



TO: U.S. Army Corps of Engineers
FROM: Julie Ufner, National Waterways Conference
RE: Request for Extension of Comment Period for Draft Engineer Manual (EM) 1110-2-1913
DATE: August 23, 2022

On behalf of the National Waterways Conference (NWC), we respectfully request a 90-day extension to the public comment period for the U.S. Army Corps of Engineers (Corps) draft Engineering Manual 1110-2-1913 – Evaluation, Design, and Construction of Levees. Our members are concerned that the September 1, 2022, deadline for comments does not leave them with enough time to adequately review and thoughtfully comment on the proposed revisions.

NWC was established in 1960 and is dedicated to a greater understanding of the wider public benefits of our Nation's water resources infrastructure. Conference membership is diverse and includes the full spectrum of water resources stakeholders, including flood control associations, levee boards, waterways shippers and carriers, industry and regional associations, hydropower producers, port authorities, shipyards, dredging contractors, regional water supply districts, engineering consultants, and state and local governments. Many of our members are non-federal sponsors on Corps projects, and own and maintain water resources infrastructure including levees and other flood reduction structures that will be directly impacted by the changes in the draft EM.

As referenced in NWC's "Comments on the "Development of the National Levee Safety Program" (Docket No. COE-2021-007) on March 31, 2022, we continue to have concerns about the reliability and reproducibility of data used across the program for risk-informed design. The draft EM contains significant changes from historical design manual procedures that have worked for several decades and we request additional time to analyze, disseminate and share our findings.

Thank you for your consideration. We look forward to partnering with USACE on this update. For more information or questions, please contact Julie Ufner, NWC President and CEO, at 202.203.4795 or by email at julie@waterways.org.