

March 17, 2009

FOSC

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of Skagit County

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*People dedicated to preserving
Skagit County's rural character by
protecting the natural
environment; supporting
sustainable resource-based
economies; and promoting livable
urban communities for present
and future generations.*

Skagit County Planning Commission
Skagit County Administration Building
1800 Continental Place
Mount Vernon, WA 98273

Dear Planning Commissioners:

Thank you for the opportunity to comment on the Countywide UGA Open Space Plan developed by Skagit County Planning and Development Department for the Skagit Council of Governments.

Friends appealed a number of issues to the Western Washington Growth Management Hearings Board including "Identification of Open Space Corridors" citing RCW 36.70A.110(2) and - .160. As we understand it, the RCW requires counties to include "greenbelt and open space areas in its UGAs and to identify open space corridors within and between urban growth areas. The Board noted that

"... This generalized discussion in the CP, plus city maps (that do not show greenbelts in unincorporated UGAs) and County parks plan maps (which do not show open space corridors between UGAs), do not adequately meet the requirements of RCW 36.70A.110(2) and .160."

The Final Decision and Order, issued February 6, 2001 stated:

"...(9) Within 180 days, adopt maps or some other clear mechanism to identify greenbelts and open space areas within UGAs and open space corridors within and between UGAs."...

Concern about the Scope of the Proposed Open Space Plan

A plain reading of the FDO suggests that the County was to identify existing or, in the process of the 7 year and/or annual Comprehensive Plan update, proposed greenbelts and open space areas within UGAs. The County has produced a Countywide UGA open space plan, complete with an inventory of assets, themes and interpretive opportunities, an implementation plan and various other suggestions. Friends is concerned that while the Plan, on paper, may be appropriately designated a DNS under SEPA, the plan, if implemented would require full SEPA and Shorelines reviews as well as public participation and most importantly public willingness to fund a project of such scale. Friends would have great concern if the Planning Commissioners recommended the plan, as it now stands, for implementation, with or without available funding.

Concerns about the Public Process

There was limited public participation in the development of this plan. The questionnaire appeared to be designed for an urban focused open space and greenbelt plan, and did not take into account the resource land needs. Further, it is unclear in reviewing the proposed plan how the public will know, for example,

that diking districts manage privately held lands on agricultural zoned lands. Similar concerns about forest land access and activities are also unaddressed.

Much more public process will be needed if the plan is to reflect the strong desires of Skagitonians to continue the rural lands based economy and not jeopardize rural character.

Concern Over Funding and Program Planning

In the current economic downturn, Friends does not see how a request for funding the development of a plan of this scale is appropriate. Further, the plan purports to use the Conservation Futures tax that is currently used for the Farmland Legacy Program for this program. It is inappropriate to "poach" funding from an existing tax that was put in place to sustain Skagit's rural economy. While some may argue that a trails system might generate tourism, the County already has 60% of its land base in protected national and state parks, forests, reservations, reserves, natural areas, etc. Threatening the 8% of the land base which supports agriculture, still the largest economic driver in the County, is unwise.

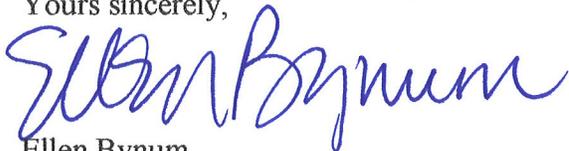
A further concern is that much of the area proposed in the plan for trails is also land which is tied to floodways, floodplains or other areas which are affected by rivers, creeks and/or streams. The upcoming USGS study as well as revisions to the FEMA plans for flooding will need to be incorporated in any trails system.

There is concern that the published information on private conservation programs is an endorsement by the County. Some reviewers felt it was inappropriate for the County to use the information provided by those organizations in whole or part, without a way to evaluate the program impacts and effects.

Friends of Skagit County asks that you do not take actions on this plan until it has been more fully integrated into the Comprehensive Plan process and until rural lands experts can evaluate the effects that it would have upon Skagit's rural economy.

Thank you for your time and attention.

Yours sincerely,



Ellen Bynum
Director

cc: FOSC Board, Gerald Steel, P.E., Counsel.