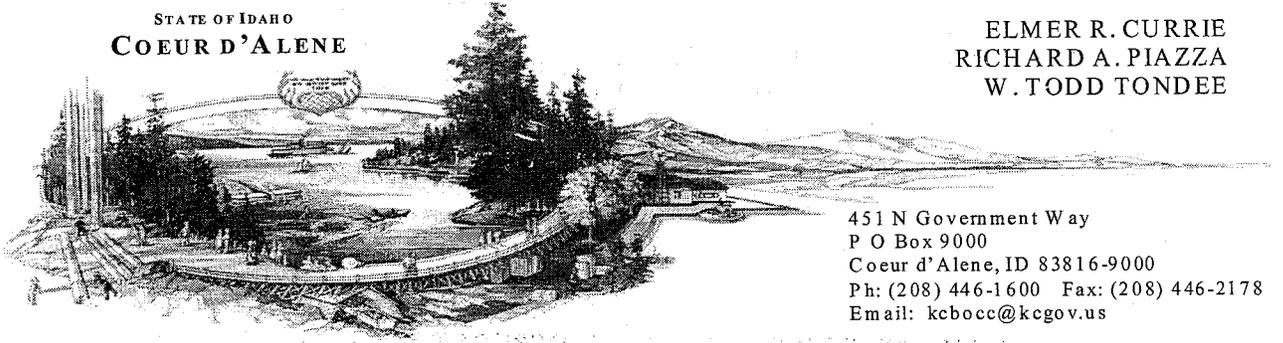


# KOOTENAI COUNTY COMMISSIONERS

STATE OF IDAHO  
COEUR D'ALENE

ELMER R. CURRIE  
RICHARD A. PIAZZA  
W. TODD TONDEE



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March 23, 2010

U.S. Army Corps of Engineers  
CECW-CE Douglas J. Wade  
441 G Street, NW  
Washington D.C. 20314-1000

Subject: Docket Number COE-2010-0007  
Process for Requesting a Variance from Vegetation Standards for  
Levees and Floodwalls

Dear Mr. Wade:

The proposed process for requesting a variance from vegetation standards for levees and floodwalls is a valid concern for our local communities in Kootenai County. Requiring the involvement of an engineer for levee variances creates a financial burden for the County as we do not have an engineer on staff. Forcing all regions towards one national standard is not practical or feasible.

If our communities lose the existing Seattle District variance, we are unsure of our ability to secure the necessary funding to provide site specific variances. The Seattle District understands our local issues and concerns within their regional jurisdiction and their experienced staff is familiar with our levees. We have partnered and collaborated with the Corps of Engineers' Seattle District for many years to ensure that the safety of our levee is not compromised and effective surveillance, monitoring, inspection, maintenance, and flood fighting does not jeopardize the integrity of our levees. Through the years, the Seattle District's variance and partnership has allowed us to withstand flooding including three federally declared flood disasters. Losing this variance will prompt a financial burden that we may be unable to meet, and mitigating to the national vegetation standards can undermine the integrity of our levees, causing major concerns to life safety.

We strongly feel that keeping variances at the district level provides the highest level of safety for our community as well as the protection of property and the environment in Kootenai County. We ask that you consider this request for keeping variances at the district level.

Sincerely,

**Kootenai County  
Board of Commissioners**



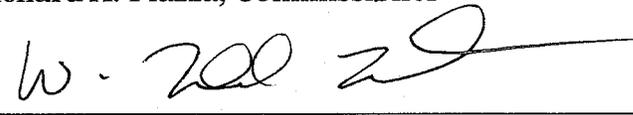
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Elmer R. Currie, Chairman



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Richard A. Piazza, Commissioner



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W. Todd Tondee, Commissioner

c: Senator Mike Crapo  
Senator James E. Risch  
Representative Walt Minnick  
Representative Mike Simpson