SKAGIT RIVER IMPACT PARTNERSHIP

coordinating partner November 9, 2006

CITY OF MOUNT VERNON **BUD NORRIS, MAYOR**

Carl L. Cook, Jr.

Director Mitigation Division

U.S. Department of Homeland Security Region X

FEMA

130 228th Street, SW

CITY OF BURLINGTON ROGER "GUS" TJEERDSMA Bothell, WA 98021-9796

SKAGIT COUNTY

KEN A. DAHLSTEDT COMMISSION CHAIRMAN

CITY OF SEDRO-

Re:

Response to Wilbert O. Thomas' February 9, 2006, "Evaluation of Flood Frequency Analyses for the Skagit River, Skagit County, Washington"

WOOLLEY SHARON DILLON, MAYOR

Dear Mr. Cook

TOWN OF LACONNER WAYNE EVERTON, MAYOR

SKAGIT COUNTY

DIKE DISTRICT NO. 3 **DAVID OLSON** COMMISSIONER

SKAGIT COUNTY CONSOLIDATED DIKE DISTRICT NO. 22 **CURTIS WYLIE** COMMISSIONER

SKAGIT COUNTY DIKE DISTRICT NO. 17 DARYL HAMBURG COMMISSIONER

SKAGIT COUNTY DIKE, DRAINAGE, AND IRRIGATION **IMPROVEMENT** DISTRICT NO. 12 CHARLES H. BENNETT COMMISSIONER

SKAGIT COUNTY DIKE DISTRICT NO. 1 DON MOE, COMMISSIONER

SKAGIT COUNTY DRAINAGE AND IRRIGATION DISTRICT HERB WALTNER COMMISSIONER

In November 2005, FEMA asked Skagit County to prepare and submit a report to FEMA summarizing the hydrologic and hydraulic work that the County had performed as part of its in-kind services for the USACE General Investigation Study on the Skagit River. The hydrologic and hydraulic work was performed under contract to the County by Pacific International Engineering. The County submitted the requested report to FEMA on December 13, 2005. On February 10, 2006, FEMA Region X transmitted a report entitled "An Evaluation of Flood Frequency Analyses for the Skagit River", to the Skagit County Commissioners. This report documented review comments by Wilbert O. Thomas (Thomas Report) of Michael Baker, Jr., Inc. on behalf of FEMA.

On January 3, 2006 the County Commissioners sent a letter to FEMA (copy attached) identifying the County's serious concerns with the hydrology developed by the Corps "...because our staff could not agree with the method the Corps was required to use in its statistical treatment of the unrecorded historic flood events – a method our staff continues to believe will lead to inaccurate results". The letter further states, "...the hydrology and hydraulic models developed by our technical consultant are accurate and merit your full consideration". The County Commissioners requested that "...FEMA submit the County's analysis to a qualified independent technical consultant so that the County's information can be considered on its merits". The Thomas Evaluation is FEMA's response to the County Commissioners' request. Due to funding limitations at the time the Skagit County Commissioners did not authorize a written response to the Thomas Evaluation.

The Skagit River Impact Partnership (SRIP) was formed to provide an organization to identify and represent issues of common impact to the Communities and Diking and Drainage Districts of the Skagit Valley. The SRIP has been funded and designated by its membership to prepare a response to the Thomas Evaluation. The SRIP appreciates the effort and hard work by FEMA and Will Thomas in preparing the evaluation. However, we believe that the conclusions of the Thomas Report are not substantiated. The attached Memorandum, prepared by our consultant, Pacific International Engineering, addresses the inaccuracies and unsupported conclusions of the Thomas Report.

The SRIP is committed to performing technically accurate, fully supported and detailed analysis of the hydrology and hydraulics of the Skagit River system. We believe our work should and will withstand the scrutiny of qualified independent technical review. We believe that the work performed by our consultant is of the highest quality and represents an accurate evaluation of the hydrology and hydraulics of the Skagit River watershed. Without identifying any specific technical flaws, the Corps, USGS and FEMA, have inferred the work of our consultant is deficient, and these agencies continue to support the Corps-developed hydrology and hydraulic model. However, at this time we do not believe that reviews performed by the Corps, USGS or FEMA or their consultants represent an "independent technical review". We therefore request to meet with FEMA to ascertain the process for FEMA to adopt the hydrology and hydraulic model developed by our consultant.

Sincerely,

Bud Norris

Mayor, City of Mount Vernon Skagit River Impact Partnership

cc: Senator Patty Murray

Senator Maria Cantwell

Congressman Rick Larsen

Col. Mike McCormick, District Engineer, Seattle District, USACE

Charles L. Steele, Department of Ecology

Skagit River Impact Partnership

Skagit County Council of Governments

Skagit River Impact Partnership (SRIP) Letter to Carl L. Cook, Jr.

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Sharon Dillon

Mayor, City of Sedro-Woolley

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Gus Tjeerdsma

Mayor, City of Burlington

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Charles Bennett

Dike District 12 Commissioner

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Don Moe

Dike District 1 Commissioner