October 19, 2005

LTG Carl Strock U S Army Corps of Engineers Headquarters 441G Street Northwest Washington, DC 20314

## Dear LTG Strock:

The impacts of Hurricanes Katrina and Rita on Gulf Coast states have been devastating to these coastal environments and have highlighted the importance of these areas to the Nation both environmentally and economically. The role of the Corps in disaster response has been crucial. It seems clear that the Corps will have a continuing and prominent role in the rehabilitation of coastal infrastructure and ecosystems. This role will likely include existing projects and new initiatives. Your Environmental Advisory Board (EAB) is eager to provide advice to the Corps as this process unfolds. We strongly recommend that the Corps' first Environmental Operating Principle 'Strive to achieve Environmental Sustainability' be adhered to even in this time of rapid response. Sustainability should be incorporated in near team activities and serve as the hallmark of long-term restoration of the Gulf Coast.

During our October 12-13, 2005 working session we received briefings on emergency response and ongoing Corps efforts to meet current and future needs of the region. We understand that a new planning effort will soon be initiated to consider future coastal policy and potential synergies among ecosystem restoration, storm surge reduction and navigation efforts. The EAB maintains a keen interest in these issues and requests regular, detailed and timely reports on progress towards integrated water resource planning in the impacted region.

We also have learned that the Corps has initiated an immediate detailed evaluation of the performance of existing flood protection measures during Hurricane Katrina, and has solicited the services to the ASCE and NRC to assist in this activity. We endorse these approaches. In addition, The EAB has identified other immediate actions to ensure current activities do not result in further environmental degradation, and to provide a firm foundation for future planning and sustainability. We urge you to undertake the following actions:

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## **Environmental Considerations in Near Term Repairs to Corps Projects**

- Identify opportunities for near-term repairs to existing flood and hurricane protection systems that are consistent with all of the Environmental Operating Principles. We urge you to direct the COE to proactively consider environmental consequences with each decision to repair infrastructure and to design repairs accordingly. This might include beneficial use of sediments dredged during reopening on navigation channels, or importing sediments for levee reconstruction to prevent further disturbance of existing ecosystems.
- Provide assurances that near-term repairs will support, rather than constrain, future plans to restore the coast, e.g., that a rebuilt levee could still be modified to provide for riverine diversions.
- Review the consequences of the Corps' participation in the FEMA Public Assistance Program, which seems to fuel the immediate restoration of the public infrastructure without thoughtful assessment of long-range consequences. Where possible, we urge more sustainable, non-structural approaches to floodplain management be taken into consideration. Again, long-term sustainability should be incorporated into each near-term decision.
- Describe and incorporate near-term repairs that will allow environmental improvements in the future and not constrain implementation of existing plans for restoration.

## **Immediate Support for Longer Term Planning**

- Initiate detailed analyses using numerical models of the effects of changing coastal landscapes. Evaluate the cumulative impact of other Corps projects on the performance of flood protection projects.
- Initiate detailed analyses using numerical models of the effects of the flood protection and other Corps projects on the coastal landscape.
- Explore non-structural measures to reduce future flood damage and loss of life, including most appropriate use of hazardous lands below sea level.
- Develop and reinforce progressive internal mechanisms to enable future integration of ecosystem restoration with the traditional missions of navigation, storm damage reduction, and flood protection. This should include the operation and maintenance of existing projects, as well as the planning and implementation of future projects.
- Identify future environmental scenarios (e.g., climate change, sea-level rise, subsidence) within which long-term options for the entire coastal system can be evaluated.

We believe it is important for the Corps to act now on these issues. When we meet in December, we request a report on progress and/or your evaluation of why these activities should not be urgently pursued. Also, at our December meeting we hope to receive a briefing on the Corps' longer-term plans for integrating environmental needs into future activities within the impacted area. We hope our discussions with you in December will lead to specific actions that are time-bound and measurable. Such action is critical for restoration of a Gulf Coast that will sustain the ecosystem, the economic vitality and the people who call this region home.

Thank you for considering our recommendations we look forward to your reply and to productive discussions at our December meeting. Please feel free to call on me or any member of EAB if you have questions.

Sincerely

Ken Babcock Chairman

Environmental Advisory Board