

SKAGIT RIVER IMPACT PARTNERSHIP

COORDINATING PARTNER

CITY OF MOUNT VERNON
BUD NORRIS, MAYOR

November 17, 2006

SKAGIT COUNTY
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COMMISSIONER CHAIRMAN

CITY OF BURLINGTON
ROGER "GUS" TJEERDSMA
MAYOR

CITY OF SEDRO-
WOOLLEY
SHARON DILLON, MAYOR

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

Carl L. Cook, Jr.
Director, Mitigation Division
U.S. Department of Homeland Security Region X
FEMA
130 228th Street, SW
Bothell, WA 98021-9796

Re: FEMA letter to SRIP of October 16, 2006

Dear Mr. Cook:

Thank you for your letter of October 16, 2006 to me as spokesman for the Skagit River Impact Partnership ("SRIP.") The SRIP appreciates the efforts you have made in the interests of the citizens of Skagit County; in particular, we appreciate your traveling to Burlington to meet with us on September 14th. Unfortunately, it occurs to us that some confusion has resulted from that meeting.

The SRIP invited you to the September meeting not only to introduce our organization, but also to express our concerns as to the hydrologic data currently being used by FEMA's contractor, the Corps of Engineers. The experts that the SRIP has retained to review the hydrology have identified numerous instances in which the historic flood data is clearly inconsistent. These inconsistencies in the data will undoubtedly result in the development of flood hazard maps that can not, and will not, be trusted. Although you appear to characterize our meeting as entailing a new hydrological proposal on the part of the SRIP to remove four early floods from the modeling, that was not our intent. What we had hoped to do was to have our engineers demonstrate that the data contains fatal flaws. It appears our intent was misconstrued which has lead to some confusion. However, the underlying issue – that FEMA is relying on the Corps' defective data - still remains.

As we are sure you will agree, the flood maps developed by FEMA have become essential tools for a variety of people and industries that use the maps for different purposes. Here in Skagit County, builders, developers, real estate professionals,

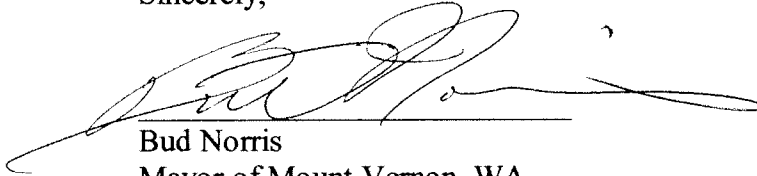
and lenders all use the maps to make informed decisions about particular parcels of property. Similarly, state and local government planners and engineers use those same maps to plan for future growth, and develop appropriate measures to address flooding issues. In siting facilities such as emergency operations centers, fire and police stations, hazardous waste sites, and hospitals, it is essential that the maps accurately depict those areas of our community that are at risk of flood damage. As Dan Sokol, the State of Washington's NFIP Coordinator, wrote to FEMA on January 31, 2005, the state of Washington aggressively campaigned for the modernization of the flood maps, with quality and accuracy of the maps being a primary motivator. The State was deeply concerned that the incorporation of unreliable data into the maps would have a damaging effect on the participation by stakeholders, and the ultimate adoption of the maps. Mr. Sokol's concerns appear to have come true.

We are aware that modernization of the nation's flood maps was designed to provide for engineering updates, including the validation of existing flood data. Unfortunately, it has become clear to us that FEMA's effort is woefully underfunded, resulting in shortcuts that have compromised the quality of the maps. As the Office of the Inspector General, Department of Homeland Security, concluded in its report entitled *Challenges in FEMA's Flood Map Modernization Program* (Report No. OIG-05-44) (Sept., 2005), the proposed budget for the map modernization was "inadequate to meet nationwide requirements for map modernization." As the Inspector General concluded, and as we have seen, FEMA has sacrificed its primary goal of improving the quality of its maps, settling instead for little more than the digitization of its existing, inaccurate maps. This is indeed unfortunate.

We believe that map modernization is a complex process, which requires the integration of engineering data with local data so that an accurate map that will benefit many different users will result. We further believe that the process of modernization requires federal authorities to work cooperatively with local officials, to obtain the best data and better define the flood risk to our community. Such coordination is essential to the modernization process in order to instill confidence in the finished maps, so that our constituents will support the adoption of the finished product. If the maps may be easily challenged and are characterized as being based on fundamental errors, the finished product will be worse than useless. We intend to pursue our mutual goal of ensuring that the resulting maps are accurate by submitting requests to FEMA to provide explanation of basic information. We hope that FEMA will respond with timely, solid, and defensible engineering justification to our questions. We will expect a delay in the implementation of any revised maps until this process is complete.

Again, thank you for your efforts on behalf of the citizens of Skagit County. We look forward to working with you in the future.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bud Norris', written over a horizontal line.

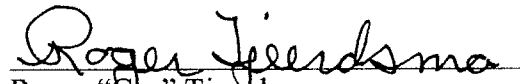
Bud Norris
Mayor of Mount Vernon, WA
Chairman of Skagit River Impact Partnership

cc: McCormick
Murray
Cantwell
Larsen
Chuck Steele
NFIP Administrator

November 17, 2006

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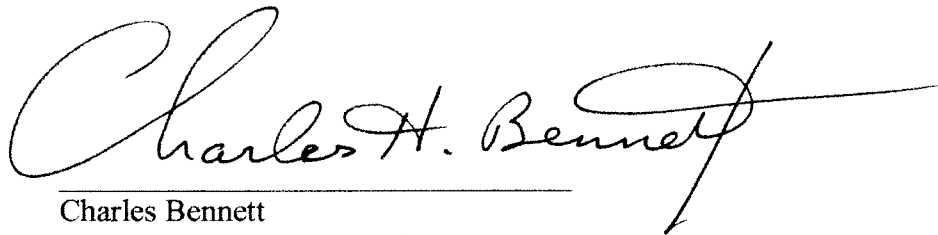
A handwritten signature in black ink that reads "Roger Tjeerdsma". The signature is written in a cursive style with a horizontal line underneath it.

Roger "Gus" Tjeerdsma
Mayor, City of Burlington

November 17, 2006

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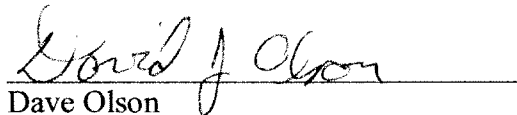
A handwritten signature in black ink that reads "Charles H. Bennett". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Charles Bennett
Dike District 12 Commissioner

November 17, 2006

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

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A handwritten signature in cursive script that reads "David J. Olson". The signature is written in black ink and is positioned above a horizontal line.

Dave Olson
Dike District 3 Commissioner

November 17, 2006

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A handwritten signature in cursive script that reads "Sharon Dillon". The signature is written in black ink and is positioned above a horizontal line.

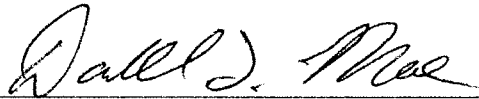
Sharon Dillon

Mayor, City of Sedro-Woolley

November 17, 2006

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A handwritten signature in cursive script, appearing to read "Don J. Moe". The signature is written in black ink and is positioned above a horizontal line.

Don Moe
Dike District 1 Commissioner