



# Federal Emergency Management Agency

Washington, D.C. 20472

August 24, 2010

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

IN REPLY REFER TO:  
Case No.: 09-10-1122R

The Honorable Sharon Dillon  
Chairperson, Skagit County  
Board of Commissioners  
1800 Continental Place, Suite 100  
Mount Vernon, WA 98273

Community: Skagit County, WA  
Community No.: 530151

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Dear Ms. Dillon:

This responds to a request that the Department of Homeland Security's Federal Emergency Management Agency (FEMA) comment on the effects that a proposed project would have on the effective Flood Insurance Rate Map (FIRM) and Flood Insurance Study (FIS) report for your community, in accordance with Part 65 of the National Flood Insurance Program (NFIP) regulations. In a letter dated February 25, 2009, Mr. Esco Bell, Director of Public Works for the City of Mount Vernon, requested that FEMA evaluate the effects that updated topographic data, updated hydraulic analyses, and proposed levee improvements would have on the flood hazard information shown on the effective FIRM and FIS report along the Skagit River from approximately the confluence with the South Fork Skagit River to approximately 6,500 feet upstream of Curtis Street and on the South Fork Skagit River from approximately Peter Johnson Road to approximately the confluence with the Skagit River.

We are in the process of developing a new countywide FIRM and FIS report for Skagit County, Washington. The U.S. Army Corps of Engineers (USACE) 2008 FLO-2D model for the Skagit River, which utilized the flood discharges determined by USACE in May 2008, was used to develop the preliminary FIRM, dated June 30, 2010. This model was used as the base conditions model for this proposed project reach.

The proposed project will consist of construction of a proposed levee and floodwall on only the left bank of the Skagit River. This levee will extend from Freeway Drive, perpendicular to the road, to the left bank of the Skagit River, approximately 1,100 feet upstream of West Division Street. It will continue along the river bank to a location approximately 200 feet upstream of Riverview Lane. At that point, the levee will extend landward, perpendicular to the Skagit River, for approximately 700 feet and make a horseshoe around the water treatment facility as it extends back upstream for approximately 900 feet.

The existing levees, which are not considered to provide protection from the base (1-percent-annual-chance) flood, extend along the left and right banks of both the Skagit River and the South Fork Skagit River. The existing levees extend further upstream and downstream of the proposed revised reach.

All data required to complete our review of this request for a Conditional Letter of Map Revision (CLOMR) were submitted with letters from Mr. Albert Liou, Pacific International Engineering.

Because this revision request also affects the City of Mount Vernon, a separate CLOMR for that community was issued on the same date as this CLOMR.

We reviewed the submitted data and the data used to prepare the effective FIRM for your community and determined that the proposed project meets the minimum floodplain management criteria of the NFIP. Because the updated hydrologic/hydraulic analyses completed as part of the preliminary FIS report and FIRM reflect improved methods and analyses, the submitted duplicated preliminary FLO-2D hydraulic computer model, dated July 14, 2010, was used as the base conditions model in our review of the proposed conditions model for this CLOMR request. We believe that, if the proposed project is constructed as shown on “Skagit River Levee System, City of Mount Vernon – Downtown Flood Protection Project,” prepared by Pacific International Engineering, dated January 30, 2009, and the data listed below are received, the floodplain boundaries of the base flood will be delineated as shown on the annotated FIRM (COE 2008 Hydrology Inundation Map, Post-Project Condition), prepared by Pacific International Engineering, dated January 4, 2010.

### **Skagit River**

The proposed conditions model incorporated the proposed levee project and updated topography into the preliminary model. Three comparisons were run for the proposed conditions model, which included analyses of the following scenarios: both levees holding, without the left bank levee, and without the right bank levee.

As a result of the proposed project, the Base Flood Elevations (BFEs) for the Skagit River will increase and decrease with both levees holding, compared to the preliminary BFEs. The maximum increase, 0.2 foot, will occur approximately 8,790 feet downstream of Curtis Road, and the maximum decrease, 0.1 foot, will occur approximately 3,980 feet downstream of Curtis Road.

As a result of the proposed project, the BFEs for the Skagit River will increase and decrease without the left bank levee, compared to the preliminary BFEs. The maximum increase, 0.4 foot, will occur approximately 5,230 feet downstream of Curtis Road, and the maximum decrease, 0.6 foot, will occur approximately 3,510 feet downstream of Curtis Road.

As a result of the proposed project, the BFEs for the Skagit River will not change without the right bank levee, compared to the preliminary BFEs.

As a result of the proposed project and updated topography, the width of the Special Flood Hazard Area (SFHA), the area subject to inundation by the base flood, will not change compared to the preliminary SFHA width along the Skagit River.

### **South Fork Skagit River**

The proposed conditions model incorporated the proposed levee project and updated topography into the preliminary model. Three comparisons were run for the proposed conditions model, which included analyses of the following scenarios: both levees holding, without the left bank levee, and without the right bank levee.

As a result of the proposed project, the BFEs for the Skagit River will increase and decrease with both levees holding, compared to the preliminary BFEs. The maximum increase, 0.1 foot, will occur approximately 1,430 feet downstream of Moore Road, and the maximum decrease, 0.2 foot, will occur approximately 2,800 feet upstream of Moore Road.

As a result of the proposed project, the BFEs for the Skagit River will increase and decrease without the left bank levee, compared to the preliminary BFEs. The maximum increase, 0.06 foot, will occur

approximately 1,250 feet downstream of the confluence with the Skagit River, and the maximum decrease, 0.5 foot, will occur approximately 550 feet downstream of the confluence with the Skagit River.

As a result of the proposed project, the BFEs for the Skagit River will not change without the right bank levee, compared to the preliminary BFEs.

As a result of the proposed project and updated topography, the width of the SFHA will not change compared to the preliminary SFHA width along the Skagit River.

Upon completion of the project, your community may submit the data listed below and request that we make a final determination on revising the effective FIRM and FIS report.

- Detailed application and certification forms, which were used in processing this request, must be used for requesting final revisions to the maps. Therefore, when the map revision request for the area covered by this letter is submitted, Form 1, entitled “Overview & Concurrence Form,” must be included. (A copy of this form is enclosed.)
- The detailed application and certification forms listed below may be required if “as-built” conditions differ from the preliminary plans. If required, please submit new forms (copies of which are enclosed) or annotated copies of the previously submitted forms showing the revised information.

Form 2, entitled “Riverine Hydrology & Hydraulics Form”

Form 3, entitled “Riverine Structures Form”

Hydraulic analyses, for “as-built” conditions, of the base flood; the 10-percent, 2-percent, and 0.2-percent-annual-chance floods; together with a topographic work map showing the revised floodplain boundaries, must be submitted with Form 2.

- Effective January 13, 2010, FEMA revised the fee schedule for reviewing and processing requests for conditional and final modifications to published flood information and maps. In accordance with this schedule, the current fee for this map revision request is \$5,000 and must be received before we can begin processing the request. Please note, however, that the fee schedule is subject to change, and requesters are required to submit the fee in effect at the time of the submittal. Payment of this fee shall be made in the form of a check or money order, made payable in U.S. funds to the National Flood Insurance Program, or by credit card (Visa or MasterCard only). The payment, along with the revision application, must be forwarded to the following address:

LOMC Clearinghouse  
6730 Santa Barbara Court  
Elkridge, MD 21075

- “As-built” plans, certified by a registered professional engineer, of all proposed project elements
- Community acknowledgment of the map revision request

- A copy of an officially adopted maintenance and operation plan for the levee. This plan, which may be in the form of a written statement from the community Chief Executive Officer, an ordinance, or other legislation, must describe the nature of the maintenance activities, the frequency with which they will be performed, and the title of the local community official who will be responsible for ensuring that the maintenance activities are accomplished.
- Evidence of the notification of all property owners who will be affected by any increases in width and/or shifting of the SFHA, and/or BFE increases. This documentation may take the form of certified mailing receipts or certification that all property owners have been notified, with an accompanying mailing list and a copy of the letter sent.
- An annotated FIRM, at the scale of the effective FIRM, that shows the revised SFHA boundary delineation shown on the submitted work map and how it ties into the SFHA boundary delineation shown on the effective FIRM at the downstream and upstream ends of the revised reach
- Because we are preparing a revised FIRM and FIS report for Skagit County in our countywide format, upon completion of the project for which this CLOMR is issued, please comply with one of the following requirements:
  - If the countywide FIRM and FIS report for Skagit County become effective before completion of the proposed project, the hydraulic model submitted for the project Letter of Map Revision (LOMR) that follows this CLOMR must tie into the hydraulic model used to prepare the newly effective FIRM and FIS report. Therefore, please submit a hydraulic model and an annotated FIRM in which the revised SFHA boundary delineation ties into the SFHA boundary delineation in the hydraulic model used to prepare the newly effective FIRM and FIS report at the upstream and downstream ends of the revision
  - If the LOMR submittal for the proposed project is received before the countywide FIRM and FIS for Skagit County become effective, then the SFHA boundary delineation must tie into the currently effective information
- Technical data and documentation demonstrating that the levees have been certified as providing protection from the base flood and are in compliance with all aspects of 44 CFR Section 65.10.

After receiving appropriate documentation to show that the project has been completed, FEMA will initiate a revision to the FIRM and FIS report. Because the BFEs would change as a result of the project, a 90-day appeal period would be initiated, during which community officials and interested persons may appeal the revised BFEs based on scientific or technical data.

This CLOMR is based on minimum floodplain management criteria established under the NFIP. Your community is responsible for approving all floodplain development and for ensuring all necessary permits required by Federal or State law have been received. State, county, and community officials, based on knowledge of local conditions and in the interest of safety, may set higher standards for construction in the SFHA. If the State, county, or community has adopted more restrictive or comprehensive floodplain management criteria, these take precedence over the minimum NFIP criteria.

If you have any questions regarding floodplain management regulations for your community or the NFIP

in general, please contact the Consultation Coordination Officer (CCO) for your community. Information on the CCO for your community may be obtained by calling the Director, Mitigation Division of FEMA in Bothell, Washington, at (425) 487-4682.

If you have any questions regarding this CLOMR, please call the FEMA Map Information eXchange (FMIX), toll free, at 1-877-FEMA MAP (1-877-336-2627).

Sincerely,



Siamak Esfandiary, Ph.D., P.E., CFM  
Program Specialist  
Engineering Management Branch  
Mitigation Directorate

For: Kevin C. Long, Acting Chief  
Engineering Management Branch  
Mitigation Directorate

Enclosures

cc: The Honorable Bud Norris  
Mayor, City of Mount Vernon

Mr. Esco Bell  
Director of Public Works  
City of Mt. Vernon

Mr. Gary R. Christensen, ACIP  
Director  
Planning and Development Services  
Skagit County

Mr. Jeffery M. Miller, P.E.  
Public Works Director/County Engineer  
Skagit County

Mr. Harry Hosey, P.E.  
Pacific International Engineering