

Midwest Flood Control Association

Formal Statement

by

Charles Camillo, Executive Vice-President

to the

Subcommittee for Water Resources & Environment,
House Transportation and Infrastructure Committee

December 17, 2025



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Mr. Chairman and Members of the Committee,

Thank you for the opportunity to be here today in the Nation's Capitol and for allowing us to participate in this time-honored tradition of public participation in the legislative process. I am humbled to be here today to represent a sample of the local people who live, work and thrive along our Nation's waterways in the American Heartland. The people I represent commend this committee's unyielding commitment to a bipartisan approach and look forward to working with you to develop sustainable solutions to water resources challenges across the country.

I am Charles Camillo, Executive Vice-President of the Midwest Flood Control Association. Our association represents around 75 levee and drainage districts along the Missouri, Illinois and Upper Mississippi Rivers. The Midwest Flood Control Association's mission is to be a leading advocate to shape strategic policies and secure federal and local investments that protect people, safeguard communities and secure the regional economies across Iowa, Illinois, Missouri and the greater Midwest from destructive floods. While we strongly support and advocate for our allies in the navigation industry, our partner ports and harbors, and our friends in the conservation and environmental stewardship arenas, I am here today as a champion for flood control.

We are at a pivotal moment on the Upper Mississippi River. With the implementation of the Navigation and Ecosystem Sustainability Program – first authorized through WRDA 07 – and the continuation of the Upper Mississippi River Restoration Program – first authorized in WRDA 86 – our region now has two of the three necessary components to implement a holistic approach to address the needs of the Greater Upper Mississippi River drainage basin. All that remains is the third leg of that stool – systematic flood control.

The Great Flood of 1993 devastated the Midwest. According to the U.S. Army Corps of Engineers, the flood led to the deaths of 47 people, damaged or destroyed more than

70,000 homes and caused the evacuation of approximately 74,000 people. The flood also caused anywhere from \$15 billion to \$20 billion in economic damages. Adjusted for inflation that amount would be more than doubled in today's dollars. It is important to note, though, as we gather here today that the existing flood control infrastructure at that time -- that was authorized and funded by Congress, designed and implemented by the U.S. Army Corps of Engineers, and maintained and nurtured by the local people through their levee and drainage districts -- prevented an additional \$19 billion in economic damages. This highlights in a very real way the criticality of undergoing the authorization process that we are participating in today.

Flood control advocates on the Upper Mississippi River came close to realizing their dream of achieving the third leg of the stool when Congress authorized a thorough study through the Upper Mississippi River Comprehensive Plan Study authorized by WRDA 99. When the U.S. Army Corps of Engineers released that study in 2008, they did not recommend a plan due to the inability of any alternatives to reach the necessary benefit-to-cost justification thresholds. So here we are today, 32 years after the devastation caused by the Great Flood of 1993, and our risk remains unchanged.

To this end, the long-term objective of the Midwest Flood Control Association is to build lasting relationships and work with the U.S. Army Corps of Engineers and the other regional stakeholder groups -- Upper Mississippi River Basin Association, the Mississippi River Cities and Town Initiative, Neighbors of the Mississippi and other levee districts and associations -- to find a long-term comprehensive solution to the flood problem that we can all agree upon.

The Midwest Flood Control Association applauds recent legislation advanced through this Committee and WRDA. Section 8219 of WRDA 2022 authorized a Hydraulic Evaluation of the Upper Mississippi and Illinois Rivers, commonly referred to as the Upper Miss Flow Frequency Study; while Section 1227 of WRDA 2024 authorized the Upper Mississippi River System Flood Risk and Resiliency Study. We see those studies as the first steps to achieving the long-sought vision for systemic flood protection. The Midwest Flood Control Association supports both studies and pledges its commitment to be a good partner with the U.S. Army Corps of Engineers and other regional stakeholders to find an acceptable long-term solution.

The Midwest Flood Control Association also recognizes that it could take the U.S. Army Corps of Engineers up to 10 years from now to complete both the Flow Frequency Study and the Upper Miss Flood Risk and Resiliency Study; and even that is dependent on securing funding and finding a non-Federal cost-share sponsor. To that end, the immediate near-term objective of the Midwest Flood Control Association is to help our

levee and drainage districts preserve and maintain their current levels of protection and accreditation until the long-term objective can be achieved.

The Midwest Flood Control Association certainly has some reservations with the ongoing Flow Frequency Study and its potential impact on the current levels of protection and accreditation. We maintain the position that Flow Frequency Studies should not be done in a vacuum. We understand and appreciate that the U.S. Army Corps of Engineers needs the flow frequency data to understand what is happening on the river, to establish a new water surface and flood profiles and to inform the larger, but separate, Flood Risk and Resiliency Study. To be clear, we want the Corps of Engineers to have that data. We want the Corps of Engineers to use that data. But we want the Corps of Engineers to have and use that data to develop realistic, actionable solutions to offset or mitigate any resultant changes to the water surface and flood profiles. Releasing new flood profiles without actionable solutions will impact levee accreditation and cause significant increases in flood insurance rates and significant decreases in property values.

For instance, many of our agricultural districts estimate that they would see a reduction in property values ranging from \$1,000 - \$2,000 per acre. For a levee district of 15,000 acres -- the average size of our agricultural districts -- that represents a reduction of \$15 to \$30 million in property values. Our urban districts on the other end of the spectrum also face severe impacts. The Southwestern Illinois Flood Prevention District represents the crown-jewel of our association's membership from the standpoint of risk/consequences as it protects more than 150,000 people living in 25 separate communities that support roughly 60,000 jobs. The district also protects refineries, manufacturing sites and portions of interstates 55, 64, and 70 from inundation. All told, the Southwestern Illinois Flood Prevention District protects more than \$18 billion in property values. It is estimated that the district will see a 20-30% reduction in property values -- \$3.6 billion to \$5.4 billion -- if it were to lose its 500-year level of protection.

Further, if the Flow Frequency Study results in changes to the water surface and flood profiles and the Flood Resiliency Study does not receive funding or does not find a non-Federal sponsor willing to provide the necessary cost-share, it serves few other purposes than to be used as a regulatory tool for PL 84-99 compliance or FEMA accreditation.

There is an existing tool or solution to address changes in flood protection -- the 408 -- permission process. Our membership, however, knows from experience that the way the U.S. Army Corps of Engineers interprets and implements 408 permissions -- at least on the mainstem upper Mississippi River -- negatively alters the process and leaves it useless for maintaining existing levels of protection and levee accreditation.

With this mind, the Midwest Flood Control Association strongly supports the passage of a WRDA bill in 2026. Our immediate priorities for such a bill include:

- 1) Limiting the applicability/use of the results of the Flow Frequency Study to planning purposes only until the U.S. Army Corps of Engineers develops actionable solutions to address or offset any potential changes to water surface elevations and flood profiles.
- 2) Designating the results of the Flow Frequency Study as preliminary until the final disposition of the Upper Mississippi River System Flood Risk and Resiliency Study or any spin-off studies that posit actionable solutions to address or offset any changes to water surface elevations and flood profiles.
- 3) Preventing agencies from using the preliminary data from the Flow Frequency Study as a regulatory enforcement tool for P.L. 84-99 eligibility/enforcement or FEMA accreditation while the Flow Frequency Study is deemed preliminary.
- 4) Developing a means for levee and drainage districts to maintain the current level of protection and accreditation at their own expense when Flow Frequency Studies result in documented changes to water surface elevations.
- 5) Calling on the Administration to bring a commonsense approach to standardize and streamline the 408 permission process.

The Midwest Flood Control Association is very optimistic about the future. We like what we are hearing during our engagements with the Office of the Assistant Secretary of the Army for Civil Works. We look forward to working with the Honorable Assistant Secretary, Adam Telle, as they prepare to launch their initiatives to deliver quality infrastructure across the nation.

We also applaud the leadership at the Headquarters, U.S. Army Corps of Engineers. Major General Jason Kelly, the Deputy Commanding General for Civil Works has publicly emphasized his commitment to get creative to address stakeholder concerns where the Corps of Engineers can. He asked us to challenge them on policy and legislation, to give them clean asks, to give them realistic proposals with specifics, something the Corps of Engineers “can sink their teeth into”. We feel the priorities we set forth above do just that.

Again, the Midwest Flood Control Association thanks this Committee for your dedication to improving the lives of Americans from across the county and for giving us this opportunity to present our views today.