

One Hundred Organizations Call for Improving Water Resources Planning

March 12, 2018

Members of the Senate
United States Senate
Washington, D.C. 20510

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

Dear Senator:

On behalf of the 100 undersigned conservation, taxpayer, and faith-based 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 U.S. Army Corps of Engineers (Corps) projects under the National Environmental Policy Act, and by full compliance with the Clean Water Act and the many other laws that the public relies on to protect our nation's waters.

Unnecessarily destructive water resources projects and outdated operating plans have caused massive damage to the nation's waters and made freshwater species the most imperiled group of fish and wildlife in North America.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. 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 \$230 billion in damage. In 2017, the nation suffered from five inland floods and hurricanes that each caused more than \$1 billion in damage. Collectively, those storms caused more than \$268 billion in damage and took 276 lives. As a nation we can do better.

To address these challenges, the Corps needs a new approach to project planning; one that prioritizes the use and protection of the nation's natural infrastructure—healthy rivers, floodplains, and wetlands—that provide affordable and sustainable flood protection, clean water, and vital wildlife habitat. During Hurricane Sandy, wetlands prevented \$625 million in flood damages in 12 coastal states and reduced damages by 20 to 30 percent in the four states with the greatest wetland coverage. During Hurricane Katrina, coastal wetlands reduced storm surge in some New Orleans neighborhoods by two to three feet, and levees protected by wetland buffers had a much greater chance of surviving than levees without wetland buffers.

Our organizations urge Congress to enact the following common sense, cost-effective reforms to advance the use and protection of natural infrastructure to address the nation's many significant water resource challenges *and* protect the environment.

- **Use Natural Infrastructure Where Possible.** Congress should require a full evaluation of a natural infrastructure alternative in each Corps study addressing flood and storm damage reduction, and require use of cost-effective natural infrastructure measures where they can provide an appropriate level of protection and benefits. Despite longstanding requirements to consider natural infrastructure, the Corps rarely selects such approaches. This reform would build on

existing law, codify what is supposed to be current practice, establish a common sense approach to planning, reduce the risks associated with catastrophic levee and floodwall failures, promote sound floodplain management, and protect the environment as required by the National Water Resources Planning Policy (42 USC 1962-3).

- **Modernize Operation of Existing Projects.** Congress should require the Corps to evaluate and update operating plans and water control manuals for large-scale Corps projects at least every 10 years and implement needed operational changes. Many major Corps projects are operated under antiquated, decades-old water control manuals (that guide reservoir operations and river flows) and navigation plans (that guide dredging, channel modifications, and water levels behind locks and dams). Projects being managed under 20, 30, 40, and 50 year old operating plans cause significant harm to fish and wildlife and the environment, increase flood risks for many communities, and aggravate already contentious water supply conflicts. Regular operating plan updates would ensure that the nation's extensive array of federal water infrastructure is managed with state of the art approaches that can both improve operations and protect the environment.
- **Utilize Federal and State Expertise.** Congress should ensure that the Corps utilizes recommendations made pursuant to the Fish and Wildlife Coordination Act that derive from the special expertise of federal and state fish and wildlife experts, such as methods and metrics for assessing fish and wildlife impacts and mitigation opportunities. The Corps often ignores such recommendations made during the critically important Fish and wildlife Coordination Act review process, leading to projects that cause unnecessary harm and to mitigation plans that do not work. Evaluating fish and wildlife impacts and mitigation opportunities in accordance with the extensive and carefully developed recommendations of federal and state fish and wildlife experts is a common sense, cost-effective way to make projects better and improve planning efficiency.
- **Fully Account for Project Costs and Benefits.** Congress should ensure that the Corps' benefit-cost analyses fully account for project costs, including lost ecosystem services and full life-cycle costs; exclude benefits from activities that are contrary to law and policy; and utilize an appropriate discount rate comparable to those for other federal construction projects. Corps benefit-cost analyses are often wildly inaccurate with actual costs and benefits bearing little to no relation to the benefit-cost ratio used to justify Congressional approval. Typically, these analyses significantly understate actual construction costs; fail to account for the costs of environmental damage; include benefits from activities that are contrary to law, policy, and sound resource management (e.g., counting agriculture or development benefits created by draining wetlands, or counting flood damage reduction benefits on lands subject to federal flood or conservation easements). Modernizing the benefit-cost analysis would help ensure that Congress and the public understand a project's true costs and benefits.
- **Modify Cost Share Requirements to Improve Planning.** Congress should modify non-federal cost share requirements to incentivize use and protection of natural infrastructure. Congress should establish a sliding cost share for flood and storm damage reduction projects to make it financially beneficial for communities to encourage and embrace natural infrastructure measures where appropriate. Congress should establish a meaningful non-federal cost share for operations and maintenance of little used segments of the inland waterways system to minimize maintenance-induced damage to natural infrastructure on waterways that are rarely used but that still obtain full federal funding for operations and maintenance.

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- **Establish Transparent Prioritization Criteria.** Congress should improve delivery of Corps projects by developing transparent criteria and metrics for the Administration to use in prioritizing funding in the annual budget proposal. Criteria 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 significant challenges created by more intense storms, more frequent and severe flooding, unprecedented droughts, and unintended consequences from many already-constructed water resources projects. We look forward to working with you to ensure that these reforms are enacted into law.

Sincerely,

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