



**Principles & Standards**  
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### **Proposed Revisions to the Principles and Standards Applicable to the Development and Planning of Water Resources Projects**

Objective: clear, concise and workable Principles to develop, plan and fund water resources projects that advance the national interest by maximizing the net-beneficial effects based on a thorough analysis of all alternatives and the critical input of non-federal sponsors.

The Council on Environmental Quality is preparing to finalize its *Proposed National Objectives, Principles and Standards* governing the planning of water resources projects. An independent report issued by the National Academy of Sciences' National Research Council (NRC) found that CEQ's proposal fundamentally fails to achieve the stated goal of establishing a national planning policy and framework for an effective planning process. Given the significant flaws identified in the proposal, we urge the Administration to issue a new draft proposal for public review and comment, including review by the NRC. A revised draft should incorporate the tenets of Executive Order 13563, *Improving Regulation and Regulatory Review*, emphasizing the parity of our national objectives for public health, welfare, safety and the environment while promoting economic growth, innovation, competitiveness and job creation. Failure to establish a long-term viable planning model will have a devastating effect on our nation's economic stability at a time when our nation cannot afford it.

◆ Recognizing the critical role of our water resources infrastructure to a robust economy, job creation and environmental well-being, it is imperative that the resulting Principles establish a clear, concise, and workable framework to guide the development of these essential projects. Such Principles should: utilize cost-benefit analysis and other such recognized ***and proven*** analytical tools as a basis to compare options; provide for the consideration of all alternatives, and not exclude classes of alternatives from consideration; require that decisions are made based on an assessment of net beneficial effects, and establish a peer review process that is appropriate to the potential impacts of the project and seamlessly integrated into the planning process.

◆ The National Objectives must provide for maximizing economic, environmental and social benefits, while not requiring additional features which result in a waste of scarce financial and natural resources.

◆ Projects should be developed on a collaborative, watershed or regional basis, rather than project-by-project.

◆ Cost-sharing, recognizing the important role of non-federal sponsors as well as federal and state planners, must be incorporated into the planning process to ensure a transparent, predictable and comprehensive process.

*The National Waterways Conference, established in 1960, is dedicated to a greater understanding of the widespread public benefits of our nation's water resources infrastructure. Our mission is to effect common sense policies and programs, recognizing the public value of our nation's water resources and their contribution to public safety, a competitive economy, national security, environmental quality and energy conservation. Conference membership is comprised of the full spectrum of water resources stakeholders, including flood control associations, levee boards, waterways shippers and carriers, industry and regional associations, port authorities, shipyards, dredging contractors, regional water districts, engineering consultants, and state and local governments.*