Matthew Larsen  
Acting Associate Director for Water  
U.S. Geological Survey  
12201 Sunrise Valley Dr., MS 436  
Reston, VA 20192  

Dear Mr. Larsen:

Thank you for requesting that ASFPM provide comments to you on your new initiative, Water for America. As you know, ASFPM represents over 11,000 local and state floodplain managers throughout the United States and promotes the safe and wise use of our nation’s floodplains. As such, we strongly support the USGS and its mission to provide scientifically valid information to support the decision making process on resources, environmental quality and natural hazards.

ASFPM would support conducting a broad scale national water availability and use assessment as detailed in your plan, if new monies were available to undertake the effort, and has the following comments on your questions.

1. The criteria should be kept at a large scale; otherwise studies could run into water rights and many other issues. Regional watersheds that have recently experienced (or are currently experiencing) extreme hydrologic events – floods or droughts – should be studied first.

2. USGS should focus on the following: a. Watersheds that have recently experienced (or are currently experiencing) extreme hydrologic events – floods or droughts; b. Watersheds that are experiencing significant changes in potential demand for water (e.g. population growth).

3. Very large units should be used and it should be divided into summer and winter to determine seasonal variability caused by the demand for irrigation.

4. USGS should use only existing data from states, water districts and related agencies to minimize the cost and not impact other on-going programs.

5. State and regional organizations should be the primary source of information.

6. Specific pollutants, including sediment, and their general sources; geomorphological health; significant land use, vegetation and population changes; historic activities or events with residual impacts (e.g. mining, large wildfires, major agricultural practice changes).

7. As floodplain managers we assess flooding at all scales and need information at all scales in order to make reasonable decisions.
8. Not only streams with flood damage potential, but streams that are over allocated and thus would have an impact on the natural and beneficial functions the nation needs to preserve. In addition, information is needed on geomorphological conditions, including risk of erosion, deposition, or stream migration; major water diversions into and out of basin (e.g. irrigation diversions on the Rio Grande affect flood hydrology); significant conversion of wetlands and significant changes in agricultural practices (e.g. increases in corn acreage in Iowa & reduction in wetlands, reduction in wetlands near New Orleans); significant changes in condition of vegetation (e.g. wildfire, pine beetle killing trees); interstate and/or international compacts which include the watershed of interest; presence of Superfund sites in the watershed.

ASFPM strongly supports the Coop Program and the National Streamflow Information Program, NSIP. The goals of both these programs are to provide reliable long-term data for a variety of uses including flood prediction and water availability. Because of the necessity of having long term data we do not believe any funds should be diverted from this critical information gathering program to fund this new Water for America initiative.

More streamflow information is needed to be able to accurately predict the frequency of floods, determine the impacts of land use changes, and determine the impacts of climate change on floods and water availability within watersheds of all sizes. The long term collection of data by the NSIP is critical to predicting the extent and impacts of future floods.

ASFPM prefers that money be spent on that data collection because the lack of adequate data to characterize the resource renders assessments no better than educated guesses. At the federal level it would be informative to have an inventory of what is being done at the regional, state, and local level. In our experience it is pretty hard to say you have or don’t have enough water if you don’t know how much you are using. Therefore we strongly urge USGS to not divert any funds from either the Coop program or NSIP to fund this initiative.

Thank you for this opportunity to comment.

Regards,

Larry Larson, P.E., CFM
ASFPM Executive Director