September 5, 2007

Congressman Rick Larsen  
1529 Longworth House Office Building  
Washington, D.C. 20515

RE: Incorrect Skagit River Flood Analysis and Long Term Repercussions to the Cities of Mount Vernon and Burlington – Request

Dear Congressman Larsen,

The Councils of Burlington and Mount Vernon met in joint session September 5, 2007 to receive information on the status of several issues related to the Skagit River flood risk, and determine next steps where appropriate. This is an issue which carries with it substantial future ramifications. We must get it right.

The Councils recognize the Skagit flood risk is serious. The Councils and the Mayors take their responsibilities to protect the citizenry from flooding, very seriously. However, the Councils are concerned that the magnitude of a 100-year flood event is being overstated, skewed high due to inclusion of poorly substantiated historic flood estimates in the flood frequency analysis. Use of these overstated historic estimates translates to incorrectly high base flood elevations; further, the underlying hydrology makes every project to protect against the 100-year event more expensive.

The Councils believe the current analysis is wrong. It will result in base flood elevations being set too high, significantly slowing growth in key urban commercial and industrial areas of our cities that are lawfully located in the flood plain. Slower growth (much slower in many areas, we believe) will result in slower growth in the property tax base – the source of funding for important basic services, including schools. In time, this slower commercial and industrial growth will cause slower growth in other revenue sources, including sales tax. This will mean fewer resources to fund basic government services, including and especially, schools. Since we know base flood elevations are going up anyway, we know we already face a significant economic challenge. At issue is, are we being burdened unfairly, due to an administrative process that is imposing excessive base flood elevations on us incorrectly?

We believe we have a significant challenge to meet, even with the correct analysis, which will broadly move base flood elevations higher throughout our cities. But to set base flood elevations too high due to an incorrect technical analysis will economically penalize the citizens of the Skagit Valley for decades, due to the combined effect of 1) slower than necessary growth in the tax base, and 2) higher than necessary expense for flood measures. Therefore, it is critically important the analysis be correct.
Prior to and subsequent to the County’s technical consultant releasing its analysis of Skagit River flooding in December 2005, the report drew criticism from the Corps of Engineers, the USGS, FEMA, and others. However, we believe this report has withstood the test of time, has been validated by subsequent independent technical reviews (Northwest Hydraulics and Hromadka) and technically strengthened with new independent research (Hamilton Smith house). Previous requests to FEMA to incorporate the results of this analysis into its flood mapping effort have been ignored. But we believe this analysis is the most authoritative and most accurate yet produced, and should be used as the basis of any further work by FEMA. To that end, the Cities and adjacent Dike Districts have developed a complete, FEMA-ready analysis, including the hydrology, hydraulic model, and FEMA flood plain maps, which we expect to have ready for FEMA review by mid-October. This complete package is substantial, well-documented and defensible. We will request FEMA substitute this package as the technical basis for FEMA’s revised base flood mapping program for our urban growth areas. We ask you to support this effort.

Sincerely,

Bud Norris
Mayor
City of Mount Vernon

Roger “Gus” Tjeerdsma
Mayor
City of Burlington

C: Board of County Commissioners
Senator Patty Murray
Senator Maria Cantwell