

The Walla Walla District of the U.S. Army Corps of Engineers (the Corps) proposes to remove woody vegetation adjacent to the walking/biking paths of Mill Creek below the diversion dam at Rooks Park. The Corps has submitted a “draft Finding Of No Significant Impact” (FONSI) and an “Environmental Assessment” (EA). The vegetation removal is proposed *to meet flood risk reduction and maintenance requirements in accordance with Corps Headquarters regulation and policies* (FONSI).

The proposed expensive levee alteration is problematic with respect to aesthetics, climate, habitat, and safety. It would make walking, running, biking, and horseback riding less pleasant; would degrade habitat for terrestrial and aquatic organisms; **and may decrease levee strength and public safety.**

According to the FONSI, *the vegetation free zone is to provide access to and along the levee for surveillance, inspection, maintenance, and flood-fighting.* Although shrubs and grasses might hide a small seep, trees would not hide a significant leak.

In addition, the FONSI states that roots weaken a levee *creating safety concerns during floods.* **Actually, roots strengthen levees** (as rebar strengthens concrete walls). An added benefit is that evapotranspiration by vegetation reduces that moisture content of the levees, potentially increasing their strength.

The Corps plans to clear-cut the trees in fall 2015 and excavate stumps and root balls in 2016. Removing stumps and root balls does not generally include removing all the roots, which typically extend horizontally as far from the tree trunk as does the canopy. If the trees are killed, their roots will die. Dead roots rot. Rotting roots leave tunnels. If a levee gets saturated during a flood, tree root tunnels provide avenues for piping. Water flowing through the tunnels enlarges them. **The piping may lead to levee collapse during a flood.**

Many statements in the FONSI and EA are misleading or debatable:

1. *The affected area only amounts to 1% of the federally owned lands at Mill Creek Project* (EA, p.20). However, this 1% likely has the highest visitor use. Tree removal would significantly affect aesthetics.

2. The shade cover on the creek *would decrease from 2.5% to 0%* (EA, p.20). Because fish, including the endangered steelhead, require water at less than 70 degrees, every bit of shade during our hot summers is important.
3. The Corps declares no significant impact, yet notes that tree removal means reduced terrestrial insects for fish to eat, and fewer leaves for aquatic insect larvae. The Corps admits that vegetation removal *would produce moderately negative affects on terrestrial wildlife*, and that a few bird species would be affected (EA, p.21). Kingfishers and osprey would have fewer trees on which to perch while hunting. No mention is made of potential harmful effect on rabbits, river otters, or other mammals.
5. *Recreationalists using the path on the north levee in the late afternoon/evening may notice a difference in the shade...*(EA, p. 30). What about the south levee at midday in summer?
6. *Given the minuscule contribution of CO2... from the proposed action to overall global emissions, effects are considered insignificant* (EA, p. 31). This statement refers to fuel consumption; not mentioned is the potential carbon sequestration by 308 trees to be cut. If each of us has the attitude that our carbon emissions are insignificant relative to overall global emissions, the hope for reducing the rate of global climate change is greatly diminished.

The Corps headquarters seems to treat all levees as the same, from the long giant structures along the Mississippi River to our local tiny levees. They are not the same. One size does not fit all. What happened a decade ago in New Orleans during hurricane Katrina should not dictate clear-cutting of trees on Mill Creek's levees, **especially if it may weaken our levees , thereby increasing flood risk.**

The Corps eventually backed down when challenged about the removal of levee vegetation in California. According to *The Fresno Bee* (24 March 2014), "The U.S. Army Corps of Engineers says it will no longer disqualify levees that fail its maintenance standards because they have too many trees and other vegetation. Instead, it will allow local levee managers to decide if trees are a threat to flood safety ." "As a result of a lawsuit ...the Corps suspended its controversial program requiring removal of all trees and shrubs from levees...(Center for Biological Diversity, 11 September 2014)."

This expensive (about \$300,000) project **which may weaken Mill Creek levees** and which will reduce shade, habitat, and aesthetics is unnecessary. I urge the local Corps to challenge the directive from Headquarters. That failing, a full Environmental Impact Statement including cost/benefit analysis should be required.

I urge citizens to read the FONSI and EA on the home page of the Walla Walla District of the Corps and attend the public meeting on Wednesday, 12 August, at 5 p.m. in the Airport Terminal Building Conference Room. Ask questions, voice your opinion, and submit your comments to NEPANWW@usace.army.mil by 24 August.