



January 24, 2020

Dear Water Resources and Environment Subcommittee Members:

Please find below priorities for your consideration from the National Association of Counties (NACo) for the 2020 authorization of the Water Resources and Development Act (WRDA).

Counties appreciate the Committee's work to include a directive in the 2018 WRDA authorization instructing the Army Corps to consult with local governments on future and pending WRDA projects, as well as annual district budgets, deauthorized projects and guidance documents. In 2016, counties spent \$22 billion on sewage and solid waste management alone and annually invest \$122 billion in infrastructure and maintaining and operating public works, such as public water systems. As boots on the ground, local officials know where federal resources can be maximized and must have a seat at the table as water projects are considered. A strong intergovernmental partnership is critical as this legislation is developed, and we look forward to working with Congress to once again achieve our shared goals.

On behalf of America's 3,069 counties, thank you for the opportunity to provide input as the Committee considers a new WRDA authorization.

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## NACo WRDA 2020 Priorities

### [Extending Section 404 Permits from Five to Ten Years](#)

NACo urges the federal government to improve the CWA §404 permit process by the U.S. Army Corps of Engineers (Corps); remove routine maintenance of human-made public flood protection facilities and infrastructure from the §404 permit process when no endangered species habitat is present, and extend the (CWA) general permit term for routine maintenance from five to ten years.

### [Consultation with Local Governments on Projects](#)

In consultation with federal or state governments, NACo supports counties undertaking water resource projects within a county's jurisdiction to ensure that county concerns are incorporated into project planning.

NACo supports the federal government consulting with local governments in the decision-making process, which includes the authority to assume full responsibility for planning and implementing flood control projects, assessing and mitigating their environmental impacts and determining the necessity or advisability of flood control projects by the federal government.

### [Reauthorization of the State Revolving Loan Fund, the Clean Water State Revolving Fund and the Drinking Water State Revolving Loan Fund](#)

NACo supports federal funding for existing or new federal mandates. NACo supports the State Revolving Loan Fund (SRF) programs, the Clean Water State Revolving Loan Fund (CWSRF), and the Drinking Water

State Revolving Loan Fund, as supplements to, not a substitute for, federal grants program. Grants and technical assistance should be made available to those small, rural, disadvantaged communities that are unable to meet their needs solely with loans. States should provide adequate funds to match federal grants to the SRF program and assure flexibility in the administration of such loans.

#### [Unlocking the Harbor Maintenance Trust Fund](#)

NACo supports the full expenditure of harbor maintenance trust fund collections on dredging and harbor maintenance and providing equity for deep draft ports that contribute collections to the fund but do not have significant dredging needs by allowing them to utilize trust fund dollars for limited port-related uses other than dredging.

#### [Revise the Process to Assess Benefits of Federally Funded Water Infrastructure Projects](#)

NACo supports the U.S. Army Corps of Engineers (Army Corps) and the White House Office of Management and Budget (OMB) to add a benefit-cost analysis to life-safety, agricultural land value and the impacts of crop flooding, protection of low-income communities and environmental benefits to determine the benefit of federal investments in flood control projects.

NACo supports authorizing the Army Corps to implement the 2013 Principles, Requirements and Guidelines to allow rural communities to fairly compete for federal funding by considering non-population-based criteria for water projects.

#### [Increase Funding for the Use of Natural Infrastructure to Mitigate the Risk of Storms and Flooding and Improve Resiliency](#)

NACo supports continued and increased funding for federal programs that assist counties with planning and the implementation of projects that address habitat restoration and connectivity, ecosystem restoration and resiliency, protection and enhancement of ecological resources including fish and wildlife and environmentally beneficial modifications to existing projects.

NACo supports the national policy goal of net gain/no net loss of wetlands and encourages a management approach that first avoids wetlands, then minimizes wetland loss and mitigates any loss as the final alternative. This policy goal is intended to prevent new adverse impacts on the watershed, flood storage capacity and water quality impacts.

#### [Support Research into Harmful Algal Bloom Prevention and Mitigation](#)

Harmful algal blooms (HABs) and hypoxic events (severe oxygen depletion) are some of the most scientifically complex and economically damaging issues challenging our ability to safeguard the health of our nation's aquatic ecosystems. Almost every state in the U.S. now experiences some HAB event and the number of hypoxic water bodies in the U.S. has increased 30-fold since the 1960s with over 300 aquatic life systems now impacted.

NACo supports the renewal of the Harmful Algal Bloom and Hypoxia Research and Control Act and encourages the U.S. Environmental Protection Agency (EPA) to collaborate with other federal agencies to identify nutrient reduction strategies and scalable Harmful Algal Bloom mitigation processes.

### Increased Funding for Publicly Owned Dams and Levees

NACo supports increased federal commitment to fund the repair and rehabilitation of America's non-federal, publicly-owned dams and levees with priority funding given to structures presenting the highest risk of failure and which present the highest risk to homes, schools, businesses or important infrastructure in the event of failure.

Federal funding should be made available through grants, loans, and federal cost-share programs designed to assure that unsafe or deficient dams and levees are brought into compliance with national minimum safety standards and to assure that necessary maintenance and upgrades can be conducted to meet these standards on an ongoing basis.

NACo urges federal and state governments to consult with, and include, counties in the decision-making process when undertaking the rehabilitation of unsafe or deficient dams and levees located within the jurisdiction of the county.

### Invest in Transboundary Water and Sewage Infrastructure Along U.S./International Borders

NACo supports authorizing funding for projects identified by the U.S. Environmental Protection Agency (EPA), and other appropriate federal agencies, that would address transboundary sewage or contaminated water flows that occur along United States/international borders.

### Federal Funding for Continued Education and Scientific Study of Ocean Acidification

NACo supports federal efforts to address the increasing problem of marine debris. This includes, but is not limited to:

- Support for continued reauthorization of the Marine Debris Research, Prevention, and Reduction Act (MDRPRA) and/or similar legislation and increased funding to the National Oceanic and Atmospheric Administration (NOAA) to provide additional resources for grants to coastal counties for beach cleanup efforts, derelict fishing gear removal;
- Research on the effectiveness of offshore cleanup methods; and,
- Federal policies that encourage states and localities to educate small business communities and consumers about the significant environmental harm of single-use plastic bags/bottles and the benefits of associated county-wide bans and additionally encouraging reuse/recycle policies at the local level.