

SKAGIT COUNTY PLANNING DEPARTMENT

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July 13, 1979

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SKAGIT COUNTY
COMMISSIONERS

Mr. Sidney Knutson, P.E.
Assistant Chief, Engineering Division
Department of the Army
Seattle District Corps of Engineers
P.O. Box C-3755
Seattle, Washington 98124

RE: Draft Environmental Impact Statement - Skagit River Lower Levee and Channel Improvement Project.

Dear Mr. Knutson,

The Skagit County Planning Staff have reviewed the Draft Environmental Impact Statement for the Skagit River Project and would offer the following comments:

- 1) The Planning Department's review has tried to focus on the non-physical impacts of the project rather than the actual physical impacts due to construction. Review of most of the physical impacts can be better addressed by agencies with expertise (i.e. Game, Fisheries, Ecology, etc.). The impact that we focused on are primarily the potential conversion of agricultural land or the anticipated tendency for encroachment or pressure for development of the "flood-safe" areas resulting from the project completion.
- 2) The levee and channel improvement project proposed by the Corps is in excess of protection standards proposed by the Skagit County Planning Department, endorsed by the Planning Commission and adopted by the Board of County Commissioners. The approved Northwest and North Central Comprehensive Plans advocate twenty year protection downriver from Mount Vernon (Sections 6.6.1.2 in both plans). This standard also applies to the proposed Comprehensive Plans for the Southwest and South Central Districts. The Northwest and North Central Plans date from 1974 and 1973 respectively. Thus, an improvement program aimed at a fifty year flood frequency protection level or greater, would seem to contradict existing county policy.
- 3) Throughout the text, the EIS states that the levee improvement project will not have a direct affect on agricultural land which has been given 100 year flood protection. While this may be true, the EIS does not sufficiently address the indirect impacts of the proposal as they relate to the potential conversion of flood safe agricultural land to other uses. Surely the Corp's experience in levee and flood safety projects

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has exposed them to before and after conditions on flood proofed rivers. It is a surprising omission that such knowledge was not brought to bear in assessing the impact of the Skagit River Levee Improvement Project.

- 4) In Sections 3.02.2, 3.02.6, and 4.02.5 the Corps acknowledges that agricultural land receiving 100 year flood protection will come under pressure from competing uses, ostensibly urban spill over from Mount Vernon and Burlington.

The land primarily in question lies west of the Skagit River and I-5 bounded roughly on the north by SR 20 and on the south by a line drawn from the junction of Junquist Road and Penn Road to the intersection of Highway 536 and SR 20, which forms the western tip of the "Avon Triangle".

It is the contention of the Corps, that existing zoning practices, rather than the levee project, would be mostly responsible for a change from agricultural to other uses. The inference is that changes would occur without the river improvement project in those areas where zoning would allow.

The county is committed to a policy of holding the commercial zone between Mount Vernon and Burlington to a line 660 feet west of the centerline of I-5. At its westernmost point, the agricultural land given 100 year flood protection extends some four miles from I-5. The Draft EIS seems to misrepresent county policy by inferring that the county would rezone land in the "Avon Triangle" whether or not the River Improvement Project takes place.

- 5) Section 4.02.18 states that, "although the proposed project may have a tendency to accelerate the development of certain areas currently zoned as urban by provision of 100 year protection, it should also tend to preserve large areas of agricultural land as rural by not providing 100 year protection to most of the Skagit Delta". Again, in Section 4.03.2, it states that, "a beneficial impact may be realized since the proposed action will tend to preserve large areas of agricultural land by not providing 100 year protection."

Currently, the rural area down river from Mount Vernon has from three to fourteen year flood protection. The Corps proposes to increase protection to the level of a fifty year flood. It is difficult to construe such a significant increase in flood protection as a means of preserving agricultural land. Such increased protection would seem to act as a growth stimulant, unless the Corps assumes that development will concentrate in floodplain areas which have 100 year protection, i.e. the "Avon Triangle".

- 6) Section 4.02.4 equates urban areas with those locations receiving 100 year flood protection. The ensuing conclusion is to consider the "Avon Triangle" as an urban area. In addition, federal floodproofing requirements are not required in areas which have 100 year protection. This would substantially lower development costs in the protected floodplain, and would, by extension, act to stimulate growth by creating suitable conditions for urban (residential and commercial) settlement in an area which the county desires to remain agricultural.
- 7) Sections 4.02.11 and 4.02.12 cite increased tax revenues and new construction as project benefits. The related cost, however, would be the displacement of some currently productive agricultural land. Also, in Section 4.02.12, the Corps refers to the 100 year protected agricultural land as the "former floodplain", implying that the levee system will somehow negate geologic conditions. Will the area in question still be a former floodplain if the levees are over topped in a 110 year flood?
- 8) The EIS does a credible job of assessing short term impacts on the environment. However, it does not address the long range implications of providing 100 year and 50 year flood protection for the floodplain. Just to mention the fact that development pressures will increase as a result of the project is not sufficient. Long term impacts, particularly the potential for urban expansion into the "Avon Triangle", must be carefully and thoroughly addressed.
- 9) The plates which detail the location of the levee are inadequate. It is difficult, and sometimes impossible to discern the exact location of structures as well as to determine land use at specific locations. This makes it difficult to assess alternative levee alignments.
- 10) The text does not in clear terms or in any detail explain the flooding resulting from a 50, 100 or greater flood event. Section 4.02.1 tries unsuccessfully to relate the chain of events that may occur. The emphasis of the text is on the protection provided and its benefits but doesn't address the happenings of a 100 year flood event. Would you outline in some detail how the system is designed to fail at certain points, at what levels certain levees will be overtopped and what areas will be impacted first and then most severely by the flood waters?
- 11) Recent modifications to Alternative 3E have proposed to eliminate the weir and replace it with an "erosion control sill". Please explain in some detail how this new system will function. Assuming it functions in the same general manner as the weir and at the 50 year level, the system becomes functional and directs the excess water towards the Samish Basin, and further, assuming the Samish Basin is already flooding as has been the past occurrence, what impact will the additional water have? Once this occurs, where do the flood waters go (through what if any existing channels, depressions, etc.) and what impact will that have on existing Samish Flood water flow patterns?

Sidney Knutson, P.E.
Draft EIS - Lower Levee Subject
July 13, 1979

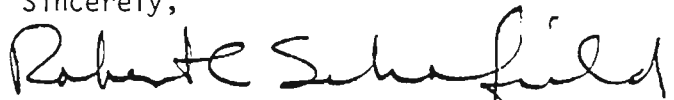
Page -4-

- 12) Section 2.03.9 cites the market value of agricultural crops was 29.1 million in 1974. According to statistics generated by the Skagit County Cooperative Extension Service, the 1977 Gross Farm Dollar Value was \$56,936,539 compared to 1974 values of \$51,644,810. There seems to be a discrepancy of some \$20 million of value.
- 13) Could a copy of Executive Order #11988 be added as a supplement to the Final EIS?
- 14) Section 2.03.16 cites there are no county parks within the study area. The Skagit County Parks Department has a three acre park facility below the Conway bridge with picnic facilities and a boat launch scheduled for completion in the near future.

In conclusion, we feel the Corps needs to do more analysis of and present more information pertaining to the following three items:

- 1) The non-physical impact of the project on the agricultural land resultant from increased flood protection,
- 2) The impact and ramifications of a 100+ year flood event and where the impacts will occur and to what degree, and,
- 3) Recent revisions to the Corps preferred Alternative 3E not discussed in the Draft Environmental Impact Statement (i.e. "erosion control sills", Nookachamps mitigation measures, Clear Lake ring dikes, etc.).

Sincerely,



Robert C. Schofield, Director
SKAGIT COUNTY PLANNING DEPARTMENT

RCS/mlh

encl Selected Statistics - Skagit County Agriculture 1977
Skagit County Parks Brochure

cc Board of County Commissioners
W. Eugene Sampley, Director of Public Works
Karen Northrup - Corps of Engineers

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