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**Comments to
Proposed Skagit River Flood Risk Management
General Investigation
Skagit County, Washington
Draft Feasibility Report and
Environmental Impact Statement
Tentatively Selected Plan (TSP): Comprehensive Urban Levee Improvement (CULI) Alternative**

July 17, 2014

The Samish Basin, similarly to the Skagit Basin, is comprised of some of the most productive farmland in the state of Washington and produces a similar array of agricultural crops and livestock. The Samish River has a modest diking system completed in the mid 1980's on the lower reaches that is scaled to manage only Samish River flows. The Samish River dikes have experienced dike breaks since construction- the most notable were during the floods of 1990 and 1995. The last time a Skagit River flood impacted the Samish Basin was in 1921 and was attributed to a dike break at Burlington. The interior basin has several drainage districts: Drainage & Irrigation District 14, 25, 16, 5, and 18. There are several dike districts: Dike District 25, 5, 19, and 4. The greater Samish Delta/agricultural area is strongly influenced by tidal pressure as its elevation ranges from slightly below sea level to approximately twenty feet. The districts are organized by their natural topography relative to drainage outlets. The over-all elevation differential within the drainage district's boundaries is negligible - relatively flat - which exacerbates timely surface, storm and flood water drainage especially considering the limited number of interior drainage outlets coupled with strong tidal influence which is mainly a single tide cycle during the rainiest times of the year. With the increase in upland development, surface water management within the lower basin has become more challenging and has resulted in increased pumping to augment tide cycles. The timely removal of surface waters is of paramount priority to the drainage districts and agricultural crops.

We are writing to express concerns and objections to the Comprehensive Urban Levee Improvement (CULI) Alternative (TSP), specifically the impacts to the rural and agricultural areas north and west of the project area, particularly the Samish Basin. We strongly believe the proposed CULI does not adequately consider or appreciate the inadequacy of the present drainage systems to effectively handle additional flood waters from the Skagit River let alone the occasional floodwaters from the Samish River. Furthermore, the Samish River diking system is greatly incapable of handling the Skagit River flood waters and will experience over topping and damage to its fragile infrastructure. There is a serious lack of flood water return gates within the basin as a whole. The basin is struggling with that very issue for

dealing with the annual rainwater events and will likely be looking at increasing interior drainage outlets in the near future.

It appears that drainage issues will be "determined later" at the feasibility stage but to those of us familiar with permitting basic drainage maintenance and necessary repairs, this is a red herring. The fact is it takes years and intense negotiation to maintain existing infrastructure. The systems are over-due for upgrade and augmentation yet the path to implement improvements is blocked by permitting and various environmental review processes. In order to implement the TSP it is necessary for the drainage facilities and possibly some of the Samish diking systems to be upgraded but there is no discussion on how that may happen. Waiting until a flood happens or after the project is built is too late. We are already behind schedule in a real sense. It would appear that the Flood Control Act of 1962, section 209 could be a path to additionally augment the drainage infrastructure along with this project:

*Flood Control Act of 1962, Section 209: "The Secretary of the Army is hereby authorized and directed to cause surveys for flood control and allied purposes, including channel **and major drainage improvements**, and floods aggravated by or due to wind or tidal effects, to be made under the direction of the Chief of Engineers . . . " ...Puget Sound, Washington, and adjacent waters, including tributaries, in the interest of flood control, navigation, and other water uses and related land resources."*

The plan is silent, or at best alludes to the feasibility phase, about post flood recovery for the rural areas. The concern that "*Flood fighting may affect the performance of the CULI Alternative if activities confine flood flows and allow for more water to reach downstream areas where levees could be at risk of overtopping and failure which include the urban centers protected by this alternative*" suggests there will no longer be any attempts to minimize flooding as long as Burlington stays dry. This is unacceptable to the rural property owners and flies in the face of the idea that everybody will take a little bit of water. The reality appears to be the rural people will get wet and more often while Burlington in general will stay dry. What is so disreputable about this notion is that the City of Burlington was advised many times over many years to avoid siting valuable infrastructure and commercial enterprises in the most vulnerable areas for flooding and to leave the area surrounding and including Gages Slough available for flood waters. That advice was ignored and now the rural citizens will pay the price. There was opportunity to explore and utilize creative uses of pervious and semi-pervious surfaces and selectively locating and elevating structures while utilizing the vast acreages of parking lots as drainage basins. Instead it seems people think farmland can soak up the flood waters instead. Farmland can only do a part but not all of the accommodating. The desire of the urban areas to become free of purchasing flood hazard insurance is a selfish folly.

The plan needs a great deal more detail on the frequency and depth of the potential flooding to the rural areas especially as a result of the deflection dike built to the north and around the Burlington industrial park. It appears the industrial park buildings are already up on elevated pads so one wonders why the need to dike them in and we suggest omitting this section of dike entirely. How often will the flood gates at highway 20 and the railroad be closed? The plan, in an offhand way, mentions throughout the document uncertainty to the rural areas outside the Skagit dikes:

- *Specific risk and uncertainty remaining includes the extent of potential induced and transferred flood risk resulting from confined flood flows with larger and more robust levees to areas in the northern Skagit River floodplain, including the Nookachamps-Clear Lake area and Sedro-Woolley, and downstream below Mount Vernon.*

- . . . *Structural measures such as low elevation berms and improvements to interior drainage and sea dikes, can be evaluated on an incremental basis to reduce induced and/or residual flood risks once the risk is better understood.*
- . . . *Residual risk is still of concern for much of the rural floodplain, including cropland. Many critical structures remain in the floodplain or would become isolated during floods. Nonstructural measures such as updating evacuation plans and routes will be considered during feasibility-level design.*
- *The northern floodplain may experience an increase in floodwaters spreading across the Samish River near Edison; thus this area could have an adverse impact to public health and safety.*

Experience has proven that waiting until “later” to take on a fundamental task such as the interior drainage improvements is a foolhardy plan of action. The interior drainage must be an integral part of the entire package and not relegated to a nebulous date in the future. Understanding this is a draft proposal with some of the elements still at the conceptual stages, it is still prudent to include some strategies for removing the inevitable flood waters. Consultation with the aforementioned drainage and diking districts within the Samish Basin, particularly the inundation areas, must take place before the plan goes forward any further. There needs to be some level of certainty for the interior drainage infrastructure especially since it is often now and in the future will be taxed to carry more flood waters and potentially more surface waters with the advance of climate change toward rainier winters and springs. The drainage districts’ tax base cannot continue to carry the ball for increased surface water inundations and flood waters.

The over-all transfer of risk from the Burlington urban area to the eastern areas of Sterling, Nookachamps, Clear Lake and to the north and west into the Samish Basin is unacceptable. The plan has determined 16,000 persons will be removed from flood risk but is silent on how many rural people will be inundated other than to say the risk is somewhere between 0 and 100%.

The TSP itemizes certain industries but completely omits obvious agricultural infrastructure that are dotted throughout the Samish Basin: several potato warehouses and packing facilities, a frozen and fresh fruit processing plant, several grain handling and storage facilities and several dairies and livestock operations. The TSP cherry picks certain public facilities but is silent on those located in the rural impacted areas. The fire hall at Allen becomes isolated during a flood and there are at least two elementary schools within the area that would be affected. There is also a community grocery store at Allen and numerous small businesses in Edison to name the most obvious. These facilities all have value but the plan is silent on the impact to them because it categorically lumps everything outside Burlington and Mount Vernon as generic and expendable, rural. It is NOT expendable and is of equal importance to the fiscal well-being of Skagit County. The plan lists major employers and is again silent on the number employed by the agricultural sector.

We question the statement “removes from the flood plain”. The urban areas are not without risk and are still within the flood plain. What will change is the insurance rating but that risk and cost is shifted to the rural area without financial compensation.

The notion that everyone will take some water does not offer enough comfort to the rural areas. Our flood risk seemingly does not change from doing nothing but could be worse with the TSP. A discussion is missing on how the county portion of the cost for the project will be capitalized throughout the county: Will it be pro-rated? Will there be a reduction of property taxes according to the risk? Will landowners be compensated for diminished valuations due to increased flooding? Will property owners be compensated for flood damages? Will FEMA now put more restrictions upon the rural property owners? These questions are not offered to derail a robust flood plan but are very important to the rural property owners.

We respectfully request additional comment time beyond 45 days. There needs to be community meetings in the effected rural areas outlining the risks and coordination with the drainage and diking districts. The plan's somewhat conceptual nature makes some details hard to determine without additional time for research and discussion.

Sincerely,

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