



**National Association of Flood & Stormwater Management Agencies**  
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NAFSMA Comments on the  
Proposed Principles  
Issued September 12, 2008

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## **Introduction**

The National Association of Flood and Stormwater Management Agencies (NAFSMA) is a 30-year old national organization based in the nation's capital that represents local, regional, and state flood and stormwater management agencies, most of which are located in large urban areas. NAFSMA members serve more than 76 million citizens by providing flood and/or stormwater management.

Many of our member agencies are local sponsors for Corps' projects within their communities. We are proud of our partnerships with the Corps and the many successful Federally-partnered projects that have reduced flood damages and loss of life in our communities while providing places for families to live with lower flood risks and desirable economic, social, and environmental conditions.

NAFSMA recognizes the challenges of updating the Principles and Guidelines which attempt to integrate planning, policy, procedures, environmental aspects, economics, engineering, forecasting, multiple government agencies, the public, and ultimately funding. NAFSMA wants to actively participate developing the Principles and Guidelines in collaboration with our Federal partners. After the Guidelines are developed, NAFSMA request the opportunity to submit additional comments on the Principles since each are directly related.

The NAFSMA comments below are provided on the proposed Principles issued on September 12, 2008. General comments are followed by specific comments.

## General Comments

1. **Develop a concise and fundamental set of Water Resource Planning Principles on which the Guidelines can be developed.**

The proposed Principles contain a mixture of principles, standards, procedures, guidelines, and examples. There are some well written principles and standards in the document, but overall, it is difficult to understand and some fundamental principles are missing, not clearly stated, or should not be included at all. Examples are provided in the comments below.

2. **Recognize the role of the local sponsor as a partner, not just a stakeholder or non-Federal interest.**

One of the major changes since 1983 is that local sponsors (Non-Federal Sponsors) are making significant contributions to the cost of federal studies and projects. Local sponsors have understandably taken a more active role in the identification, development, and implementation of flood damage reduction projects. Consequently, many have developed a high degree of planning, environmental, policy, and technical expertise. Local sponsors today are strong partners with the Corps, not just stakeholders or non-Federal interests. The Principles need to acknowledge and recognize the role of the local sponsor in all steps of the planning and study process. Consider including the following sentence

“Non-Federal sponsors who share the costs and ownership of the planning process can strengthen and improve the proposed plan through active participation and decision making in collaboration with Federal partners.”

3. **Incorporate “non-Federal objectives” in addition to national planning objectives and study objectives.**

Non-Federal Sponsors understand national planning objectives need to be satisfied, however, there are local or non-Federal objectives that also need to be recognized. For partnerships and projects to succeed, satisfying the objectives from each partner is necessary.

4. **Develop Guidelines to verify that Principles do not increase the time and cost of studies.**

Principles should guide identification of a plan that addresses the problem(s) while meeting the national, non-federal, and study objectives without requiring unnecessary steps or level of detail that increases the time or cost of the study. Be prepared to modify the Principles after the Guidelines are developed such that study time and cost savings can be achieved without reducing the ability to identify an efficient, complete, and effective plan.

5. **Address the problem with low property value communities not being able to compete with high property value communities in identification of the federal interest.**

This was a consideration listed in WRDA 2007 and supported by NAFSMA. Continue to recognize the ability to pay issue in some communities as addressed in WRDA 1986.

6. **Include a statement indicating when the Principles would become effective.**

NAFSMA recommends that the Principles not become effective until both the Principles and Guidelines are developed and adopted. Also, they should not apply to any feasibility or reevaluation study initiated prior to adoption.

7. **Request for comment on appropriate discount rate to use.**

This belongs in the Guidelines, not the Principles. Suggest covering in the Guidelines. There are other details such as period of analysis, pricing, forecasting, etc. that can be covered in the Guidelines that also impact the economic analysis.

8. **Request for comment on language that would enable other water resource agencies to use Principles as well.**

A set of Principles that applies to all Federal agencies involved in water resources is the ideal approach necessary for watershed-wide and multi-objective planning. Each Federal agency could then develop specific implementation guidelines. In practice, a set of Principles that is based on the Corps of Engineers policies and planning process is more practical and beneficial to local sponsors because the Guidelines that follow will be more directly relevant to partnered projects.

### **Specific Comments**

Comments on specific content are included below. Suggested changes are included to clarify the comment.

9. **Suggested changes to Section 2, National Planning Objective**

The national planning objective is not easy to state in one sentence. A revised version presented below more closely relates to the planning effort supporting decision making which is what planning is intended. Since a clear and concise national planning objective is critical, it would be prudent to improve this version even more to everyone's satisfaction.

“The national objective of water and related land resources planning is to support wise, informed, and environmentally sound decisions on the use and management of the Nation's water and related land resources consistent with public safety and community values. The national planning objective for a specific study can incorporate some or all of these elements: facilitate sustainable national economic development, encourage wise use of water

and related land resources - including floodplains and flood-prone coastal areas, support the protection and restoration of significant aquatic ecosystems, promote the integration and improvement of how the Nation's water resources are managed; and reduce risks, vulnerabilities, and losses due to natural disasters.”

10. **Exclusion of “acceptable” from the four criteria.**  
We understand “acceptable” was a misunderstood and controversial criteria from the 1983 Principles. However, the Principles needs to clearly lay out the role of the community and non-Federal Sponsor in the planning and decision making process.
11. **Comments on Section 4, Watersheds**  
NAFSMA supports watershed water resources planning; however it will be difficult to do in many cases. Local sponsors with jurisdictions that don't cover the entire watershed or have limited legal jurisdiction may not be able to provide the local share. It also appears the intent is to move toward larger, multi-use projects and away from smaller, single purpose projects. Another consequence of watershed wide and multi-use planning is that traditional leaders of the study effort such as the Corps of Engineers may no longer be the logical leaders of the study. Non-Federal sponsors, States, or Regional Districts could take the lead. It is more likely the Corps project will be part of an overall watershed plan with complementary projects from multiple jurisdictions.
12. **Comments on Section 5, Science Based Analysis and Section 6, Conditions**  
The subjects of these sections are important, but most belong in standards or guidelines. For example, peer review is important and intended to improve the plan formulation and selection process. Study oversight, management, quality control reviews, etc. are just as important as peer review.
13. **Resource (funding) limitations should not be a consideration during plan formulation.**  
The sentence in Section 7, Plan Formulation referring to consideration of current and future Federal and non-Federal resources was surprising. It should not be a consideration during plan formulation, but can be a consideration in selecting the final plan and making annual funding decisions.
14. **Comments on Section 9.1, Selection Criteria**  
The NED and EQ selection criterion is reasonably well explained in general terms. An explanation of how PS, RED, and OSE will fit into the selection criterion is needed in the Principles.

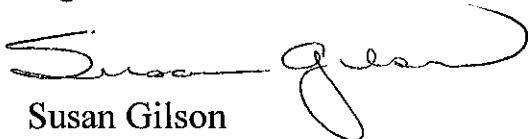
15. **Exclude benefit to cost ratio thresholds from the Principles**

NAFSMA objects to the inclusion of a benefit to cost ratio threshold in the Principles based on the following reasons:

- With the updated Principles and Guidelines, it appears future projects will be evaluated on both monetary and non-monetary benefits.
- While benefit to cost ratio is an important economic indicator, there are others that are used, as well.
- Guidelines for determining the likelihood of federal funding could be developed outside of the Principles to assist Districts and non-Federal sponsors during plan selection.

NAFSMA appreciates the opportunity to submit these comments on behalf of local sponsors across the country. NAFSMA requests that the Corps of Engineers and other federal agencies continue to work diligently in close collaboration with NAFSMA and other partners so together we can develop a set of clear, concise, and complete Principles and Guidelines to guide our water and related land resources studies for many years. Please feel free to contact me at 202-218-4133 or [sgilson@nafsma.org](mailto:sgilson@nafsma.org), with any questions.

Signature,



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