



Nooksack Tribal Council

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Hon. Barry Buchanan, Chair
Whatcom County Council
311 Grand Ave., Suite 105
Bellingham, WA 98225
Via email: bbuchana@co.whatcom.wa.us

Chairman Buchanan:

I write on behalf of the Nooksack Indian Tribe to discuss the issue of flooding, and to express concern about a proposed County Council Resolution entitled Eliminating the Barriers to Removing Excess Gravel from the Nooksack River that may be introduced as early as tomorrow. The resolution seems to suggest that the Nooksack Indian Tribe and the Lummi Nation agree. ***The Nooksack Indian Tribe has not been consulted on the proposed Resolution and does not support floodplain gravel mining, including on tribal properties.*** Further, we understand that neither the Lummi Nation nor the federal government, which holds title to the land in trust for the tribes, have been consulted either.

We all understand that local flooding is a difficult situation. The Nooksack Indian Tribe was impacted by the recent floods, and like others, we are still working to clean up afterwards. There has been a lot of damage to homes and businesses, and we know that people throughout Whatcom County were harmed. Perhaps lost in the discussion is that there has also been extensive damage to our salmon resources.

We still believe an approach that integrates salmon recovery with flood management, as was agreed to in the 2005 WRIA 1 Salmon Recovery Plan is the best course of action. Whatcom County has taken the lead by developing an integrated planning process (FLIP) to update the Comprehensive Flood Hazard Management Plan that brings together diking districts, federal, state and local regulatory agency staff, technical experts, landowner representatives and the tribes to integrate the needs of salmon, agriculture, cities and towns. This process includes developing goals, management strategies, alternatives, and projects to address flooding on the Nooksack River. Several pilot projects from this process are currently in the design phase, demonstrating that it is leading to on-the-ground action.

The FLIP approach is to seek a shared understanding of the problems as well as risk reduction actions through effective collaboration. We have collectively learned a lot in the FLIP process and believe it is important now to review what we have learned. It is also important to better understand this recent flood before pursuing remedial flood remedies that are not fully vetted. Assessments during the FLIP process have identified areas of channel aggradation and degradation, and some specific 'pinch points' where the channel is constricted by such things as bridges and substantial narrowing of levees. We have learned over time that backwatering occurs upstream of these 'pinch points' during floods, and when that happens, sediment is deposited, which can make flooding worse. The Nooksack Tribe has invested substantially in the FLIP process, and we believe FLIP is the approach that will successfully integrate flood risk reduction with improved salmon habitats and habitat forming processes.

Though finding solutions will be challenging, it begins with asking the right question: *how do we reduce the harm of flooding during heavy rain events?* What we need, is to work toward a suite of potential solutions that together improve long-term flood management and salmon recovery planning, while also protecting cultural resources. We do not support moving forward with a gravel extraction proposal without adequate analysis of the flood benefit or environmental costs of gravel removal.

We all want to reduce the impacts of future floods to people, property, infrastructure, and salmon. Let's work together to ask the right question and then work towards solutions that work for the broader community.

Sincerely,

/s/

Ross Cline, Sr., Chair

cc: Hon. James Wilson, Jr., Chair
Lummi Indian Business Council
Via email: jamesw@lummi-nsn.gov

Hon. Bryan Mercier, Regional Director
BIA Northwest Regional Office
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