



August 5, 2014

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

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

Subject: City of Burlington Comments on Report

Dear Ms. Hadley:

The selection of the Comprehensive Urban Levee Improvement (CULI) Alternative as the Tentatively Selected Plan (TSP) is consistent with the plans of the City of Burlington as a practical approach to flood hazard mitigation in the Skagit River Basin. After examining the details of the alternatives presented in the Draft Feasibility Report, the CULI is clearly the most cost effective and technically effective means of reducing flood risk to life and property.

The City of Burlington strongly supports construction of levees that are certified and accredited to 1% Annual Chance Exceedance (ACE) in order to optimize long term public safety and economic development. The report takes that goal one step further with the proposed 0.4% ACE as the preliminary National Economic Development (NED) Plan, a cost-effective approach.

The unique location of Burlington presents many challenges, with the Skagit River on two sides, the intersection of Interstate 5 and SR 20, and the BNSF Railroad mainline and east/west rail lines all coming together here in the heart of the City.

Burlington has a long history of over 110 years as an incorporated City, and the role of the City as a regional service center has greatly expanded over the past 20+ years, primarily because of its central location. Implementing the CULI TSP is vital to protecting important transportation corridors. We recognize that it is not possible to protect all occupants in the Skagit River Basin equally. The common sense approach of reducing the flood risk to the greatest portion of the population coupled with protecting the economic generators of the region is the right approach as achieved by implementing the CULI action. The City of Burlington is home to approximately 9,500 jobs and is a significant generator of state and local sales tax revenue through its regionally significant retail center. This economic engine must be preserved and protected for the benefit of the region.

The City provides first class police and fire protection to its residents as well as to its regional neighbors. Especially, in time of emergencies, such as floods, it's crucial to sustain this valuable community infrastructure.

Dike District #12 and Burlington have been long standing partners in working to upgrade the levee system around the community and work is now in process towards the goal of levee certification. Burlington is also coordinating with the Dike District, United General Hospital and the Sedro-Woolley Wastewater Treatment Plant to get funding that will move those project components into a preliminary design phase for added flood protection. This is the right time to take action to finalize the efforts of the Corps of Engineers General Investigation and move the overall program forward.

One of the significant issues that is studied in the Draft Feasibility Report is the debris buildup behind the BNSF Bridge. The influence of debris buildup is significant in the overall flood picture as demonstrated by analysis contained within the report. The City is working with BNSF to secure funding to replace the bridge, which is approximately 100 years old, and remove the center piers that collect debris. This is a very costly venture and building the necessary private / public partnership to accomplish this goal is years in the making. This would be a good addition to the TSP.

The City also supports the optimization of the Baker Dam storage as presented in the CULI alternative. Expanding the window of reservoir drawdown and increasing volume of available storage is a low cost compliment to added levee protection.

Containing and channeling flood waters are thoroughly analyzed in the report. An equally important component in the flood fight is conveying the waters away from affected areas as quickly as possible. Gages Slough parallels the Skagit River from north of Burlington to downstream of Mount Vernon. This waterway has become stagnant over the years, and has been choked by sedimentation and vegetation. Dredging of Gages Slough and armoring it to convey vast amounts of water should be considered as an additional component of the CULI.

The City of Burlington supports inclusion of thorough evaluation of, and mitigation measures for any impacts to our neighboring communities from the implementation of the CULI TSP. As a result, Burlington asks that the CULI thoroughly identify the impacts to the City of Sedro-Woolley and outlying areas to minimize and mitigate for additional water which might be channeled their way.

And finally, the City has been gravely concerned about the outcome of FEMA's current efforts to revise and update the Flood Insurance Rate Map program. We ask that benefits derived from this TSP be coordinated with and reflected in FEMA's study.

Thank you for taking action on this long awaited program and for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'S. Sexton', written over a light blue horizontal line.

Steve Sexton
Mayor

Copy to: Skagit County
City of Mount Vernon
City of Sedro-Woolley
City of La Conner
City of Anacortes