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U.S. Army Corps of Engineers

Headquarters

Attn: P&G Revision

CECW-ZA

441 G Street, NW

Washington, DC 20314-1000

Dear Secretary Woodley:

The National Waterways Conference welcomes the opportunity to provide comments on the proposed revisions to the Principles published in the Federal Register on September 12, 2008. We want to commend the Corps for undertaking this very critical effort to respond to the Congressional direction as contained in WRDA 2007 to bring the Principles up to date with present planning priorities and objectives.

WRDA 2007 established the following objectives for revisions to Principles and Standards: maximize economic development, public safety, value of projects to low income communities, interaction of a project with other water resources projects or programs within a region or a watershed, the use of contemporary water resources, and evaluation methods that ensure water resources projects are justified by public benefits.

We are concerned that the draft Principles as promulgated do not adequately address all of these objectives. We are particularly concerned about what appears to be a rejection of the watershed approach to Federal water resources planning and an over-emphasis on National Economic Development as the Federal planning objective. WRDA 2007 directed the Corps to revise and update Principles and Standards to incorporate recognized current planning objectives rather than merely focusing on National Economic Development.

Our primary concerns about the proposed revisions to the Principles are as follows:

- The revised Principles establish a minimum Benefit/Cost ratio of 1.5 for recommending the addition of incremental investment to Federal actions. This is a direct rejection of the long established economic criterion of 1.0 to establish the threshold for recommending Federal action. This incremental requirement means that overall project BCRs are mandated to be **greater** than 1.5 to 1. This troubling aspect is compounded by a second layer criterion that gives preference to even higher BCRs in project selection. These criteria arbitrarily sacrifice net benefits and are inconsistent with "efficient use of the nation's resources" as articulated in the National objective. Moreover, we have serious concerns with applying budgetary constraints to the planning process at all, when this factor would be more appropriately considered during the decision-making process for the budget.
- We do not see a strong commitment to the watershed approach for planning Federal actions. As stated universally in stakeholders meetings and in WRDA 2007, the Watershed approach to Federal Water Resources planning needs to be established as the underpinning for these proposed revisions to the Principles.
- The proposed revisions also establish as a planning objective the integration of the availability of Federal resources into the planning process. Such integration would require Federal planners to consider Administration budgetary proposals in the planning process, often years in advance of such proposals. Planning, as an activity, should primarily relate to gaining a complete understanding of a set of problems and identifying the range of investment options available to address those problems. By contrast, budgetary decisions are made in light of current investment priorities, opportunities and available resources, all of which change from year to year. For good reason, decisions on budgetary priorities have historically been separate from the planning process and this separation needs to be sustained. We strongly recommend deleting availability of Federal resources from the revised Principles.

Overall, we have substantial concerns that these proposed revisions accurately reflect the requirements of WRDA 2007, and clearly fail to address stakeholder comments provided to the Corps of Engineers this past June. We strongly urge you to discard these proposed revisions to the Principles and draft a revision that reflects the objectives established in WRDA 2007 and the comments previously furnished by stakeholders. Once the Proposed revisions have been brought into greater consistency with the objectives of these revisions, the proposed revisions need to be reissued for comments.

To assist in this revision, I am attaching some detailed comments for your reference.

Sincerely,

Amy W. Larson

Amy W. Larson
President
National Waterways Conference, Inc.