



ASSOCIATION OF
METROPOLITAN
WATER AGENCIES



July 17, 2008

The Honorable Arlen Lancaster
Chief, Natural Resources and Conservation Service
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

Dear Chief Lancaster:

As a coalition of organizations representing thousands of drinking water and wastewater utilities across the country, we are writing to express our support and enthusiasm for a new agricultural conservation program recently enacted as part of the 2008 Farm Bill. The Agricultural Water Enhancement Program (AWEP) was created to provide additional assistance to farmers to help them undertake measures to specifically preserve and protect regional water resources. The AWEP is an important new tool that farmers can use to address water quality and water quantity challenges that are part of agricultural operations.

We are especially excited about the opportunities that the AWEP provides for outside partners such as public drinking water and wastewater utilities to collaborate with farmers on efforts to achieve their water quality and quantity goals. Drinking water and wastewater utilities have a great deal of expertise on effective measures that promote water conservation, increase groundwater recharge, reduce storm-water run-off, and improve manure management and treatment to mitigate adverse impacts to water quality. The AWEP provides an opportunity for these utilities to utilize their expertise to directly assist agricultural producers. As such, we respectfully request that you consider the following suggestions as you proceed with developing rules and guidelines for AWEP implementation:

- We urge that the rules explicitly include publicly owned drinking water and wastewater utilities as “units of state and local government” that are eligible to partner in AWEP. The initial House-and-Senate-passed versions of the Farm Bill specifically identified water agencies as eligible AWEP partners. In addition, the committee report accompanying H.R. 2419 when it first passed the House in 2007 specifically cited the benefits of allowing “non-traditional partners such as water

- districts or municipal water drinking water systems” to partner with USDA and farmers to undertake projects to improve water quality. As a result, we believe there is clear congressional intent to include public water and wastewater systems as eligible AWEP partners, and USDA’s rules should therefore ensure that utility expertise is employed to preserve and protect our water resources.
- We strongly encourage you to provide at least \$60 million annually to partnership-based water quality and conservation projects. We believe that there is significant interest among potential partnering organizations to justify this funding level. This would also allow up to \$13 million per year for individual AWEP producer contracts.
 - We urge that the rules define water enhancement activities eligible for AWEP funding as broadly as possible, including efforts that reduce storm-water run-off, improve water conservation, and improve manure management practices that mitigate water quality impacts.
 - Finally, we believe that funds should be available for meritorious projects in all regions of the country, regardless of where they are located. Therefore, we urge the department to avoid establishing targeted funding priority areas in a way that would exclude proposals from non-priority areas from receiving adequate support.

Thank you for your consideration of these recommendations and we look forward to working with you to ensure that the AWEP successfully meets its goal of facilitating partnerships that will improve regional water quality and quantity for our nation’s farmers.

Sincerely,

Association of California Water Agencies
Association of Metropolitan Water Agencies
American Water Works Association
National Association of Clean Water Agencies
Water Environment Federation

Cc: Doug Lawrence, Acting Farm Bill Coordinator, Natural Resources and Conservation Service