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Mr. R.D. James
Assistant Secretary of the Army for Civil Works
U.S. Army of the Corps of Engineers
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Dear Mr. James:

Membership of the Interstate Council on Water Policy (ICWP) includes state and interstate water resources management agencies, many of whom have water planning authorities and responsibilities. The USACE Planning Assistance to States (PAS) has provided much needed cost-sharing opportunities to further water planning in many ways. We understand that a directive has been issued stating that all PAS funds be exclusively directed toward flood risk management projects. While we certainly understand the recent flood events across the country have been devastating, we believe it is short-sighted to not continue to fund planning projects with broader benefits. Also, the Floodplain Management Services Program is already in place and it seems duplicative to also restrict PAS to only be used for flood management when another program specific to flood management services exists. ICWP urges you to keep the PAS program flexible to meet a wider range of water resources issues and allow the program to continue to function in a way that has been of great benefit to ICWP members.

PAS funding has traditionally been used to fund a wide range of water resources studies, and several of our members have successfully partnered on studies that have proved vital to ensuring long-term water supply stability throughout the nation. These studies have particularly been helpful in rural areas that don't always have available funds to help solve their water challenges. In addition, many times these studies have multiple purposes; a water resources study can help promote long-term water sustainability while reducing flood risk for a particular locality.

ICWP is concerned that removing flexibility in this program and narrowing it to flood risk management projects only may have several unintended consequences:

- If the PAS funding source is not available for stable water supply planning, real economic hardship can be the result. The inability for smaller municipalities and regional water systems to meet the needs of their business and domestic use customers means those businesses could very well re-locate or not expand, further spiraling economic downturn in rural or economically stressed regions.
- Droughts can be as damaging as floods, both in response and recovery costs, but also in short & long-term economic damage. States looking to partner with

USACE on drought mitigation planning could be hampered by this directive and unable to effectively plan and mitigate future droughts.

- Many states' water plans have been updated largely because of the cost-share provided by PAS. Long-term water planning and promotion of smart use of water resources is vital to ensuring population growth, economic success, and that critical infrastructure projects are completed in the state.
- PAS funds currently allow partnering with local partners on issues of concern to their citizens. While some of these are tied to flood risk, others have multiple goals and require the study of a larger basin area. By reducing focus to one area (flood risk), these plans may not be as beneficial to these local partners and citizens. For example, ICWP membership currently has at least two proposed studies that could help citizens address erosion and streambank stabilization. ICWP membership have also utilized PAS funds in the past for water quality monitoring and modeling efforts to evaluate sediment delivery as well as to conduct bathymetric surveys and sediment transport modeling within USACE reservoirs for water supply planning purposes. We understand that these issues, though critical to local citizens to protect property, would not be considered within the scope of "flood risk" studies and now would not qualify for funding under this current directive.

ICWP recognizes and appreciates flood risk as a particularly important and timely topic. However, we urge that the PAS program remain open to a wider range of water resources issues and allow the program the flexibility that has been of great benefit to ICWP members.

With best regards,



Sue Lowry
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Cc: James Dalton, Director of Civil Works, USACE HQ
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