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From: website@co.skagit.wa.us [mailto:website@co.skagit.wa.us]

Sent: Thursday, August 07, 2014 5:25 PM

To: Planning & Development Services

Subject: PDS Comments

Name : kathryn alexandra

Address : 4311 ginnett rd

City : anacortes

State : WA

Zip : 98221

email : kalexandra@comcast.net

Phone : 3602938606

PermitProposal : TDR hearing

Comments : ansfer of Development Rights (TDR) is one way to increase density in urban areas by taking the development rights (DR) off of rural lands (farms and forests). Successful TDR programs are used in urban areas to create parks and open spaces in a robust development market where there is strong demand for more density.

Skagit County has a well tested Comprehensive Plan passed in 1996 which designated resource lands, rural lands and other land use zonings. The Skagit Farmland Legacy Program (FLP), funded by a property tax, purchases development rights (PDR) off of farmland and has permanently conserved 10,000 of the 90,000 acres in the Agriculture - Natural Resource Lands (Ag-NRL) zone.

The County studied TDRs some years ago and rejected a TDR program. I agree with the Commissioners' earlier decision on TDRs and opposes implementing a TDR program that could jeopardize the existing Farmland Legacy Program.

The TDR report contains no economic analysis of how the Farmland Legacy Program will be affected or how TDRs might affect farming. Nor does it say that consultants to the report promote fully contained communities, small towns created inside forests, as a way to "save" forests in Snohomish County.

Skagit is NOT an urban county. Cities and towns have the ability to add more residents using in-fill or by designating areas for density bonus sales to developers. TDR programs require additional trained staff and administrative costs to accomplish what Skagit has already done using the comprehensive plan, good zoning, planning policies and the farmland protection program. In short, Skagit County does not need TDRs.

This is threat to the future of Skagit farmland .