

Alameda Creek Alliance ♦ American Rivers ♦ Clean Water Action
Costal Conservation Network ♦ Endangered Habitats League
Friends of the Los Angeles River ♦ Friends of the River
Friends of the Santa Clara River ♦ Matilija Coalition
National Wildlife Federation ♦ Natural Heritage Institute
Natural Resources Defense Council ♦ Planning and Conservation League
South Yuba River Citizens League ♦ Waterkeeper Alliance

April 19, 2016

The Honorable Barbara Boxer
Ranking Member
Environment and Public Works Committee
United States Senate
Washington, D.C. 20510

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

Dear Senator Boxer:

The undersigned 15 California organizations and California offices of national organizations greatly appreciate your leadership on the environment which has produced significant benefits for California and given you the well-deserved recognition of having one of best environmental voting records in the Senate. As you develop the next Water Resources Development Act (WRDA), we urge you to add to this legacy by ushering in a new approach to water resources planning – one that prioritizes use of natural systems to solve water resources problems and makes the most effective use of existing infrastructure.

In the face of climate change and critical California's needs, maintaining the status quo approach to water resource planning is untenable. For example, despite significant climate-change induced changes to rainfall and snowmelt patterns and the challenges created by one of the most severe droughts on record, the Army Corps of Engineers continues to operate 35 federal flood control dams in Central California under operating plans that are dramatically out of date, with many dating back 50 years. Californians are also bearing witness to the high costs of undoing the environmental and social damage created by the Corps of Engineers' intense structural channelization of the Los Angeles River.

Our organizations call on you to lead efforts to transform federal water resources planning by including the following common-sense, cost-effective reforms in the next WRDA:

- **Ensure modern management of water projects by requiring the Corps to update operating plans and water control manuals at least every 10 years.** Many large-scale Corps projects are managed under antiquated, decades-old water control manuals (guiding reservoir operations and river flows in many parts of the country and floodwater management operations in California) and navigation plans (guiding dredging, channel modifications, and water levels behind locks and dams in large parts of the U.S.). Updating these plans and floodwater-management systems to take advantage of improved weather forecast accuracy and modern management techniques can, in many cases, improve both

operations and the environmental performance of these projects. It is important for the Corps of Engineers to manage for the future, not the past.

- **Require use of cost-effective, low impact nature-based solutions where they can provide an appropriate level of protection and benefits.** The Corps continues to recommend environmentally destructive and costly structural projects even where less costly and environmentally protective measures would provide better solutions. Nonstructural and restoration solutions are a cost-effective way to both solve water resource problems *and* protect people, wildlife, and the many businesses that rely on healthy rivers, coast, and wetlands, as required by the National Water Resources Planning Policy (42 USC 1962-3).
- **Utilize federal and state expertise by requiring evaluation and mitigation of fish and wildlife impacts consistent with Fish and Wildlife Coordination Act recommendations.** Corps planners continue to ignore recommendations from state and federal fish and wildlife experts leading to unnecessary environmental harm and costly mitigation plans that do not work. Fish and Wildlife Coordination Act review is a longstanding, critically important component of water resources planning and utilizing the expert recommendations from these reviews is a common sense, cost-effective way to make projects better.
- **Modernize emergency flood recovery efforts by allowing use of P.L. 84-99 emergency funds for levee setbacks and other low impact solutions that increase public safety.** P.L. 84-99 requires the Corps to fund 80% to 100% of the cost of restoring a publicly-owned flood project damaged by a flood to pre-disaster conditions (33 U.S.C. 701n), but these large, guaranteed federal subsidies cannot fund nonstructural measures unless specifically requested by the local sponsor. Removing this prohibition would ensure effective evaluation of more sustainable and less costly alternatives.
- **Improve planning and transparency by making water resources planning data and policy guidance available to the public.** Critical data and regional policy guidance are often unavailable, significantly impeding the ability of outside experts and the public to effectively evaluate Army Corps planning, projects, and programs. Increasing data and policy guidance transparency is fundamental to improving Army Corps decision making.

These common sense, cost-effective reforms would help transform the Army Corps of Engineers into an agency that can be relied upon to recommend and implement the solutions that Californians need. We look forward to working with you to ensure that these reforms are enacted into law.

Sincerely,

Jeff Miller
Director
Alameda Creek Alliance

Steve Rothert
California Regional Director
American Rivers

Miriam Gordon
California Director
Clean Water Action

Terry Harris
Executive Director
Coastal Conservation Network

Dan Silver
Executive Director
Endangered Habitats League

William Preston Bowling
Special Projects Manager
Friends of the Los Angeles River

Ron Stork
Senior Policy Advocate
Friends of the River

Ron Bottorff
Chairman
Friends of the Santa Clara River

Paul Jenkin
Director
Matilija Coalition

Beth Pratt-Bergstrom
California Director
National Wildlife Federation

Gerald Meral
Director, California Water Program
Natural Heritage Institute

Katherine S. Poole
Senior Attorney, Water Program
Natural Resources Defense Council

Jonas Minton
Senior Water Policy Advisor
Planning and Conservation League

Caleb Dardick
Executive Director
South Yuba River Citizens League

Pete Nichols
Executive Director
Waterkeeper Alliance