



April 5, 2010

Terry Breyman
Council on Environmental Quality
722 Jackson Place, NW.
Washington, DC 20503

Re: Proposed National Objectives
Principles and Standards for Water and Related Resources Implementation Studies
December 3, 2009

Dear Mr. Breyman:

The City of Cedar Rapids, Iowa appreciates the opportunity to provide comments on the draft Principles and Guidelines. We support proposed revisions to improve the planning guidelines and comply with the requirements of Section 2031 of the Water Resources Development Act of 2007 (Public Law 110-114).

Our comments and suggestions in part are based on our ongoing community case study involving the current (old) Principles and Guidelines. In June, 2008 the City of Cedar Rapids experienced a flood of historic proportions (levels in excess of 19 feet above flood stage, and over 11 feet above the previous recorded flood event). The Cedar River, running through the heart of the City, directly impacted over 14 percent of the land area of the City, filling the first floor of high rise downtown office buildings and a multitude of historic brick storefronts. More than 5,000 residential structures in 10 square miles were inundated with sewage and debris-filled flood waters. Evacuations over two days displaced more than 18,000 residents and 9,000 employees. While these numbers describe the magnitude of this disaster, they fail to illustrate the on-going impacts of the event on the residents and businesses of the community.

Approaching two years after the flood, the City is still heavily involved in flood recovery activities. Immediately following the flood disaster, and consistent with the Planning Principles proposed in the draft, the City undertook an extensive community-based flood recovery planning effort in developing our Framework Plan for Reinvestment and Revitalization. The City Council approved recovery plan substantially agrees with the basic principles proposed in the draft, including the removal of flood damaged homes out of harm's way to avoid the unwise use of flood-prone areas, while focusing on maintaining our community integrity, economic viability, and sustainability. Our successful recovery and redevelopment is contingent on construction of a flood management system to help reduce or eliminate future flood damages to the residential, commercial, industrial, and historical properties that are not able to be feasibly relocated outside of the record flood-impacted areas.

The US Army Corps of Engineers is currently in the process of completing a detailed Flood Management Feasibility Study to determine if a federal project can be recommended as economically feasible in Cedar Rapids. They are constrained under the current (old) Federal

Public Works Department

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Principles and Guidelines that rely on a Benefit-Cost Ratio (BCR) for a project based solely on a National Economic Development (NED) Account without considering the other monetary and non-monetary impacts we know have occurred in our community. The current (old) criteria produces a planning result that clearly does not reflect the social, environmental, and regional economic impacts on our community following the flood disaster. The NED account does not adequately take into consideration the far reaching social, environmental and regional economical impacts that have already affected our community from the recent record flood and will continue to accrue until a flood management system is constructed to allow revitalization of the flood impacted areas.

We noted a recent example of inconsistencies between calculating national benefits based on our experience with the reconstruction and protection of our waste water treatment plant. This plant was severely flood damaged with the 2008 Flood event. The Army Corps of Engineer's preliminary BCR for flood protection of this plant is 0.20. This BCR was determined based on applying monetary benefits only to structures or equipment damage, per the requirements of the current Federal Principles and Guidelines. This approach did not take into consideration the significant economic loss of industries and businesses due to shutdowns, the environmental impacts of releasing raw sewage into the Cedar River, the potential Environmental Protection Agency fines, etc. However, utilizing another federal program, (FEMA 606), these costs are able to be taken into consideration with their reconstruction costs and FEMA determined a BCR greater than 3.00 for flood protection of the wastewater plant, making it eligible for federal funding assistance.

Another example supporting the proposed Principles and Guidelines is related to the additional risk and uncertainty in climate change. The National Weather Service's forecast for flooding or "chances of exceeding" levels in the year 2010 for Cedar Rapids indicates the chance of exceeding a 30-foot water level this spring is approximately 1% (2008 flood level was 31.12-feet and well above a 500-year storm event). Simply put, a Federal agency indicates there is a 1% chance that record water levels and flooding that occurred in 2008 will reoccur again in spring 2010. The current (old) standard does not include this increased variability in catastrophic flooding and consequently, results in a lower probability of severe flood occurrence and thus, a significantly lower BCR.

With our recent flood disaster situation and a Corps of Engineers detailed feasibility study in process, we do suggest consideration be given for the Principles and Guidelines to allow actual flood damage monetary costs to be utilized for communities in our situation. The current guidelines combined with the other federal disaster programs (FEMA and CDBG disaster assistance programs) unintentionally create potential inconsistencies that penalize communities for doing the right things with the federal funding being provided for recovery. For example, utilizing the disaster funding to purchase as many flood damaged homes as possible is consistent with the federal objectives, but places significant social, environmental, and fiscal impacts on the community with managing the relocation and re-establishment of several thousand residents in a reasonable time. The current Federal Principles and Guidelines do not adequately account for these significant social, environmental, and fiscal monetary impacts since they do not contribute directly to the flood damages avoided by constructing a flood mitigation system. Cedar Rapids sits in a substantially more vulnerable position today when compared to the pre-disaster flood risk. Impacts of another flood without an effective structural flood mitigation system would result in further social, environmental, and fiscal impacts on the

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City, its residents and businesses, and an extended recovery timeline spanning decades rather than years. The new principles and guidelines should account for this type of situation not only for Cedar Rapids, but for other similar communities that have been devastated by significant flood damages in advance of a detailed feasibility study.

Taking into account the suggestions noted above, the City of Cedar Rapids is in full support of the proposed changes to the Principles and Guidelines, especially as they pertain to section G. *Account for National Benefits and Costs in Appropriate Monetary and Non-monetary Terms* and section I. *Address Risk and Uncertainty, Including the Effects of Climate Change and Future Development.*

Thank you for the opportunity to review and comment on the Draft Principles and Guidelines. We look forward to the implementation of these revisions as soon as possible. If you have any questions regarding these comments, please contact myself or Michael Dufoe, P.E., Project Engineer at (319) 286-5802.

Sincerely,

THE CITY OF CEDAR RAPIDS PUBLIC WORKS DEPARTMENT

A handwritten signature in blue ink, reading "David J. Elgin". The signature is fluid and cursive, with the first name "David" being the most prominent.

David J. Elgin, P.E., L.S.
Public Works Director/City Engineer

DJE/tls