



Carnation

Duvall

King County

North Bend

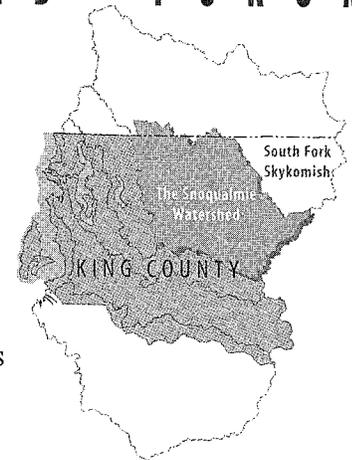
Snoqualmie

Snoqualmie Tribe

S N O Q U A L M I E W A T E R S H E D F O R U M

April 12, 2010

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



RE: Opposition to Proposed Revised Policy Regarding Variances from Vegetation Standards for Levees and Floodwalls (Docket Number COE-2010-0007)

Dear Mr. Wade:

On behalf of the Snoqualmie Watershed Forum, we are writing to provide comments on the Proposed Revised Policy Regarding Variances from Vegetation Standards for Levees and Floodwalls. The Snoqualmie River is a largely rural watershed that covers nearly 700 mi² in eastern King County, Washington. The Snoqualmie River and its tributaries are home to three species of salmonids that are listed as threatened under the Endangered Species Act: Puget Sound Chinook salmon, bull and steelhead trout. The Snoqualmie Watershed Forum is a partnership between King County, the Snoqualmie Tribe, and the cities of Duvall, Carnation, North Bend and Snoqualmie. The Forum provides a mechanism for coordinating and implementing water resource and habitat projects in the Snoqualmie and South Fork Skykomish Watersheds that together represent roughly half of the larger Snohomish Basin. All of our member jurisdictions are signatories to the Snohomish River Basin Salmon Conservation Plan.

Our member jurisdictions also understand flooding first-hand and the proposed policy directly impacts approximately 9.5 miles of flood protection facilities in our watershed. Public safety of levees – the stated objective of this change in policy – is of paramount importance to all of us. We are confident, however, that the retention of vegetation under the regional variance does not jeopardize the stability of these flood facilities and likely strengthens them. Experience in our region shows that vegetation strengthens levees due to the binding effect that the roots of plants have on embankment materials in the Pacific Northwest. King County has extensive experience using bio-stabilization methods that incorporate native vegetation to repair levees.

Fish habitat in the Snoqualmie River has been highly degraded due to the cumulative effects of past actions. One of the main goals of the Snohomish River Basin Salmon Conservation Plan (adopted as part of the federal Puget Sound Chinook Recovery Plan) is to replant the banks of the rivers and streams, and to improve channel edge conditions for juvenile salmonids. Since 1998, the Forum has invested \$5.2 Million toward habitat restoration, watershed protection, and other salmon recovery activities in the watershed. Our

investments have leveraged an additional \$27 Million from federal, state, tribal and local sources toward these efforts. Removing trees along the banks – even if the banks are modified from their natural condition – is a major step backward.

The proposed policy change threatens to undermine two pillars of our salmon recovery strategy:

1) Public agencies must set the example for habitat restoration before looking to sacrifices from private landowners. Since the completion of our salmon conservation plan in 2005, all of the largest habitat restoration projects in our watershed have occurred on public lands through the collaborative actions of numerous agencies and non-governmental partners. At the same time, our smaller jurisdictions have undertaken substantial efforts to replant riparian areas and to support similar actions by partner organizations both within and outside of city boundaries. Private landowners have also stepped up to the plate, planting over 100 acres of riparian areas since 2005. These plants are of course still immature and will take many years to provide the full riparian benefits associated with mature trees. This is something we talk about with many landowners – that it will take a long time to see the results of your dedication and hard work. It has not been easy to convince people to undertake these actions. We will set a double standard by cutting down trees on public facilities while simultaneously asking private landowners to plant trees.

2) Sound science must guide our restoration activities. Our basin partners spent several years developing a robust, science-based approach to salmon recovery. We expect the U.S. Army Corps of Engineers to do the same regarding vegetation on levees. Any policy changes should be based on scientific research, which the Corps committed to during the Corps-sponsored symposium, “An Examination of Levee Vegetation Policy,” held in February 2009 in Renton. Specifically, the Corps stated that the Seattle District’s regional variance would remain in place until the research currently underway at the Corps’ Engineering Research and Development Center is completed. The study is not complete. The current national levee vegetation standards in Corps ER 500-1-1 engineering manual were developed decades ago and were based primarily on the needs of river systems in regions other than Puget Sound. These standards conflict with many contemporary policies and practices in the Pacific Northwest related to the role of native riparian vegetation, which provides critical fish and wildlife habitat to several species listed under the federal Endangered Species Act.

Also, under the proposed procedures, it will be extremely costly and time consuming to secure a variance for future actions. For that reason, should the variance policy proceed as proposed, we request that you allow all existing variances to stay intact for a minimum of two years to allow for a reasonable transition to the new requirements.

Finally, we are very concerned about the unintended consequences of the policy change that will further hamper restoration efforts. Vegetation removal from levees requires mitigation; ironically, mitigation often takes the form of

additional planting elsewhere, which can be expensive in its own right. But, sometimes there are additional costs that overwhelm the direct costs of mitigation actions. For example, in the Green River basin, as a direct consequence of recent and anticipated vegetation removal on levees, an additional \$2.5 million will be spent on the acquisition of a receiving site where "mitigation plantings" can be done. While that specific project also presents excellent opportunities for additional restoration, it is debatable whether a single-site planting can mitigate ecologically for the removal of trees along miles of riverbank. When the \$2.5 million acquisition cost is combined with actual planting and maintenance cost, this also represents an exorbitantly high mitigation cost, and the diversion of a significant amount of funding from flood reduction related projects. In closing, we respectfully request that the Corps live up to its commitment to base policy decisions regarding the regional variance on sound science. Similar to the Corps, the Forum shares the goal of conserving and restoring our rivers while continuing to protect public safety. We sincerely hope the Corps will strive to balance its multiple mandates and objectives to reach an innovative science-based approach to managing our rivers' levees. We look forward to working with the Corps on future projects and programs to improve watershed health and public safety.

Sincerely,



Charles Peterson
Councilmember, City of Snoqualmie
Chair, Snoqualmie Watershed Forum



Elizabeth Walker
Councilmember, City of Duvall
Vice-Chair

cc: Members of the Snoqualmie Watershed Forum
Honorable Patty Murray, United States Senator
Honorable Maria Cantwell, United States Senator
Honorable Dave Reichert, United States Congressman
Col. Anthony Wright, Commander and District Engineer, US Army
Corps of Engineers, Seattle District
Jo-Ellen Darcy, Assistant Secretary of the Army
Barry Thom, Acting Regional Administrator, Northwest Region, NOAA
Fisheries
Steven Landino, Director, Washington State Habitat Office, Habitat
Conservation Division, National Marine Fisheries Service
Kenneth Berg, Manager, Western Washington Field Office, US Fish and
Wildlife
David Dicks, Executive Director, Puget Sound Partnership