

December 14, 2017

The Honorable Mitch McConnell  
Majority Leader  
United States Senate  
317 Russell Senate Office Building  
Washington, DC 20510

The Honorable Charles Schumer  
Minority Leader  
United States Senate  
322 Hart Senate Office Building  
Washington, DC 20510

The Honorable Paul Ryan  
Speaker  
United States House of Representatives  
1233 Longworth House Office Building  
Washington, DC 20515

The Honorable Nancy Pelosi  
Democratic Leader  
United States House of Representatives  
235 Cannon House of Representatives  
Washington, DC 20515

The Honorable Ron Johnson  
Chairman  
Committee on Homeland Security and  
Governmental Affairs  
United States Senate  
328 Hart Senate Office Building  
Washington, DC 20510

The Honorable Claire McCaskill  
Ranking Member  
Committee on Homeland Security and  
Governmental Affairs  
United States Senate  
730 Hart Senate Office Building  
Washington, DC 20510

The Honorable Bill Shuster  
Chairman  
Transportation and Infrastructure Committee  
United States House of Representatives  
204 Cannon House Office Building  
Washington, DC 20515

The Honorable Peter DeFazio  
Ranking Member  
Transportation and Infrastructure Committee  
United States House of Representatives  
2134 Rayburn House Office Building  
Washington, DC 2051

Re: Disaster Recovery Reform Act (H.R. 4460) and Inclusion of Sec. 207(b)

Dear Representative:

The undersigned 24 organizations who are members of the Water Protection Network urge that Section 207(b) be stricken from H.R. 4460 (Disaster Recovery Reform Act). Section 207(b) would create a new back-door funding mechanism for U.S. Army Corps of Engineers flood damage reduction projects (USACE Projects) through FEMA's Hazard Mitigation Grants Program.

Given the large capital expenses commonly associated with USACE Projects, we are concerned that allowing funding of these projects through the Hazard Mitigation Grants Program (HGMP) could drain FEMA's HMGP funds very quickly. Given that HMGP funded projects have been proven to be cost

effective and have excellent ratios of benefits-to-costs<sup>[1]</sup>, that are generally far higher than those achieved by USACE Projects, we do not support Sec. 207(b). The bill would weaken FEMA's Duplication of Benefits policies that currently bars FEMA from providing funding for flood damage reduction projects carried out by USACE.

The nation needs to rely more on non-structural flood mitigation strategies such as helping willing homeowners relocate out of harm's way, protecting critical infrastructure that cannot be sited elsewhere, and restoring floodplain areas that provide habitat as well as act as enhanced buffers against flooding – projects which FEMA's HMGP primarily supports. But these programs already receive far too little funding and receive far less funding than USACE Projects on an annual basis.

The proposed Sec. 207(b) would widen an already existing disparity in our nation's funding of flood risk reduction strategies, sending funds that are likely to be used on non-structural projects to large, capital-intensive structural USACE Projects.

H.R. 4460 legislation includes many other positive provisions that would encourage communities to update building codes, incentivize states to develop long-term plans for addressing the risks of flooding disasters, and allow FEMA to help communities rebuild in a manner that makes them more resilient. But Sec. 207(b) undermines this otherwise good piece of legislation. We urge you to strike Sec. 207(b) from H.R. 4460.

Please do not hesitate to contact Marisa Escudero at 202-797-6644 or any of the undersigned with regards to this letter.

Sincerely,

**American Rivers**

Meghan Boian  
Associate Director, Policy and Government  
Relations

**Apalachicola Riverkeeper**

Dan Tonsmeire  
Riverkeeper

**Atchafalaya Basinkeeper**

Dean A. Wilson  
Executive Director

**Audubon Missouri**

Anita Randolph  
President

**Citizens Against Widening the Industrial Canal**

John Koefler  
President

**Citizens Committee to Complete the Refuge**

Carin High  
Co-Chair

**Florida Wildlife Federation**

Manley Fuller, III  
President

**Friends of the River**

Ronald Stork  
Senior Policy Staff

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<sup>[1]</sup> See the *Economist Magazine's* Flood Economics website. Available at <http://floodeconomics.com/>; FEMA, Hazard Mitigation Assistance Loss Avoidance Study Summaries. Available at <https://www.fema.gov/hmgrp-loss-avoidance-studies>.

**Great Egg Harbor Watershed Association**

Fred Akers  
Administrator

**Great Rivers Habitat Alliance**

David Stokes  
Executive Director

**Kentucky Resources Council, Inc.**

Tom FitzGerald  
Director

**Kentucky Waterways Alliance**

Bijaya Shrestha  
Water Policy Director

**Louisiana Audubon Council**

Barry Kohl  
President

**Missouri Coalition on the Environment**

Heather Navarro  
Executive Director

**Missouri Parks Association**

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