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May 26, 2011

Honorable Nancy Sutley
Chair, Council on Environmental Quality
Executive Office of the President
730 Jackson Place, NW
Washington, DC 20503

Dear Chairwoman Sutley

The National Association of Flood and Stormwater Management Agencies (NAFSMA), which represents flood and stormwater management agencies throughout the country, many of which are partners with the U.S. Army Corps of Engineers on flood damage reduction and ecosystem restoration projects, is writing to express our concerns with the process that we understand will govern the release of the Principles and Standards (P&S).

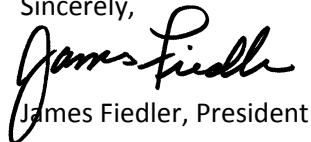
NAFSMA appreciates the enormous effort that CEQ has put into the development of the P&S and subsequent Principles and Guidelines and appreciates being invited to participate in a number of the dialogues held to shape the documents.

NAFSMA is concerned that the specific Principles and Standards document may be issued in final form before being released for public review and comment. It has now been almost 18 months since the public has had a chance to review this document, which is expected to have significant impacts on the way federal agencies with water resource responsibilities do business as well as on our local member agencies charged with flood and stormwater management, public safety, and environmental responsibilities in their own jurisdictions.

NAFSMA urges CEQ to solicit comments on this document, as well as on the related Principles and Guidelines documents. Since these documents are expected to have even broader impacts on the nation's water resources than prior guidelines, our membership feels that a formal review process would be appropriate.

Please feel free to contact NAFSMA's Executive Director Susan Gilson at 202-289-8625 with any questions. The association very much appreciates your consideration.

Sincerely,


James Fiedler, President

Cc: Hon. Jo-Ellen Darcy, Steve Stockton, Robyn Colosimo

