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May 18, 2007

Elizabeth P. Caldwell
US Army Corps of Engineers
Headquarters (CECW-HS)
441 G Street, NW
Washington, DC 20314

Subject: Draft Final White Paper, Treatment of Vegetation within Local
Flood-Damage-Reduction Systems, 20 April 2007.

Dear Ms. Caldwell:

The American River Flood Control District maintains 40 miles of levees on the lower American River and north Sacramento area creeks. We offer our strong support for policies that will improve local flood protection and increase public safety. We also appreciate the complexity of the vegetation management issue in maintaining our levee system.

If implemented as drafted, the proposed Corps policy would divert funds from cost-effective maintenance activities to meet new requirements, which in many cases, would produce limited flood damage reduction benefit. For example, there are significant costs associated with providing a 15 foot vegetation-free zone. The original flood control project easement is 10 feet or less. It is neither realistic nor cost-effective to attempt to turn back the clock and acquire a wider flood easement in an area that was largely urbanized decades ago.

In addition, the policy as proposed does not give proper consideration to the integrity of a levee system, but rather takes a blanket approach to requirements. There has been a substantial federal, State, and local investment in slurry wall construction to control underseepage on American River levees. These improvements to the levee system should be given proper weight when evaluating the flood reduction benefit of the proposed vegetation policy.

The proposed vegetation policy cites EM 1110-2-301 as the basis for maintenance requirements. EM 1110-2-301 is most useful as a vegetation planting guide for new project design. However, to use it as the basis for establishing standards to correct pre-existing conditions does not seem to be a reasonable use of this document.

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The American River Flood Control District has a strong commitment to protecting our residents from flooding. We also look forward to working with the Corps over the next several months to develop workable, cost-effective methods for operating and maintaining our flood system. We encourage the Corps to allow sufficient time in the Project Delivery Team schedule to develop a sustainable policy that includes practical considerations provided by levee maintaining agencies.

In recent years, our District has worked with the Department of Water Resources and the State Reclamation Board to begin developing encroachment standards for urban levees, including vegetation standards. We invite the Corps to participate in this process.

Thank you for the opportunity to review the draft white paper. Please contact me at (916) 929-4006 if you would like further information from our District.

Sincerely,

A handwritten signature in blue ink that reads "Gary Hester". The signature is written in a cursive, flowing style.

Gary Hester
General Manager