

Public Comments: Comprehensive Flood Hazard Management Plan

All public comments received from January 3rd to February 3rd have been grouped in this summary by commenter, comments specific to the Comprehensive Flood Hazard Management Plan, and general comments. A summary of each specific comment is followed by staff review and a recommendation, while the general comments has only a staff review and comments.

Acronyms:

Flood Control Zone District: FCZD, the District

Comprehensive Flood Hazard Management Plan: Comprehensive Plan or Plan

- 1) I think that it has not been explained thoroughly to the people of Chelan County that this plan and any monies it collects or is matched by FEMA, is only for property within the County Right of Way. This does not include any private property.

- a. **Staff Review and Comment:** *As detailed in the presentation to the Monitor Community Council, outlined in the Interim Operating Guidelines (August 2014), and within the Comprehensive Plan, one of the primary elements of the FCZD is to protect public infrastructure from flooding events and, when needed, have funding to recover from these events. Private property owners in flood hazard areas may qualify for FEMA grant funding and the District may act as an eligible applicant agent for identified feasible and cost-effective flood hazard mitigation projects.*

- i. **Recommendation:** Nothing further.

General Comments

- 1) And pay we do, much to the dissatisfaction of many Chelan County residents. I was part of the Monitor Council meeting when the commissioners came to initially present the plan. Our response was a resounding dissent to more taxes. Especially those that do not directly benefit the whole population with respect to whom is paying into the Plan.

- a. **Staff Review and Comments:** *Chelan County spends taxpayer money to recover from flood disasters. Outside of the Public Works Road Fund, the County does not have a fund to pay for flood recovery. The money taken from the Road Fund, significantly affects the normal operating budget of the Public Works Department. To best meet the needs of the citizens and businesses of Chelan County and to ensure that the Public Works Department continues its duties of overseeing and maintaining the road system, a Flood Control Zone District has been adopted (Resolution 2014-59) to minimize the effects to the county from disastrous flood damages. When flooding does occur, it affects the entire regional economy and when public infrastructure such as roads are damaged, the cost of repair is borne by all county residents.*

- 2) The commissioners passed, without a vote of the people, to levy additional property taxes among the entire Chelan County population.

- a. **Staff Review and Comments:** *Per RCW 86.15.020, the District may only be formed in two ways: 1) A resolution by the Board of County Commissioners; or 2) A petition by the citizens. The RCW does not allow the Board of County Commissioners to call for a public vote on the FCZD formation.*

3) One of the reasons the commissioners explained why this was necessary, was that the County budget could not contain the costs in the event(s) of flood damage. Regardless of whether or not any events occur, this money is collected and held by the County. This is a clear indication that the commissioners have no idea what the scope of costs may be and are unable to predict with any certainty how much will be needed in the event of flood preparations. Furthermore, it presents a clear picture of how Public Works cannot manage their budget properly and forecast budgetary needs accordingly.

a. **Staff Review and Comments:** *Floods have caused loss of life and damage to structures, crops, land, transportation infrastructure (roads and bridges), and utilities. Floods also cause erosion and landslides, and can transport debris and toxic products that cause secondary damage. Flooding affects all citizens in the county by:*

- *Destroying and damaging homes and businesses,*
- *Disrupting government services,*
- *Damaging transportation routes and bridges,*
- *Stranding residents,*
- *Contaminating water supplies,*
- *Causing septic system failures, and*
- *Damaging infrastructure such as waste water treatment plants, power lines, ditches, culverts, and other utilities.*

Chelan County spends taxpayer money to recover from flood disasters. Outside of the Public Works Road Fund, the County does not have a fund to pay for flood recovery. The money taken from the Road Fund, significantly affects the normal operating budget of the Public Works Department. To best meet the needs of the citizens and businesses of Chelan County and to ensure that the Public Works Department continues its duties of overseeing and maintaining the road system, the Commissioners implemented a Flood Control Zone District. This proactive approach by the Commissioners now means there is a dedicated fund (which does include an emergency reserve fund) to utilize for flood damage and cleanup, capital projects, and education - minimizing the impacts to the county's Road Fund.

4) Therefore, I would like to request a report of the financials of money collected. This should include totals collected annually, any matching funds received from FEMA, funds disbursed from this account to the County, and how much it cost to hire Tetra Tech to provide the Comprehensive Flood Management Plan.

I would also like to see prediction and forecasts for the needs of this collected tax. To maintain this program just to receive matching funds from FEMA and the inability of the PW to manage their budget, are not valid reasons. The public deserves to know the status of this and whether or not the collection of taxes should have a near-future sunset.

a. **Staff Review and Comments:** *Chelan County fulfilled this comment as a Public Records Act request on January 10, 2017 by providing a copy of the 2015 & 2016 Revenue Status Report, Local Agency Standard Consultant Agreement, and a link to the Comprehensive Plan.*

- b. *The Flood Control Zone District is overseen by the Board of County Commissioners. Similar to other county departments, the Commissioners must approve the operating budget on an annual basis.*
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1) As an attachment, a proposed action timeline for the implementation of the plan sectioned out by all stakeholders.

a. **Staff Review and Comment:** *Within Section 13.2 – Selected Mitigation Actions, Table 13.1 lists the identified actions, the lead agency for each, and the proposed timeline. The parameter for the timeline are as follows:*

- *Short-term—Action to be completed in 1 to 5 years*
- *Long-term—Action to be completed in greater than 5 years*
- *Ongoing—Action currently being funded and implemented under existing programs.*

These timelines can be altered during Comprehensive Plan updates because of numerous factors such as available grant funding, a presidential disaster, loss of life, etc.

i. Recommendation: No changes are necessary.

General Comments

1) Nason Creek was NOT on the Repetitive Loss Area or designated as a potential flood loss area but a year ago last December and two years prior to that we had major flooding with the loss of our road to three homes as well as major damage to FS Road 6910 near the bridge which we individual home owners had to repair and pay for. The Forest Service said they were not responsible nor had the funds and neither would the County.

We have had a home in the area since 1982 and have had to repair Butcher Creek Road numerous times due to high water/washout.

- a. **Staff Review and Comment:** *Butcher Creek Road is classified as a USFS managed roadway and is not under Chelan County's purview. Because of this, state law prohibits Chelan County Public Works Department from assisting to repair flood damage to a bridge or roadway.*
- b. *As outlined in Section 4.3.1, the intent of the Flood Control Zone District is "To safeguard human life, health, and safety by protecting public infrastructure from flooding and channel migration." The Board of County Commissioners found it advantageous to define that the primary purpose of District funding is to protect public infrastructure, in order to minimize flood-related impacts to the Road Fund.*
- c. *One goal of the Flood Control Zone District is to join FEMA's Community Rating System. CRS is a voluntary incentive program that recognizes and encourages community floodplain management activities. As a result, a homeowner's flood insurance premium rates are discounted to reflect the reduced flood risk resulting from the FCZD actions.*

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- 1) Looking at the list of people on the 'Stakeholders Committee' that put the Comprehensive Flood Hazard Management Plan together there are too many people who appear to have an employment connection to Chelan County Government or the Government of one of the Cities in Chelan County. In short, the property owners in the various river drainages that will be affected by this plan are not represented on the Stakeholders Committee.

a. **Staff Review and Comments:** RCW 86.12.210 specifically states that "officials from city, town, or special district, including conservation districts" are to participate in the development of this type of comprehensive plan. Recognizing this unbalance, the District added citizen representation from Malaga, Wenatchee, and Entiat to the Stakeholders Committee.

b. As advertised, the public was welcome to attend each of the ten stakeholder meetings, with each meeting offering the public the opportunity to provide comments on the Comprehensive Plan. In addition to the stakeholder meetings, three open houses were held in Wenatchee, Chelan, and Leavenworth.

i. **Recommendation:** Nothing further at this time. In the future, the county will continue to consider the location and number of citizens on stakeholder or steering committees.

General Comments

- 1) The nearly annual flooding of meandering streams that cause streambed relocation are a natural part of the ecology of an often rain soaked and snow covered coastal mountain range. It is the frequent violent flooding that has made the streams and rivers of the Cascade Mountains prime salmon spawning habitat. The best way to deal with natural flooding is to not build in flat bottom valleys that have the potential for flooding, and to restore the marsh lands and forests. AND, if we must build in a flood zone, build flood tolerant structures that do not redirect or obstruct the natural flow of the flood water.

a. **Staff Review and Comments:** Chelan County appreciates this comment and agrees. Chelan County Code chapter 3.20, which is overseen by Chelan County Community Development Department, regulates development within floodplains. Existing zoning ordinances are already in place to minimize disturbances to critical areas, such as marsh lands.

- 2) I see the proposed Chelan County Comprehensive Flood Hazard Management Plan as creating new bureaucracy that is to be built with tax dollars the people of Chelan County are not going to be willing to pay.

a. **Staff Review and Comments:** The Chelan County Flood Control Zone District was initiated by the Board of Chelan County Commissioners in June 2014 (Resolution 2014-59) and is funded by an annual property tax of \$0.07 per \$1000 assessed value. The District, who is tasked with implementing the Comprehensive Plan, is a non-regulatory district within Chelan County.

b. The county's flood prevention ordinances and the National Flood Insurance Program regulations have been previously adopted and are administered by the county's Community Development Department. While there are no plans to increase regulations,

the funding will allow the FCZD to assist other departments to better enforce the current regulations that are in place.

- 3) We already have a splatter shot of Salmon recovery plans, promoted by a plethora of bureaucratic agencies and organizations that are making expensive attempts to repair man's damage to the salmon spawning streams in Chelan County. We have Chelan County's compliance plan for the Shoreline Management Act. We have ongoing Growth Management Act compliance. And, hanging over the whole river management question is the National Wild and Scenic Rivers Act.
 - a. **Staff Review and Comments:** *Comment is noted. As with the all plans outlined in the comment above, each plan serves a specific purpose. The intent of the Comprehensive Flood Hazard Management Plan is to provide guidance on how to most effectively meet the goals and objectives of the Flood Control Zone District.*

- 4) Much of the flood plain restoration work that needs to be done could be achieved with guidance from the Chelan County Natural Resource Department and the Chelan Douglas Land Trust.
 - a. **Staff Review and Comments:** *Both Chelan County Natural Resource Department and Chelan Douglas Land Trust were contributing stakeholders on the steering committee. Their past planning efforts have been recognized and incorporated by reference within Chapter 4 of the Comprehensive Plan. It is the District's intention to continue to consult with these other departments when their expertise can be utilized. It is not the intent of the Flood Control Zone District to duplicate responsibilities within the county, rather share resources and continue to collaborate.*

- 5) Another aspect could be tax incentives to encourage property owners to make on the ground corrections. The permitting process for flood plain restoration should be as simple and straight forward as possible. And, with careful negotiations and small incentive payments, arrangement might be made for adjacent private property owners to make flood plain restorations on public lands.
 - a. **Staff Review and Comments:** *Comment is noted and this incentive may be considered as the FCZD matures over time.*

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- 1) On page xii of the document, there are lists of Clients and Stakeholders. In neither case were the citizens of Chelan County listed. This is, in itself, revealing. The document should reflect the best interest of the citizenry and the environment. To start off the document by excluding us from these lists is, in our opinion, incorrect and should be corrected.
 - a. **Staff Review and Comments:** *The reason behind this list was to acknowledge and show appreciation to a group of people who spent countless hours participating in the development of the Comprehensive Plan for the Flood Control Zone District. It was not the intention to minimize or disregard the citizen of Chelan County by leaving them off of these lists. Of note, the Steering Committee did have participation from a number of citizens of Chelan County.*

- i. **Recommendation:** The following statement will be added: "In addition to the Stakeholders Steering Committee's effort, the Flood Control Zone

District and the Comprehensive Flood Hazard Management Plan would not be possible without the citizens of Chelan County.”

- 2) The Executive Summary is not included. Please advise us when it is so we can give input on it.
- a. **Staff Review and Comments:** *Comment is noted and Chelan County will forward once completed.*

i. **Recommendation:** The Executive Summary is intended to be finalized once all public comments are evaluated.

- 3) Under the section titled “Why Prepare this Plan?” numerous points are made, but the precise purpose of the plan is not overtly stated. We suggest that a concise statement be provided. Based on what we find within the paragraphs of this section, it likely should be something like:

“The purpose of the Chelan County Comprehensive Flood Hazard Management Plan is to reduce or alleviate the loss of life, personal injury, and property damage that can result from flooding through long- and short-term strategies.”

Yes, this is included in the first paragraph of this section, but having it as a clear, stand-alone purpose statement is important.

For one thing, if this is in fact the purpose of this document, all of the plan’s contents need to be evaluated based on this statement. Will the actions being proposed reduce or alleviate the loss of life, personal injury, and property damage?

If this statement of purpose is not the purpose of the plan, then please state so in clear terms.

- a. **Staff Review and Comments:** *The Executive Summary will contain the Mission Statement that was developed by the Steering Committee and formally voted on and approved for use within this Comprehensive Plan. The Mission Statement focuses on the range of objectives and actions to be considered in the Comprehensive Plan. As further discuss in Chapter 11, the Mission Statement that the Steering Committee developed and formally adopted reads “Through partnerships and careful planning, identify sustainable, cost-effective actions that will mitigate the impacts from flood hazards; to protect the health, safety, quality of life, environment, and economy of the communities within Chelan County.”*

i. **Recommendation:** Ensure Mission Statement is included in the Executive Summary.

- 4) Error Section 3.2.2: The document states that “Chelan County sits between the Cascade Mountains to the west and the Columbia Plateau to the east.” In fact, a substantial portion of Chelan County is in the Cascade Mountains.

- a. **Staff Review and Comments:** *Comment is noted.*

i. **Recommendation:** The sentence “A substantial portion of Chelan County is in the Cascade Mountains” will be added to the Comprehensive Plan.

- 5) Error page 66: To identify and implement flood hazard management activities in a cost-effective and environmentally **contentious** manner

a. **Staff Review and Comments:** *Comment is noted.*

- i. **Recommendation:** Replace contentious with sensitive so the sentence reads "To identify and implement flood hazard management activities in a cost-effective and environmentally sensitive manner."

General Comments

- 1) Our first input to the proposed flood management plan is to be honest with us: Do you really intend to listen to us? Will you filter what you hear and only adjust the plan in ways that support the preconceived direction? Do you only tell us enough to get our endorsement but withhold that which might cause alarm? Do you respect the citizens' property rights? What are the real motivations behind this project, both initially, and at this point of its development?

a. **Staff Review and Comments:** *Chelan County has made a conscience effort to keep the citizens of Chelan County informed on the potential to create a Flood Control Zone District through the eventual development of the Comprehensive Plan. The county has encouraged public comments at: eight advertised workshops (five cities and three community council's) detailing the proposed Flood Control Zone District, ten stakeholder meetings throughout 2015/2016 (all were advertised and open to the public with a dedicated time for public comments), three Open Houses (Wenatchee, Chelan, and Leavenworth), and numerous advertised workshops with the Board of County Commissioners. It has been the county's attempt to be as transparent and open to the public as possible.*

b. *The intent of the Comprehensive Flood Hazard Management Plan is to provide guidance on how to most effectively meet the goals and objectives of the Flood Control Zone District.*

- 2) In projects like this, there is an ongoing and ever-present balance between what is "natural" and what the community desires. For example, flooding can be entirely natural, but sometimes we must overrule nature to make for an environment safe for humans. Similarly, some wetlands are natural, some are induced.

Even within the term "natural," there is conflict: At what point in history were things "natural?" Five years ago? Fifty? Five-hundred?

a. **Staff Review and Comments:** *Comment is noted.*

- i. **Recommendation:** The term Natural has been defined by FEMA and the definition is provided the Glossary.

- 3) In reading the long list of "Relevant Programs and Regulations," it would seem that there are no possible actions that could be taken that would not violate or conflict with at least one of these many programs or regulations. In the execution of the plan that is ultimately approved, how will this be reconciled?

For example, about two years ago, we were asked for input on a project to add “engineered log jams” to the White River. (Incidentally, as far as we can tell our input was all dismissed). One of the intended purposes of that project was to promote horizontal water migration. In the subject draft flood management plan, it mentions controlling horizontal water migration. While this is not necessarily a conflict, it is easy to foresee circumstances that the goals of these projects are in conflict. We expect that other such conflicts exist.

On the surface, it would appear we are spending vast sums of money on one program to promote horizontal water migration, only to have another program developed to reduce it.

In reading the draft plan, it is obvious that there is a vast matrix of interrelated, overlapping, and often conflicting policies, regulations and laws. We are concerned about the viability of wisely and legally choosing actions to take.

- a. *Staff Review and Comments: As with any project the Public Works Department undertakes, all local, state and federal regulations are evaluated against the project scope and, typically in the planning process, involve all regulatory agencies. This early communication allows conflicting interests to be vetted and, if needed, the project scope can be adjusted accordingly. Our department has the same philosophy as it relates to coordinating with the public - early and often.*
- b. *As outlined in Section 4.3, the intent of the Flood Control Zone District is “To safeguard human life, health, and safety by protecting public infrastructure from flooding and channel migration.” The Board of County Commissioners found it advantageous to define that the primary purpose of District funding is to protect public infrastructure, in order to minimize flood-related impacts to the Road Fund – safeguarding services that this fund provides. The District may rely upon other relevant plans and agencies for projects located outside of the county’s right-of-way.*

- 4) Many decades ago, a road was built that crosses the White River Valley toward the Little Wenatchee Valley. Like so many other roads built in that era, they paid little attention to the effect on the environment, specifically, the hydraulics of the area.

We have been told that in the 1970’s the Army Corps of Engineers rebuilt the road, and that the supervisor of the project unilaterally decided to increase the altitude of the through-pipes, thus effectively creating a dam. While the valley tended to be wet before then, the new dam effectively created wetlands, which now many people want to protect. As a point of reference, early settlers to the White River Valley farmed the land upstream of this road, now made impossible because of the human-induced wetlands.

But as mentioned earlier, how far back do you go to determine what is natural?

From a flood management perspective, this road would promote flooding upstream, and perhaps reduce flooding downstream. Do note that, between this road and Lake Wenatchee, there are virtually no homes. Upstream from this road, there are numerous homes impacted by this damming. As landowners upstream, we would like to see new through-pipes installed to reflect the conditions of 100 years ago. A neighbor has investigated and determined cost-effective means to accomplish this.

- a. **Staff Review and Comments:** *Comment is appreciated and the information provided will be beneficial in the future if a project is proposed in this area.*

5) Conclusion

- We are unclear about the motivations and purpose of the plan
- We are suspicious about the process and its ability to gather and incorporate citizenry input
- It is not clear to us how this plan will be implemented while being in compliance and cooperation with other plans, programs and regulations
- We are in favor of protecting human life and property.
- We are in favor of protecting and restoring the natural environment.
- We are not confident in this plans ability to effectively and positively impact either of these.

- a. **Staff review and comments:** *Thank you for your time providing comments on the Comprehensive Plan. It is the County's hope that over time, we can build a trust and confidence that the Flood Control Zone District is a transparent and successful program for the citizens of Chelan County.*

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- 1) There is inconsistency with acronym declaration. For example, some acronyms are declared once and some are declared but still spelled out at times.

- a. **Staff Review and Comments:** *Comment is noted.*

i. **Recommendation:** The District will double check this aspect of the Comprehensive Plan and attempt to be consistent with acronyms.

- 2) Page 1-1, paragraph 4, 3rd sentence: "Data suggests..." I recommend a citation to support this claim.

- a. **Staff Review and Comments:** *Comment is noted.*

i. **Recommendation:** A reference has been added.

- 3) Page 1-3, section 1.3.3, arrow bullets: there is a list of specific areas; however, the last arrow bullet states "Floodplain reconnection" is this an overall goal/general statement or a specific area?

- a. **Staff Review and Comments:** *Floodplain reconnection is a general statement, similar to Number One/Two Canyons, and Dry Gulch. Future planning efforts may identify projects in the above referenced areas.*

i. **Recommendation:** Nothing further required at this time.

- 4) Page 2-11, section 2.7: "Table 2 3" appears to missing a hyphen.

- a. **Staff Review and Comments:** *Within the public comment version of the Comprehensive Plan, it appears a hyphen is indeed located in Table 2-3. However, this will be double checked within the final version of the Plan.*

i. **Recommendation:** Ensure a hyphen is present in Table 2-3.

- 5) Page 3-3, section 3.2.1, subsection "Climate and Stream Flows:" The start of sentence one, "Watershed's..." Should this be singular?

a. **Staff Review and Comments:** *Comment is noted.*

i. **Recommendation:** Revise sentence to read "The Wenatchee Watershed extends from snowfields....."

- 6) Page 3-5, subsection "Topography and Soils", second paragraph: Do you have a citation to support geologic characteristics?

a. **Staff Review and Comments:** *Comment is noted.*

i. **Recommendation:** A reference has been added.

- 7) Figures 3-4 and 3-5: Is it possible to enlarge the populated areas? (e.g., Cashmere, Wenatchee, Chelan). I think it is relevant and important to compare historic flooding areas to locations of these critical facilities; therefore, have maps with finer scales.

a. **Staff Review and Comments:** *Homeland Security laws prohibit revealing specific locations of critical facilities. Because of this, it makes it difficult to create finer scale maps without breaking national security laws. Section 3.3.2 does detail what the Steering Committee determined to be considered a critical facility.*

i. **Recommendation:** Nothing further is allowed at this time.

- 8) Page 3-14, section 3.4: Do you have a citation to support research related to people living below the poverty line and disaster effects?

a. **Staff Review and Comments:** *Comment is noted.*

i. **Recommendation:** A reference has been provided.

- 9) Page 3-17, section 3.4.3, first paragraph: Do you have a citation to support research related to minorities and disaster planning?

a. **Staff Review and Comments:** *Comment is noted.*

i. **Recommendation:** A reference has been provided.

- 10) Page 4-9, section 4.2.2 title: Consider spelling out Ecology (e.g., Washington State Department of Ecology Grants).

a. **Staff Review and Comments:** *Comment is noted.*

i. **Recommendation:** Section 4.2.2 title has been revised to read "Department of Ecology Grants".

- 11) Page 5-1, section 5.2.1: Methodology description lacks detail. What are the 57 questions asked? Are the questions tied directly to the County's capability assessment criteria? Provide in appendix?

a. **Staff Review and Comments:** *Questions asked to determine the jurisdictions capability to participate in the Community Rating System is a proprietary program developed and utilized by Tetra Tech Inc. The floodplain management categories of questions are*

outlined in Section 5.2.1, however providing the exact questions are trademarked and cannot be listed.

i. **Recommendation:** Nothing further is allowed at this time.

12) Figure 7-1: Remove the SR 285 label, it blocks a good portion of Wenatchee (or include finer scale maps) → same comment for all map figures.

a. **Staff Review and Comments:** Comment is noted.

i. **Recommendation:** The Comprehensive Plan figures will be reviewed and updated as needed.

General Comment:

1) I feel the background information prior to discussing plan implantation lacks scientific support in places. There is reference to disadvantaged groups of people, but how does the plan specifically reach out to that specific group? Was there consideration to analyze more economic impacts relating to catastrophic flooding events, such as, lost wages? Finally, will there be a methodology developed to measure the effectiveness of the plan long-term?

a. **Staff Review and Comments:** FEMA has guidelines on how economic impacts are addressed, which generally speaks towards social equity and how it cannot be a factor on how flooding events are addressed (such as lost wages) in a Comprehensive Plan. Flooding impacts all citizens of Chelan County and singling out a particular group is not the basis of this Plan.

b. This Comprehensive Plan is a planning tool to steer the FCZD. In the future, when capital projects are proposed, an outreach effort for that particular project will occur. At that time, it will be determined how best to conduct this effort in order to be as effective as possible.

c. Chapter 15 details Comprehensive Plan maintenance. The FCZD will create an action plan on an annual basis with the assistance of the Steering Committee. After each year, a progress report will be completed and provided to the Board of Supervisors. As funding becomes available, priorities could be altered to meet the needs of Chelan County.

i. **Recommendation:** Nothing further at this time.