

THE RECLAMATION BOARD

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May 11, 2007

Ms. Elizabeth Caldwell
U. S. Army Corps of Engineers
441 G Street, Northwest
Washington, DC 20314-1000

Dear Ms. Caldwell:

This is in response to the U.S. Army Corps of Engineers' (Corps) April 20, 2007 Draft Final White Paper – Treatment of Vegetation within Local Flood-Damage-Reduction Systems. The Reclamation Board (Board) is the State agency that cooperates with the U.S. Army Corps of Engineers in managing flooding along the Sacramento and San Joaquin Rivers and tributaries. For nearly 100 years, the Board has acted as liaison between the State of California and the United States, its residents, property owners, and local levee maintaining agencies. In that role, the Board provides an open forum where all interests may express their views regarding flood management.

The Board staff has reviewed the *Draft White Paper*, and we have shared it with our local levee maintaining partners. We have asked them to provide specific comments directly to you.

Based on the Board staff's review, and the input we have received so far from our local partners, we are concerned with the new policy requiring removal of virtually all vegetation on the levees. We are also concerned with the plan to strictly enforce the 15- foot vegetation-free zone adjacent to the levee toe. There are hundreds of trees on federal levees in the Central Valley, and removing them would be an enormous task that would require a huge amount of time and money, and potentially result in substantial environmental consequences. The Reclamation Board has been enforcing vegetation-free zones of 10-feet from the levee toe. Requiring the 15-foot vegetation-free zone would cause a real hardship for both the Reclamation Board and the local maintaining agencies, because additional easements would have to be acquired throughout the project.

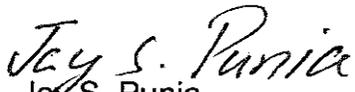
While we applaud your efforts to improve public safety, this new policy would constitute a significant shift in the Corps' practice in California and will have serious unintended environmental consequences. We urge the U. S. Army Corps of Engineers to work with the Board and the Department of Water Resources staff, resource agencies, and the local levee maintaining agencies, to ensure that our

Ms. Elizabeth Caldwell
May 11, 2007
Page 2

concerns are addressed, before you finalize and implement this new policy. It is very important that this draft policy be reviewed collaboratively by all interested parties to ensure that it is consistent with environmental laws and California's FloodSAFE initiative. The new policy should be properly staged and coordinated to assure that State and local agencies are given ample time to plan, design, finance, and execute the projects needed to achieve compliance with the new policy.

If you have any questions, please call me at (916) 574-0609, or your staff may contact Dan Fua, Supervising Engineer of the Reclamation Board at (916) 574-0698.

Sincerely,


Jay S. Punia
General Manager

cc: (See Attached List).

cc: Colonel Ronald Light, District Engineer
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