



August 4, 2014

Ms. Hannah F. Hadley  
U.S. Army Corps of Engineers  
CENWS-EN-ER  
P.O. Box 3755  
Seattle, Washington 98124-3755

RE: Skagit River Flood Risk Management General Investigation, Skagit County,  
Washington, Draft Feasibility Report and Environmental Impact Statement

The City is pleased to see the County (the sponsoring partner) and the USACE achieve the important milestone of providing the public a draft feasibility report and undergo environmental review in the form of an Environmental Impact Statement.

The study seeks to accommodate important strategic objectives of regional flood protection. Thus the study aligns in large measure with the City's strategic goal to provide all of its residents reduced risks from flooding. It is the City's goal that such reduction be achieved at minimum level of FEMA 100 year flood protection as now or hereafter established by FEMA. Flood protection is the City's number one infrastructure priority. Large developed areas within the City's existing city limits and urban growth area are protected in some measure from Skagit River flooding by existing levees. Work in the GI to assure and improve the level of protection to existing urbanized areas is essential. The City's existing urbanized areas in the 100 year flood plain include many important and essential local and regional public services and infrastructure such as City Hall, the Superior and District Courts, Skagit County and City police departments, federal post office, BNSF main railway line, City's wastewater treatment plant, the county jail, the regional multi-modal transportation hub and historic downtown Mount Vernon. Failure to receive adequate protection to the City's existing urbanized infrastructure will have probable, significant, adverse economic, cultural and social-economic impacts to the greater region. Mount Vernon also retains the greatest population of any city in Skagit County. Mount Vernon urbanized areas located within the floodplain also include residentially zoned or mixed residential/commercial areas. Failure to address the existing urbanized area will have significant impacts to homeowners and residents.

The City's public works department has reviewed the report. The City continues to advocate that the GI Study and preferred alternative mitigation measures provide, at a minimum, 100 year flood protection as determined by FEMA to the City's Urban Growth Area. It appears that the feasibility report includes flood mitigation measures which if constructed provide flood protection at or greater than the City's desired 100 year level of service in many areas within the City with the exception of West Mount Vernon and some small outlying areas. To the extent the proposed mitigation measures provide flood protection at or greater than the desired levels within the City's UGA, the City is in general support the GI Study. In those areas which the study cannot demonstrate such flood protection, the City respectfully requests that the USACE Corps demonstrate through the EIS process that those areas within the City's UGA where measures fail to provide 100 year flood protection or greater will not receive adverse environmental impacts caused by the project, including but not limited to the results of rerouting, collecting or otherwise directing greater volumes of water during a flood event.

Lastly, another important area that we request to be more thoroughly addressed in the GI study is assurance that the selected alternative does no harm to others. The need for the project to mitigate for its adverse impacts to our neighbors and community members is essential.

The City looks forward to your response and appreciates the opportunity to comment in this process.

Sincerely



Esco Bell, P.E.  
Public Works Director

cc: Mayor Boudreau  
City Council  
Kevin Rogerson, City Attorney  
Jana Hanson, Community and Economic Development