March 11, 2016

Re: Improve Army Corps of Engineers Planning in the Next Water Resources Development Act

Dear Senator/Representative:

On behalf of the 110 undersigned conservation and taxpayer organizations, and our millions of members and supporters across the country, we urge you to include the reforms outlined below in the next Water Resources Development Act (WRDA). We also call on you to defend the critically important protections provided by careful and comprehensive reviews of Army Corps projects under the National Environmental Policy Act.

Unnecessarily destructive water resources projects have caused massive damage to the nation’s waters and made freshwater species the most imperiled group of fish and wildlife in North America. At the same time, the nation’s flood damages have skyrocketed. The National Weather Service reports that between 2000 and 2014, inland flooding took 1,010 lives and caused more than $129 billion in damage. Coastal storms caused even more harm. Hurricanes Katrina and Sandy alone caused more than $200 billion in damage.

Maintaining the status quo approach to water resources planning will only make the situation worse. The Army Corps should instead plan, construct, and operate projects to protect and restore the natural function of the rivers, floodplains, and wetlands that provide sustainable flood protection, clean water, and wildlife habitat. This new approach is essential for addressing the significant challenges created by more intense coastal storms, more frequent and severe flooding, unprecedented droughts, and the unintended consequences from many already-constructed water resources projects.

Our organizations urge Congress to adopt the following common sense, cost-effective reforms to modernize water resources planning:

* **Require use of cost-effective, low impact nonstructural and restoration solutions where they can provide an appropriate level of protection and benefits.** The Corps continues to recommend environmentally destructive and costly structural projects even where less costly and environmentally protective measures would provide better solutions. Low impact solutions are a cost-effective way to both solve water resource problems *and* protect people, wildlife, and the many businesses that rely on healthy rivers, coast, and wetlands, as required by the National Water Resources Planning Policy (42 USC 1962-3).
* **Modernize management of water projects by requiring the Corps to update operating plans and water control manuals for large-scale Corps projects at least every 10 years.** Many large-scale Corps projects are managed under antiquated, decades-old water control manuals (guiding reservoir operations and river flows) and navigation plans (guiding dredging, channel modifications, and water levels behind locks and dams). Regular plan updates would ensure that federal water infrastructure is managed with state-of-the-art approaches to both improve operations *and* protect the environment.
* **Utilize federal and state expertise by requiring evaluation and mitigation of fish and wildlife impacts consistent with Fish and Wildlife Coordination Act recommendations*.*** Corps planners continue to ignore recommendations from state and federal fish and wildlife experts leading to unnecessary environmental harm and costly mitigation plans that do not work. Fish and Wildlife Coordination Act review is a longstanding, critically important component of water resources planning and utilizing the expert recommendations from these reviews is a common sense, cost-effective way to make projects better.
* **Modernize emergency flood recovery efforts by allowing use of P.L. 84-99 emergency funds for levee setbacks and other low impact solutions that increase public safety.** P.L. 84-99 requires the Corps to fund 80% to 100% of the cost of restoring a publicly-owned flood project damaged by a flood to pre-disaster conditions (33 U.S.C. 701n), but these large, guaranteed federal subsidies cannot fund nonstructural measures unless specifically requested by the local sponsor. Removing this prohibition would ensure effective evaluation of more sustainable, less damaging, and less costly alternatives.
* **Improve planning and transparency by making water resources planning data and policy guidance available to the public.** Critical data and regional policy guidance are often unavailable, significantly impeding the ability of outside experts and the public to effectively evaluate Army Corps planning, projects, and programs. Increasing data and policy guidance transparency is fundamental to improving Army Corps decision making.
* **Improve delivery of Corps projects by developing transparent criteria and metrics for the Administration to use in prioritizing funding in the annual budget proposal.** Prioritizationcriteria and metrics should be specific and measurable and focused on the Corps’ primary concerns of flood and storm damage reduction projects, navigation projects, and environmental restoration projects. Geographic distribution could also be a component. The Administration should be held accountable in applying the criteria and metrics, which can be adjusted as necessary in future Water Resources Development Acts.

Our organizations urge Congress to adopt these common sense, cost-effective reforms to help ensure that federal water resources planning can address the nation’s many significant water resources challenges. We look forward to working with you to ensure that these reforms are enacted into law.

Sincerely,

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