship of natural resources and self help.

CONCLUSIONS

DRAFT 3/8/00 Page

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From its findings, the Commission drew the following conclusions.

- The United States would benefit from development of national drought policy with preparedness as its core.
- Comprehensive, proactive drought planning and mitigation measures that incorporate long-term strategies can lessen the impact of drought on individuals, communities, and the environment. They can also reduce the need for future emergency financial and other relief. *Operative word here is can, the safety net should, in one form or another, remain in place*

through period of transition.

- The people and entities that are likely to receive the greatest share of federal emergency assistance because of drought—that is, farmers, livestock producers, and other rural entities—often have the fewest personnel, information, and financial resources to prepare for and mitigate the potential impacts of drought. ***True, however the USDA FSA does have adequate personnel to assist farmers – their arms are tied by USDA policy – EPIC, SCAN, UCAN could help these people.***
- Individuals, businesses, local/county/state governments, tribes, and nongovernmental organizations with an interest in or responsibilities for drought management—as well as the general public—would benefit from training and technical assistance to plan for and reduce the impacts of drought. ***In Montana, having the FSA, tribes, Army Corps, and BIA attending meetings would be a good start.***
- There are a number of "success" stories in drought preparedness at the individual, local, state, regional, and federal levels that would make excellent models for use in training and technical assistance. ***True, but the successful efforts in Montana were locally-driven with the federal, state, and county governments partners in support.***
- A pooling of federal, state, and local experience, possibly in the form of a handbook on emergency planning, would be a useful tool in helping determine which measures and resources need to be in place to respond to emergencies whose particular causes are unforeseeable. ***Perhaps at a statewide level, or for a sector such as dryland farming, or municipal water, but not a comprehensive handbook.***
- Effective plans should also be designed based on cost and performance and incorporate staged responses to incipient droughts at pre-defined trigger points. Drought-related data can be better marshaled, interpreted, and disseminated to all parties with an interest in drought, including the media and public at large, so that citizens and experts in drought management alike can gain the knowledge they need to help lessen the impacts of drought. ***We support these criteria***
- Easy access is needed to information on nonfederal and federal programs related to drought monitoring, assessment, and prediction. Effective drought monitoring requires information on climate and water supply conditions, including information on precipitation and temperature, soil moisture, stream flow, reservoir and groundwater levels, and snow pack. ***Too vague – We need funding for and to expand our NRCS Snotel real-time gauging, USGS minimum streamflow monitoring network that has full, not coop, funding for the best long-term gauges used to monitor drought, and a real-time soil moisture measurement network – all of which are posted on the Internet pages of the respective agencies. For example, Bu Rec’s Agri-Met stations could be linked to USDA or Ag Stats for actual soil moisture and remote precip. Data collection.***
- Drought-related research is the foundation of many drought programs and is critical in the production of high-quality innovations that lead to improved drought preparedness and mitigation measures. ***Yes! Continue to build the database of climatology for reference and use for risk management during climate anomalies.***

RECOMMENDATIONS

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The basic premise of the Commission's recommendations is straightforward: **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.

Investments on the front end in preparedness will save money over the long run.

The goals are:

Incorporate planning, implementation of plans and mitigation measures, resource stewardship, environmental considerations, and public education as the key elements of effective national drought policy.

Forge closer ties among scientists and managers so that scientists understand which monitoring, research, data collection, modeling, and other scientific efforts are needed to reduce drought impacts and improve public understanding of those impacts. *Scientists already know what data is needed to reduce impacts – they either have no state forum at which to present the interpretation of data to managers and the media; meet among themselves but do not disseminate the data to the public where mitigation needs to take place, or; lack appropriate means such as watershed groups to which info. And expertise can be channeled.*

Develop and advocate comprehensive risk-management strategies into drought preparedness.

Maintain a safety net of emergency relief that rewards stewardship of natural resources and self help.

See our previous comments; Current FSA programs ironically often punish producers for using self-help, and make payments to those who plant the same crops and let damage accrue each year.

Coordinate drought programs and response.

We recommend that Congress pass a National Drought Preparedness Act, which would establish a nonfederal/federal partnership through a National Drought Council as described in Recommendation 5.1. The primary function of the Council is to ensure that the goals of national drought policy are achieved. *We like the follow-through accountability such a body could provide, but they need to check-in at the grass-roots level to determine if policy objectives are being achieved. Without more details, it sounds like another layer of bureaucracy to us.*

- 2. Forge closer ties among scientists and managers so that scientists understand which monitoring, research, data collection, modeling, and other scientific efforts are needed to reduce drought impacts and improve public understanding of those impacts.**

Once again, scientists already know what kinds of help or information is needed – but their programs are being cut back at a time when they are needed most, too few of the drought-affected parties know what scientists are doing and where to find their info.; or states located in semi-arid regions, are remiss in not having a clearinghouse for data or a forum, like a drought advisory committee, at which a comprehensive picture of conditions can be presented to resource managers and the media, who are waiting for direction, a story or news. Scientists are waiting to share their knowledge and findings – all that they need is an invitation and a forum for presentation, such as a state drought advisory committee.

The Commission supports drought monitoring/prediction, operational products, and research efforts that make the greatest contribution to improved preparedness and risk management, and, ultimately, to reduced relief payments. *Specifically, the NRCS Snotel real-*

time network, BuRec real-time reservoir data, USGS real-time streamflow data on a fully-funded drought network for each state, not the coop format which is not a firm enough commitment to long-term drought data on surface water.

5. Coordinate drought programs and response.

The federal drought program is a collection of initiatives run by different departments and agencies. Every analysis of past responses to major droughts notes that these programs need to be better coordinated and integrated. The legislation enabling the National Drought Policy Commission cited this problem and asked the Commission to recommend whether all federal drought preparation and response programs should be consolidated under one existing federal agency and, if so, to identify such agency.

We believe that such consolidation would be impractical and ineffective. Drought affects a wide array of constituents, among them farmers, ranchers, non-farm businesses, tribes, water districts, municipalities, and industry. The federal expertise required to address the needs of these constituents and the impacts of drought on the environment resides in many agencies. The federal agencies currently involved in drought programs report to multiple congressional authorizing and appropriating committees, making it difficult to restructure these authorities appropriately in a timely manner.

In arriving at its recommendations, the Commission considered the consolidation option and three others. The first was a "National Drought Council" similar in composition to the National Drought Policy Commission, but that also includes a representative from the U.S. Department of Energy, a representative from the Environmental Protection Agency, and a nonfederal, nongovernmental environmental representative. ***This option is too far removed to discuss or address any more than the NDPC already has.*** The second option was a presidentially created federal drought coordinating body comprised of only federal representatives from the appropriate federal agencies. ***Like the option #2, this proposal would likely do little to improve drought response. Ask each state how it would like to see federal assistance and respond accordingly.*** This entity would be directed to coordinate with state and local governments, tribes, regional drought-related entities, and the private sector in carrying out its duties. The third option was to build on existing, less formal models such as the Department of Agriculture's Resource Conservation and Development Councils or the Association of State Dam Safety Officials. ***Create no more federal councils or committees, just listen to the states and be at the table. This is a state-lead / federal agency follow issue.***

We recommend the following:

- 5.1 Congress should establish a long-term, continuing National Drought Council to coordinate federal and nonfederal interests, needs, programs, and stakeholders. 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. Once the National Drought Council is created, the federal agency coordinating group should become part of the Council. The Council should either be exempt from FACA or constituted in a way that does not trigger FACA. Primary responsibilities of the Council include:
 - Coordinate delivery of existing and new federal drought programs and facilitate appropriate outreach to assure coordination of federal programs with other governmental and non-

governmental entities and all other interested parties.

- Encourage states, localities, and sovereign tribes to coordinate with current regional *and state!* drought planning entities, perhaps within watersheds *YES!* or river basins, or to establish new regional entities. Members of these planning entities would define their goals

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- and methods of operation. For example, they may decide to establish sub-regions in recognition of specific conditions that may lead to drought in one area of the region, while another area may not experience drought. The Council's role would be to coordinate available assistance to the regions. The Council would collaborate with the governors of all states in each region, appropriate agencies, and interested parties and seek the counsel of university researchers with drought-related expertise.
- Coordinate a periodic in-depth evaluation of federal drought-related programs to determine the degree of customer satisfaction, the extent of gaps that exist between program goals and service delivery, and other circumstances that may hinder effective operation. *Sounds appropriate.*
 - Coordinate development of a detailed implementation plan as soon as practicable. The plan will include specific actions in each of the four program areas (preparedness, information and research, risk management, and emergency relief) and specific steps to maximize customer satisfaction.

5.2 We recommend that the Secretary of Agriculture chair the Council. The Secretary of Agriculture will report to Congress and the President annually on the activities and recommendations of the National Drought Council.

5.3 We recommend that Congress provide federal departments and agencies with appropriate authority and funding needed to support the activities of the National Drought Council and to carry out the recommendations in

69. Received April 8, 00 (a missing attachment from the April 4 e-mail). Distributed to Goal 4, Bullets 2, 3 Page 46-7, 3 P, Page 48; Goal 2, Bullets 8 & 9, Pages 47-8, P 2, Page 48 under Recommendations, No 2 page 48, Goal 5, P 3, Page 48, Bold in No. 5, Page 49. Goal 3,

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

3/29/00

Dear Ms. Dittus:

Thank you for the 3/8/00 Draft: Preparing for Drought in the New Millennium. The FedEx contents, sent by Janice Watkins to my home in Maryland, was a very quick response to my request for a copy suggested by your letter of March 14, 2000.

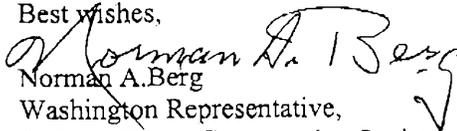
The 39 page document represents an accurate description in their findings of the present drought situation, concluding that this country can and must do better to prepare for drought in the future. The basic premise: We can reduce this nation's vulnerability to the impacts of drought, and thus reduce the need for emergency relief, by making preparations the cornerstone of national drought policy, is an excellent recommendation. Also, we strongly support the view that consolidation of current activities would be impractical and ineffective. Also, we support the alternative of creating a National Drought Council, to be chaired by the Secretary of Agriculture.

All other recommendations and goals are also supported, as realistic and needed at very level of drought related responsibilities. We are encouraged that drought has been elevated by this work to an issue requiring more attention. The Soil Conservation Service, exists today partially because of the "Dust Bowl" of the 1930's. I was honored to serve as their sixth Chief, and at one time in my career had the Great Plains Conservation Program (GPCP) under my jurisdiction. That Program, now merged into the Environmental Quality Incentives Program (EQIP), along with the Agricultural Conservation Program (ACP), by the 1996 Farm Bill, needs more financial and technical assistance funding to meet its demand by landowners with soil and water conservation problems. One activity that should be mentioned in the report is the Snow Survey and Water Forecasting Program. This field work provides estimates of annual water availability from high mountain snow packs and relates to summer stream flow in the Western States and Alaska. Information is used by agriculture,

industry, and cities in estimating future water supplies. This action, each winter by the Natural Resources Conservation Service (NRCS), is strongly endorsed. We commend the mention of the need to complete the Nation's Soil Surveys as soon as possible. There are other features of the Draft that deserve attention and comments. However, because of the public comment deadline of March 31, 2000, We want to be on record as being responsive to this critical issue.

We appreciated the chance to comment on the Draft.

Best wishes,


Norman A. Berg
Washington Representative,
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1200 18th Street NW Suite 800
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70. Received March 29, 00 Assigned to : Goals 1 & 5, P 2; Goal 2, P 3