

August 10th, 2023

The Honorable Shalanda Young
Director
Office of Management and Budget
Washington, D.C. 20500

Dear Director Young:

On behalf of our millions of members and supporters, the undersigned hunting, fishing, and conservation organizations, and businesses comprising the Theodore Roosevelt Conservation Partnership Natural Infrastructure Working Group, write in support of expediting the review of the U.S. Army Corps of Engineers (USACE) Principles, Requirements, and Guidelines (PR&G) Agency Specific Procedures (ASPs).

The PR&G at USACE provides a common framework for analyzing water resources projects, programs, activities, and related actions involving Federal investment. The ASPs will replace an Army memorandum dated January 5, 2021, that provided interim direction to the USACE project planning process. The USACE ASPs are currently awaiting review by OMB after USACE took public input last summer on the proper scope of the ASPs and submitted a draft proposal for interagency review.

It is essential that the ASPs are released in a timely fashion so that the public can comment on the proposal, and so that USACE can align before the end of the administration with other federal agencies that already have implemented ASPs for the 2014 PR&G. Updated ASPs would enshrine a more holistic federal objective focused on providing maximal public benefits in water resources projects. This would let USACE increase project compliance with the Water Resources Development Act of 2016, 2018, 2020, and 2022 that required USACE to study natural and nature-based alternative solutions to mitigate flood-risk. It would also elevate principles of environmental justice and sustainable economic development in the USACE project planning process.

The TRCP Natural Infrastructure Working Group is a subset of the organization's 61-partner organization Policy Council, with a specific interest in advancing natural infrastructure solutions to support habitat improvement and climate resilience. The letter above is the result of continued deliberation between the signed groups below and represents the shared positions of our organizations.

Sincerely,

American Rivers

Coastal States Organization

Environmental Defense Fund

National Audubon Society

National Wildlife Federation

The Nature Conservancy

Theodore Roosevelt Conservation Partnership

CC The Honorable Michael Connor, Assistant Secretary of the Army for Civil Works
Stacey M. Jensen, Office of the Assistant Secretary of the Army for Civil Works