



## **ASSOCIATION OF STATE FLOODPLAIN MANAGERS, INC.**

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### **Testimony for the Record Association of State Floodplain Managers**

U.S. Army Corps of Engineers Oversight Hearing  
February 7, 2013  
Senate Committee on Environment and Public Works

Chairman Boxer and Ranking Member Vitter,

The Association of State Floodplain Managers (ASFPM) appreciates the opportunity to share observations about the programs of the U.S. Army Corps of Engineers (Corps) and their implementation as part of the Committee's oversight.

The 15,000 members of ASFPM are partners of the Corps, the Federal Emergency Management Agency (FEMA) and other federal agencies at the state and local levels in reducing loss of life and property due to flooding. Our 34 state chapters are active within their states and often nationally as well. State and local floodplain managers and their private sector engineering and floodplain management colleagues interact regularly with the Army Corps both at the Headquarters and the District levels in developing and implementing solutions to flooding challenges.

Floods are the nation's most frequent and most costly disasters every year and the costs to taxpayers continue to increase. While the Corps has often successfully engineered structural means of controlling flood waters, it is becoming more and more apparent that 1) operation and maintenance costs are exceeding the ability of communities to pay those costs, which is their obligation; 2) structural projects, while necessary in some instances, are expensive; 3) traditional projects can inadvertently increase flood hazards upstream, downstream and across the river and 4) non-structural projects can often offer a less expensive, more sustainable and affordable means of reducing flood hazards.

To meet the challenges of riverine and coastal flooding in an era of more frequent and more severe storms, it is important that the Army Corps of Engineers take a broad, comprehensive and watershed-based view of overall flood risk management. We are very pleased that the Corps is clearly moving in this direction. We compliment the Corps leadership, both civilian and military, for their wisdom and vision in adopting this broader perspective.

To encourage enhanced effectiveness in addressing both cost considerations and the need to protect lives and property, ASFPM would like to discuss several areas where improvement is needed. We will address:

- Strategic Direction
- Flood Risk Management
- Levee Safety or Levee Risk Management
- Public Law 84-99 program
- Technical assistance, analysis and planning programs
- Principles and Guidelines

## **Strategic Direction**

Over the past several years, the Corps has been performing several high level strategic planning oriented initiatives that have been important. The 2010 release of “Responding to National Water Resources Challenges” developed a foundation for future strategic direction. In that document, eight recommendations emerged, including making integrated water resources management more understandable and a preferred way to plan and manage public water and related land resources as a system. Also notable was the Corps collaborative approach to the development of the recommendations using listening sessions, and input from other Federal agencies as well as other non-governmental organizations.

It is clear that these early data have become foundational to current strategic thinking at the Corps. “The current trajectory of funding water resources projects is not sustainable.” This was the take-home message at the 2012 USACE Strategic Leadership Conference attended by ASFPM as well as several other Corps partners. In remarks made by senior Corps leadership – with which ASFPM is in agreement – when you look long term, the Corps must change how they are doing business. An increased focus on collaboration and problem solving with partners will be necessary as will making smarter, strategic investments in infrastructure. Given the increasing cost of operations and maintenance, funding for new starts and other projects is being proportionately reduced. Simply put, as a nation, we cannot afford to keep doing business as we have had in the past. More frequent and intense disasters are making current approaches too costly or rendering them ineffective.

The Corps of Engineers is uniquely positioned to transform itself and take such an approach. Rare among agencies, the Corps allocates resources for research and development through entities like the Institute for Water Resources, and has a long history

of expertise in all aspects of flood loss reduction – both structural and non-structural. Centers of expertise such as the Corps National Non-Structural Floodproofing Committee publish unique publications that are used by thousands of floodplain managers. Programs like Silver Jackets are promising new collaborative programs that thrusts the USACE into a new “convener” role.

The Corps should also be considered for an enhanced role of technical assistance and broad-based problem solving/planning for non-structural solutions especially after flood disasters. Given the current structure and focus of the Corps – most post-disaster work has been focused on immediate response missions related to infrastructure and public works and flood response activities (flood fighting) and repair/rehabilitation work. However, given the Corps expertise and assets, they can also be brought to bear in providing technical assistance and problem solving expertise. For example, post-Sandy, many of the affected areas have a need to understand different non-structural flood mitigation options available to them, however, this has been done only haphazardly in the past.

The Corps should also be commended for the release of updated Environmental Operating Principles. Clearly these more closely align with some of the recent strategic thinking that is occurring within the Corps. The emphasis on sustainability, full accounting and consideration of environmental benefits, and taking a risk management/systems approach are all encouraging. ASFPM hopes to see these principles in action at the regional and district levels in the future.

## **Flood Risk Management**

Looking at flooding problems in a way that considers the various options for managing the hazard and the associated human development to reduce risk offers many different ways for the Corps to use its expertise. It was former Chief of Engineers, General Riley who led the development of a now well-known stair-step graphic depicting the various ways communities and citizens could “buy down” their risk. Since the most effective tools to reduce future flood risk are land use, building codes and development planning and standards, which are the tools of local government, the Corps can be especially effective if it makes its expertise more available to assist local governments.

ASFPM notes that various Corps Districts differ in the extent to which they practice this perspective. We would urge more encouragement and training to promote a more expansive technical assistance role at the District level. Some Districts do provide assistance to communities and States in assessing their flood risk, exploring all non-structural and structural options to address that flood risk, and to help them seek partners

to implement those solutions. This typically happens through the FPMS, PAS and Silver Jackets programs.

## **Levee Risk Management**

Despite enormous public investment in flood “control” structures, that spending has been outpaced by development in risky areas and development in the watershed that increases runoff and flooding, and by the gradual deterioration of the protection provided by those structures. As the public grows to recognize the risks associated with levees, communities are working to evaluate the various actions they can take in response to those risks: levees can be repaired and improved or set back from the river to relieve pressure and erosion on the levee; homes, businesses, and infrastructure at risk can be relocated to reduce risk and restore floodplain function; waters can be detained upstream or adjacent to the stream by re-opening areas closed to flood storage and conveyance, such as Napa, California did; and measures can be combined to achieve the most effective results with scarce public dollars, with a particular eye to reducing the long term operations and maintenance (O&M) costs for communities and taxpayers.

We have entered an era of levee “triage” – the process of prioritizing federal response to flood risk associated with levees and rationing scarce federal taxpayer dollars on multiple-objective risk reduction projects that may include floodplain restoration, reconfiguration of structural systems, and combinations of approaches to make the best use of limited public resources. As Congress considers the development of a national levee risk management program, ASFPM notes that three program elements have been recommended in national reports and studies published before and since Hurricane Katrina:

1. Expand and complete the National Levee Inventory;
2. Reduce flood risks associated with levees through evaluation of flood risk management options beyond the historic approach of new or improved levees; and
3. Build and leverage nonfederal capacities to reduce levee-related flood risk, including state and local land use, infrastructure protection, development standards and building codes.

A complete inventory of all of the nation’s levees – federal, nonfederal, and private – is the first step to conduct the levee triage that will be necessary so that everyone, including Congress, understands the scope of the crisis we face. ASFPM encourages the inclusion of all levees that provide protection to federally-funded assets in the National Levee Database.

Any new federal funding program for flood risks associated with levees should be reserved for the top performers (communities and regions) who have demonstrated nonfederal

leadership in the identification and reduction of flood risk associated with levees. Projects need to address those risks by leveraging more fully state and local authorities over land use, infrastructure protection, development standards and robust building codes. Additionally, eligibility for a new levee risk management fund should require that nonfederal partners take specific steps to address flood risk associated with levees in the following ways:

1. Participate in the National Flood Insurance Program;
2. Adopt a FEMA approved Hazard Mitigation Action Plan that includes emergency action and planning for residual risk areas associated with all levees and residual risk areas in their jurisdiction, including post-flood recovery and resiliency;
3. Prevent the construction of critical facilities in areas subject to inundation in the 0.2%-chance floodplain, and require that all existing CFs be protected, accessible, and operable in the 0.2%-chance flood;
4. Evaluate the full array of nonstructural measures to reduce risk, implement effective nonstructural measures in combination with any structural measures that are selected, and adopt standards to prevent any post-project increase of risk (both probability and consequences), prior to any commitment of public funds toward levee work;
5. Demonstrate binding and guaranteed financial capacity and commitment to long-term operations and maintenance, rehabilitation, and management of all levee structures and system components in the community's jurisdiction;
6. Adopt short- and long-range flood risk reduction planning in residual risk areas as part of the community's mitigation, development and land use planning;
7. Communicate with property owners in residual risk areas, including spillway easement areas, to notify them of their risk, advise them of the availability of flood insurance, update them on emergency action plans, report on levee operations and maintenance over the past year, and for other public notification and engagement activities; and
8. Consideration of flood insurance behind levees either through individual policies or with a community wide policy. The rate should be commensurate with the risk (higher levee protection, lower cost policies).

Response to the levee crisis – and smart investment of limited public dollars – will benefit from evaluation of the full range of measures to reduce risk, including flood insurance, changes in land use, and strategic relocation from areas of greatest risk.

## Adjustments to P.L. 84-99

Under P.L. 84-99, the Chief of Engineers, acting for the Secretary of the Army, is authorized to undertake activities including disaster preparedness, advance measures, emergency operations (flood response and post flood response), rehabilitation of flood control works threatened or destroyed by flood, protection or repair of federally authorized shore protective works threatened or damaged by coastal storm, and provisions of emergency water due to drought or contaminated source. P.L. 84-99, which is the principle Corps program to repair and rehabilitate, incorporates a significant bias against non-structural and integrated approaches (combining structural and non-structural approaches) to rehabilitation and repair of flood control works (FCWs). ASFPM understands that Engineering Regulation 500-1-1 which is the operational guidance for P.L. 84-99 is in the process of being updated and we hope that, in the future, it will incorporate a much greater focus on non-structural approaches.

The Rehabilitation and Inspection Program (RIP) provides for inspections of FCWs, the rehabilitation of damaged FCWs, and the rehabilitation of Federally authorized and constructed hurricane or shore protection projects. Any eligible FCW that was damaged by water, wind, or wave action due to a storm is eligible for repair under RIP, either at 100% or 80% federal taxpayer cost. RIP assistance is available to federally and non-federally built FCWs. Operation and maintenance is the responsibility of the local sponsor, and so long as there is proper and timely maintenance, the FCW can be included in the program. Currently, the following FCWs can be included, provided they meet the eligibility inspections:

1. Federally authorized and constructed hurricane or shore protection projects (HSPPs).
2. Federally constructed, locally maintained levees and floodwalls.
3. Non-Federally constructed, locally maintained levees and floodwalls that provide a minimum of a 10-year level of protection with 2 feet of freeboard to an urban area, or a minimum of a 5-year level of protection with 1 foot of freeboard to an agricultural area.
4. Federally constructed, locally maintained flood control channels.
5. Non-Federally constructed, locally maintained flood control channels that provide a minimum of a 10-year level of protection. [NOTE: Interior drainage channels within the protected area of a levee system are not flood control channels.]
6. Pump stations integral to FCW.
7. Federally constructed, locally maintained flood control dams.
8. Non-federally constructed, locally maintained flood control dams.

An unfortunate side effect of the current eligibility standards is that non-federal entities responsible for operations, maintenance, and repair are driven to defer maintenance until after the system is damaged by a flood event. P.L. 84-99 eligibility needs to be modified to assure that any federal investment in levee work targets structures that pose the greatest public safety risk, and incentivizes responsible nonfederal actions in levee operations, maintenance, and repair.

ASFPM recommends the following changes to the eligibility thresholds for P.L. 84-99 be modified to allow funds to be invested in inspection, rehabilitation, repair, breach, and removal of flood control works:

1. Non-Federally constructed, locally maintained levees and floodwalls that provide a minimum of a 50-year level of protection with 3 feet of freeboard to an urban area, or a minimum of a 25-year level of protection with 2 foot of freeboard to an agricultural area.
2. Non-Federally constructed, locally maintained flood control channels that provide a minimum of a 50-year level of protection. [NOTE: Interior drainage channels within the protected area of a levee system are not flood control channels.]
3. Non-federally constructed, locally maintained flood control dams that provide a minimum of 50-year level of protection with 3 feet of freeboard and spillway capacity to handle the 0.2% flood to an urban area, or a minimum of a 25-year level of protection with 2 foot of freeboard and spillway capacity of 1% flood to an agricultural area.
4. Nonstructural measures previously constructed under P.L. 84-99.

Since this program provides significant federal taxpayer dollars for repair and rehabilitation of levees and dams for which local entities have signed operation and maintenance agreements, it seems entirely appropriate to associate a set of requirements to be met by those entities in order to qualify for federal assistance. ASFPM recommends that eligibility for P.L. 84-99 be available only after the following steps have been taken:

1. The entity responsible for operation, maintenance and repair (OM&R) has adopted and demonstrated compliance with an approved OM&R plan.
2. Responsible entity must communicate annually with property owners in residual risk areas, including spillway easement areas, to notify them of their risk, update them on emergency action plans, report on levee operations and maintenance over the past year, and for other public notification and engagement activities.
3. Responsible entity must demonstrate binding and guaranteed financial capacity and commitment to long-term operations and maintenance, rehabilitation, and

management of all levee structures and system components in the community's jurisdiction;

4. Jurisdictions in residual risk areas must:
  - a. Participate in the NFIP,
  - b. Adopt a FEMA approved Hazard Mitigation Action Plan that includes emergency action and planning for residual risk areas associated with all levees and residual risk areas in their jurisdiction, including flood-fighting, post-flood recovery and resiliency, and
  - c. Prevent wherever possible the construction of new critical facilities (CFs) in areas subject to inundation in the 0.2%-chance floodplain, and require that all new and existing CFs be protected, accessible, and operable in the 0.2%-chance flood;

P.L. 84-99's treatment of non-structural options is limited. ER-500-1-1 indicates:

*Under P.L. 84-99, the Chief of Engineers is authorized, when requested by the non-Federal public sponsor, to implement nonstructural alternatives (NSA's) to the rehabilitation, repair, or restoration of flood control works damaged by floods or coastal storms. The option of implementing an NSA project (NSAP) in lieu of a structural repair or restoration is available only to non-Federal public sponsors of FCW's eligible for Rehabilitation Assistance in accordance with this regulation, and only upon the written request of such non-Federal public sponsors.*

Unfortunately, this is consistent with the underlying statutory language. The result? Little or no consideration of non-structural measures, even when such measures could be more cost-effective, and more consistent with the Corp's re-released Environmental Operating Principles. The reality is that funded work should evaluate the full array of nonstructural measures to reduce risk, implement effective nonstructural measures in combination with any structural measures that are selected, and adopt standards to prevent any post-project increase of risk (both probability and consequences), prior to any commitment of public funds toward levee work. Since non-structural options are only considered on an "as requested basis" the requirement that the repair or rehabilitation approach be the "least cost to the government" alternative cannot logically be met because in the vast majority of the cases, not all alternatives are being evaluated. We can no longer afford to ignore possibly less expensive non-structural alternatives. Specific modifications needed include:

1. Explicitly requiring consideration of realigning or setting back levee segments, and integrating setback levees to the fullest practicable extent in any federally-funded levee work, including repairs under P.L. 84-99. This important modification to P.L. 84-99 can help reduce "pinch-points" in levee systems that are often damaged or fail



in repeated flood events, resulting in continued property loss, economic disruption, and federal spending on repairs and disaster payouts. Currently, emergency repair options (as defined in 33 USC 701b-11) do not include the consideration of realignment or setting back of damaged levees. In fact, Section 5-16a of ER 500-1-1 indicates that levees in disrepair should either be repaired in-place or removed (the only nonstructural alternative). Moreover, the consideration of alternatives to re-establishing the levee in the same location falls to the sole discretion of levee owners, despite the fact that federal taxpayers pay for the large majority of repair costs. In cases of repeated levee failures or where existing levee alignments create significant pinch points or other risks, the Chief of Engineers should be able to initiate consideration of options to reduce long-term risks and repair costs.

2. Removing bias towards structural projects and against non-structural projects. This includes consideration of nonstructural measures in every instance and not solely at the request of the sponsor, removal of funding caps for nonstructural measures, and more equivalency in repairs to nonstructural measures after a subsequent flood event; and
3. Including a provision for expedient buyouts of structures and land under P.L. 84-99. Due to the existing bias against nonstructural measures, this is not now currently feasible. However, these should be pursued with the same expediency as levee repairs just after a flood has occurred, versus through the normal project development process.

## **Technical Assistance, Analysis and Planning Programs**

From a strategic standpoint, the area of technical assistance, analysis and planning support is a significantly underinvested and underutilized aspect of Corps operations; however, it should be a major aspect of how the Corps does business in the future. The Army Corps has several programs that support state and local officials with technical assistance, analysis and planning.

The Floodplain Management Services (FPMS) program provides valuable and timely services in identification of flood risks and flood damages. The program enables the Corps to support State, regional, and local priorities in addressing flood risks through collaboration and cooperation by developing location-specific flood data which can be used to reduce overall flood risks. Like FPMS, the Planning Assistance to States (PAS) program was authorized to provide valuable and timely services in identification of flood risks and flood damages. This program also allows for any effort or service pertaining to the planning for water and related resources of a drainage basin or larger region of a state, for which the Corps of Engineers has expertise. The Silver Jackets program is a highly

successful addition to the pre-existing Planning Assistance to States and Flood Plain Management Services programs.

All of these programs have been able to provide significant benefits for a relatively small investment. By providing Corps expertise, these programs assist states and communities to make better informed decisions and to engage in more comprehensive consideration of their flood risk and the various options for reducing the hazard. These can be structural, non-structural or a combination of the two and can often lead to less expensive and more sustainable solutions.

ASFPM strongly recommends a substantial expansion of these programs. So many communities do not have the resources to either employ or contract with private civil engineering experts. The Corps could make a major contribution to reducing flood-related losses in the nation by making its expertise more widely available. Consistent comments from floodplain managers indicate more demand for the programs than can be met and indicate that a major impediment to making use of the programs is a lack of sufficient funding.

Technical Assistance programs, such as Silver Jackets, PAS and FPMS, need increased authorizations of \$50 million each to provide technical assistance in investigating and designing solutions that apply the full range of risk reduction measures, including:

- Hazard identification, risk reduction, and mitigation;
- Spatial and land use planning;
- Climate adaptation for resources and the built environment; and
- Resiliency of critical infrastructure and facilities.

As noted earlier in our testimony, the old model of the Federal government being the primary vehicle for accomplishing all of the nation's water resources or flood loss reduction projects is not sustainable. But the Corps can play a lead role in a model where the Federal government provides incentives to undertake sustainable solutions, where it provides the technical know-how and expertise to solve a flooding problem, or where it provides data and information to enable states and communities to make better decisions. All three of the aforementioned programs have the capacity do to this. How, then can these programs be more useful to states and communities?

1. The Corps must have the ability to provide technical assistance outside of a specific, authorized project. Technical assistance is not always a large project; rather, it may be something much smaller needing only a limited investment of resources, but where the ultimate solution will be greatly improved with Corps expertise. Simply

put, the Corps needs to be able to have boots on the ground in a much more nimble manner. Previously, outside of a specifically authorized or approved project, the Corps couldn't even attend a meeting much less provide technical assistance. The Silver Jackets program has allowed Corps resources to better interact with states and communities – but even it is limited in scope and resources. An ongoing authority and resources should be available for the Corps to perform in this manner.

2. FPMS and PAS must be better managed as national programs. While our data is anecdotal, it appears that FPMS and PAS are not evenly or consistently administered throughout the country. Certain Corps Districts have high expertise and capability with these programs and others do not. It is unclear that there is any updated general program guidance available at any level of the Corps. We know through our work with the Corps that there do not seem to be mechanisms or processes to comprehensively identify, collect, review and prioritize requests for FPMS/PAS services, review projects completed, and adjust program metrics in any consistent manner. Based on conversation with PAS/FPMS program staff and from our members, ASFPM believes that the demand for these programs significantly exceeds available resources. All Corps Districts should have the level of capability as do those that regularly use FPMS and PAS.
3. The Silver Jackets program has proven to be successful and should continue with maximum flexibility to address individual state's needs and issues. There have been many benefits to the Silver Jackets program including better coordination and understanding of the various programs and agencies involved in comprehensive flood risk management, identification and coordination of resources, and development and undertaking of collaborative projects. It is important though, that all Silver Jackets POCs from the Corps embrace the role and vision of the program.
4. The Corps must be able to “be present” at meetings and conferences to interact with partners and share their technical knowledge. – and resources must be provided to do so. As a result of recent high profile meeting and conference events that received significant negative publicity due to cost and extravagance, federal agencies, including the Corps, have severely limited their participation in conferences or meetings. ASFPM believes this is exactly counter to the envisioned future role of the Corps as being leaders in providing technical assistance and as collaborators. While technology can be helpful in transferring some knowledge, in-person interactions are still a key element of a collaborative process and very useful to floodplain management professionals who take that knowledge and benefit of interaction back to the state and community elected officials and citizens..

At a recent meeting of the Federal Interagency Floodplain Management Task Force (FIFM-TF) several opportunities and activities to enhance floodplain management efforts at

various levels of government and to help agencies become better stewards of public resources were identified. These activities were developed collaboratively by the Working Group of the FIFM-TF, comprised of 11 agencies, including the Corps. A just released memo by the FIFM-TF supports ASFPM's recommendations as they relate to technical assistance and collaboration. Two key recommendations from that memo are:

- Enhance Technical Assistance to Communities in Coastal Areas. Coastal areas that are home to over 160 million people, support 66 million jobs and contribute \$8.3 trillion to the U.S. economy. These areas are also prone to a number of natural hazards. As a result, it is critical that we provide coastal communities with the resources they need to make better decisions that reduce flood risk, damages and human suffering. . The Task Force will be exploring broader use of the Community Rating System as an incentive mechanism for coastal communities to make better floodplain management decisions. In addition, the Task Force plans to assess floodplain management-related technical assistance available to coastal communities and identify gaps that may need to be filled.
- Improve Silver Jackets Awareness and Participation. Silver Jackets interagency teams promote valuable collaboration among federal and state agencies with respect to flood risk management. They focus on a common set of priorities and are capable of more easily leveraging resources to solve problems. Involvement by federal agencies other than FEMA and the Corps, however, has been inconsistent. Having stronger support for Silver Jackets teams from all agencies involved in flood risk and floodplain management will provide more resources and opportunities for collaboration to the Silver Jackets teams and promote more innovative and effective approaches to flood risk management. The Task Force will prepare a memorandum to its member agencies and other interested agencies recommending that they designate a point of contact to coordinate their involvement in the Silver Jackets program.

## **Revision of USACE Principles and Guidelines (P & G)**

Federal activities and investments in water resources and flood control projects have been guided by a process that has remained largely unchanged for thirty years, despite a growing record of disastrous floods. The first set of "Principles and Standards" was issued in September 1973 to guide the preparation of river basin plans and to evaluate federal water projects. Following a few attempts to revise those initial standards, the current principles and guidelines went into effect in March 1983. Since then, the national experience with flood disasters has identified the need to update federal policy and

practice to reflect the many lessons learned and advancements in data, information, and practice.

Section 2031 of the Water Resources Development Act of 2007 (WRDA 2007) called for revision to the 1983 Principles and Guidelines for use in the formulation, evaluation, and implementation of water resources and flood control projects. WRDA 2007 further required that revised principles and guidelines consider and address the following:

1. The use of best available economic principles and analytical techniques, including techniques in risk and uncertainty analysis.
2. The assessment and incorporation of public safety in the formulation of alternatives and recommended plans.
3. Assessment methods that reflect the value of projects for low-income communities and projects that use nonstructural approaches to water resources development and management.
4. The assessment and evaluation of the interaction of a project with other water resources projects and programs within a region or watershed.
5. The use of contemporary water resources paradigms, including integrated water resources management and adaptive management.
6. Evaluation methods that ensure that water resources projects are justified by public benefits.

During the six years since WRDA 2007 was enacted, costly and disruptive floods have continued to plague the Mid-West, Gulf Coast, and Eastern Seaboard, with Hurricane Sandy providing the latest reminder of the extent of the nation's vulnerability. ASFPM believes that the nation can no longer afford to continue on its current path of authorizing and funding projects through a process that is so heavily biased toward structural approaches without comprehensive review of environmental impacts and consideration of nonstructural alternatives, and without fully leveraging state and local authorities in land use, infrastructure maintenance, and building codes.

While the 1983 P&G needs to be retired and replaced by modern Principles and Guidelines as soon as possible, we note that in Section 2032 of WRDA 2007, the Congress also called for a report on the nation's vulnerability to flooding, including risk of loss of life and property, and the comparative risks faced by different regions of the nation. The report is to include the following elements:

- An assessment of the extent to which programs in the United States relating to flooding address flood risk reduction priorities;

- The extent to which those programs may be encouraging development and economic activity in flood-prone areas;
- Recommendations for improving those programs with respect to reducing and responding to flood risks; and
- Proposals for implementing the recommendations.

Federal policy initiatives such as the update of P&G – and investments through supplemental appropriations – that are underway could be informed by the findings and recommendations anticipated to emerge from this report. We urge Congress to insist on timely delivery of this report.

Again, thank you for the opportunity to share our observations with you. We hope you find them helpful in your oversight of Army Corps of Engineers programs and direction. If you have any questions, please contact ASFPM Executive Director, Chad Berginnis, at (608) 828-3000 or [cberginnis@floods.org](mailto:cberginnis@floods.org).