

St. Francis Levee District of Arkansas

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Established 1893

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Secretary: Godfrey White (Mississippi) Treasurer: Robert H. Stacy (Cross)

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My name is Rob Rash and I am the CEO of the St. Francis Levee District of Arkansas and a Regional Engineer for the Mississippi Valley Flood Control Association (MVFCA). The St. Francis Levee District of Arkansas (SFLD) was created in 1893 and owns, operates and maintains 411 miles of levee protecting all or parts of eight (8) counties in Northeast Arkansas.



The MVFCA, SFLD and hundreds of partners along with thousands of people that live along the magical Mississippi river and enjoy protection and the productivity of the world envied Commerce and Flood Control System appreciate the work of the Mississippi River Commission and the US Army Corps of Engineers. The Mississippi Valley Flood Control Association requested FY17 Mississippi River and Tributaries (MR&T) Appropriations in the amount of \$500 million per year and an infrastructure re-investment amount of \$2 billion following the 2015 Record setting Christmas Flood. We remind you and our nation of the MR&T's exceptional system performance in 2008, 2011, 2012 (drought), and the 2015 Floods AND the other high and low water events for 88 years. The investment by the MR&T system in preparation for the 2011 flood ... resulted in more than \$246 billion worth of damages prevented by the MR&T system ... a return on federal investment of over 46 to 1. These prevented damages do not include the return for low water benefits. The hydraulic improvements made by the construction of dikes, cutoffs and channel improvements that allowed a record flood by volume to flow at a lower elevation, are the same improvements that allowed barge traffic to move during the near record low water experienced throughout the Mississippi River in 2012-2013.

We thank Congress for the support and funding you have provided in the past. This funding reveals your awareness of the importance of flood control projects throughout the Mississippi River Valley and the value and unmatched economic and social benefits it provides this great Nation.

The Mississippi River and Tributaries Project was authorized following a record flood in 1927 that inundated more than 26,000 square miles of the Mississippi River Valley. Over 700,000 people were left homeless and many lives were lost. Most, if not all, East- West commerce was stopped and it adversely affected the economy and the environment of our great nation. After that devastating event Congress wisely

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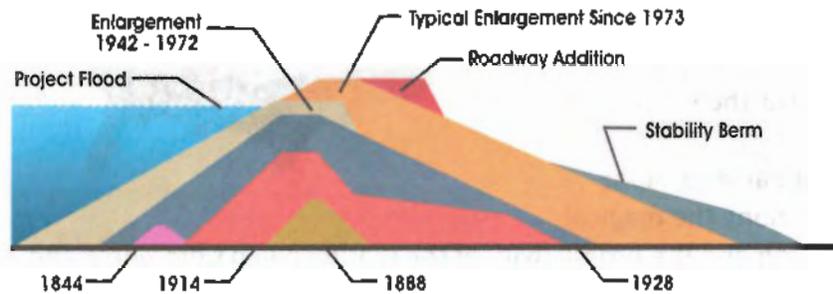


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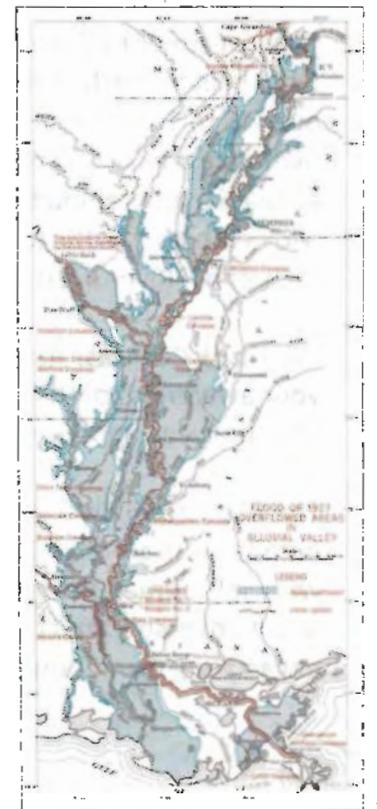
passed a bill and established the Mississippi River and Tributaries Project and authorized the U.S. Army Corps of Engineers along with the local people to develop a plan to prevent such a disaster in the future. This project currently is a separate line item in the budget. To remove it will destroy the continuity of this high value, high return, and much needed national investment.



To date the MR&T Project has prevented flood damages and provided other benefits resulting in a current benefit/cost ratio of over \$46 to \$1. The MR&T is a wise investment for our nation.

Countless lives have been spared due to the construction of this great system and our nation receives three billion dollars of transportation rate savings each year largely due to the current reliability of a navigation channel afforded by the MR&T system.

The MR&T project had merit from its beginning and continues to reward the citizens of the valley and the entire nation. It is a wise investment for this country and it is good for our economy. It will be a vital link to the defense of our nation in the event of an attack by our enemies ... because it serves as a defendable INNER Coast and an artery to transport large equipment and supplies. This project must be targeted for swift completion, proper maintenance and increased investment for recapitalization. The MR&T serves as an example of federal and local partnership and investment for our great nation ... in the past, and for our future! I challenge you to find any other project of any nature which approaches the benefits current and long term of this comprehensive flood control system.



The performance of the comprehensive Mississippi River and Tributaries system and the Ohio Valley reservoir system during the 2011 flood on the lower Mississippi River validates the wise investment the nation made to prevent a calamitous natural disaster like the 1927 flood. That devastating event changed America and forcibly unified its people to support protection of lives and property from the fury of the river. The MR&T system performed as designed, despite rainfall exceeding 600 to 1,000 percent of the normal average rainfall in a two-week period from April 21-May 3 over a significant portion of six states that coincided with the arrival of the upper Mississippi spring snowmelt crest. The significant flood event established many new record discharges and stages along the lower Ohio and Mississippi rivers. Unlike the 2011 flood, the Mississippi River during the benchmark and calamitous Great Flood of 1927 inundated most of the alluvial valley. Like the toppling of a series of dominoes, one overmatched levee after another burst under the unprecedented pressure exerted by the swollen river from excessive rainfall.

At a time when we must stimulate our economy, at a time that safety from terrorist activities must be enhanced and at a time that many in our nation are concerned about cleaner air and water ... we have an opportunity to meet those needs. We must make sound re-investments in our infrastructure which will give back more monies to the taxpayers of this country than was invested ... while at the same time increasing our defense capabilities should our nation be attacked from an outside force (the system provides an inner coast unexposed to arrival by sea).

Local interests have delivered their part in providing rights of way, roads, utilities and minor maintenance. Our government must re-invest to help fulfill the federal obligation and bring it to completion as quickly as possible.

We believe the Corps could effectively deliver (with the direction of congress) \$500 million each year (as a baseline) for maintenance and construction within the MR&T. We respectfully request Congress approve this level of reliable and efficient funding for maintenance and construction for the MR&T. The MR&T improvements described are for Flood Control. However, these benefits were also realized during the low flow event experienced on the Mississippi River. The hydraulic improvements that allowed a record flood event to pass at a 0.8 feet lower elevation in 2011 than in 1937, also allow barge traffic and a near record low event experienced in 2012-2013. If it were not for the MR&T system improvements barge traffic during the low water event would have been nonexistent.

The Mississippi Valley Flood Control Association requests:

- that Congress support the Upper Mississippi River Comprehensive Plan (UMRCP). The impact of the flood of 1993 on the Upper Mississippi was devastating leaving \$15 Billion in damages, loss of life and damage to 72,000 homes. In 2008 the Upper Mississippi was again ravaged by catastrophic flooding and again in 2011 flooding costs top \$360 Million in infrastructure damage. The Upper Mississippi River Comprehensive Plan's system approach to Flood Control and the Mississippi River and Tributaries Project must be funded and promptly executed for protection of the entire Mississippi River Valley.
- that the Congress increase support and a more systematic approach for the Authorization and Appropriations of dredging for MR&T and Non-MR&T Ports and Harbors. Flood Control and Navigation interests go hand in hand and you cannot have efficient commerce movement and delivery without a reliable system during critical business seasons. Flood Control and Navigation are symbiotic.

With the tragedy that struck the Gulf Coast and East Coast, we must now turn our attention to the future and attempt to make certain that at least the flooding does not take place again. We can prevent that; the Dutch, the English and the Italians have done it and so can we if we treat flood control as something that we must do. The citizens of this great nation deserve it and a vibrant economy must have the reliability for production and exports.

There are four anomalies of nature that cause death and destruction to our nation. They are (1) earthquakes, (2) hurricanes, (3) tornadoes and (4) floods. The first three we can do very little if

anything about except to prepare for the worst. We can build protection against floods, against the "maximum probable flood", one that has an "improbable occurrence but nevertheless a remotely possible one".

In order to provide protection for people, land and the economy we believe that four things are critical as we take action as a nation:

- Environmental laws, regulations and executive orders, or at least the way they are interpreted for flood control projects, must be streamlined or changed or we stand to lose more lives and have another environmental challenge such as the one we experienced in New Orleans and along the Gulf Coast during Hurricanes Katrina and Rita in 2005.
- Reconsider cost-sharing for flood control projects unless intend to only protect those that can afford it and neglect those that cannot.
- Relax or re-engineer the formula to include ALL THE BENEFITS for the requirements for the benefit to cost ratio for flood control projects. And as a reminder ... it is not possible to assign a dollar value to saving a human life.
- Invest in infrastructure throughout the Mississippi River watershed. The United States has the largest inland waterway navigation/commerce system in the world. This water commerce system is positioned in the center of the country and the infrastructure is the envy of the people along the greatest rivers around the globe. This system keeps us competitive with exports and in the world market and must be properly maintained and operated. These things must be done ... without flood control, nothing else matters.

We provide a simple reminder. The MR&T system is not complete and will not pass the Project Design Flood, and the system has been stressed with recent record flooding (Christmas 2015-2016)!

Thank you for your leadership and the reality that you have helped prevent \$100's of billions of dollars in damages because you supported and funded the greatest civil works project on the planet ... the MR&T!

MVFC: Facts, Issues, Challenges, and Opportunities

Thank you for understanding the nations needs and the importance of the MR&T system by not allowing FEMA to charge mandatory flood insurance (SEC. 107. MANDATORY COVERAGE AREAS)

Thank you for understanding the tremendous negative impact this piece of legislation would have had on the entire Mississippi River Valley. Billions of dollars already spent on flood control structures would be negated because of needless MANDATORY flood insurance premiums. Please remember the 1928 flood control act recognizes the investment of the local people by initial construction and taxation of themselves for maintenance. This investment was over 200 million dollars in 1928 and totals more than 14 billion dollars today. Making the total federal and local investment in the MR&T system over 30 billion dollars. Because of this, it is still necessary to discuss the new policies being implemented by the Federal Emergency Management Agency in their Map Modernization Program.

The recommendations from the National Levee Safety Committee, if used, force unachievable maintenance standards and predatory flood plain management tactics. This will needlessly destroy economic development for over 22,000,000 acres of land in this country. Please do not use a "one size fits all" approach and place false fear in the minds of people living behind levees. We can inform without fear! These flood insurance premiums, because of the support of Congress, the hard work of the U.S. Army Corps of Engineers and local levee and drainage districts across this country, are not necessary but do create a nice funding mechanism for future disasters.

On January 30, 2015 Executive Order 13690 amended the Federal Flood Risk Management Standard (FFRMS) and ultimately forces people from their homes. Congress stopped an attempt by FEMA to force similar measures through the National Flood Insurance Program. The FFRMS was developed without meaningful public input by a coalition of federal agencies formally known as the Mitigation Framework Leadership Group which was established in 2013 in response to Hurricane Sandy rebuilding efforts and the Presidential Policy Directive / PPD-8: National Preparedness dated March 30, 2011. This group worked behind closed doors toward establishment of a standard that increases the vertical elevation and corresponding horizontal extent of the areas protected by levees.

The effects of the FFRMS will be devastating for over 40% of the United States population in areas declared floodplains by these standards in coordination with the unachievable levee standards set forth by the National Levee Safety Committee.

The EPA Waters of the United States "rules clarification" (WOTUS) will make it virtually impossible to inhabit areas protected by levees. WOTUS further undermines the Congressional intent of the Clean Water Act and in the words of many local people "will make every pothole in a city street that holds water regulated by the EPA". This appears to be an attempt by the EPA to overstep their authorities and pervert the original intent of the Clean Water Act. Please do not allow the Federal Bureaucracies to negate the hundreds of years of work done by the local people, state and federal agencies and the United States Congress to provide the best Flood Control and Navigation System in the world.

MVFCAs Proposals for WRDA 2016

(in agreement with the National Waterways Conference INC)

- Reinforce the essential role that the Congress plays in the important and independent investment decisions regarding the nation's water resources infrastructure by affirming that Section 7001 of WRRDA 14 mandates that any proposals submitted under this section which satisfy the criteria enumerated in the law must be included in the required report to the Congress for consideration for authorization in WRDA. Noncompliance with Administration policy is not a permissible reason to relegate any proposal to the report's appendix.
- Ensure an open and transparent process for the development of implementation guidance by requiring consultation with non-federal sponsors on any provision impacting their responsibilities and by providing for notice and an opportunity for comment, and the consideration of those comments in the development of final implementation guidance.
- Modify Section 1024 of WRRDA 14 to confirm that an "emergency" is not limited to natural disasters but also includes failures that result from lack of maintenance, as reflected in the 2014 Manager's Amendment, and further recommend that authority to implement this provision be delegated to the District Commanders to ensure prompt action.
- Recognizing that non-federal sponsors are increasingly taking on more responsibility for the study and construction of projects, direct that implementation of Section 1014b of WRRDA 14 allow for incremental reimbursements for completed discrete segments, consistent with Policy Guidance Letter 53, and provide that a local sponsor is eligible for reimbursement for the federal share of work later recommended by the Chief of Engineers and approved by the Assistant Secretary of the Army (Civil Works).
- Require implementation of Section 1007 of WRRDA 14, after the requisite notice and opportunity for comment, to establish timely and consistent review of Section 408 decision requests, before any further implementation of EC 1165-2-216, and further clarify the scope of projects subject to Section 408 review as those that affect a Corps project's functionality and purpose, not every activity within a project's property boundaries.
- Develop a comprehensive approach for the regular maintenance of the nation's small ports and harbors (with emphasis on the Mississippi River and its Tributaries that provide more than half of US exports for agriculture), which play a critical role in regional and national economies.

St. Francis Levee District of Arkansas Additional Request

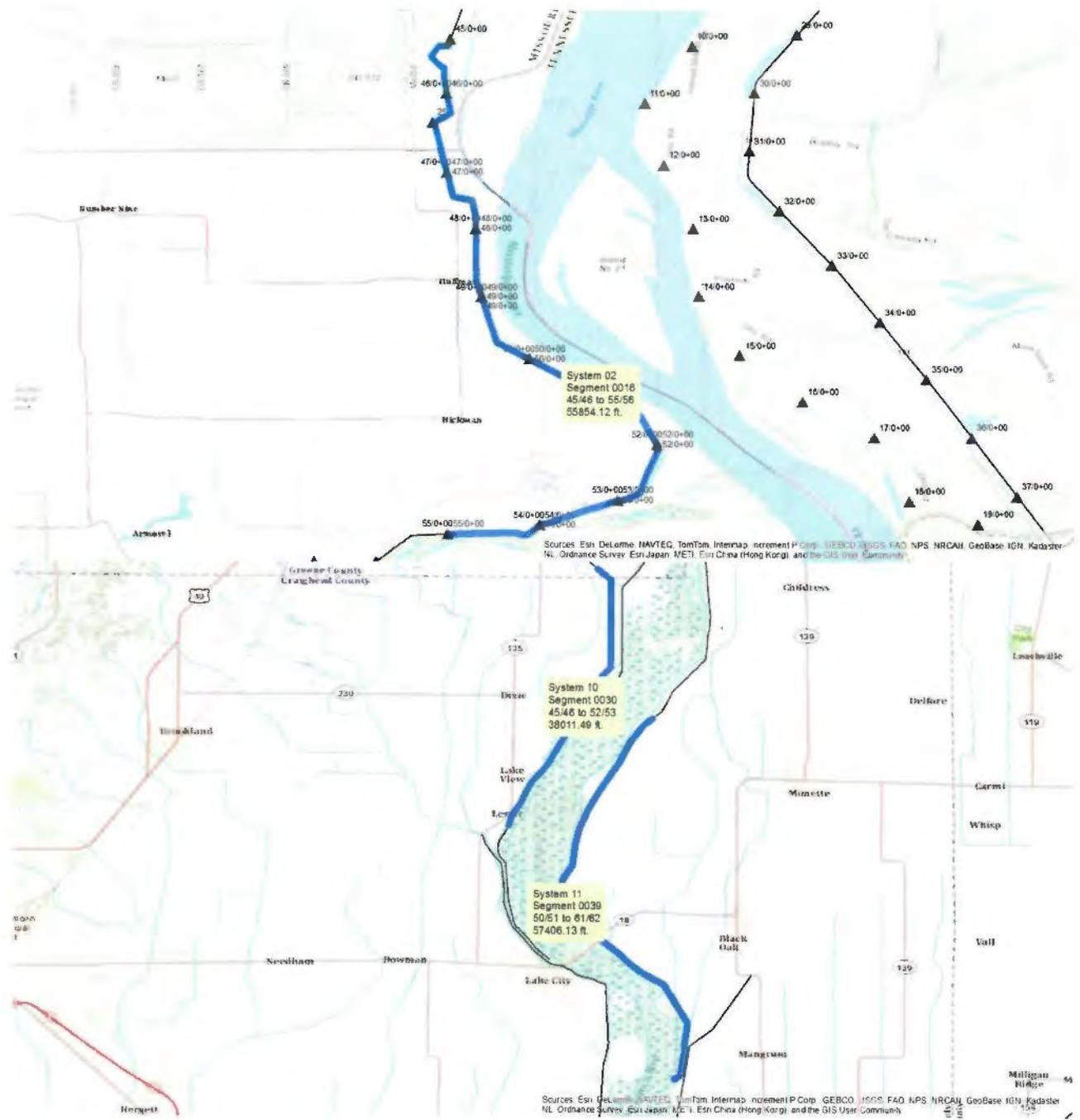
1.) System 2 Scour Repair Project Timeline

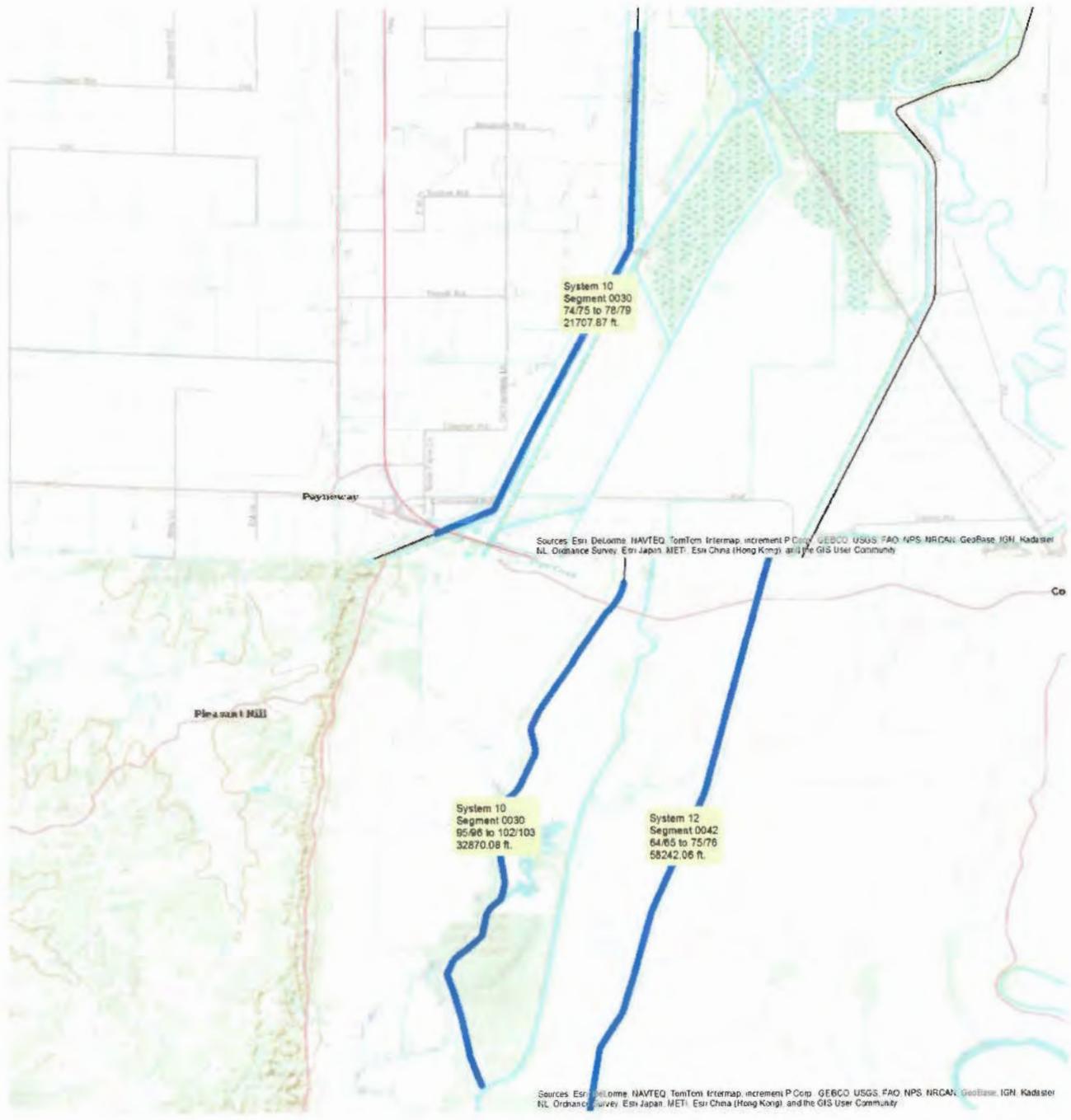
- a. This project has been an area of concern for over a decade and has been noted on numerous inspection reports. This MRL project is located between LM 190-195 and needs to be repaired immediately. Please provide an update and timeline for project completion.

2.) System 12 Scour Repair Project

- a. This scour is in two places as noted on numerous inspection reports and needs to be repaired immediately. Please provide a project update and a timeline for project completion.

3.) Below please find the requested Crushed Limestone needs. Please provide an update on availability and a timeline for project completion.





System 10
Segment 0030
74/75 to 78/79
21707.87 ft.

System 10
Segment 0030
95/96 to 102/103
32870.08 ft.

System 12
Segment 0042
64/65 to 75/76
58242.06 ft.

Sources: Esri, DeLorme, NAVTEQ, TomTom, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), and the GIS User Community

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