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October 3, 2008

HQUSACE
Attn: P&G Revision, CECW-ZA
441 G Street, NW
Washington, DC 20314-1000

FAX: 202-761-5649

Re: Proposed Principles & Guidelines Revisions

Dear Mr. Larry J. Prather, Assistant Director of Civil Works:

The Water Resources Development Act of 2007 directed the Secretary of the Army to revise the Principles and Guidelines the U.S. Army Corps of Engineers uses to formulate, evaluate and implement water resources projects. The Board of Mississippi Levee Commissioners has reviewed the proposed revisions to the Principles that were published in the Federal Register dated September 12, 2008.

The Board is very concerned that the draft proposal would increase the minimum benefit/cost (b/c) ratio from 1:1 to 1.5:1. This means that a project would have to generate $1.50 in benefits for every $1 spent. Over the past three years the Office of Management and Budget has not included any projects in the President's Budget that offered less than $3 in benefits for every $1 spent.

Water Resource projects are already up against overwhelming odds to meet the 1:1 b/c ratio. The Corps of Engineers only includes national economic benefits, it does not include other benefits such as regional economic development and social well-being effects such as preventing loss of life.

If a project has been authorized by the Congress, has a positive BC ratio and is funded by the Congress, it should be given equal consideration for construction. The Lower Mississippi Valley, being a part of the Delta Regional Authority, must see that its' projects be given equal treatment with the wealthier areas of the United States. It is impossible for rural America to compete with urban areas to obtain a 1.5 b/c ratio!

We urge that the Secretary substantially revise the proposed Principles and resubmit them for public review.

If you have any questions, please feel free to call.

BOARD OF MISSISSIPPI
LEVEE COMMISSIONERS

Peter Nimrod, P.E., P.L.S.
Chief Engineer

cc: Senator Thad Cochran
Senator Roger Wicker
Congressman Bennie Thompson
Governor Haley Barbour