## UNITED STATES DEPARTMENT OF AGRICULTURE

## SOIL CONSERVATION SERVICE

Room 360 U.S. Courthouse, Spokane, Washington 99201

May 23, 1979

Mr. Sidney Knutson, P.E.
Asst. Chief Engineering Division
Department of Army
Seattle District Corps of Engineers
P.O. Box C-3755
Seattle, WA 98124

Dear Sir:

In regards to the Draft Environmental Impact Statement for the proposed Lower Levee Channel Improvement Project, we offer the following comments:

1. Project Description - 1.08 Operation and Maintenance, Page-15

The responsibility of the local sponsor should also include regulation of animal use and utilization of all terrain vehicles on dikes. In the past, dike degradation and damage has been caused by such use.

2. Environmental Setting Without the Project - 2.05.6 Interior Drainage,
Page-38

The economic well being of the agricultural community is very dependent on drainage improvements. Without the present drainage improvements, the largest dairy in Skagit County (located in the project area) could not adequately operate. Thousands of feet of subsurface drainage tubing and open ditches for outlets have been constructed to cope with both surface and subsurface drainage problems in the project area.

3. Environmental Setting Without the Project - 2.05.7 Existing Condition of Levees, Page-39 and 40

There is no mention of existing soil material within the dikes.

Considerable seepage now occurs through several reaches of dike during high river flows. Are there sections of existing dike too porous to build on without an impervious core trench being added?



4. Probable Impacts of the Proposed Action on the Environment - 4.02.1 Level of Flood Protection, Page-66 and 67

We are somewhat confused over the specific design and intended use of the proposed weir structure. The document contains no cross-section or other drawings and specifications for the weir. The magnitude of a weir that will spill 60,000 cubic feet per second during a 100-year flood event should be more adequately addressed in the document. Cross-sections and profiles that show the proposed weir and its relationship to different river flows and surrounding ground elevations should be included.

At the April 24, 1979 meeting in Allen, Washington, the Corps of Engineers informed local citizens the weir will start spilling water between a 15 and 20-year flood event. This is considerably less than the stated 50-year flood protection mentioned on page-66.

5. Community Services - 4.02.9, Page-70

The present location of United General Hospital between Burlington and Sedro Woolley will be impacted by the proposed project. The hospital elevation is around 42.5 feet while the top of the weir will be at 40 feet.

The protection of the hospital is extremely important to the welfare of Sedro Woolley, Burlington, and Eastern Skagit County. The impact of the project on the hospital operations should be addressed, in addition to possible mitigating measures.

6. The Project Area - 4.04.3, Interior Drainage, Page-76

Several existing drainage systems will be bisected by the proposed levees north and west of Burlington. Adequate recognition and treatment of each system should be addressed in the document. Many of these systems were installed with Federal assistance, both financially and technically and represent a sizable investment to the farmer.

7. The Project Area - 4.04.5, Water Quality, Page-78

A portion of the proposed project includes 1,750 feet of channel work on Gauges Slough. Where will this take place? Will the present tide outlets be included in the channel work? Will the channel work affect Snelson's Lake? Due to the past problems with Gauges Slough, we believe more information is needed on this phase of the project.

## 8. The Project Area - 4.05.9, Prime Farmland, Page-84

As was stated in the July 7, 1978 correspondence with this agency, nearly all of the soils within the project area meet S.C.S criteria for prime agricultural land. The major limitation of the soils is adequate drainage. Allowances should be made to schedule work when the farmland is dry to avoid cropland damage from compaction. Farmers should have the opportunity to install subsurface drainage systems in proposed ponding areas before dikes are constructed north and west of Burlington. These mitigations will help insure no more than 40 acres of prime agricultural land will be lost by the proposed project.

Thank you for the opportunity to comment on the project. If you have further questions, please do not hesitate to contact me.

Sincerely,

Galen S. Bridge

State Conservationist

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