



July 15, 2020

The Honorable Peter DeFazio
Chair
Committee on Transportation & Infrastructure
Washington, DC 20515

The Honorable Sam Graves
Ranking Member
Committee on Transportation & Infrastructure
Washington, DC 20515

The Honorable Grace Napolitano
Chair
Subcommittee on Water Resources
Washington, DC 20515

The Honorable Bruce Westerman
Ranking Member
Subcommittee on Water Resources
Washington, DC 20515

Dear Chair DeFazio and Napolitano and Ranking Members Graves and Westerman:

Since 1919, the National Parks Conservation Association (NPCA) has been the leading voice of the American people in protecting and enhancing our National Park System. I write to offer NPCA's support for provisions in the recently introduced Water Resources Development Act of 2020, which the committee is marking up today.

The U.S. Army Corps of Engineers (USACE) is an important partner in many places where NPCA works to protect and restore national park waterways and landscapes, the communities that surround them and the millions of people who visit them each year. From Gateway to the Grand Canyon, Everglades to Olympic, water is central to the features, wildlife, recreation and aesthetic of these esteemed places. However, national parks, once viewed as isolated and remote, are affected by activities occurring in their watersheds. These beyond park boundary activities often enhance or detract from the visitor experience.

The Water Resources Development Act is an important bill that prioritizes work undertaken by the USACE in and around parks. Since 2014, Congress has passed WRDA every two years to create or revise USACE policy and support new USACE projects that help protect, restore and enhance our national parks and their landscapes. We appreciate the committee keeping to this two-year schedule.

Title I – General Provisions

This title includes provisions of interest to NPCA. The health of our parks depends on the health of the water and land in and around them. WRDA 2020 includes provisions that expand the use

of natural infrastructure or nature-based features. Natural or nature-based features can be more cost effective. Restoring or protecting sand dunes or wetlands in place of traditional human built projects like levees, jetties or groins is also more sustainable than traditional structural approaches, more resilient to a changing climate, provides multiple benefits to communities where they are already applied, improves wildlife habitat, reduces operations and maintenance requirements and reduces post-disaster spending. We note the following sections:

- *Sec. 110. Resiliency Planning Assistance.* This section allows the USACE to provide technical assistance to non-Federal interests and other federal agencies to conduct resiliency planning to avoid repetitive flooding impacts and to anticipate, prepare and adapt to “changing climatic conditions and extreme weather events.”
- *Sec. 112. Review of Resiliency Assessments.* This section requires USACE to update existing planning guidance related to sea level rise and, when requested, to consider the need for a project because of rising oceans and document its potential benefits.
- *Sec. 113. Small Flood Control Projects.* This section amends the Section 205 Small Flood Continuing Authority Program to cover projects that use natural or nature-based features in addition to non-structural or structural approaches.
- *Sec. 114. Conforming Amendment.* This section ensures equal cost-share treatment of natural and nature-based infrastructure with non-structural project alternatives.
- *Sec. 115. Feasibility Studies; Review of Natural and Nature-Based Features.* This section requires the USACE to summarize in each flood reduction or hurricane and storm damage reduction project feasibility study any nature-based features that were considered and to provide an explanation if those features were not recommended.
- *Sec. 119. Economically Disadvantaged Community Flood Protection and Hurricane and Storm Damage Reduction Study Pilot Program.* This section creates a pilot program to weigh opportunities for USACE to address flood risk reduction and hurricane and storm damage reduction needs for economically disadvantaged communities using, as much as possible, natural, and nature-based solutions alone or in combination with non-structural alternatives.
- *Sec. 120. Permanent Measures to Reduce Emergency Flood Fighting Needs for Communities Subject to Repetitive Flooding.* This section offers new authority for the USACE to study, design and construct projects in communities that have experienced repetitive flooding events using, as much as possible, natural, and nature-based solutions alone or in combination with non-structural alternatives.
- *Sec. 122. Study of Natural Infrastructure at Corps of Engineers Projects.* This section requires the GAO to report to Congress on USACE’s consideration of natural and nature-based features during project planning.

In addition to encouraging natural infrastructure and other nature-based features, this title also includes sections that benefit the lands and waters around parks, including:

- *Sec. 125, Beneficial Reuse of Dredged Material; Dredged Material Management Plans.* NPCA supports the beneficial use of dredged material to help restore national park sites and their landscapes. These materials – when environmentally sound – can contribute to

climate resiliency, expand flood and storm reduction effectiveness, address coastal and tidal flooding, increase habitat for endangered species and improve recreational access.

- *Sec. 128, Harmful Algal Bloom Demonstration Program.* Nutrient pollution impairs park waterways across the country. The demonstration program authorized by this section will determine the causes of, and how to effectively treat and eliminate, harmful algal blooms in the Great Lakes, the tidal and inland waters of New Jersey and Lake Okeechobee, Florida. The lessons learned will be valuable in addressing this source of pollution for waterways across the country.

Title II – Studies and Reports

In addition to these policy changes, NPCA also supports the following:

- *Sec. 202. Expedited Completion.*
 - (b) *Post-Authorization Change Reports.*
 - (3) *Project for ecosystem restoration, Central and Southern Florida Project Canal 111 (C-111), South Dade County, Florida.*
 - (4) *Project for ecosystem restoration, Comprehensive Everglades Restoration Plan, Caloosahatchee River C-43, West Basin Storage Reservoir, Florida.*
- *Sec. 203. Feasibility Study Modifications.*
 - (d) *New York and New Jersey Harbor and Tributaries, New York and New Jersey.* This modification ensures the study for flood and storm damage reduction for the New York and New Jersey Harbor and Tributaries project evaluates and addresses the impacts of low-frequency precipitation and sea-level rise on the study area.

We also support *Sec. 206, Great Lakes Coastal Resiliency Study.* We appreciate the committee's support for protecting and restoring the Great Lakes. We support directing the Army Corps to expand the USACE's comprehensive Great Lakes coastal resiliency study to assess the impact of record high lake levels on coastal flooding, storm damage, ecosystem restoration and recreation. The results of this study will benefit Sleeping Bear Dunes National Lakeshore (MI), Indiana Dunes National Park (IN), and five other parks, lakeshores, monuments and memorials in the region.

Title III – Deauthorizations and Modifications

We also support several provisions that restore and protect land and water around parks across the country:

- *Sec. 306, the Chesapeake Bay Environmental Restoration and Protection Program.* The Chesapeake Bay is home to several thousand species of plants and animals, from blue crab to bald eagle. The region is steeped in history, including the legacy of American Indians, arrival of European settlers, inspiration of the American Revolution and tragedy of the Civil War. This natural and cultural history are protected by more than 50 national parks. To help

restore and protect this national treasure, NPCA supports increasing funding for the Chesapeake Bay Environmental Restoration and Protection Program and providing support for public outreach for this program.

- *Sec. 316, Rio Grande Environmental Management Program, Colorado, New Mexico, and Texas.* NPCA supports extending the authorized appropriations needed to carry out the Rio Grande Environmental Management Program in Colorado, New Mexico and Texas. Diversions, dams and levees along with other changes caused by urban development have contributed to significant degradation of the Rio Grande River watershed. This program provides the Army Corps with the ability to contribute to habitat restoration along the river, work that will benefit parks like Bandelier National Monument (NM).
- *Sec. 319, Central Everglades, Florida.* Restoring the Everglades is critical to protecting the national parks of South Florida, which is why NPCA supports this language clarifying that the much-needed Everglades Agricultural Area Reservoir is part of the Central Everglades Planning Project, as authorized by section 1308 of the Water Resources Development Act of 2018 (132 Stat. 3819). Construction on the reservoir needs to begin as soon as possible without unnecessary delays to ensure more freshwater can flow south to Everglades National Park and Florida Bay where it is desperately needed.

Title IV — Authorizations

NPCA supports the following project authorizations:

Sec. 401. Project Authorizations.

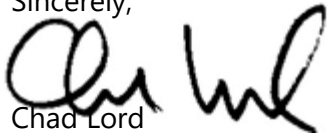
- (3) Hurricane and Storm Damage Risk Reduction.
 - 4. NY East Rockaway Inlet to Rockaway Inlet and Jamaica Bay, Atlantic Coast of New York
- (4) Flood Risk Management and Ecosystem Restoration.
 - 2. NY Fire Island Inlet to Montauk Point, New York Reformulation
- (5) Ecosystem Restoration.
 - 3. FL Comprehensive Everglades Restoration Plan, Loxahatchee River Watershed Restoration Project, Martin and Palm Beach Counties
 - 4. IL The Great Lakes and Mississippi River Interbasin Study - Brandon Road, Will County
 - 6. MD Anacostia Watershed Restoration, Prince George's County

We also support the special rule for the Brandon Road project in Sec. 402.

NPCA appreciates the committee's commitment to move forward with a water resources bill every two years. We also appreciate the overall avoidance of streamlining provisions that would be controversial. There is a lot of good work ready to be done and we urge you to continue to move forward in a bi-partisan basis.

Thank you for considering our views. Please do not hesitate to contact me if you have any questions. I can be reached at clord@npca.org or 202.257.4365.

Sincerely,

A handwritten signature in black ink, appearing to read "Chad Lord". The signature is stylized and cursive.

Chad Lord

Senior Director, Water Policy