

Corps' Measures Workshop Public Comment Sheet		
August 18th, 2008		
This is the electronic version of the public comment form. Thank you for providing your comments electronically.		
To submit comments, reply to: Lornae@co.skagit.wa.us		
Hard copies can be mailed to Lorna Ellestad 1800 Continental Place, Mount Vernon WA 98237 or dropped off at the same address.		
Comments will be accepted until 4:00 pm September 30, 2008.		
Name: Larry Kunzler		Phone: Unlisted
Address: Skagit County		
email: floodway@wavecable.com		
General comments are welcome. To direct a comment towards a specific measure, please identify the measure by the measure name and		
Comment #	Measure number and name from Table 1.	Comment:
1	General Comment	Corps of Engineers brought 8 people. A huge waste of taxpayer's money. How much did this meeting cost the taxpayer? Corps has taken 10 years and 10 million dollars and is now asking us for our comments on 38 possible flood projects. Corps understatement at meeting, "Doing anything with us is kind of complicated." Corps needs 1.3 million to "stay on schedule" for completion of study. If they don't get it, they will have to revise schedule. I'm sorry but meaning no disrespect to the Corps employees, this appears to be a never ending process based on funding that may or not ever be realized.
2	General Comment	It would appear that the money is not going to be there for even completing study, probably will not be there for any project that we have to compete for from other areas of country. If we want flood control in Skagit County we are going to have to fund it ourselves. Ten years, proceeded by 93 years of studies after studies is enough.
3	General Comment	There were some disturbing things at the Corps presentation. They did not know status of moving Hamilton which suggests a lack of communication between Corps and County staff. Corps staffer was looking at map and couldn't locate Mt. Vernon. When the person in charge can't even locate a major city in the floodplain, it doesn't bode well for confidence in the Corps.
4	General Comment	Aren't we putting the cart before the horse? How are we going to pay for any flood control project? Property taxes on all citizens? What about those who won't receive the same benefits as others? Sales tax? Do the citizens of Burlington support a ring dike (bathtub project)? Shouldn't we have an advisory vote on these issues?

5	General Comment	It was very heartening to hear the Corps state how their projects cannot induce flooding without compensating landowners. It was also very heartening to hear the Corps state that the 3 bridge corridor acts as a dam. This public admission has been long overdue.
6	<u>Measure #2.</u> General Statement by Corps: <i>Must have 90% accuracy of weather forecasting before the Corps could put together plan for Baker Dams.</i>	Good luck with that! However, shouldn't the agency be basing its decisions on "Best Available Science" and if they were to error shouldn't that error be on the side of safety of the residents of the flood hazard areas instead of the corporate interest of power brokers? Wouldn't taking control of the dams at an earlier flood flow stage say 60,000 cfs instead of 90,000 cfs be beneficial from the standpoint of managing the outflow with respect to the timing of the crest of the flood event?
7	<u>Measure #'s 1, 2, 3.</u> General Statement by Corps: Compensation for hydropower losses are a local sponsor responsibility.	This is the first time that I believe the Corps has stated publicly that compensation for dam storage would be the responsibility of the local sponsor. I have no problem with that and in fact have been recommending for over 2 years that if we wanted more storage behind the dams that we should offer to pay for it. (See www.skagitriverhistory.com: Angry Citizen September 2006, The Realities of Flood Control in Skagit County and March 2008 E-mail discussion re: Plan B)
8	<u>Measures #'s 1 & 2.</u> <i>"If structural changes are required to Baker Dams they would be cost prohibitive because Baker only contributes 25% to the flow in a major flood event."</i>	Isn't 25% or 1/4 of the flood flows significant from the standpoint of letting the crest from the Sauk River pass the Baker River before or after that 25% is released into the system?
9	<u>Measure #2.</u> <i>"Decision on what to do with Baker Dams is at least 2 years away except that nothing will be done with Lower Baker because it is something the Corps does not have authority to do. Also, Corps wants "passive system" and Seattle District does not expect headquarters to approve."</i>	It appears we have wasted a lot of time looking at storage in Lower Baker because they "do not have the authority to make it happen". To me, if it has the potential to be beneficial, something that the Corps in 1966/67 suggested that it might be (See www.skagitriverhistory.com: Letter to Puget Power from Corps of Engineers, MFR re: Corps Investigation of Existing Baker Sites, Corps Memorandum re Lower Baker River Storage Projects, Corps Memorandum re Preliminary Report on Baker River Regulation) then the Corps should seek the authority to look at modifying the procedures such as taking control of the dams at an earlier stage of the flood event not wait until river reaches 90,000 cfs.
10	<u>Measure #3.</u> <i>"Any changes to Ross Dam storage would require re-opening of FERC license."</i>	Given the fact that FERC has so far been totally non-responsive to protecting the lives and property of Skagit Valley residents, without the full support of Seattle City Light, we would probably be wasting our time.

11	<u>Measure #'s 4 & 5.</u> Corps would “probably” not support Nookachamp or Harts Slough (Sterling area) storage project (i.e. Measures 4 & 5), levees in Nookachamps). Reasons given, very expensive, would induce 5 feet of flooding in Sedro-Woolley, would have to purchase flowage easements from Nookachamp residents due to “induced flooding”. Causes more frequent flooding at higher levels downstream. Double pump event not studied by Corps.	This is actually a good thing. This proposal was originally looked at in the 1960’s and pretty much abandoned because of the same reasons. During a “double-pump” type of flood events, the basin would not be available for any kind of storage and the resulting floods would be even more severe. By putting levees on the edge of the river the smaller flood events would become more serious for downstream residents resulting in more damages than are currently experienced. Induced flooding (5 ft in Sedro Woolley) is also unacceptable. It was nice to hear the Corp would require flowage easements for induced flooding. What the Corps did not state is that the severity of the flooding in the Nookachamps and Sterling during 10 year events and higher is already induced flooding due to the impacts of the existing levees.
12	<u>Measure #6.</u> Sterling levee could not be 100 yr levee in accordance with EO 11988 because it would promote development in rural areas.	Yet another good thing. 100 year levee would not only induce several feet of flooding into Sterling/Nookachamp basin but would promote urban development in all lands north of Highway 20 to across Cook Road and from I-5 East to Sedro-Woolley.
13	<u>Measure #7.</u> 500 ft setback would make sense, preliminary cost 428 million.	Agree, a good idea but is probably cost prohibitive. Corps has been trying to get the levees off the edge of the river since 1897. Dike District #12 responded in the mid-1950's by moving them 4,000 feet closer to the river.
14	<u>Measure #8.</u> 3 bridge corridor, 500 ft setback system, 3 bridge corridor acts as a dam, opening it up would cause less flooding upstream but more downstream. Corps does not have authority to make this happen. R/R bridge construction cost alone would cost 32 million. This does not include cost to R/R for shutting down its bridge while construction is underway.	One has to wonder how the Corps was going to do this in 1979 if they didn’t have the authority and why are we even talking to the Corps if every positive project that Skagit residents are interested in it seems that they don’t have the authority to make it happen.
15	<u>Measure #9.</u> Overtopping Levees. To get enough water out of the system you must start flooding at 5 year event. This is one the Corps will probably drop.	Say what? A lot of money was spent in the early 1990’s promoting overtopping levees. Never was it ever mentioned that they would have to start overtopping in the 5 year event for that project to work. In fact, overtopping levees (i.e. spillways) have been promoted in the Valley since 1922. What analysis has been performed to reach that conclusion? No data was presented at the meeting to support that conclusion. What public document is this analysis contained in? Why wasn't a failure scenario in the Avon area studied?

16	Measure #10. Setback levees for Dike 17 side would be required to run along Freeway Drive.	So what would happen to the existing levee system and what would you do with the Anacortes Treatment Plant if you moved the levee to Freeway Drive? See presentation 53:50.
17	Measure #12. Setback levees with excavation, <i>Corp will not pursue because it "would destabilize the river system."</i>	Again, what analysis was done to support this conclusion? In the early 1990's during the feasibility study, it appeared to be one of the preferred alternatives. Hasn't the current levee system "destabilized" the natural chain of events? Leaving it as it is seems to be the "do nothing approach".
18	Measure #16. <i>Mt. Vernon floodwall not a stand alone measure. Issue is you don't have connectivity with river. You don't see the river.</i>	Is this to say that it shouldn't be happening by itself or that the Corps would not pursue it because of adverse impacts created if it is built by itself?
19	Measure #17-20. Bypass systems, would have to start to use in 5 to 10 year event, and would not function unless the 3 bridge corridor is widened.	This is perhaps the most serious statement made by the Corps as far as I was concerned. It has always been my position that we must widen the 3 bridge corridor, get the water past Burlington and get rid of it before it gets to Mt. Vernon. I have even asked Corps personnel about this proposal and have always been told that we would have to design the levee system in the Avon area to fail in order for it to work. If the current amount of storage and the current level of protection was in place since 1921 (and possibly back to 1900 if you feel that the Stewart figures are wrong) we would have only had to dump water onto the floodplain once and possibly twice in the last 87 years. Now we are being told that it would have to be designed to begin passing floodwaters in a 5 year event. Clearly that would not work. Again, I ask for the documentation to support that hypothesis.
20	Measure #'s 28, 31-36: Ring dikes not favored because of safety issues. <i>"Creates bathtub effect." Could create induced flooding.</i>	I think the Corps is right on point on this issue. Ring dikes are a disaster waiting to happen. Yes, they can protect you from small flood events up to a 100 year flood but when they fail or when you have a 250 year event they will create an even greater disaster than if you had no levees at all. Levees in general create a terrible sense of false security.
21	Measures #28, 29: Sedro-Woolley Sewage Treatment Plant, <i>"not sure ring dike is needed."</i>	Really?? After 13 years and 10 million dollars we still don't even know if a simple ring dike around the sewage treatment plant is needed? I'm sorry but that is a terrible tribute to us spending a lot of money and having little if anything to show for it.
22	Measures #30: Ring dike for United General. <i>Issue ingress and egress.</i>	Wouldn't the bath tub effect like in #15 above be the major concern.
23	Measure #26: <i>No federal funds can be used as a matching fund for moving Hamilton.</i>	Is that just Corps federal funds or is that FEMA funds as well? So where is the funding for moving Hamilton going to come from?

<p>24</p>	<p>General Comment: <i>“Corps has no authority to tell locals that they can’t build flood control structures.”</i></p>	<p>Really? That’s not what was just reported in the Sacramento Bee August 21, 2008: “Stein Buer, SAFCA executive director, said the main reason for the delay is a 2006 federal policy change requiring any physical change in an urban levee to be approved by officials at U.S. Army Corps of Engineers headquarters in Washington, D.C. This policy's effect on Natomas, he said, only recently became clear.”</p>
<p>25</p>	<p>Measure #27: Corps will not deal with debris management.</p>	<p>Once again a federal decision that makes no sense. Structures built in the floodway; in the river channel itself (i.e. bridge abutments) that collect debris which can in some situations redirect flood waters into flood control structures, thus giving them less stability and possibly cause the destruction of the structure, and the Corps will not deal with that? Absurdity never had a finer hour.</p>