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| **Steven Telleen** |

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On August 3 the Boulder City Council held the first reading on the proposed annexation agreement for the CU-South property. This agreement is being pushed through at a rapid pace ostensibly for flood mitigation. I hope the Council will consider a few facts from the 2013 flood-loss impact summary, compiled in 2014 by the City of Boulder on the basis of FEMA’s assessment of damages, because it directly affects all Boulder residents, not just those in the South Boulder Creek Drainage Area.

To summarize:

- Focusing on the SBC drainageway does not address other drainage areas in the city that suffered more damage. The focus and priority should be on the areas that suffered the most damage first. If this proposal is approved will there be money left to address the areas that suffered more damage than this one?

- The 2013 flood was considered a “70-year flood” and yet 44% of the damage occurred in the 500-year flood zone. This should raise concern about the current 100-year solution adopted by City Council for the SBC drainageway!

- In the SBC floodplain, 70-80%% of the damage was caused by non-stream related water that the current CU-South proposal does not address or mitigate.

- Of the stream-originated water, 65-70% of the water came from local-drainage flooding rather than SBC. This suggests that focusing on mitigating the local-drainage issues first might provide more effective mitigation than the current CU-South proposal.

If the above is not enough to concern you, consider that every Boulder resident will pay for this directly or indirectly, because the proposed financing is via a utility *fee* increase not a *tax* increase. A tax increase would trigger an automatic TABOR vote.

The bottom line is: the data do not support making the highest priority the annexation of CU-South for mitigation of South Boulder Creek (SBC) flooding. This is particularly true when the many tens of millions of dollars this agreement requires will take money away from other areas in the city that suffered even more damage during the 2013 flood.

According to the City’s own document, the ranking of losses by drainage basin places SBC in 3rd place ($27,815,855) for the Total Estimated Loss behind Boulder Creek ($41,276,084) and Two-Mile Canyon/Goose Creek ($39,101,067).

However, these totals are misleading as the data document that much of the SBC flood loss in 2013 came not from SBC, but from local drainage flooding and other non-stream related issues (sewer, groundwater, etc.). Since the CU-South annexation proposal would only address flooding issues for SBC, it is worth ranking the drainage basins using the loss data from the “Major drainageway flooding” category. In this ranking SBC drops to fifth place behind Boulder Creek, Two-Mile Canyon/Goose Creek, Wonderland Creek, and Gregory Canyon.

This City-compiled document also provides data comparing SBC losses in the 100-year versus 500-year floodplain.

Almost half (44%) of the damage done in the SBC Floodplain was in the 500-year flood zone area outside the 100-year flood zone ($15,841,479 for the entire 500-year floodplain minus $8,957,975 for the 100-year portion equals $6,983,522 outside the 100-year floodplain).

This alone should indicate that a 100-year solution may be inadequate even for a 2013 level storm. Approving this agreement, which only addresses a 100-year level storm, would lock-in a solution that is likely inadequate and certainly not resilient.

The document also shows that only 30% of the overall damage in the SBC 100-year floodplain was from stream flooding (SBC plus local streams), and 65% of that stream-flood damage was from local stream flooding, not the Major SBC drainageway.

Applying these same calculations to the SBC 500-year floodplain only 21% of the total damage was from stream flooding, and 70% of that stream-flood damage was from local stream flooding not the Major SBC drainageway.

This suggests that even if the proposed SBC mitigation plan does successfully contain the Major SBC drainageway water, which essentially is the entire rationale for quickly approving a CU-South annexation agreement, **it will only account for 35% of the 30% of the total damage (about 10% overall) in the 100-year flood area and 30% of the 21% of the damage (about 7% overall) in the 500-year area**.

Analysis of these data strongly suggest that the current CU-South solution in any configuration is not likely to provide Boulder residents with the mitigation promised by the City, yet the Council continues to rush to sign an agreement based on an artificial deadline.

Tell the City Council, you want an effective solution, not a rushed agreement

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