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November 19, 2019

The Honorable Grace Napolitano  
Chair  
Subcommittee on Water Resources and Environment  
1135 Longworth House Office Building  
Washington, D.C. 20515

The Honorable Bruce Westerman  
Ranking Member  
Subcommittee on Water Resources and Environment  
1135 Longworth House Office Building  
Washington, D.C. 20515

Chair Napolitano and Ranking Member Westerman:

The National Audubon Society applauds your commitment to advancing water infrastructure legislation that is critical to restoring America's ecosystems, protecting wildlife habitat and increasing the use of natural infrastructure. These goals are critical to advancing Audubon's mission to protect and restore the places that birds need for today and tomorrow.

As progress continues in developing the next Water Resources Development Act (WRDA), we urge you to prioritize the Army Corps' use of natural infrastructure and nature-based solutions that are essential for resilient communities, robust populations of birds and wildlife, and support local economies that depend on reliable water infrastructure. It is also important that the ecosystem restoration mission of the U.S. Army Corps of Engineers (Army Corps) is prioritized as an important way to advance projects and policies that provide ecological benefits through WRDA bills.

Audubon supports the following concepts in the next WRDA:

- **Modernize the Benefit-Cost Analysis process to better account for ecosystem services and facilitate the use of natural infrastructure.** One of the major barriers to advancing the use of natural infrastructure is the challenge in demonstrating the benefits that resilient natural infrastructure project alternatives provide. Congress should modernize the criteria used to assess benefits and costs by requiring the Army Corps to more accurately account for ecosystem services benefits.

- **Create a natural infrastructure leadership role within the Army Corps.** Congress should designate a new leadership role within the Office of the Chief of Engineers that is directed to increase the use of natural infrastructure options for ecosystem, navigation and flood-risk reduction projects or other infrastructure that helps protect natural systems.
- **Increase the number of authorized Beneficial Use of Dredged Material projects.** Audubon has worked with the U.S. Army Corps of Engineers, states, and partners to use dredged material to restore habitat that is important to birds and coastal communities. This work has created islands that provide excellent nesting habitat for birds such as Black Skimmers, Snowy Plovers, and Least Terns, and is leading innovations in thin-layer dispersal of dredged sediment to protect tidal marsh habitat in the face of sea-level rise. In the first round of this pilot program, the Corps received 90 proposals, demonstrating high demand for these projects **In addition, Audubon supports on-going efforts within the Corps to develop best practices that can be incorporated into beneficial use of dredged material projects.**
- **Improve storm and flood-risk reduction planning for vulnerable communities.** The non-federal cost share requirement is often a barrier to providing sound storm and at-risk reduction planning for socially vulnerable communities. Congress should establish targeted criteria that could be used to waive the non-federal cost share for communities that are disproportionately impacted by this requirement. A revised Benefit-Cost Analysis should also be revised to take into account socially vulnerable communities that have high exposure to climate change impacts, including sea level rise and flooding.
- **Ensure progress on Coastal Louisiana restoration.** Audubon has owned and managed over 26,000 acres on the coast of Louisiana and the Mississippi River Delta for almost a century. A recent study by Audubon and partners shows that the coast of Louisiana is one of the most important places in the world for wildlife habitat, with over 50% of some species of birds relying on the coast of Louisiana for the nesting and breeding habitat. The restoration and protection of the Mississippi River Delta, often through WRDA legislation, is essential to keeping this important ecosystem from collapse. We support efforts in current and future WRDA legislation that help address the crisis in Louisiana.
- **Authorize or update Everglades restoration projects.** Progress continues on the world's largest ecosystem restoration effort, with a number of projects scheduled to be completed over the next 2 years. It is important that additional projects or post-authorization change reports with wide-spread stakeholder support are authorized to ensure this progress continues. It is also important to ensure that components of the Comprehensive Everglades Restoration Plan are not delayed because of limitations on new construction starts.
- **Authorize the Brandon Road Lock and Dam Project.** The Great Lakes ecosystem is another globally important place for birds where Audubon focuses its water conservation efforts. The Great Lake includes about 20% of the freshwater on Earth and provide a source of freshwater for 30 million Americans. One of the greatest ecological threats to the health of the Great Lakes is the invasion of invasive exotic Asian carp. Asian carp have already wreaked havoc on the Mississippi and Illinois Rivers, outcompeting native fish for food and habitat, and creating a

safety threat for people who recreate on these waterways. The environmental and economic consequences are significant. The Great Lakes support a \$7 billion fishery; a \$16 billion tourism industry; waterfowl production areas that support a hunting economy of \$2.6 billion a year; and hunting, fishing, and wildlife observation that generates approximately \$18 billion a year. The Great Lakes Mississippi River Interbasin Study-Brandon Road Report (GLMRIS-BR) evaluated options to prevent the upstream transfer of Asian carp. A Chief of Engineers Report for this project was submitted in the summer of 2019 after encouragement in WRDA 2018, and authorizing this project should be a top priority in future WRDA legislation. This project will complement other important efforts to protect and restore the Great Lakes ecosystem including reauthorization and funding for the Great Lakes Restoration Initiative and full investment in the Clean Water State Revolving Fund and Drinking Water State Revolving Fund.

- **Protecting and restoring the Delaware River Watershed.** In the Water Infrastructure Improvements for the Nation Act, (PL 114-332) that included WRDA 16, the Delaware River Basin Conservation Act (DRBCA) created the Delaware River Basin Restoration Program (DRBRP) in the U.S. Fish and Wildlife Service, clearly affirming the national priority of restoring the Delaware River Watershed. The DRBRP provides a competitive grant and technical assistance program to support on-the-ground work by state and local governments, non-profit organizations, and universities. The Delaware River Basin Commission is a federal-state compact agency tasked with overseeing a unified approach to managing the basins' water resources. Despite the recognition of importance of the commission in the DRBCA, full funding for federal government participation has not been appropriated since October 1, 1996, with the exception of one congressionally directed appropriation in FY2009. In order to advance the goals of DRBCA, support for both the DRBRP alongside the DRBC is imperative.
- **Reauthorize the Middle Rio Grande Environmental Management Plan.** This cooperative program should be reauthorized for 10 years and the federal cost-share of developing a comprehensive program management plan increased to 100% to ensure the participation of multiple state and local partners.
- **Pre and post monitoring of project impacts.** The Army Corps should be required to include and fund more robust monitoring plans to track and assess impacts during project implementation and after completion. Monitoring plans can help determine if negative impacts are occurring, and provide the chance to adjust operations to reflect real-time impacts. Monitoring plans can also demonstrate the tangible benefits after a project is complete in a way that helps articulate the return on investment in ecosystem restoration, navigation and flood-risk management projects alike.

In addition to these priorities, Audubon urges the Subcommittee to reject any attempts to advance the Pearl River Basin Demonstration Project or the Yazoo Backwater Area/Flood Reduction, Wildlife Habitat, and Water Quality Improvement Project. Natural infrastructure alternatives should be pursued to address the longstanding flooding concerns in the regions these projects affect.

Audubon looks forward to continuing to work with the Subcommittee to advance these and other important water infrastructure priorities in the future.

Sincerely,

A handwritten signature in blue ink that reads "Julie Hill-Gabriel". The signature is written in a cursive, flowing style.

Julie Hill-Gabriel  
Vice President, Water Conservation  
National Audubon Society