

February 24, 2026

The Honorable Shelley Moore Capito
Chairman
Environment and Public Works Committee
U.S. Senate
410 Dirksen Senate Office Building
Washington, D.C. 20510

The Honorable Sheldon Whitehouse
Ranking Member
Environment and Public Works Committee
U.S. Senate
456 Dirksen Senate Office Building
Washington, D.C. 20510

The Honorable Kevin Cramer
Chairman
Environment and Public Works Committee
Transportation and Infrastructure Subcommittee
U.S. Senate
410 Dirksen Senate Office Building
Washington, D.C. 20510

The Honorable Angela Alsobrooks
Ranking Member
Environment and Public Works Committee
Transportation and Infrastructure Subcommittee
U.S. Senate
456 Dirksen Senate Office Building
Washington, D.C. 20510

RE: Policy Recommendations for the Water Resources Development Act of 2026

Dear Chairman Capito, Chairman Cramer, Ranking Member Whitehouse and Ranking Member Alsobrooks:

The undersigned 85 organizations, including 13 national groups and local and regional groups representing 32 states and Puerto Rico, urge you to include the reforms outlined below in the next Water Resources Development Act (WRDA). These common-sense reforms would build on recent Water Resources Development Acts to keep communities safe, allow our treasured wildlife to thrive, and protect billions of dollars of federal and state investments.

America's communities are being tested like never before. Severe storms and floods are increasingly wreaking havoc on communities and infrastructure, putting people at risk, and causing billions of dollars of damage each year. America's treasured wildlife is in crisis, including the freshwater species most affected by water resources projects. The reforms outlined below would give the Army Corps of Engineers (Corps) additional tools to address these problems while protecting taxpayers, local sponsors, communities, and the natural defenses and vital habitats provided by healthy rivers, floodplains, and wetlands.

- **Improve Project Cost Estimates.** Congress should ensure that the Corps' project cost estimates account for the true costs of project delivery. Corps project cost estimates often are not reliable, with the actual costs of many projects skyrocketing far above the amount originally authorized by Congress. This imposes unexpected financial burdens on taxpayers and non-federal sponsors and prevents effective planning, budgeting, and authorization. To account for the true costs of project delivery, cost estimates must be based on an appropriate level of design maturity, as recognized by Corps leadership and Congressional appropriators. To be reliable, estimates must also account for delays in funding or sub-optimal funding streams; residual flood risks and any shifting of flood risks onto other communities; life cycle outlays; and lost ecosystem services including natural flood protection. Establishing clear criteria to guide Corps cost estimates will improve project

planning, facilitate development of the most cost-effective solutions, protect taxpayers and provide certainty to non-federal sponsors.

- **Facilitate Nonstructural Solutions.** Congress should facilitate and incentivize the use of nonstructural solutions (e.g., easements, elevations, buy-outs) to reduce flood risks. Over the past 50 years, Congress has enacted multiple provisions directing the Corps to carefully assess these highly effective and cost-effective solutions. These common-sense solutions typically produce \$5 to \$7 in benefits for each dollar spent, and are far more cost effective than structural solutions especially in smaller rural communities and areas that suffer from multiple sources of flooding. However, internal Corps policies undermine selection of these solutions, including by transferring a portion of project costs onto individual homeowners—a transfer that does not happen with structural projects. Congress should remove arbitrary policy barriers and reduce the non-federal cost share for nonstructural features to support community flexibility and ultimately save taxpayer dollars. Facilitating voluntary nonstructural measures will protect communities, wildlife, and taxpayers.
- **Utilize Federal and State Expertise.** Congress should ensure that the Corps utilizes expert recommendations made pursuant to the mandatory reviews carried out under the Fish and Wildlife Coordination Act. These longstanding and critically important reviews facilitate project planning by ensuring the Corps has the advantage of recommendations that derive from the special expertise of federal and state fish and wildlife experts, such as methods and metrics for assessing fish and wildlife impacts and mitigation opportunities. But these carefully developed recommendations often are not used by Corps planners, leading to projects that cause unnecessary harm and mitigation plans that do not work. Utilizing federal and state fish and wildlife expertise is a common sense, cost-effective way to improve projects and planning efficiency.
- **Clarify Need to Offset Impacts from Operations and Maintenance.** Congress should clarify the longstanding requirement to offset new impacts to fish and wildlife resources from activities carried out pursuant to updated operating plans and water control manuals, as required for all Corps projects. While the Corps is working to restore wetlands, floodplains, and river habitats across the country through hundreds of Congressionally authorized projects, the Corps often is not offsetting the severe damage to these same resources resulting from the long-term operation of navigation systems and reservoirs. As a result, the essential benefits that could be achieved through mitigation are being left on the table. Clarifying the need to offset new impacts caused by updated operation and maintenance plans will help protect people and wildlife, align Corps goals, and protect billions of dollars of federal and state investments.
- **Improve the Corps' Infrastructure Inventory and Disposition Study Process.** Congress should mandate a report to expand public knowledge of Corps infrastructure that is minimally maintained, abandoned, inactive, or otherwise in “caretaker” status. These projects, which are largely left to deteriorate while failing to provide any meaningful benefits for flood control, hydropower, transportation, or other key mission area, are hazardous to both the environment and public safety. A comprehensive inventory of this levee and dam infrastructure will help provide the Corps and other stakeholders with the

information needed to manage this infrastructure appropriately. Congress should also improve the Corps' ability to assess their own water resource infrastructure for disposition when those structures no longer serve their federally authorized purpose and instead pose safety hazards to the public and impair functioning ecosystems.

- **Amend the National Levee Safety Program and Authorization of Floodplain Functions Mapping Initiative.** Congress should amend the National Levee Safety Program to incorporate the protection and restoration of floodplains in recognition of the importance of functioning floodplains to the Corps' flood control mission. Congress should further authorize a floodplain mapping initiative to carry forward interagency work to enable strategic, science-based decision-making regarding infrastructure investment and natural disaster mitigation using existing science and data resources that are currently housed across multiple agencies, including USACE, FEMA, and NOAA.
- **Maximize Emergency Debris Removal Benefits.** Congress should direct an update to the Corps' emergency debris removal contracts to maximize benefits. The Corps plays a critical role in helping communities recover from floods, hurricanes, tornados, and fires through emergency debris removal that is typically conducted through contracts with private companies. But key terms in these contracts inadvertently incentivize the unnecessary removal of healthy vegetation and habitats that prevent riverbank erosion, reduce the risk of destructive landslides, deliver natural flood protection, and provide vital fish and wildlife habitat. In some areas, these terms have led to the destruction of residential infrastructure, adding to the significant costs of rebuilding. In the process, taxpayer dollars are wasted on payments for unnecessary and destructive debris removal. Modernizing emergency debris removal contracts will safeguard communities, wildlife, and taxpayers.
- **Create an Integrated Floodplain Management Pilot Program.** Congress should establish an integrated floodplain management pilot program to reduce flood damages and provide environmental and community benefits. This pilot should be modeled after successful state-driven initiatives, particularly from Washington, Vermont, and California, and further incentivize additional states to adopt a model of floodplain management that reduces overall flood risk and restores ecosystems.

Our organizations urge Congress to adopt these common sense, cost-effective, and multi-benefit reforms to protect communities, wildlife, and taxpayers. We look forward to working with you to ensure that these reforms are enacted into law.

Sincerely,

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Government Relations Director
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Peter Spaulding
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American River Trees

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