

From: [Roger Mitchell](#)
To: [NWS-Skagit-River-GI](#)
Subject: [EXTERNAL] Skagit River General Investigation Study - Comment
Date: Monday, July 21, 2014 12:24:44 PM
Attachments: [Comment on Skagit River General Investigation Study Scoping Summary Report for the Draft Feasibility Study and Environmental Impact Statement revised February 2012.docx](#)

Ms. Hannah Hadley,

Please see my attached comment for the record.

Please confirm receipt of this message and of inclusion of my comment in the record.

Thanks

Roger Mitchell
Bow, WA

Comment on Skagit River General Investigation Study – Scoping Summary Report for the Draft Feasibility Study and Environmental Impact Statement revised February 2012

by Roger Mitchell
Bow, Washington

Any one of the stated flood risk management alternatives will have profound impacts on thousands of Skagit County citizens, taxpayers, and property owners, our local economy, and our general well being. Citizens or their instituted government should not take the decision lightly.

With years of information gathering, computer modeling, and discussion, no one actually knows if any proposed flood mitigation plan will actually work. What we do know, with an enormous amount of historical accuracy, is that it will cost way more than is currently estimated. Despite the many years of study and gazillions of dollars spent thus far, it will still be a crapshoot.

My preferable option would be a bypass solution that would move water through the Skagit Valley without inundating farms, homes, businesses, schools, roads, and other areas.

My major concern is that rural, private property owners and our much-needed agricultural community will, once again, bear the brunt of whatever action is taken. Pages 1-2 of “Skagit River General Investigation Study Scoping Summary Report for the Draft Feasibility Study and Environmental al Impact Statement” (revised February 2012) states a focus on solutions that, “...increase protection for urban areas in the Skagit River delta, with lesser protection for rural areas...”. Private property owners and agricultural landowners need to be adequately compensated by contracts executed before any land work associated with this plan is commenced. Any flood mitigation contemplated or implemented must adhere to the Washington State Attorney General’s “Advisory Memorandum: Avoiding Unconstitutional Takings of Private Property”. In making any flood mitigation choice it is imperative that private property rights be respected. Often that property is the physical manifestation of people’s lives, careers, hopes, and dreams. Private property is often the heritage of generations of a person’s family lineage.

A major caution is an unwarranted reliance on cost benefit analysis. The most important aspect of an accurate cost benefit analysis is including all the costs and all the benefits and properly quantifying them. Most cost benefit analyses fail when not all costs are included. Furthermore, benefits are often double counted thereby skewing the result and the implications. Too much reliance may be placed on cost benefit analysis because it is human nature to think that a numerical representation is a reflection of accuracy. It isn’t. The numerical result in a cost benefit analysis, especially one as complex as flood mitigation projects, is based on many, many highly subjective inputs.