



Bold Changes are Needed to Move Water Project Planning Into the 21st Century Urge the Administration to Fundamentally Change the Principles and Standards Comments Due April 5, 2010

The Council on Environmental Quality is accepting public comments on new guidelines for planning water resources projects. Comments on the draft Planning Principles and Standards (the "draft P&S") are due by April 5, 2010. While the draft P&S recognize the value of healthy rivers, wetlands, and coasts, they do not move water resources planning into the 21st Century. Instead, the draft P&S retain the current approach to water project planning that has produced devastating environmental losses, unacceptable risks to public safety, and an enormous waste of taxpayer dollars. Fundamental changes are needed to ensure that the new P&S will produce projects that address current water resources needs, comply with current laws and policies, and utilize modern science and economics.

As Congress has directed, the new P&S must ensure that environmental protection and restoration are primary objectives for **all** water projects. The P&S should require the use of non-structural and restoration approaches wherever possible to solve water resources problems, such as reducing flood damages. The P&S should also require the most effective use of existing infrastructure, conservation, and resource protection as fundamental prerequisites for water supply planning. A new P&S that ensures the protection and restoration of healthy rivers, wetlands, and coastlines will create a healthier environment, increase public health and safety, improve the ability of natural and human communities to thrive in the face of climate change, and ensure the wise use of scarce taxpayer dollars.

Your Comments Are Critical The Final Principles and Standards Will Direct the Planning and Construction of Federal Water Projects Nationwide

When final, the new P&S will replace the current water project planning guidelines, the *Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies* or P&G. The P&G, which have not been updated since they were written more than a quarter century ago, form the foundation of every water resources project planned and constructed by the Corps of Engineers, the Bureau of Reclamation, the Natural Resources Conservation Service, and the Tennessee Valley Authority.

The P&G dictate how these agencies consider environmental impacts, evaluate costs and benefits, and select project alternatives. The current P&G focus almost exclusively on maximizing National Economic Development or NED. This singular focus on NED has produced a strong bias for large structural projects that destroy healthy natural ecosystems; encouraged development in high risk areas, luring people into harm's way; and allowed construction of projects that fail to adequately protect public safety.

The Water Resources Development Act of 2007 directed the modernization of the P&G and established a new national water policy that requires all water projects to protect and restore the environment. The new planning guidelines must implement this new national policy, ensure compliance with current laws and policies, require the use of modern environmental and economic sciences in project planning, and ensure that water resources planning is capable of addressing the nation's many water resources challenges including those wrought by climate change.

The Requirements of the Draft Principles and Standards

Like the current guidelines, the draft P&S require all projects to promote economic development. Environmental protection is treated as a constraint on project planning and not a goal. The draft P&S fundamentally change planning for restoration projects by requiring — for the first time — that restoration projects also promote economic development.

Like the current guidelines, the draft P&S also require a benefit-cost analysis for all projects, although not all benefits have to be monetized. In an important step forward, the draft P&S require the benefit-cost analysis to account for project-induced changes to the value of ecosystem services. Once the costs and benefits have been evaluated, the draft P&S require selection of the alternative that provides “the greatest net combined contribution to the National Objectives.” The national objectives are all tied to promoting economic development; there is no stand alone environmental protection/restoration objective for project planning.

The new P&S will have a much broader reach than the current guidelines. Once finalized, the P&S will apply to **all** federal water and related resources implementation studies, including those carried out by the Corps of Engineers, the Bureau of Reclamation, the U.S Fish and Wildlife Service, the U.S. Department of Agriculture, the National Oceanic and Atmospheric Administration, the National Park Service, and the U.S. Environmental Protection Agency. The new P&S will also apply to federally funded work carried out by non-Federal entities on federal lands or facilities.

The draft P&S can be accessed at
<http://www.whitehouse.gov/administration/eop/ceq/initiatives/PandG>

Comments on the draft P&S can be submitted online at
<http://www.whitehouse.gov/administration/eop/ceq/initiatives/PandG/submit>

Fundamental Problems with the Draft Principles and Standards

The Draft P&S Retain the Failed, Status Quo Approach. The draft P&S require that **all** water projects — including restoration projects — promote economic development. There is no stand-alone environmental protection objective, and there are no directives to ensure that all possible steps are taken to avoid and minimize damage to the environment. The draft P&S rely exclusively on a project-by-project assessment of costs and benefits to identify those projects that are appropriate for federal investment. This will continue the current piecemeal approach to water resources planning; is subject to speculation, miscalculation, and manipulation; and requires federal agencies to prove over-and-over again what we already know — that our natural resources are worth protecting.

- To comply with the Water Resources Development Act of 2007 and to promote sound water resources planning, the draft P&S must ensure that all projects protect and restore the environment. The P&S should establish clear directives to ensure protection of the environment, and should promote projects designed to restore damaged ecosystems. The draft P&S should allow the balancing of project costs against project benefits as a basis for selecting an alternative only after all clear policy directives (see below) have been met.

The Draft P&S Fail to Ensure Protection of Critical Waters. While the draft P&S include some good rhetoric about the value of a healthy environment, they do not ensure that water projects will protect and restore the environment, improve and protect water quality, or ensure adequate water quantity.

- The P&S should establish a compulsory framework for project planning, with clear directives that will ensure the prioritization of environmental protection and restoration. For example, the P&S should: (1) require the use of non-structural/restoration approaches to solve water resources problems wherever possible; (2) prohibit the construction of new reservoirs or other water supply projects unless the community utilizing the project is meeting strong efficiency targets, is making the most effective use of existing infrastructure, and has implemented an enforceable source water protection program; and (3) prohibit the construction or operation of projects that would prevent maintenance of ecologically sound instream river flows.

The Draft P&S Significantly Undermine Restoration Planning. The draft P&S fundamentally change the current approach to restoration planning. The draft P&S require, for the first time, that restoration projects promote economic development and that they undergo a benefit-cost analysis. These requirements would apply to water related restoration projects planned and carried out by all federal agencies, including the Fish and Wildlife Service, the National Oceanic and Atmospheric Administration, and the National Park Service. Current guidelines allow the Corps of Engineers to plan ecosystem restoration projects to increase the quality and/or quantity of ecosystem resources, and require only a cost-effectiveness evaluation of restoration projects.

- The P&S must ensure that restoration planning is not tied to economic development. Restoration projects should be allowed to focus exclusively on improving the quality and quantity of natural resources and ecosystems.

The Draft P&S Fail to Establish Standards Appropriate to Water Supply Projects. The draft P&S fail to require state of the art planning approaches for water supply projects.

- The P&S must require state of the art planning for water supply projects. For example, the P&S should ensure that water supply projects will be considered only after all steps have been taken to: (1) increase the effectiveness of existing infrastructure; (2) maximize end-use conservation; (3) utilize integrated water resources management; and (4) protect and restore groundwater recharge and instream river flows.

The Draft P&S Fail to Meaningfully Address Climate Change. While the draft P&S mention climate change, planning is not focused on addressing and responding to the increasing sea-level rise, changes in glacial and snowmelt patterns, declining ecosystem health and threats to biodiversity, and more frequent and severe storms, floods, and droughts being caused by climate change.

- The P&S must make minimizing the impacts of climate change on communities, water resources, and fish and wildlife a driving factor in water resources planning. The P&S must ensure that our federal investments in water resources will address and account for the impacts of climate change, including impacts to hydrologic cycles, natural ecosystems, infrastructure and land use, and human communities.

The Draft P&S Fail to Provide Clear Triggers for Their Use. The draft P&S state that they are to be used for all “Federal water and related resources implementation studies” that “investigate and recommend Federal implementation of site-specific projects and project modifications to address water resources problems, needs and opportunities.” This definition leaves many unanswered questions regarding applicability of the P&S. For example, will the P&S apply to the development or revisions of water control plans or operations and maintenance plans, or project reevaluations?

- The P&S must clearly define the types of projects and studies covered by the new P&S. Critically, the draft P&S must be fundamentally revised before they are applied to such agencies as the U.S. Environmental Protection Agency, the U.S. Fish and Wildlife Service, the National Park Service, and the National Oceanic and Atmospheric Administration. Applying the current draft P&S to all federal agencies would significantly undermine restoration and federal lands management efforts nationwide.

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