



Basis of Concern about FEMA's Underlying Technical Analysis of the new Base Flood Maps for Skagit County

1. The hydrologic analysis is clearly wrong, skewed high due to overly conservative estimates of the magnitude of floods which occurred near the turn of the last century, prior to gage installation.
2. The result of that analysis will be higher base flood elevations (much higher in some areas); higher than necessary costs for flood control measures, and significant negative long-term economic ramifications for the communities.
3. The higher base flood elevations will slow growth and development (much, much slower in some key commercial areas, such as South Mount Vernon and College Way / Riverside).
4. Slower growth will result in slower property value increases, especially commercial property in the current flood plain.
5. Slower growth in property value will, over time, be significant and
 - a. Cause property tax rates to increase in order to pay for the same level of services.
 - b. Make each individual property owner's share of the property tax burden greater, for the same level of services.
 - c. Make it more difficult for voted property tax initiatives (schools, emergency services, hospitals) to gain approval by the voting public. In addition to higher property tax rates, there will be higher construction costs to meet the new base flood elevations.
6. Financing for the unnecessarily higher-cost flood measures will compete with other important services, the relative cost of which is already increased due to the effects of the incorrect analysis.
7. The incorrect analysis will cause the additional flood storage at the Baker Hydroelectric Project to be rejected (Corps' analysis paradoxically eliminates this critically important flood measure, because the Corps' analysis shows the 100-year event would overwhelm the additional flood storage envisioned).

This externally-generated, administratively-created situation will put the local communities at an economic disadvantage, which will get worse, slowly, over time. And it is based on an incorrect analysis.

Questions, Statements and Responses

- 1) It is safer to stick with the Corps' incorrect analysis, because it is conservative and will therefore protect the community better, and save lives.
 - a. The "safety" argument is disingenuous. We know the Skagit is a dangerous flood risk. But the Skagit River is not like New Orleans, where large areas of the city are 10 feet or more below sea level. We know when a flood is coming, we have time to respond, flood fight, or evacuate if necessary. And if the Corps process results in no project (likely outcome, due to the expense and Corps cost/benefit ratio), how does that make it safer?
- 2) It is necessary to stick with the Corps' incorrect analysis, because it will keep us in the Corps' process which will ultimately provide the funding needed to build a flood project.
 - a. Other, more pressing Federal needs will take precedence over the "pot of gold" coming to the little Skagit Valley for a huge Corps flood project. But even if a \$300 million flood project were authorized and funded by Congress (unlikely), the local share would still be a minimum of 35% -- over \$100 million. The fact is, we do not need the Corps at all, if we get the analysis right and bring in funding partners to get flood measures on the ground. For example, to the extent that flood measures which protect the interstate highway are put in place, the State would be a funding partner.
- 3) Only the business and development community is concerned about this, primarily due to self-serving business interests.
 - a. The business community is not the only group interested in this flood issue. All taxpayers recognize the importance of business growth and development for providing jobs and tax base. There is no attempt to "lowball" the flood risk in the Skagit valley. The concern is to get it right so that the community can properly address the flood risk, and not be unfairly penalized by an incorrect analysis.
- 4) The Corps' incorrect analysis will lead to a pullback in development on the flood plain. This is painful but necessary due to overdevelopment that has occurred and which must be undone.
 - a. As with many other communities across the country, this area established towns too close to rivers, in the flood plain. But we are here now and the State's Growth Management Act requires the cities to take the bulk of future growth and development. The philosophical argument that all development on the flood plain must be undone is not a practical solution.
- 5) A 200-year or a 500-year flood can and will occur. What is wrong with protecting against these bigger floods?
 - a. Nothing. It may be a good idea to provide more than 100-year flood protection in some areas, but it is the definition of the 100-year event that drives all of the administrative requirements of the new base flood elevations, and the negative economic effects. If the analysis incorrectly overestimates the magnitude of the 100-year event, as is now the case, then the local communities are burdened with the significant additional economic disadvantage this brings. We believe the decision to provide more than 100-year protection should rest with the local communities.