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January 18, 2017

Harry Haslam Washington State Department of Transportation Northwest Region P.O. Box 330310 Seattle, WA 98133-9701

Floodplain Memo
College Way (SR 538) @ I-5

City of Mount Vernon Skagit County, WA

Dear Mr. Haslam,

This memo has been prepared to demonstrate the above project's compliance with Executive Order (EO) 11988: Floodplain Management. On behalf of the City of Mount Vernon Department of Public Works, we are requesting your concurrence that this project conforms with requirements outlined in Federal Emergency Management Agency (FEMA) EO 11988 and will not impact any regulated floodway, cause a significant (greater than 1-foot) net rise in the 100-year floodplain, or adversely affect floodplain habitat.

EO 11988 requires that federal agencies take action to avoid, to the extent possible, impacts associated with the occupancy and modification of floodplains in order to reduce the risk of flood loss, to minimize the impacts of floods on human safety, health and welfare, and to restore and preserve the natural and beneficial values served by floodplains. This includes considering alternatives to developing within the floodplain. Federal agency actions include federally undertaken, financed, or assisted construction and improvements. As this project has received federal funding from the Federal Highway Administration (FHWA), it requires compliance with EO 11988.

In compliance with EO 11988, alternatives were considered to developing within the 100-year floodplain. However, it was determined that there are no practicable alternatives to the proposed project occurring within the floodplain. As the project will involve improving existing infrastructure within the floodplain, the proposed project cannot be relocated to a location outside of the floodplain and still achieve the proposal's purpose and need. A no-build alternative would result in continued congestion issues at the College Way (SR 538) interchange with I-5.

The City of Mount Vernon Department of Public Works is proposing to improve the interchange on College Way (SR 538) at the underpass of Interstate 5 (I-5) to provide congestion relief, safety, and extension of the life of the interchange. The project will add two additional lanes on

College Way, relocate existing retaining walls, and re-channelize the existing roadway to add left turn capacity. Stormwater improvements will be also be incorporated during final design of the project to address the increase in impervious surfaces as a result of the proposed project.

The majority of the project area, and much of the Skagit Valley, is located within the vast floodplain of the Skagit River. The FEMA-mapped base flood elevation within the project area is approximately 33.8 feet (NAVD 88 converted from 30 feet NGVD 29). Refer to the attached FEMA FIRM panel of the project area which shows the limits of the FEMA-mapped floodplain as well as mapped base flood elevations in NGVD 29 (Figure 1). Also refer to the attached figure that shows the proposed project area in relation to the mapped 100-year floodplain (Figure 2).

In total there will be approximately 3,000 cubic yards (CY) of excavation below the FEMA-mapped base flood elevation of 33.8 feet. There will also be approximately 15 CY of fill, for a net excavation of approximately 2,985 CY. Any stormwater improvements will also involve net excavation below the FEMA-mapped base flood elevation. No portion of the project area is mapped as a floodway, so there will be no excavation or fill within FEMA-mapped floodway. As such, there will be no rise in the 100-year floodplain or floodway of the Skagit River as a result of the proposed project.

In addition to the net excavation within the 100-year floodplain as a result of the proposed project, there is no functional floodplain habitat within the project footprint. Vegetation within the project area is dominated by ornamental planter strips and maintained lawns that do not provide any functional floodplain habitat.

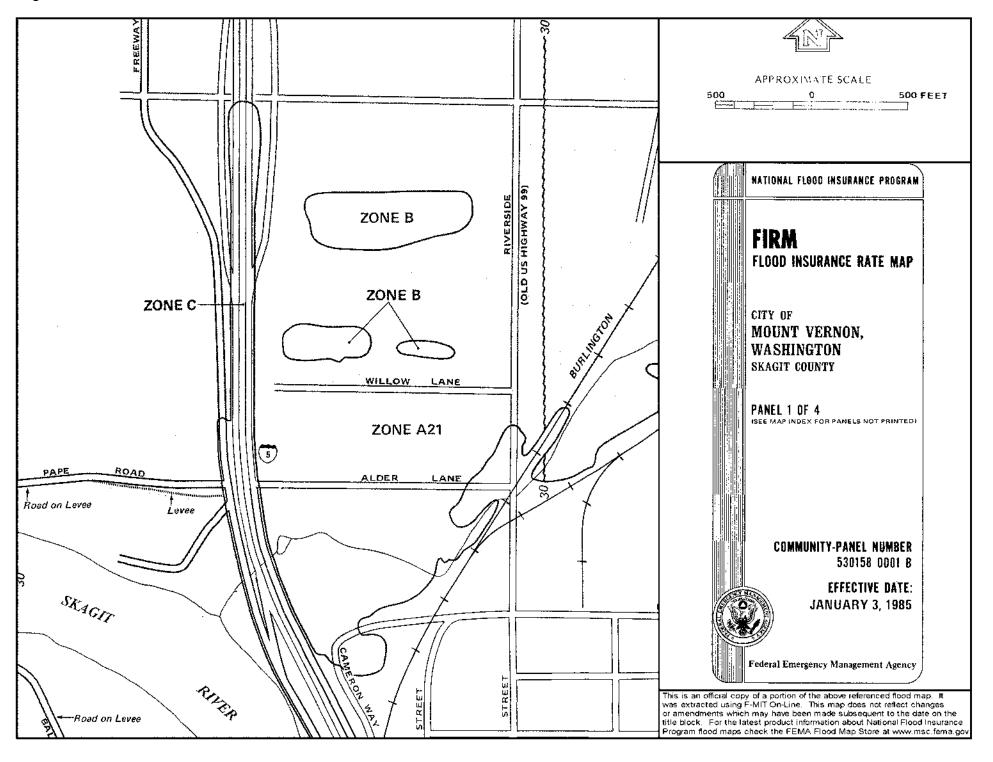
Again, on behalf of the City of Mount Vernon, we are requesting your concurrence that the project meets requirements outlined in FEMA EO 11988. Should you have any questions, please contact me at 425-503-3629 or via email at rwidener@prodigy.net.

Sincerely,

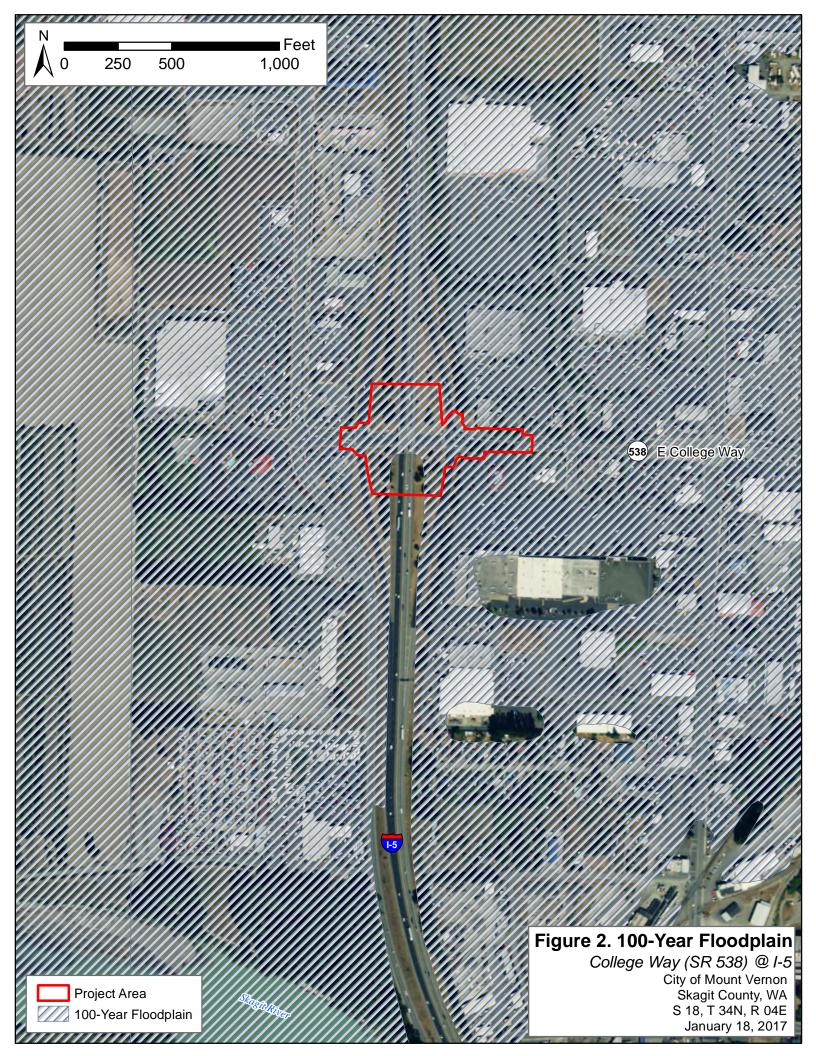
Ross Widener

Widener & Associates

Figure 1. FEMA FIRM



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