

March 10, 2009

Jeroldine Hallberg  
Skagit County Planning and Development Services Department  
1800 Continental Place  
Mount Vernon, WA 98273

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Dear Ms. Hallberg:

This letter contains the comments of Skagit Audubon Society on the Skagit Countywide Urban Growth Area Open Space Concept Plan dated January 2009.

Skagit Audubon Society strongly supports the provisions for preserving wildlife habitat and migration corridors in the Growth Management Act and the Skagit County Comprehensive Plan. We believe that the Open Space Concept Plan has the potential to help achieve these preservation goals.

Skagit County has very significant and diverse wildlife values, many of which have been or will be adversely impacted by human population growth and related development. Well-designed and maintained open space and corridors within and between Urban Growth Areas can help mitigate the effects of the habitat fragmentation that has already taken place and avoid further losses of significant habitat. Wildlife and native plants also add an important dimension to the quality of life in Skagit County and should rank high in any planning considerations.

We note the Open Space Concept Plan's statement (pages 1 and 4) that Skagit County's many agencies and organizations involved with open space preservation have made notable progress in parts of the county distant from the Urban Growth Areas (UGA's) but have had less success in and near the UGA's. As stated, there are a number of reasons for this, including the higher costs of land in more developed areas. We support the proposed emphasis of the plan on obtaining financing to assist these existing organizations and agencies preserve and enhance open space, including corridors, around and within the county's UGA's.

Skagit Audubon Society supports the idea of extending corridors through UGA's and linking them as well as extending them to distant parts of the county. The plan suggests, for example, that the Cascade Trail link eastward to Ross Lake National Recreation Area and that other routes reach north to the Pacific Northwest Trail, south to Snohomish County, south from Anacortes to Deception Pass, etc. Such a system of linked trails would be a very significant recreational asset. If designed for more than recreation it could also support the needs of wildlife for secure passage between areas of habitat. As global warming alters habitats and forces wildlife and plants to move, continuous linkages of habitat will become even more important to the survival of species.

We note and welcome the plan's repeated mention of interpretive opportunities related to the proposed open space corridors. Residents of and visitors to Skagit County would benefit from the opportunity to learn about the significant wildlife resources of this area, from wild salmonids in the rivers to Trumpeter and Tundra Swans and many other bird species wintering or breeding

here. Increased public awareness of wildlife will build support for the planning, financing, and implementation needed to keep Skagit County a desirable place to live.

Much of the text of the plan focuses on conceptual trail routes through open space in and between the UGA's. This can be read to imply narrow corridors sufficient to accommodate walking or bicycling but which would probably not be effective as wildlife habitat or movement routes between areas of habitat. We support the need for trails supporting non-motorized recreation and transportation but would like to see as frequent references in the plan to the importance of open space and corridors for wildlife needs.

To help ensure that open space and linkages meet the legal and technical requirements for wildlife habitat and migration corridors, it is important that the 9 members of the UGA Open Space Advisory Committee to be appointed by the County Commissioners include at least several with the educational and professional expertise to evaluate funding proposals for the wildlife-related portions of the UGA Open Space – Public Benefit Rating Criteria (Appendix G). These criteria include 2.1 (Aquatic habitat) and 2.2 (Wildlife habitat and corridors).

We also note the relevance of criteria 2.3 (Agricultural lands) and 2.4 (Woodlands) to wildlife in Skagit County. Specifically, many species of birds wintering here are dependent on a combination of agricultural lands and adjacent wildland or marine habitats. One of Audubon Washington's policy priorities for 2009 recognizes the importance of farms and working forests as critical wildlife habitat. Audubon supports policies which enable farmers and foresters to continue supporting the habitat needs of wildlife.

Finally, referencing Appendix E, Regulatory Approaches, D.3.1, we support requiring developers of subdivisions to provide open space and preserves that are adequate and properly designed to support wildlife habitat needs. This appears to be an approach that could be put into practice even before a source of funding is found for broader implementation of the plan. We support linking this regulatory approach to accomplishing the goals of the Open Space Concept Plan from now on.

The Board of Skagit Audubon Society has reviewed and approved this letter. Thank you for the opportunity to comment.

Sincerely,



Timothy Manns  
Board Member  
Skagit Audubon Society

P.O. Box 1101  
Mount Vernon, WA 98273