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Board of Lewis County Commissioners
351 NW North Street
Chehalis WA 98532-1900

Re: CMZ Maps, your letter of Aug. 12, 2009, mine of Aug. 7, 2009

Gentlemen:

Thank you sincerely for your letter of Aug. 12, 2009, replying to my letter of Aug. 7 asking that you rescind and repudiate the CMZ maps.

We cannot believe that you do not address or even mention the overwhelmingly greatest impact of the CMZ maps, which is the destruction of our property values. Most of our properties in or near the zones are no longer saleable for anything like reasonable value to prospective purchasers informed about the maps, meaning our property values have been made very low, arguably zero. You know this: you yourselves would never pay any significant price for property predicted by government to have high risk of being a river channel within ten years. Your maps have condemned our properties. Commissioner Grose estimated that 800 properties are affected, so if the average value of them was \$100,000, which is surely low, the total injury to us is over \$80 million.

Eighty million dollars is about 200 times the largest damage we've ever suffered in a flood, and perhaps 20 times the damage we would likely suffer from any imaginable real channel migration. The reasonable goal of the maps is to protect us from channel migration, but it is very unreasonable to take action costing twenty times the amount of predicted possible injury to protect us from that injury, especially when the action is based on a very questionable and provably erroneous prediction rather than fact.

The many grotesque errors prove that the maps are very inadequately prepared and worthless; they encompass and ruin the value of hundreds of properties unjustifiably because of errors. Your publishing of such erroneous maps is inexcusable and capricious. Further, the maps are predictions only; no one knows if the predicted channel migrations will actually occur, yet you publish them, ruining us. I suggest that you failed us when you accepted these devastating state requirements without making the state prove every dot and tittle.

Since you put such infinite faith in the engineers' questionable and non-factual predictions, perhaps it is meaningless to argue with them. However, we do not believe that the channel will migrate as the maps predict; further that if it did, it would affect only a small fraction of the properties included in the engineers' "shotgun" method. We believe that in the Muddy Fork area above High Valley Park No. 8, the river may return to its pre-2006 channel naturally, that there may be geologic evidence that it has done exactly that in centuries past, perhaps as recently as 1900. We know that a relatively small expenditure in re-channeling the Muddy Fork (now while it is dry of water so without fish damage) would positively prevent the channel from migrating toward High Valley Park where much of the maps' property value damage is inflicted.

We know you three men, that you are human just as we are. We are sure that you care about the huge injury these maps have done to us, in very many cases totally in error. Please, Commissioners, as our elected representatives, show that you care and be our representatives in our defense against this vicious, wrongful and very damaging attack!

But I offer an escape. Your letter stated: “because the 2006 flood became the new ‘flood of record,’ the County is required to remap the area.”

I know that the flood of 1977 was higher than the flood of 2006. My point is that, if the flood of 2006 was lower than the flood of 1977, it is not the new flood of record, and thus the county is not required to remap the area. Having no requirement to remap the area, we could then unpublish the CMZ maps, repudiate them because of their gross inaccuracy, and forget the issue. To publish the maps doing \$80 million of injury, when we’re not required to do so, would be very irresponsible and wrong.

The flood of Dec. 2, 1977 at the Packwood gaging station was 36,200 CFS, a 42-year event. The flood of Nov. 6, 2006 was reported to the Highway Shopper newspaper on Nov. 11, 2006 in a telephone interview with Louis Fuste, Public Relations Officer of the United States Geological Survey office in Tacoma, to have been 27,400 CFS, a 12-year event.

Very extraordinarily, several months after the Nov. 6, 2007 flood and after the peak flow of 27,400 CFS was determined and reported, the U.S.G.S. changed the peak flow to 42,100 CFS, a very unscientific-seeming increase of 54%, for unexplained reasons. I believe those reasons were not scientific, that their new flow rate was very exaggerated, partly because I know the 1977 flood water was one to two feet higher than the 2006 flood in most places. I am sure that your close questioning of those in the U.S.G.S. who changed that flow will prove that it was not a scientific correction. I am sure that your GIS or engineering consultant can verify these observations of mine below to be true by examining aerial photographs and by the observations of many other Packwood residents:

In 1977, Cowlitz water overflowed Mountain View Drive in 8th High Valley Park about a hundred yards south of its intersection with Maple Way, a few blocks from my home. In 2006, the river never overflowed Mountain View Drive; it peaked a foot or more lower than Mountain View Drive at that point.

In 1977, the Cowlitz flooded most of Fairways Nos. 1, 2, 3, 4 and 5 of the High Valley Country Club golf course, also near my home. It left only enough dry land at the northeast ends of Fairways nos. 3 & 4 for the helicopter to land, ferrying us to and from Packwood. In 2006 these fairways were flooded little if at all.

In 1977, the river overflowed the Packwood airport and mostly surrounded the Packwood Community Hall, leaving only enough dry ground for the other end of the helicopter ferry across the river. If memory serves, as the Hall was being used as the emergency services center, the basement door and window wells were sandbagged. In 2006 water did not overflow the airport and there was no water around the Packwood Community Hall.

In 1977, at the east end of Main Street in Packwood, the fence posts at the end of the Snyder home driveway had about 18 inches of water standing around them. In 2006, the driveway fence had been shortened back from that point, but there was no water in the field near that point.

Please have your flood people examine and prove that the 2006 flood was not a “new flood of record,” and that Lewis County is thus not required to remap the area. Then unpublish and repudiate the maps.

Sincerely yours,

David R. Bunting