



February 8, 2012

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The Honorable Doris Matsui
2434 Rayburn House Office Building
Washington, D.C. 20515

Dear Representative Matsui:

On behalf of the California State Association of Counties (CSAC), I am writing to thank you for your continued leadership aimed at ensuring that the U.S. Army Corps of Engineers' (Corps) one-size-fits-all levee vegetation removal policy is reexamined. In particular, we thank you for introducing HR 399, the *Levee Vegetation Review Act of 2013*, which would require the Secretary of the Army to undertake a comprehensive review of the Corps' policy guidelines on vegetation management for levees. Our association is pleased to endorse this important legislation.

As you know, the Corps' vegetation management guidelines represent a narrow and restrictive policy that is unworkable for California's flood control agencies. Additionally, the Corps' variance process fails to recognize the regional diversity of California counties' flood protection systems and will adversely affect public safety and cause harm to the environment. For example, the various submittal requirements associated with the variance process, including specified timeframes to submit a variance, are infeasible. Moreover, the vegetation removal policy and variance application process would result in local agencies undertaking a significant amount of work at great expense and in competition with other public safety needs, including critically needed flood protection maintenance and upgrades.

As you are further aware, the Corps' Engineer Research and Development Center's initial research effort on levee vegetation indicated that minimal data exists on the scientific relationship between vegetation and levees. Without a sound scientific understanding of the connection between vegetation and levee safety on which to base its guidelines, the Corps should not be implementing a nationwide policy with multi-billion dollar cost implications.

The *Levee Vegetation Review Act* appropriately recognizes the need for the Secretary of the Army to conduct a comprehensive review of the Corps' vegetation management standards. The bill also properly calls for the Secretary to consider factors that promote and allow for consideration of potential variances from national guidelines *on a regional or watershed basis*. Additionally, the legislation would require the Secretary to solicit and consider the views of the National Academy of Engineering as part of the policy review process.

Thank you for your continued support in our efforts to seek reasonable modifications to the Corps' levee vegetation policy while still protecting public safety.

Sincerely,

A handwritten signature in blue ink that reads "Matthew Z. Cate".

Matt Cate
CSAC Executive Director