King County Flood Control Board **June 28, 2018**
ATTN: Reagan Dunn, Chairman
516 Third Ave, Room 1200
Seattle, WA 98104

RE: Sammamish River Flood Controls - Lake Sammamish - Willowmoor Project

We Lake Sammamish property owners wish to express our concerns about damagingly high water levels on the lake. Most of us served on an advisory committee for what's called the Willowmoor Project - a project ostensibly aimed at reducing this problem by modifying the Sammamish River flood control channel at Marymoor Park.

Our goal is to assure flood protection both on Lake Sammamish and along the entire length of the Sammamish River. Facts that we bring to your attention today indicate that Willowmoor will not assure flood protection or lessen frequent high water damages. Quite the contrary.

Here are our findings -

1 - The Willowmoor Project is focused on a short segment of the river. We're concerned with the entire length of the river. Why?

Because the entire river is the flood control system for the lake and the drainage basin. It's like the drain for a huge bathtub. But this drainage system, owned by the Corps of Engineers, has been declared deficient by the Corps.

We asked the Corps' engineer about the flood control status. Quoting from a portion of his response -

> *The inactivation of the [Sammamish River flood control] project in 2008 was a long time in the making. I had inspected it for many years and noted unauthorized modifications and a general lack of proper maintenance. I worked with KC staff ... to get the project back into compliance, but, ... the project was made inactive in 2008... [T]he direct impact of that action on KC is that any flood damages...are now fully the responsibility of KC. ...[AS WELL AS, THE] liability for damages...*

2 - The focus of Willowmoor appears to be more on fish than on flood control.

We urge that before $5 million or more is spent creating a new by-pass creek for fish that greater consideration and resolution of flood issues is imperative. A recent federal court decision supports the County doing so.

Last March a ruling in the case of Ideker Farms Vs. the U.S. Army Corps of Engineers found that the Corps, in changing its policies on the Missouri River, had focused on returning the river to a more natural state to provide fish habitat. BUT, in doing so, they neglected flood control and were found liable for damages.

The Corps is likely very sensitive, given the above ruling. They will likely restrict adding a fish passage without repair of flood controls downstream.

3 - Involvement by the Corps should be early, often, and assure flooding is addressed.

As the County requires for land use actions, the Corps requires that permits be obtained to modify any part of a flood control system. The most pertinent process in this case is known as Section 408 permitting. Quoting again, here is a summary of what the Corps' engineer told us recently with respect to 408 permitting -

> *Even though the [Sammamish River Flood Control] project is inactive and ineligible for Federal assistance, changes to it must be approved by the USACE... That basically means that you can't modify a Federally constructed project in such a way that it's functionality is degraded. In the case of Willowmoor, changing the outlet to the lake can be accomplished, but it will have to go through the 408 review process ... and be found to not adversely impact the Authorized purposes of the project... [A review by the Corps will be necessary.] Funding for this review would need to be provided to the USACE by the applicant.*
>
> *It should be noted that even if the Willowmoor modification receives a 408 approval, the overall project as a whole will remain inactive due to the numerous deficiencies downstream... [A] comprehensive review and analysis of the entire project will be required to provide a current status on what the many unauthorized modifications and lack of maintenance downstream have had on project performance...*

4 - We now know that flow into the river from downstream tributaries will far exceed what the Corps planned for.

In April of this year the County finished planning efforts for the Bear Creek Basin. Bear Creek is a tributary entering the river just downstream of the river section that Willowmoor would modify. Study results report more than a tripling in flow. Recent wording of the Willowmoor project's intent states that it will seek to reduce flooding on Lake Sammamish, BUT the caveat made along with that statement is there can be no downstream flooding.

But we know Bear Creek flow **PLUS** lake outflow **IS GREATER THAN** downstream capacity!

Is it wise not to recognize this before planning to make changes upstream that will not work downstream?

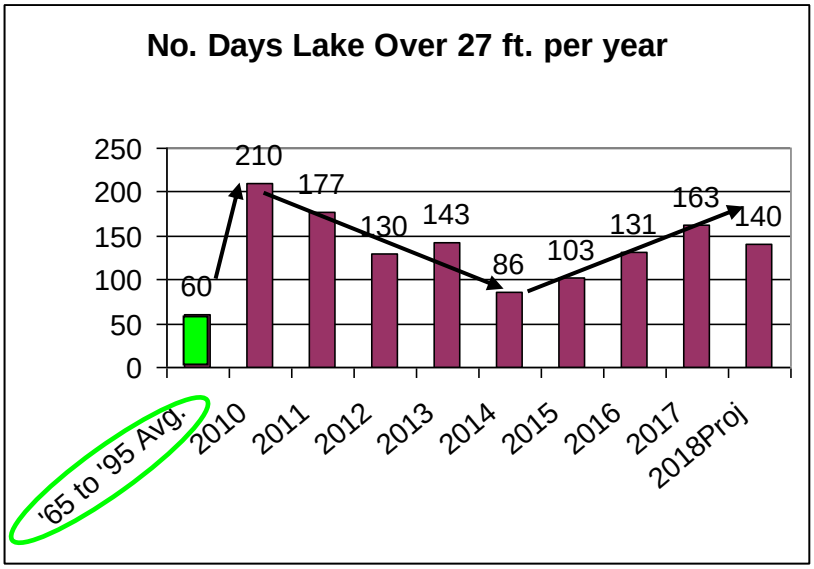
5 - What about the County's increased maintenance in this section of the river?

In response to citizen complaints the County increased maintenance and resolved problems with obstructions in this section of the river. At first this helped, but that's changed.

To review, for the first 30 years after construction of the flood project, Lake Sammamish witnessed abnormally high water levels only 2 months of the year. By 2010, due to inadequate maintenance, these extraordinary levels occurred over 6 months of the year.

A number of us lake residents brought this to the attention of the County and the Corps. Ultimately Council members Hague and Lambert stimulated a return to annual maintenance, including removal of

50% of years of accumulated sediment. But lake water levels have now reverted to an upward trend. Extraordinary high levels are persisting more than 4 months each year, and the trend is increasing.



Data Source: USGS Lake Samm. Gauge

We're told that an objective sought by the Willowmoor Project will be a return to about 3 months per year with high water levels. That would still be 50% greater than what the Corps achieved.

Our requests include -

A - That the County **fund involvement of the Corps now** to assure downstream issues in the river are resolved; Willowmoor being approved as a first step only if it will not exacerbate these problems.

B - That full consideration be given to **means to better control lake outflow**. Similar to what's done by the Ballard locks, lower the lake in advance of storms and raise the lake to store water through the summer to send downstream when fish need it in the fall. It may even be possible this technique would obviate Willowmoor's proposed withdrawal of precious Redmond ground water to cool the fish.

We've proposed such dynamic flow control, but aren't convinced it will get serious consideration.

C - That **all property owners** along the shores of Lake Sammamish and in the floodplain downstream **be notified of findings and recommendations** by the consultants on the project as well as those of the Corps of Engineers. As early as 1999 the Corps requested such notification. Here we quote from one such communication to the County -

> *Until the vegetation is managed as designed or modified by competent technical analyses, King County should advise the public of repeated and potential adverse impacts to lake elevations... [and] conduct a thorough public awareness and planning process to ensure that all interests around the lake are informed of the impacts and afforded the opportunity to provide input to the decision process*

The impacted public deserves to be kept informed of the government's intentions.

D - That **annual maintenance of the flood project be carried out now and in the future.**
One of the primary costs driving inadequate maintenance in the river has been interagency requirements to mitigate for maintenance. This has doubled maintenance cost. A stated objective of Willowmoor is that the end product not require maintenance in the future. That is simply not realistic. Maintenance will be needed to remove flow-reducing growth and sediment, both in the Marymoor section and down river. At Marymoor, maintenance should not require costly mitigation. The new fish side channel Willowmoor is proposing IS that mitigation. But commitments to maintain the entire river flood project are called for as well.

Closure
We seek your help in redirecting the focus of the Willowmoor Project to assure active Corps involvement now followed by their certification that the ultimate project will re-establish currently deficient flood controls. In support of our requests, we also provide a series of pictures, below, that demonstrate the realities imposed on Lake Sammamish property owners by mismanaged lake levels.

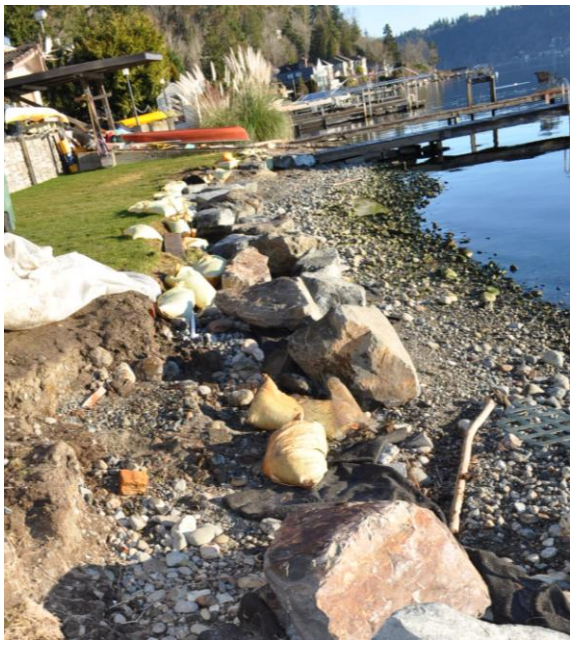
Submitted by -

Martin Nizlek Bellevue	Scott Sheffield Bellevue	Reid Brockway Sammamish	Jim Mackey Bellevue
Nan Myers Bellevue	Gary Heitlauf Redmond	Paul Best Redmond	

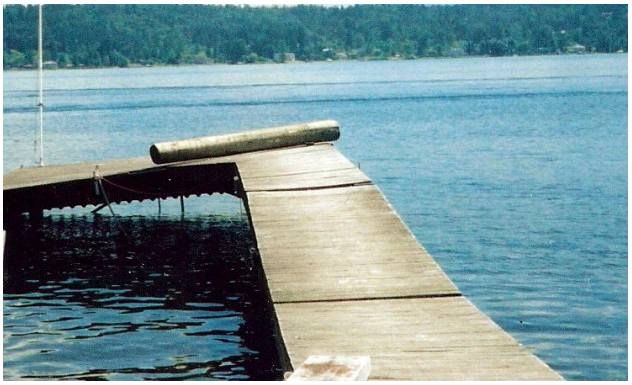
[Additional Information Follows Below]

EXAMPLE DAMAGES CAUSED BY MISMANAGED LAKE LEVELS

ERODED SHORELINE REVETMENTS AND FLOATING DEBRIS



DESTROYED DOCK PILINGS AND DECKING



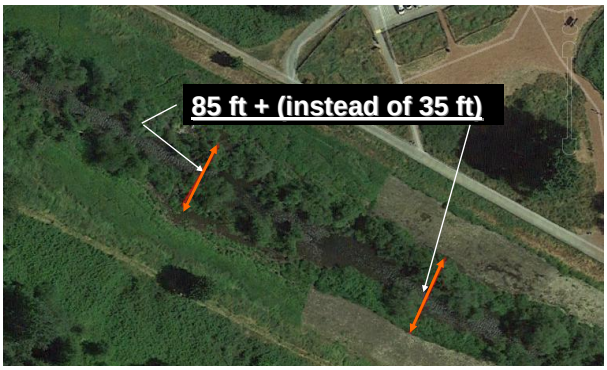
UNSAFE BOATING CONDITIONS

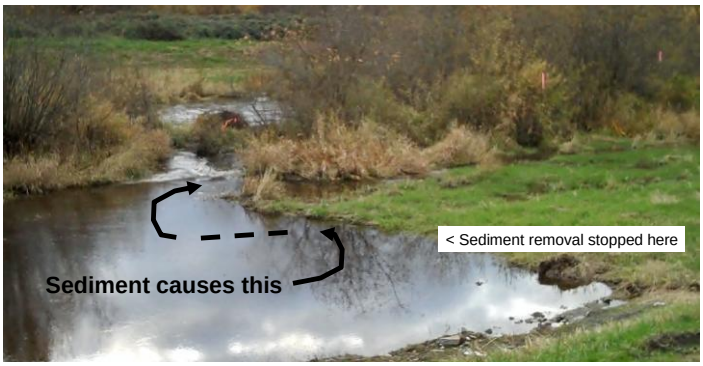
(Lake too low in summer)

(Lake too high in winter)

CAUSES OF HIGH LAKE WATER LEVELS

EXCESS VEGETATION AND SEDIMENT BLOCKING FLOOD CONTROL CHANNEL





OBSTRUCTIONS PLACED OR ALLOWED TO REMAIN DOWNSTREAM IN FLOOD CHANNEL

OTHER IMPACTS OF EXTRAORDINARY WATER LEVELS

PROPERTY TAKING DUE TO ARTIFICIAL SHIFT IN OHW-LEVEL