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Acting Secretary David Bernhardt
Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Acting Secretary Bernhardt:

On behalf of the Interstate Council on Water Policy (ICWP), I am writing to express concern shared by states across the country regarding the Department of the Interior's (DOI's) planned reorganization and respectfully request that the operation start date planned for July 1, 2019 be postponed until there is sufficient consultation with the states. Founded in 1959 to promote integrated water resource management and address water quality issues, ICWP represents the interests of state agencies and interstate and intrastate entities with water management and water quality responsibilities across the country. We invite you to work through ICWP to ensure that the states are engaged in the reorganization process and well informed regarding any implications of the reorganization. As a first step, we would like to extend an invitation to you to brief ICWP at its April 2-3, 2019 Roundtable meeting in Washington, D.C. regarding the planned DOI reorganization.

As you continue to plan for the reorganization, we offer the following specific comments for consideration:

Interconnectedness of management actions — We believe that DOI's effort to align all of its agencies into a unifying set of department regions is worthwhile to leverage information and enhance synergy. DOI agencies provide critical roles in managing lands, protecting and conserving fish and wildlife, improving availability of clean water, and generating knowledge and predictive tools. Recognizing interconnectedness of the nation's water bodies and management actions for multiple purposes, we applaud DOI's efforts to enhance integrated management among its agencies and bureaus. As the states are also strongly committed to integrated management, we believe that ICWP and its member states can provide valuable insights as to how various management actions and knowledge can be effectively leveraged.

Watershed boundaries — We respectfully request that DOI: a) reconsider its new boundaries where adequate consultation with the states has not occurred in order to ensure the Department's obligations can be effectively achieved, and b) create inter-district memorandums of understanding for its obligations that transcend two or more regions. The proposed DOI regional boundaries are clearly based on geopolitical boundaries and divide important watersheds into one or more regions. We are very concerned that this will result in "non-watershed"-based planning

and program implementation and will orphan interstate waters where there exist federal responsibilities related to management, planning, and information.

Communication and consultation — We respectfully request that DOI employ a strategic communications effort to ensure that all relevant federal and state agencies and tribes are knowledgeable of the reorganization and have the ability to provide input and adapt effectively. Any major reorganization as planned by DOI must be accompanied by thorough and clear communication with the states, tribes, and other stakeholders that are directly involved in the agencies' programs and projects. Without adequate communication and consultation, the states share a sense of discontent and uncertainty regarding the federal agencies' ability to meet their obligations. We are also concerned that DOI agency leadership and staff are not being kept informed of the reorganization details and the future of specific programs and projects.

Reorganization fatigue, resource implications — We respectfully request that agreements achieved under recent DOI agency and bureau reorganizations be considered and upheld. In recent years, DOI agencies and bureaus have undergone reorganizations that consumed substantial energy and resources from federal agencies, states, and tribes. In particular, U.S. Geological Survey state water science centers have been under reorganization over the past few years with some centers reorganizing multiple times. Additionally, it appears that some of these recently reorganized centers will be split again with the proposed Department-wide reorganization. The multiple recent reorganizations have created fatigue and frustration among federal and state agencies as well as resulted in inefficient use of resources.

Please contact ICWP's Executive Director Sue Lowry at sue.ICWP@gmail.com or 307-630-5804 to discuss the logistics of speaking at the April 2-3, 2019 ICWP meeting in Washington, D.C.

Sincerely,



Brian Atkins
Interstate Council on Water Policy, Chair

cc:

James Reilly, Director, U.S. Geological Survey
Margaret Everson, Principle Deputy Director, U.S. Fish and Wildlife Service
Brenda Burman, Commissioner, Bureau of Reclamation
Darryl LaCounte, Acting Assistant Secretary, Bureau of Indian Affairs
Brian Steed, Acting Director, Bureau of Land Management
Dan Smith, Acting Director, National Park Service
Susan Combs, Assistant Secretary for Policy, Management and Budget, Department of Interior
Tim Petty, Assistant Secretary for Water and Science, Department of Interior
Unified Regional Facilitators