AAPA American Association of Port Authorities

Alliance of the Ports of Canada, the Caribbean, Latin America and the United States

Seaports Deliver Prosperity

April 5, 2010

White House Council on Environmental Quality
722 Jackson Place, NW
Washington, DC 20503

Dear Chair Sutley:

The American Association of Port Authorities (AAPA) is pleased to provide comments on revisions to the Principles and Guidelines (P&G) for Water Resources Development with current focus on the Principles.

Public port authorities have long been involved in the application of the P&G either in cooperation with the Army Corps of Engineers or as primary formulators of project plans under Section 203 authority. We generally support the revisions advanced by the Council with concerns and suggestions as follows:

- Elevating the Environmental Quality objection (EQ) is a good thing if OMB will recognize the benefits in some form and it means additional justification of beneficial use of recovered sediments and coastal ecosystem restoration. All 11 port-deepening projects plus disposal facilities under construction include environmental components that exceed mitigation requirements. However, the benefits created by the additional restoration by project sponsors that exceed mitigation requirements are not recognized under the proposed Guidance. We suggest a separate benefit/cost ratio (BCR) be developed for the EQ components based on outputs per dollar invested and be displayed alongside the National Economic Development (NED) benefits-based BCR.
- Non-structural alternatives do not work for deep-draft navigation. Adding more small ships to handle cargo growth instead of deepening channels just limits growth, adds to pollution and costs jobs. This is counter to both livability and economic goals.
- Public safety should be imbedded in all Corps projectsand not be a stand-alone objective.
- Federal government should pay for the initial phases of watershed studies to identify initial costs and benefits of action and potential beneficiaries/sponsors, then proceed to feasibility with responsible parties. To date, the primarybillpayer for bad practices in the watershed are ports that have to deal with both sediments and contaminants from upstream.
- Real consideration of regional economic development and other social effect benefits are needed to better mirror private sector return on investment analysis. This is the method used to make stakeholder investment decisions and impact on livability, sustainability of the action and full disclosure of all benefits resulting from the project.

We realize that considerable work lies ahead in completing and gaining consensus on the Principles and in formulating the Guidelines. The AAPA looks forward to continuing to work with the Council on this and future phases of the revisions.

Sincerely,

Kurt J. Nagle
President and CEO

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