



September 13, 2018

Dear Representative:

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. On behalf of our 1.3 million members and supporters nationwide, we thank you for considering the bipartisan America's Water Infrastructure Act amendment to S. 3021. We appreciate that the Congress is keeping the Water Resources Development Act (WRDA) on a two-year cycle. This bill includes provisions that will improve the health of our national parks.

The U.S. Army Corps of Engineers 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 increasingly affected by activities occurring in their watersheds. These beyond park boundary activities often enhance or detract from the visitor experience.

Therefore, we are pleased to see the amendment to S. 3021 focus attention on restoring important ecosystems around our nation. From the Everglades (Sec. 1308, Comprehensive Everglades Restoration; Sec. 1309, the Kissimmee River), the Great Lakes (Sec. 1142, Brandon Road study; Sec. 1219, Great Lakes Coastal Resiliency Study); the Hudson Raritan Estuary (Sec. 1203) and Upper Mississippi River (Sec. 1225), these areas are important to national parks and the introduced bill supports their restoration and protection.

We also appreciate the bill's requirement that the Army Corps' aquatic ecosystem restoration, flood risk management or hurricane and other storm damage work must consider the use of both traditional and natural infrastructure alternatives (Sec. 1149). We have seen the benefits of incorporating and/or restoring natural infrastructure in Army Corps projects. Natural features not only often cost less, they also provide numerous benefits that come from integrating living breakwaters and other shoreline treatments, wetlands or other natural features into Army Corps projects. During Hurricane Irma in 2017, we saw firsthand how the nearly-completed Army Corps' Kissimmee River Restoration project held significant amounts of water in the northern Everglades, as the historic floodplain once did, instead of channelizing large volumes of water quickly and directly into Lake Okeechobee, which could have caused catastrophic damage had the Herbert Hoover Dike breached. Natural features not only protect communities from storms; they also improve water quality and connect wildlife habitat, both of which are important for the health and enjoyment of park visitors.

The amendment also includes several important reforms, including one focused on the Army Corps' benefit-cost procedures. This bill takes a small step towards ensuring a full and accurate accounting of all the benefits and costs of Army Corps projects (Sec. 1204). We hope the bill's Government

Accountability Office study on benefit-cost analysis reforms looks at that the benefits of natural and nature-based features, which are often undercounted, miscounted or discounted. It will be important to see how the GAO describes current practice and how the BCR can be improved to reflect the known benefits of natural and nature-based options.

NPCA also supports Sections 1104 and 1105 which require the Army Corps to engage stakeholders and the public in reviewing the Army Corps' 7001 annual report and draft implementation guidance developed in response to this bill. NPCA believes that public input and education is important in federal rulemaking and compliance. We also appreciate seeing requirements that the Army Corps pay attention to aquatic invasive species research (Sec. 1108) and harmful algal blooms (Sec. 1109), both of which impact the water resources in our national parks.

Additionally, while the drinking water, stormwater and wastewater infrastructure provisions do not fix the nearly \$678 million in deferred maintenance needs for national park drinking water and wastewater systems, it does focus much needed attention and resources on the needs of those communities that national parks are in or near (E.g., Title II, Title IV-Subtitle A). We appreciate the amendment addressing our nation's wastewater, drinking water and stormwater needs by increasing the availability and flexibility of resources for communities in need, creating more resilient and innovative water systems and promoting green infrastructure to address urban stormwater runoff.

Lastly, we deeply appreciate that this amendment focuses on areas with bipartisan support rather than controversial provisions that could weaken environmental laws that protect our national parks. Congress already enacted new Corps procedures designed to quicken project analysis and delivery in the last two WRDA bills. None of those changes have had adequate time to be fully implemented.

No bill is perfect. However, the amendment to S. 3021 addresses many of our national park water needs. If you have any questions, please contact me at 202-454-3385 or clord@npca.org.

Sincerely,

Chad Lord
Senior Director, Water Policy