

March 31, 2022

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The Honorable Michael L. Connor
Assistant Secretary of the Army (Civil Works)
108 Army Pentagon
Washington, D.C. 20310-0108

RE: Docket No. COE-2021-0007, *Development of the National Levee Safety Program*

Dear Mr. Secretary,

On behalf of thirty-four levee owners and operators from eleven states along with affiliated organizations and individuals, we respectfully submit the following comments related to the overall purpose, scope, and usefulness of the National Levee Safety Program (Program), including that described in the *Federal Register* notice published on December 28, 2021 (Docket No. COE-2021-0007).

We are grateful for the opportunity to submit input and have it carefully considered and responded to by our partners at the U.S. Army Corps of Engineers (USACE or Corps). While our organizations have profound misgivings about key features of the Program, we are committed to helping protect our communities from uncontrolled flooding and value our decades of collaboration and achievement with the Corps. We will continue to operate our levee systems with public safety as priority one. Our organizations will continue to use fair-minded assessments of hard evidence, costs, and available resources while pursuing the best possible trade-offs to reduce future flood-related loss and suffering.

Our primary concerns and recommendations for the Program are presented below as follows—

- I. Fulfilling the Promise of the National Levee Safety Act
- II. Maintaining Rationale Duty Assignments, Resource Allocation, and Core Competencies
- III. Improving Levee Owner/Operator Engagement
- IV. Ensuring Data Quality

I. Fulfilling the Promise of the National Levee Safety Act

The Corps is well-suited to help us achieve the two fundamental promises of the National Levee Safety Act—

1. improve the reliability of levee systems protecting people and property from floods, and;
2. develop and share objective, transparent, and useful information for advisory-level public risk communication.

During its celebrated history, the Corps has well understood and delivered on the important mission underlying our intergovernmental partnership—to work closely with local sponsors in making sure flood projects are safe to begin with, and if they are not, to do something about it!

Statement by Senate Managers – America’s Water Infrastructure Act (AWIA), 2018

The Congress has addressed the subject of us working together to ensure safe levees for several decades, including in each of the last two comprehensive water resources bills authorizing the Civil Works program of the Corps. First, the following appeared in the October 10, 2018, *Congressional Record* on S6738 as the opening portion of the Senate Explanatory Statement accompanying S. 3021, the “America’s Water Infrastructure Act of 2018”—

“Section 1144 on Levee Safety Initiative Reauthorization extends by five years the authorization of appropriations for the National Levee Safety Program, which includes the committee on levee safety, inventory, and inspection of levees, and levee safety initiative. *The Senate Managers urge the Army Corps of Engineers (the Corps) to improve the current levels of levee safety program transparency and local levee sponsor involvement.*

By law and policy, local levee sponsors assure the day-to-day performance of levee systems. As such, local sponsors typically maintain abundant familiarity with localized flood and levee system conditions as well as local risk management and communication needs. *For the levee safety program to be successful in achieving cost-beneficial flood damage reduction, the Corps must, to the maximum extent practicable, involve local sponsor expertise and rely on scientifically sound and technically rigorous analysis.* The Senate Managers are aware of internal guidance drafted by the Corps to direct its district offices to engage public sponsors as participants in all levee safety program activities. The Corps is encouraged to execute this directive fully so that local sponsors and affected citizens derive maximum benefit from the levee safety program.

The Senate Managers are additionally concerned about the agency's decision to formulate and publicize Levee Safety Action Classification (LSAC) assignments for levee systems in the absence of site-specific solutions and corresponding cost estimates. It is difficult to perform effective risk

characterization and communication about levee systems in the absence of identified corrective actions and their associated costs and benefits. *The levee safety program must improve flood protection by driving requisite cooperation with local sponsors, transparency, objectivity, rigorous technical justification, and development of actual solutions that focus on the imperative of identifying cost-beneficial, engineered solutions. The Corps noted in a March 2018 Levee Portfolio Report that, "there may be reluctance to share risk information with the public when an immediate and viable risk management solution has not been identified." The Senate Managers urge the Corps to immediately rectify this shortcoming by cooperating with local levee sponsors to produce viable levee system corrective actions and corresponding cost estimates along with LSAC assignments. Given the scope and potential impact of these levee system risk assessments, which could involve levee accreditation status by FEMA under the National Flood Insurance Program, the Corps should also seek out external peer review of the reliability and usefulness of the overall LSAC process.*" [emphasis added]

Section 131, Levee Safety – Water Resources Development Act (WRDA), 2020

Second, the following provision was enacted into law as part of the “Water Resources Development Act of 2020”—

SEC. 131. LEVEE SAFETY.

Section 9004 of the Water Resources Development Act of 2007 (33 U.S.C. 3303) is amended by adding at the end the following:

“(d) Identification of Deficiencies.--

“(1) In general.--For each levee included in an inventory established under subsection (b) or for which the Secretary has conducted a review under subsection (c), the Secretary shall--

“(A) identify the specific engineering and maintenance deficiencies, if any; and

“(B) describe the recommended remedies to correct each deficiency identified under subparagraph (A), and, if requested by owner of a non-Federal levee, the associated costs of those remedies.

“(2) Consultation.--In identifying deficiencies and describing remedies for a levee under paragraph (1), the Secretary shall consult with relevant non-Federal interests, including by providing an opportunity for comment by those non-Federal interests.”.

We believe that levee safety begins with safe levees. There is little indication, however, that the Corps has marshalled its considerable talent and resources to embrace the safe levees approach recommended by the Senate Managers in 2018, namely, that the agency support local sponsors by working closely with them to develop usable information for site-specific levee corrective actions with corresponding cost estimates. In this way, the Corps can build on its resounding success over the decades with continued emphasis on the engineering competence it has built up to continuously improve and sustain the complementary economic flood protection contributions made by well-built and well-maintained structural projects.

Section 131 of the recent 2020 WRDA amends the National Levee Safety Act of 2007 to clarify that the Corps will fulfill the following three needs to improve and sustain levee reliability. First, the result of regular Corps project inspections involving non-Federal sponsors will have the agency identify project engineering and maintenance deficiencies, if any. Next, the Corps will produce and provide to the levee owner/operator recommended remedy options with associated cost estimates. Finally, throughout the performance of these critical tasks, section 131 directs the Corps to continuously partner with the non-Federal project sponsor, including by routinely soliciting and considering their input. There is no discernable evidence that the Corps has dedicated itself to fulfillment of the Section 131 safe levee directives to ensure structural flood project reliability.

This notice for *Development of the National Levee Safety Program* and its supplemental background information seemingly fail to clearly identify agency actions associated with safe, reliable levee systems as a prioritized mission of the Corps. Instead, the reader is told that the purpose of the Program is “to improve the way levees are managed throughout the United States and its territories in order to reduce disaster suffering and improve the resiliency of communities behind levees.” The overwhelming majority of levees across the United States are not managed by the Corps. Levees are most often owned, operated, and managed by local entities created under state authorities. We remain concerned that the Corps may be intentionally or unintentionally usurping or harmfully diminishing the project management authority and role of local sponsors, which has not been authorized by Congress.

Public Law 84-99

The Public Law 84-99 Rehabilitation and Inspection Program is closely related to this pivotal discussion. Enacted some 80 years ago, the Public Law 84-99 Program has fulfilled the will of Congress to pursue the clear national interest in quickly delivering emergency assistance to repair and rehabilitate enrolled flood control projects damaged during floods. For decades, local sponsors have operated and maintained flood protection projects to both ensure their structural integrity and retain project eligibility in the program. This is a program that has worked to extend and strengthen the infrastructure component of a broader approach to flood protection for hundreds of levee-protected areas around the country. Structural projects like levees complement the distinct floodplain management activities being carried out, in most cases, by separate local zoning and regulatory agencies. In the decades since enactment of the PL 84-99 Program, there has been no effort by Congress to pursue new local sponsor obligations like zoning, building code enforcement, flood insurance, or any other non-maintenance duty or floodplain management activity as part of PL 84-99 emergency assistance agreements. However, the Corps purports that the 2007 Levee Safety Act, as amended, somehow greenlights the agency to impose new requirements onto local sponsors. This is not the case.

In the nearly 100 years of flood control cooperation that extend back to the 1936 Flood Control Act, if not the 1917 Act, Congress has refrained from interfering with local police powers as part of flood control cooperation. There is nothing in the legislation creating the Levee Safety Program, or any other authority, that marks a break with the long-established limitations governing floodplain regulatory authority and flood control cooperation between the Corps and local sponsors. We are unaware of any law granting authority to the Corps or other Federal agencies to intervene in this way. Moreover, to impose new local obligations onto the successful, decades-long Flood Control Act cooperation model is uncharacteristic of how Congress has respected the constitutional roles of states and localities. Had Congress intended to modify the flood control cooperation model it would have characteristically made the new measures of Federal interest cooperative in a manner consistent with the overall flood control model. Such a cooperative framework would make new measures subject to cost shared participation, not stark usurpation of local police powers. Any suggestion to the contrary constitutes blatant interference with the plenary powers and effective operation of non-Federal units of government.

Recommendation

Consistent with the recent, related directives from Congress and in recognition of the clear benefits that well-built and well-maintained levees provide, our organizations strongly recommend immediate Program realignment as discussed above so that we may resume our productive intergovernmental cooperation to identify and implement achievable, economic measures to help ensure that safe levees remain as a viable, lasting component of successful flood protection for communities.

II. Maintaining Rational Duty Assignments, Resource Allocation, and Core Competencies

We find that key features of the Program put communities, local sponsors, and the Nation at risk because of misplaced priorities. In the United States, where flood prone areas are home to more than 50 percent of both our population and gross domestic product, we must maintain the rational duty assignments, allocation of resources, and core competencies among inter-governmental agencies that have effectively combated uncontrolled flooding. Federal agencies and non-Federal entities can together, by each “staying in our lane,” best safeguard the Nation’s interests, including public safety, while enabling our global commerce.

Prior to enactment of the 1928 and 1936 Flood Control Acts, local flood agencies along our rivers and coastlines assumed the responsibility of protecting communities from uncontrolled flooding. Congress authorized the Corps to make federal investment in local flood control based on objective assessments of the net benefits derived from reducing damages to flood prone areas. The Corps is now improperly reframing those same project benefits as levee risk factors or “consequences” for agency program management purposes and to compel local sponsors to execute landward risk management measures. This change seems inconsistent with the intent of Congress as expressed in statute (see 33 USC 3302-3303) and, perhaps most disconcerting, will undermine the globally enviable and effective intergovernmental partnerships that have worked to protect communities from catastrophic flooding. Furthermore, while there is clear statutory

authority for the Corps to make project investment decisions based upon the benefits derived from a project, we do not find similar authority for the Corps or other Agencies to regulate projects or levee-protected lands, or to otherwise affect local sponsors by using the reframed benefits as consequences. Nonetheless, FEMA is already using Corps consequence-based levee risk assessments for pricing National Flood Insurance Program premiums under the new Risk Rating 2.0 methodology and the Corps has indicated it intends to use this information in a move toward risk-based decision making under a new rulemaking for PL 84-99.

The accepted burden and welcomed role of assuring safe, reliable Federal program levees and related infrastructure falls jointly on local sponsors and the Corps. This is so because one or the other designed, built, and performs operation and maintenance of the project itself--not the entirety of the levee-protected floodplain. Most local project sponsors, notwithstanding their outsized contribution to improved life safety and flood damage reduction, navigation, and economic development in riverine and coastal lowland areas, are not sovereign over those levee-protected lands. While local sponsors are understandably obligated to help build public awareness of the flood risk that exists near projects, most neither possess the resources nor legal authority to administer prudent use and management of property that lies beyond our projects.

The Mississippi River and Tributaries (MR&T) Project authorized by the 1928 Act has prevented \$2.021 trillion in cumulative damages to generate an unprecedented 116.8 to 1 return on investment. In 2020 alone, \$194.9 billion in flood damages were prevented along the MR&T Project. During the epochal May 2015 rainfall across Texas, Corps flood control projects maintained by local sponsors prevented more than \$13 billion in single-year flood damages. And during the unprecedented 279 days of Midwest flooding in 2019, flood control operations prevented \$2.4 billion in damages in Missouri and Kansas. The Program and USACE should be building on these and other achievements with continued emphasis on engineering competence at the Corps and among local sponsors to sustain and increase wise economic flood control.

The important responsibility of floodplain management, frequently involving local land use regulation, flood insurance, building standards, and other nonstructural hazard mitigation approaches, is guided by FEMA in partnership with land use and zoning agencies at the local level. In most cases, those local regulatory agencies are not the same as the owner-operator of the flood control project. When executed as intended, however, these separate and distinct missions of flood control and floodplain management serve as the tandem components of successful, economic flood protection, and can continue to do so. Local sponsors and the communities they help to protect can benefit from increased cooperation with FEMA and the Corps, but that will happen only if agency roles, responsibilities, and requirements are clear, justified, and achievable.

Key features of the Program are playing havoc with these rational duty assignments and core competencies by advancing a misguided approach at the worst possible time. In the face of dynamic flood risk attributable to our growing infrastructure gap and shifting demographic, development, and climatic forces, the Program would seemingly have us divert our attention from vital infrastructure by retasking flood project managers with remote floodplain management duties. Every dollar and manhour spent by the Corps and local sponsors on floodplain management is a dollar and manhour not spent on improving project performance and preventing catastrophic project failure.

The predictable outcome of the Corps and local sponsors redirecting their attention and resources to floodplain management is that less attention is paid to achieving and maintaining the critical and compelling benefits of economic flood protection. Moreover, if the Corps forces local sponsors into increasingly far-flung floodplain management duties, the traditional land-use and zoning agencies that have the proper authority, competency, and capacity to fulfill that role will be improperly incentivized to cede their responsibility to thoroughly review and understand the implications of floodplain development to local levee sponsors who lack the authority to carry out land use planning and affect floodplain management.

Recommendations

Our organizations strongly recommend that we not undermine our gains and risk future success by muddling the rational division of duty assignments, resources, labor, and core competencies among intergovernmental authorities. We should instead encourage project sponsors to work steadfastly with the Corps in diligent pursuit of the essential flood protection project gains that are achievable through economic design, construction, and maintenance improvements. The important responsibility of floodplain management, frequently involving local land use regulation, flood insurance, building standards, and other nonstructural hazard mitigation approaches, is guided by FEMA in partnership with zoning agencies at the local level. In most cases, those local regulatory agencies are not the same as the owner-operator of the flood control project. When executed as intended, however, these separate and distinct missions of flood control and flood plain management can serve as the tandem components of successful, economic flood protection. Local sponsors and the communities they help to protect can benefit from increased cooperation with FEMA and the Corps, but that will happen only if agency roles, responsibilities, and requirements are clear, justified, and achievable.

III. Improving Levee Owner/Operator Engagement

The following statement is featured prominently in this *Development of the National Levee Safety Program* notice—

“One of the foundations of the National Levee Safety Program is stakeholder engagement with those who are responsible for, are impacted by, or have interest in levees and related policies including federal/state/local governments, tribes, levee owners/operators, businesses, floodplain managers and residents. The goals for the stakeholder engagement process are to:

1. Understand the needs of the stakeholders this program is intended to support;
2. *provide opportunities for meaningful input to shape decisions and outcomes on program design, components, and products; and,*
3. ensure that the unique challenges related to levees faced by disadvantaged communities and tribes are well understood and incorporated into solutions.” [emphasis added]

It is appropriate and essential for the Program to be integrally informed and shaped by levee owners and operators, including both Federal and non-Federal levee sponsors. This essential objective is asserted on multiple occasions by the Congress since 2007. Referencing a portion of the previously cited 2018 AWIA Statement by the Senate Managers—

“...local levee sponsors assure the day-to-day performance of levee systems. As such, local sponsors typically maintain abundant familiarity with localized flood and levee system conditions as well as local risk management and communication needs. For the levee safety program to be successful in achieving cost-beneficial flood damage reduction, the Corps must, to the maximum extent practicable, involve local sponsor expertise and rely on scientifically sound and technically rigorous analysis. The Senate Managers are aware of internal guidance drafted by the Corps to direct its district offices to engage public sponsors as participants in all levee safety program activities. The Corps is encouraged to execute this directive fully so that local sponsors and affected citizens derive maximum benefit from the levee safety program.”

Mindful of these statements, we hereby register our deep disappointment and concern over the manner and methods being used by the Program to reinstitute the National Committee on Levee Safety (Committee). While the Committee may offer value to the Program and the Nation, the *Federal Register* notice titled “Notice of Solicitation of Applications for Stakeholder Representative Members of the Committee on Levee Safety (Committee)” [FR Doc. 2022–01159], posted on January 20, 2022, would create a panel with a set of duties and heavy-handed agency oversight powers that violate existing authority pursuant to 33 U.S. Code 3302 – Committee on Levee Safety.

The language in 33 U.S. Code 3302 states under section (e) Duties and Powers that “the committee shall submit to the Secretary and Congress an annual report regarding the effectiveness of the levee safety initiative in accordance with section 3303b of this title,” with each report to be comprised of information “that describes the *independent recommendations* of the committee ...”. [emphasis added]

The following Corps solicitation language found in “Committee Recommendations and Documentation Section (3)” clearly contradicts the intent of Congress and the statutory requirement to provide for *independent* Committee report recommendations—

“After each time the Committee provides recommendations, USACE and FEMA will inform the Committee within a reasonable amount of time whether the recommendations were incorporated or reasons the recommendations were not incorporated.”

Lastly, in providing direction for establishment of the Committee on Levee Safety, the Congress called for eight representatives of “State levee safety agencies”, defined in WRDA 2007 as “the agency of a State that has regulatory authority over the safety of any non-Federal levee in the State”. There are many levee districts across the nation established under State enabling legislation with such authority, including many that are sponsors of Federal levees. In WRDA 2016 the Congress recognized that “regional districts”, as a subdivision of a state government “authorized to acquire, construct, operate, and maintain projects for the purpose of flood damage

reduction” are appropriate entities to carry out the activities identified in the Levee Safety Initiative (33 U.S. Code 3303a).

The terms of the current USACE solicitation for nominations to fill positions on the Committee on Levee Safety (Committee) seem inconsistent with the statutory language and are incongruent with the expressed intent of Congress to provide regional districts a more meaningful role in levee safety, including on the Committee presently being formed.

Recommendations

After-the-fact engagement of essential levee owners and operators to ostensibly provide opportunities for meaningful input to shape Program decisions and outcomes is counterproductive and dangerous to the Nation’s interests. This ongoing and recently extended Program solicitation for stakeholder representatives to the Committee on Levee Safety is not sufficiently transparent, externally focused, or productive. Let us start anew to genuinely partner for improved, transparent, and achievable flood protection that relies on fair-minded and transparent assessments of hard evidence, costs, and available resources in pursuit of the best possible trade-offs to affordably reduce future flood-related loss and suffering.

If we are to have a Levee Safety Committee comprised of dedicated, non-Federal contributors, then let’s let them and the public contribute. We find that the Committee charter from the 2007 Act is outdated and each of our organizations is actively recommending to Congress the following legislative enhancements.

- “Skin-in-the-game” representation. *We support increasing the number and ratio of levee owner/operator representatives. Levee sponsors achieve levee safety operationally and no one has more skin in the safe levees game than do they.*
- Protection of levee sponsor data and views. *Any Committee recommendation or report to Congress must include a separate, free-standing statement of the views of levee sponsor-designated Committee members.*
- Public Comment. *All recommendations and reports of the Committee shall be published in the Federal Register for comments prior to finalization and comments of the public shall accompany recommendations and reports.*
- Oversight of Corps budgets and expenditures. *The Committee shall receive compiled, detailed reports of Corps budgets and expenditures for the Levee Safety Program and be able to provide independent comments and recommendations on the scale and distribution of funding.*
- Open meetings and total transparency. *If the Committee is to serve in an advisory capacity as envisioned in the ongoing solicitation, then the Federal Advisory Committee Act shall be made to apply to all Committee proceedings to assure that minimum standards of participation and transparency are met.*
- A Corps-only Committee. *If FEMA desires to have an advisory committee, they should pursue and self-fund their own committee. The engineering needs for safe levees are not in FEMA’s mission set. The advisory committee must concentrate on Corps authorities and avoid conflicts with FEMA authorities and goals.*

In keeping with the intent of Congress in WRDA 2007 and 2016, and consistent with the make-up of the first round of appointments to the National Committee on Levee Safety, the Corps should deem any member of a “regional district” that has “regulatory authority over the safety of any non-Federal levee in the State” as appropriate to fill one of the eight “State levee safety” representative positions on any Committee on Levee Safety, including that for which nominations are currently being sought.

IV. Ensuring Data Quality

We were encouraged by Congress stating in the 2018 AWIA—

“For the levee safety program to be successful in achieving cost-beneficial flood damage reduction, the Corps must, to the maximum extent practicable, involve local sponsor expertise and rely on scientifically sound and technically rigorous analysis.”

Regrettably, we have yet to see the Corps incorporate this vital perspective into its development and implementation of approaches to levee safety. The outputs from the Corps’ levee safety program, to date, have largely been screening level risk assessments resulting in Levee Safety Action Classification (LSAC) ratings. Concerns with the development, unchallengeable nature, and use of risk assessments have been shared with the Corps in a multitude of formats, and are reflected in the following comment contained in the Corps’ Public Comment Summary: DRAFT Engineer Circular 1165–2–218: U.S. Army Corps of Engineers Levee Safety Program—

“While we do not object to adjunct use of risk assessments per se, we are troubled by the presumption that only Corps-produced risk assessments may be used as the basis for broad programmatic operations and, indeed, the totality of our national flood protection effort. The Corps risk assessments can be neither unchallengeable nor unimprovable if we are to rationally sustain and improve the form and function of our flood control investments.”

Further, the Corps shared their concerns with the amount and quality of levee data housed in the National Levee Database (NLD) on its recently released NLD and Data Collection Fact Sheet—

“Effective flood risk management decisions rely on having access to robust comparable data that will facilitate a fuller understanding of levee conditions and their associated risk. For many years, the key gaps in knowledge for levees was identifying the location of all the levees in the Nation. Since 2007, USACE and FEMA have been working together to identify levees and include them in the National Levee Database. Although we understand more than ever about the location of the Nation’s levees and what is at stake behind them, we do not have a complete enough picture regarding their condition or expected performance during high water events.”

Recommendations

We find it to be incumbent upon the Corps to do more to ensure data quality, which should start with categorizing the quality of levee safety related information being collected, produced,

housed in the NLD, or otherwise made available to Federal Agencies or others for use in their respective programs. The Office of Management and Budget (OMB) Guidelines for implementing the Information Quality Act issued in 2019 state—

“The *Guidelines* impose three core responsibilities on federal agencies:

1. Agencies must embrace a basic standard of quality and consider quality in their information dissemination practices.
2. Agencies must develop information quality assurance procedures that are applied before disseminating information.
3. Agencies must develop an administrative mechanism for affected parties to request that agencies correct information of inadequate quality, with an appeal process and annual reports to OMB.”

And—

“The *Guidelines* characterize a subset of agency information as *"influential scientific, financial, or statistical information"* that is held to higher quality standards. This is scientific, financial, or statistical information that "the agency can reasonably determine ... will have or does have a clear and substantial impact on important public policies or important private sector decisions."

In carrying out these responsibilities, particularly the OMB requirements imposed on "influential" information, the Corps will begin the steps necessary to ensure the quality of data they are developing and sharing, and we request these steps be immediately initiated.

Conclusion

In the face of dynamic flood risk attributable to our growing infrastructure gap and shifting demographic, development, and climatic forces, we encourage our partners at the Corps to help us by prioritizing the ongoing functionality and continued enhancement of our enduring flood control investments. We encourage a return to the versatility, purposefulness, and efficiency that made possible the Galveston Seawall, St. Lawrence Seaway, Yellowstone National Park, the MR&T system, and the Panama Canal. Let's together think big and achievable while pursuing the best possible trade-offs to reduce future flood-related loss and suffering.

We thank you for focusing on outcomes, not additional process, to help meet the urgent flood protection needs of the Nation. Please direct any questions about this letter to one of the following individuals: Dan Delich at 214-707-8772 or dan.delich@sbcglobal.net; Stephen Gambrell at 901-758-1212 or mvfca1922@gmail.com; or Karin Jacoby at 816-977-1690 or karin.jacoby@huschblackwell.com.

Sincerely,

Atchison County Levee District No. 1, Rock Port, MO
Big Island River Conservancy District, Milan, IL
City of Chesterfield, MO

Cotton Belt Levee District, Helena, AR
Dyer County Levee and Drainage District, Dyersburg, TN
Fabius River Drainage District, MO
Fairfax Drainage District, Kansas City, KS
Fifth Louisiana Levee District, Tallulah, LA
Fort Bend Economic Development Council
Fort Bend Economic Development Council Flood Management Committee, representing:
 First Colony Levee Improvement District, TX
 First Colony Levee Improvement District No. 2, TX
 Fort Bend County Drainage District, TX
 Fort Bend County Levee Improvement District No. 2, TX
 Fort Bend County Levee Improvement District No. 7, TX
 Fort Bend County Levee Improvement District No. 10, TX
 Fort Bend County Levee Improvement District No. 11, TX
 Fort Bend County Levee Improvement District No. 15, TX
 Fort Bend County Levee Improvement District No. 17, TX
 Fort Bend County Levee Improvement District No. 19, TX
 Fort Bend County Levee Improvement District No. 20, TX
 Sienna Parks & Levee Improvement District, TX
Fulton County Levee Board, Hickman, KY
Hickman-Fulton County Riverport Authority, Hickman, KY
Jefferson County Drainage District No. 7, Port Arthur, TX
Kaw Valley Drainage District, Kansas City, KS
Matagorda County Conservation and Reclamation District, Bay City, TX
Mississippi Levee Board, Greenville, MS
Missouri Farm Bureau
Monarch-Chesterfield Levee District, MO
North Lafourche Conservation, Levee and Drainage District, Thibodaux, LA
Papio-Missouri River Natural Resources District, NE
Responsible River Management, Sidney, IA
Sny Island Levee and Drainage District, New Canton, IL
St. Francis Levee District, West Memphis, AR
Tensas Basin Levee District, Rayville, LA
Two Rivers Levee and Drainage District, Mediapolis, IA
Unified Government of Wyandotte County and Kansas City, KS
Velasco Drainage District, Clute, TX
Yazoo-Mississippi Delta Levee Board, Clarksdale, MS

Arkansas Waterways Commission
Coalition to Protect the Missouri River
Floodplain Alliance for Insurance Reform (FAIR)
Mississippi Valley Flood Control Association
Missouri and Associated Rivers Coalition (MOARC)
Missouri Levee and Drainage District Association
Upper Mississippi, Illinois, and Missouri River Association (UMIMRA)

CC:

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