



National Association of Flood & Stormwater Management Agencies  
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**SUBJECT:** US Army Corps of Engineers (USACE) Principles, Requirements & Guidelines (PR&G)

The National Association of Flood and Stormwater Management Agencies (NAFSMA), a national organization of public agencies whose function is the protection of lives, property, and economic activity from the adverse impacts of storm and flood waters, strongly supports moving forward with the rulemaking process to propose how the Army should implement the Principles, Requirements, and Guidelines (PR&G) for the agency and recommends USACE embark on a fully engaged participatory process to revise the quantification embodied in the selection and prioritization of projects identified to receive federal investment.

It is NAFSMA's understanding that the rulemaking process will be published this year. Our goal with engaging with USACE through our partnership agreement on the PR&G is to:

- To understand the timing and process for the rulemaking.
- Identify areas where NAFSMA members can support and add value to PR&G.

NAFSMA members have implemented multi-benefit projects that have been justified with economic, environmental, and social benefits. Our boots on the ground lessons learned can make the PR&G have a better implementation success and achieve the desired outcomes.

As part of our discussion on PR&G, NAFSMA members would like to discuss the environmental justice screening tool. We are interested in learning about the benefits and how these benefits will impact project prioritization, as well as where NAFSMA can support this process.

USACE and the Administration are at a critical juncture in advancing environmental justice and equity. NAFSMA members have partnered with USACE on flood risk reduction and environmental restoration projects and as a result operate and maintain levee systems, channels, detention basins, dams, and ecosystems throughout the country and have implemented the concepts in the PR&G for many years.

Working together on the PR&G will create a rule that will be durable and provide better execution that will result in more meaningful impacts to our communities.