

Comments on October 2011 Corps Scoping Summary Report

1.2 PROJECT HISTORY: The first preliminary examination of the Skagit river was published by the Corps on 12/4/1890. There have been well over 90 studies, examinations, reports including a GDM in 1979. There is nothing really that could be studied now that has not already been looked at before. See [Skagit River Reports](#).

2.2 Public Involvement Process: This would be unique to Skagit County since so much is done in the floodplain without the benefit of permits (i.e. fill in the floodway.)

3.2.1.3 Dikes/Levees: A levee at Sterling has been previously looked at and it was determined by the COE that to block off Sterling would add 4 ft. or water to the Nookachamp Basin. (1979 GDM) Leaving Sterling open with a weir structure still added 2 feet of water to the Nookachamp/Sterling basin. (1979 GDM)

Due to the faulty FEIS prepared by the City of Burlington and its' irresponsible land use planning, i.e. work allowed to levees without proper permitting and no cumulative impact analysis prepared to determine if floodwaters have already been raised 1 foot **within the community**, this project should not be considered.

Widening the three bridge corridor is a good project so long as it includes removal of the current levees. If locals refuse to remove them then this project should not be considered.

Given the fact that MV has already stated that if this project is implemented they will allow new development to be built flat on the ground thus continuing their irresponsible land use planning this project should be placed on hold until MV agrees to continue the requirement of building to the 100 yr. flood levels and abandons any plans for further expansion into the floodplain.

Setting the levees back is something that the Corps has been suggesting to the locals since 1890, however given the millions that have been recently spent on further encroachment into the floodway of the Skagit River by the dike districts and the Corps of Engineers I can't see that happening. Then there is the small fact that it would cost 5,000 to 8,000 acres of prime farmland which is the main reason the levees have not been moved to begin with.

Designing the Nookachamps floodplain storage project was voted down by the Skagit County Flood Control Zone Advisory Committee at least twice. The vote was unanimous on both occasions. The project was also evaluated in the 1960's and determined that it would not work. The County took the property rights of the Nookachamp Basin in 1924 by refusing them the right to put in levees at a public hearing. (See Willis public hearing testimony at www.skagitriverhistory.com.) Now the cities want to

take their property again by putting in levees and using their property as a "Lower Lower Baker" style project while they continue their irresponsible land use practices. Flood risk reduction should not be the reward for bad land use decisions.

3.2.1.4 Facilities/Infrastructure: With respect to the replacement of the BNSF bridge it has been proven by proper hydraulic modeling that the BNSF bridge does not back up floodwater. Rather it is the configuration of the levees too close to the edge of the river that is backing up the water. The Corps HEC-RAS hydraulic model does not have the capacity to model scouring and scouring is why we saw the bridge partially collapse in 1995. The bridge is a danger to the levees from the standpoint of it redirects surface flows into the levees and if it totally collapses could potentially destroy the levees in the three bridge corridor. It needs to be replaced but not because it "constricts flood flows". The levees constrict the flood flows.

3.2.1.5 Ring Dikes All of the projects listed under this heading are worthwhile projects and could be implemented without Corps involvement.

3.2.1.6 Storage Since Ross Dam storage is based on Stewarts Sedro-Woolley figures (ones that we have been told by USGS, USACE and FEMA are unreliable) and not Concrete figures they definitely need to reassess the Ross dam storage not only from the amount required but the timing of the storage requirement. See [Retyped for clarity and emphasis 8/14/1953 Corps document.](#)

One probable downside to providing additional storage a few days in advance is that you run the risk of filling up the "overbank areas" and the "induced flooding areas" downstream which during large flood events would mean more floodwater going downstream at an increased velocity. It would and does work well for smaller events as we have seen in 2003 and 2006 although at the detriment of unleveed areas.

As for as paying for additional storage I think this is absolutely necessary. You can't expect a private business to give you something for free. However if they refuse to sell you the space then sue them for the damages they cause due to irresponsible management. It's not like they don't know they are hurting people.

Considering Lower Baker Dam for emergency storage should have been **implemented** by the Corps when they first looked at this in the 1960's. See [MFR re: Corps Investigation of Existing Baker Sites; Corps Memorandum re Lower Baker River Storage Projects; and most importantly Corps Memorandum re Preliminary Report on Baker River Regulation.](#)

Not considering modifying the storage requirements in order to protect the general safety health and welfare of Skagit County residents is nothing short of ridiculous. If any adverse impacts are identified to fish then reduce the amount of time nets could be put in the river to save more fish and limit the amount of fish sports fisherman could catch.

Once again additional storage at Ross is not only needed but based on the fact that the amount of storage was based on "unreliable" data, more storage is a must. My grandmother used to say "what is good for the goose is good for the gander." If Skagit County can't use the Stewart Sedro Woolley figures

neither can the Corps or Seattle City Light. See [Retyped for clarity and emphasis 8/14/1953 Corps document.](#)

3.2.1.8 Other Measures: Non-structural projects should be considered and receive a priority over structural alternatives

3.2.2.8 Land Use: Land Use in Mt. Vernon and Burlington has been nothing short of a joke. The locals have known about the seriousness of the flooding problem since at least 1895 when they sent a "Memorial" to the US Congress. See 10/21/1895 The Skagit News article. All the building in the floodplain should be reviewed under NEPA cumulative impact analysis. Also NFIP 60.3c(10)

3.2.3 Study Process There is no river basin in the State of Washington that has had more studies, surveys, examination and reexaminations performed on it then the Skagit. See [Skagit River Reports.](#)

3.2.3.3 Involvement: Completing the GI Study in coordination with the Skagit County Comprehensive Flood Hazard Management Plan is absurd and what got us into this mess to begin with. Write the plan, and as information becomes available amend the plan. Get the dam plan done. It has nothing to do with the GI Study. How hard is that to understand?