

## Help Move Water Project Planning Into the 21<sup>st</sup> Century

*Tell the White House that it should revise the draft water planning guidelines it proposed on December 3, 2009, to ensure that environmental protection and restoration become a primary objective for all federal water projects. Public Comments are due April 5, 2010.*

### New Water Planning Guidelines

On December 3, 2009, the White House Council on Environmental Quality (CEQ) published a draft revision of new federal water planning principles. Technically called 'Proposed National Objectives and Principles and Standards,' these new principles will guide federal water resources development activities. CEQ is also proposing to apply the guidelines government-wide, beyond just the Corps of Engineers and traditional water construction agencies.

The draft guidelines for the first time require federal agencies to factor in the economic value of in-tact ecosystems in benefit-cost project calculations, and they raise the importance of protecting and restoring the environment.

However, the current draft fails to institute the sweeping post-Katrina reforms mandated by Congress and necessary to prepare and protect America from the floods, droughts, storms, and increasing sea levels fueled by climate change.

- The draft guidelines still provide too much latitude in balancing environmental and development interests on a project-by-project basis and do not prevent the selection of project alternatives that damage the environment, even when non-structural alternatives that work with nature are available and feasible.
- The draft P&S fundamentally change the current approach to restoration planning by requiring, for the first time, that restoration projects promote economic development and that they undergo a benefit-cost analysis. This requirement could harm restoration efforts.

### Comments Due April 5

CEQ will be accepting public comments on the draft guidelines through April 5, 2010. CEQ needs to hear from the public, that its current proposal falls short of ensuring the federal water projects will protect and restore our environment.

The draft can be accessed at <http://www.whitehouse.gov/administration/eop/ceq/initiatives/PandG/>. Comments can be sent to [P&G@ceq.eop.gov](mailto:P&G@ceq.eop.gov), or FAX 202-456-6546, or submitted via the CEQ Web page at <http://www.whitehouse.gov/administration/eop/ceq/initiatives/PandG/>.

### A New Water Policy In-the-Making

Federal agencies, including the Corps of Engineers, Bureau of Reclamation, and US Department of Agriculture use a document known as the "Principles and Guidelines" (P&G) to formulate, evaluate, and implement water resources projects.

The current P&G, developed in 1983, are based primarily on maximizing "National Economic Development." This economic objective has mainly led to large 'structural' projects that harm the environment.

The Water Resources Development Act of 2007 (WRDA) established a new national water policy that requires **environmental protection and restoration** to be primary objectives for all federal civil works water projects. WRDA 2007 also requires the new P&G to ensure that water projects avoid the unwise use of floodplains and to protect the public.

The CEQ is now re-writing the federal water planning guidelines to implement WRDA 2007's new water policy. Help ensure that CEQ gets it right, and implements new guidelines to protect and restore the environment.

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## The Current Planning Formula Favors Structural Projects

During the 25 years since the current P&G were adopted in 1983, demands on our water resources have grown, and global warming impacts are placing more people in harm's way and creating more stress on both water supplies and our natural systems. Congress recognizes that these changes mandate a fundamental transformation in the direction of water resources planning.

## Structural Projects Can Damage America's Aquatic Ecosystems

Although large structural water projects can produce some economic benefits and flood protection, they also can harm the environment and the economy. Relying on large structures like dams, levees and pumps is increasingly unreliable during a time when patterns of river flow, storms and flooding are changing unpredictably due to climate change. Flawed Corps planning and construction led to the catastrophic flooding of New Orleans following Hurricane Katrina. Water agency planning has failed to take into consideration the impacts of global warming, including rising sea levels, salt water intrusion, and more frequent extreme weather events.

## Recommended Changes to White House Proposal

- ✓ To comply with WRDA 2007 and to promote sound water resources planning, the draft P&S must make environmental protection a primary objective for all water projects. The P&S should establish clear directives to ensure protection of the environment, and should promote projects designed to restore damaged ecosystems.
- ✓ The P&S should: (1) require the use of non-structural/restoration approaches to solve water resources problems if at all 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; (3) prohibit the construction or operation of projects that would prevent maintenance of ecologically sound instream river flows.
- ✓ The P&S must ensure that restoration planning is not tied to economic development. Restoration projects should be focused solely on improving the quality and quantity of natural resources and ecosystems.
- ✓ 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 constructed only after all steps have been taken to: (1) increase efficiency of existing projects; (2) maximize end-use conservation; (3) utilize integrated water resources management; and (4) protect and restore groundwater recharge and instream river flows.
- ✓ Minimizing the impacts of climate change on communities, water resources, and fish and wildlife must be 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.

## For More Information

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### Planning for Healthy Ecosystems

Restoration projects and other ecological engineering solutions help fish and wildlife thrive, provide clean water, improve economies, and help communities withstand the more severe weather linked to global warming. Healthy, functioning natural systems absorb flood waters, protect homes and people from storm surges, store global warming pollution, recharge ground water, and provide critical wildlife habitat. However, federal water agencies often overlook non-structural solutions such as land use planning, demand management and restoration projects as solutions to water challenges.

The P&G revision process should shift federal project planning towards non-structural, sustainable solutions to meet our 21<sup>st</sup> century water challenges, while better protecting the environment and people from the effects of global warming.