



April 15th, 2020

R.D. James Announces Corps Project Benefits Reformulation

We start with some good news from Washington, DC. Responding to complaints from leaders of both coastal and inland communities, the Administration has announced that the Corps study processes is being modified to fully “identify, analyze and maximize all benefits in the NED, RED and OSE accounts.” The Principles & Guidelines for planning water resource projects, adopted in 1983, decreed that benefits fall into four accounts: National Economic Development (NED) and Environmental Quality (EQ) are mandated for all feasibility studies, with any benefits from Regional Economic Development (RED) and Other Social Effects (OSE) deemed discretionary.

It is important which benefits are taken into account because they determine (1) which of the alternative options for the project (including no action) is recommended by the Corps, and (2) what the benefit-cost ratio (BCR) is of each alternative. The law requires all projects to have a BCR of at least 1 to 1, while the White House Office of Management and Budget says it must be at least 2.5 to 1 to even be considered for funding (this can be circumvented, and we have done so successfully several times).

In announcing this expanded appraisal of benefits, Assistant Secretary of the Army for Civil Works R.D. James declared that “the emphasis on the estimation of NED benefits has resulted in an inconsistent approach to the evaluation of RED and OSE benefits.” Some experts have also complained that the Corps view of what constitutes a NED benefit is too narrow. While Secretary James didn’t address that criticism, he did state that “Failure to identify and evaluate all project benefits of Civil Works projects understates the value of such investments” leading to “suboptimal investment decisions.” He directed Corps personnel to include an “assessment of all project benefits in all accounts to inform agency recommendations.”

Latest from Congress

Congress passed a \$2 trillion CARES stimulus package and left town, originally slated to return April 20th, but the House and Senate will remain out of session until May 4th when the force is with them (classic Star Wars pun for those scratching their heads). Nevertheless, there’s a push for at least one more stimulus soon because the funding for small business assistance in CARES has proven to be inadequate. The Senate’s Republican leadership tried to move a proposal tightly focused on money for small businesses, but members of both parties have raised concerns that

the next stimulus should also include more money for hospitals as well as state and local governments. Sitting just offstage right now is a general bipartisan drive to put together the \$1-\$2 trillion infrastructure package to help create jobs and boost business. Passage of any mini-stimulus for small businesses and their employees as well as aid to state and local governments is being negotiated by party leaders, with not much progress reported.

What Coastal Communities Need

In addition to the funding needs of all state and local governments, coastal communities generate 45% of the nation's GDP and over \$344 billion in federal tax revenues. With tourism, ports, commercial and recreational fishing as well as energy production hard hit by the coronavirus, Howard Marlowe has several suggestions about what Congress can do to help coastal communities in his [latest blog](#).

Public Comments Sought on new Mitigation Rules

FEMA is seeking public comment on its proposed rules implementing the new Hazard Mitigation Assistance grant program established by Congress in 2018 which sets aside 6 percent of estimated disaster expenses for the BRIC (Building Resilient Infrastructure and Communities) grant program that supersedes the current Pre-Disaster Mitigation grant program. Public comments are due May 10th. Click [here](#) for more information.

Hurricane Season Forecast

An above-normal hurricane season for the East and Gulf Coasts is predicted by Colorado State University. This is the 37th year the university's Department of Atmospheric Science has made predictions. This season, they predict 8 hurricanes with half being Category 3 or higher and a 69% chance that a major hurricane makes landfall. To view the full report, click [here](#).

Mother Nature Doesn't Care

Despite the global impact COVID-19 is having on our human lives, Mother Nature doesn't care. Great Lakes levels to continue to set records, with summer levels projected to be higher than last year's record. In some areas recreational beaches are completely underwater, docks are below water, several areas have houses collapsing into the water from tall bluffs that have eroded. Again, Mother Nature doesn't care. In the Atlantic, severe erosion is occurring now in the Northeast along with warmer waters than usual from Maine to Florida, leading researchers to predict an above average hurricane season. In the Pacific, an El Nino year could mean more severe storms or at least greater erosion along the west coast. The worst we could do is be woefully unprepared for the 69% chance that a Major Hurricane makes landfall in the U.S. What if we get two of them? Do you want Congress to handle the cleanup response and recovery with a massive disaster supplemental like it has done for years? Or, would you prefer that we *invest now in infrastructure* that enables us to withstand the forces we cannot predict and better prepare

our communities to deal with Mother Nature, because remember – She doesn't care! So, while Congress mulls over whether it even wants to consider an infrastructure package with hurricane season quickly approaching, think about what is at stake. If you want a quick and painless way to reach your legislators, try the [ResistBot](#). It is a free service that will send your message to your legislators. Let them know you want funding for coastal infrastructure! Below is sample text you can use to reach out to your legislators.

Dear Representative,

Year after year the US has suffered grave losses from hurricanes and flooding, yet Congress continues to provide relief post-disaster through very expensive supplemental appropriations packages. I am deeply concerned about my community's preparedness for hurricanes and flooding. While our state and local resources are fully applied to protecting our coastal assets, we need additional support from the Federal government. I urge you to provide funding for resilient coastal infrastructure in the next stimulus infrastructure bill.

Sincerely,

(Your Name)