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,

Mitch Reid  
Executive Director   
**Alabama Rivers Alliance**

Todd Brennan

Director

**The Alliance for the Great Lakes**

Jen Hilburn  
Director  
**Altamaha Riverkeeper**

Jim Bradley  
Vice President,   
Policy and Government Relations   
**American Rivers**

Joe Zupan  
Executive Director

**Amigos Bravos**

Jerry Donohue  
President

**Amigos de Bolsa Chica**

Dan Tonsmeire  
Riverkeeper

**Apalachicola Riverkeeper**

Ellen McNulty  
Vice President  
**Arkansas Wildlife Federation**

Bob Rees  
Executive Director  
**Assoc. of Northwest Steelheaders**

Steve Willis  
Director

**Blue Planet Projects**

Carol Perkins  
Water Policy Advocate   
**Butte Environmental Council**

Brett Hartl  
Endangered Species Policy Director  
**Center for Biological Diversity**

David C. Kyler  
Director   
**Center for a Sustainable Coast**

Laura Hartt  
Water Policy Director  
**Chattahoochee Riverkeeper**

Michael William Mullen  
Executive Director and Riverkeeper

**Choctawhatchee Riverkeeper, Inc.**

John Koeferl  
President

**Citizens Against the Widening of the Industrial Canal**

Peg Furshong  
Executive Director

**Clean Up the River Environment**

Kathy Aterno  
Florida Director

**Clean Water Action**

Morgan Crutcher  
Technical and Policy Analyst

**Coalition to Restore Coastal Louisiana**

Terry Harris  
Executive Director

**Coastal Conservation Network**

Dale Beasley  
President   
**Columbia River Crab Fisherman’s Assoc.**

Denise Lofman  
Director

**Columbia River Estuary Study Taskforce (CREST)**

Clark Bullard  
Director

**Committee on the Middle Fork   
Vermilion River**

David Conrad  
President  
**Conrad and Associates**

Marjorie Ziegler  
Executive Director

**Conservation Council of Hawai’i**

Brandon Butler  
Executive Director   
**Conservation Federation of Missouri**

Dan Clark  
President   
**Cry of the Water**

Mary Beth Beetham  
Director of Legislative Affairs  
**Defenders of Wildlife**

Brenna Goggin  
Director of Advocacy

**Delaware Nature Society**

Maya von Rossum   
Riverkeeper

**The Delaware Riverkeeper**

William Fontenot  
Conservation Chair

**Delta Chapter Sierra Club**

Dan Silver  
Executive Director **Endangered Habitats League**

Pete Cangialosi  
Environmental Director **Estero Council of Community Leaders**

Manley Fuller, III

President  
**Florida Wildlife Federation**

Bob Eisenstadt  
President  
**Friends of Black Bayou**

Judith Rodd  
Director

**Friends of Blackwater Canyon**

Ron Huber  
Executive Director

**Friends of Penobscot Bay**

Dawn Buehler  
Director, Kansas Riverkeeper

**Friends of the Kaw**

Lewis MacAdams  
Founder/President

**Friends of the Los Angeles River**

Sam D. Cooke  
President

**Friends of the North Fork and   
White Rivers**

Ronald Stork  
Senior Policy Staff

**Friends of the River**

Ron Bottorff  
Chairman

**Friends of the Santa Clara River**

Vivian Newman  
Director

**Friends of the Weskeag**

Daniel Parshley  
Project Manager

**Glynn Environmental Coalition**

Fred Akers   
Administrator

**Great Egg Harbor Watershed Assoc.**

Kathleen G. Henry  
President

**Great Rivers Environmental Law Center**

Cynthia Sarthou  
Executive Director

**Gulf Restoration Network**

Jeff Gonyo  
Steering Committee Member

**Highway J Citizens Group**

William Waiters  
President

**Holy Cross Neighborhood Association**

Jack Darin  
Director

**Illinois Chapter, Sierra Club**

Erin Baird   
Executive Director

**Indiana Wildlife Federation**

Philip Greenlee  
President/CEO

**International Federation of Fly Fishers**

Angela Anderson

President

**Kansas Wildlife Federation**

Tom FitzGerald  
Director

**Kentucky Resources Council**

Tim Joice  
Water Policy Director

**Kentucky Waterways Alliance**

Adrienne Cronebaugh  
Executive Director

**Kootenai Environmental Alliance**

Sandra Bihn  
Executive Director

**Lake Erie Waterkeeper Inc.**

Marylee M. Orr  
Executive Director

**Louisiana Environmental   
Action Network**

Paul Orr  
Executive Director

**Lower Mississippi Riverkeeper**

Rachel Silverstein

Executive Director, Waterkeeper

**Miami Waterkeeper**

James Clift  
Policy Director

**Michigan Environmental Council**

Daniel Eichinger  
Executive Director

**Michigan United Conservation Clubs**

Gary Botzek  
Executive Director

**Minnesota Conservation Federation**

Barry Drazkowski  
President  
**Minnesota Division of the   
Izaak Walton League**

Heather Navarro  
Executive Director

**Missouri Coalition for the Environment**

Trana Rogne  
Steering Committee Chair

**MnDak Upstream Coalition**

Adam Kolton

Vice President, National Advocacy Center

**National Wildlife Federation**

Rob Moore

Senior Policy Analyst, Water Program

**Natural Resources Defense Council**

Duane Hovorka  
Executive Director  
**Nebraska Wildlife Federation**

Garrett Beneklasen

Executive Director

**New Mexico Wildlife Federation**

Debbie Mans  
Executive Director

**New York/New Jersey Baykeeper**

Carrie Clark  
Executive Director  
**North Carolina League of   
Conservation Voters**

Tim Gesstwicki  
CEO  
**North Carolina Wildlife Federation**

Emily Markesteyn  
Executive Director and Riverkeeper

**Ogeechee Riverkeeper**

Kristy Meyer  
Managing Director, Agricultural, Health, and Clean Water Programs

**Ohio Environmental Council**

Rich Cogen  
Executive Director

**Ohio River Foundation**

Janet Keating  
Executive Director

**Ohio Valley Environmental Coalition**

Lauri Howard  
Director

**Passaic River Coalition**

Dick Betting  
Secretary

**People to Save the Sheyenne**

Carol Hays, PhD  
Executive Director

**Prairie Rivers Network**

Ricardo de Soto   
GuardaMar

**Programa GuardaMar Caribe San Juan**

Barry Sulkin  
Director, Tennessee Office

**Public Employees for**

**Environmental Responsibility**

Denny Caneff  
Executive Director

**River Alliance of Wisconsin**

Margaret Miner  
Executive Director  
**Rivers Alliance of Connecticut**

Melanie Winter  
Director

**The River Project**

Aaron Rourke  
Director

**Rivers Unlimited**

Jim Wells  
Board President

**Salmon for All**

Tonya Bonitatibus  
Executive Director  
**Savannah Riverkeeper**

Todd Pieper  
Vice President

**Save Our Farmland Coalition**

Wendy Seesock  
Board Member  
**Save Our Saugahatchee**

Joseph Bogaard  
Executive Director

**Save Our Wild Salmon**

Jonathan F. Stone   
Executive Director  
**Save the Bay**

Michael Rice  
Director

**Save the Cape, Inc.**

Lee Willbanks  
Executive Director & Riverkeeper  
**Save the River, Upper St. Lawrence Riverkeeper**

Travis Graves  
Lower Neuse Riverkeeper

**Sound Rivers**

Dana Beach  
Executive Director

**South Carolina Conservation League**

Chris Hesla  
Executive Director

**South Dakota Wildlife Federation**

Caleb Dardick  
Executive Director

**South Yuba River Citizens League**

Navis A. Bermudez  
Deputy Legislative Director

**Southern Environmental Law Center**

Rick Eichstaedt  
Executive Director

**Spokane Riverkeeper— Center for Justice**

Paul Jenkin  
Ventura Campaign Coordinator   
**Surfrider Foundation**

Steve Ellis  
Vice President  
**Taxpayers for Common Sense**

Michael Butler  
CEO  
**Tennessee Wildlife Federation**

Janice Bezanson  
Executive Director

**Texas Conservation Alliance**

Nick Schou  
Conservation Director

**Utah Rivers Council**

Paul Schwartz  
DC Director

**Water Alliance**

David Groenfeldt, Ph.D.

Director

**Water-Culture Institute**

Pete Nichols  
National Director

**Waterkeeper Alliance**

Angie Rosser  
Executive Director

**West Virginia Rivers Coalition**

George Meyer  
Executive Director

**Wisconsin Wildlife Federation**