



*Protecting farmers,  
farming and farmland*

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March 13, 2009

City of Burlington  
Department of Planning and Community Development  
**Attn: Margaret Fleek, Planning Director**  
833 S. Spruce Street  
Burlington, WA 98233

RECEIVED  
MAR 13 2009  
PLANNING DEPT.

VIA HAND DELIVERY

Dear Ms. Fleek:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) To Adopt A Strategic Program For Comprehensive Flood Hazard Mitigation In The Burlington Urban Area And Adjacent Land With A Range Of Structural And Non-Structural Components. Our comments at this time are narrowly focused on the proposed UGA expansion request to include approximately 30 acres of prime agricultural farmland within the corner of Pulver Road and Peterson Road for the Burlington Edison School District (BESD).

It is our understanding the BESD purchased the subject Ag.-NRL zoned parcel(s), which are situated completely outside the current City boundaries and UGA, without consideration to the Countywide Planning Policies (CPP) or any other Growth Management Act regulation, policy or guideline, including, but not limited to, the City of Burlington's Growth Management Plan or Skagit County's Growth Management Plan.

We also understand the City of Burlington proposes to "swap" land currently within the City's UGA and return it to it to Ag-NRL, in an effort to achieve a no net loss of farmland and forgo any analysis required for UGA expansion and citing of public facilities. SPF disagrees that the proposed swap of land will equal a no net loss as the properties are not similarly situated nor are the soil types and conditions the same for each property.

At a minimum, SPF believes the BESD UGA expansion proposal and other UGA expansion requests that will convert Ag-NRL zoned land, are in violation of the following policies and goals:

- Skagit County Comprehensive Plan, Chapter 4 and the following adopted thereunder:
  - Introduction
  - Goal A-1
  - Policy 4A-1.1
  - General Policy Goals: Agricultural Resource Lands
  - Goal A-3
  - Policy 4A-3.1
  - Goal A-4
  - Policy 4A-4.1
  - Goal A-5
  - Policy 4A-5.1
  - Policy 4A-5.6

- County Planning Policies (CPP) 1.9, 1.10.5, 1.10.7(c), 5.10, 5.10, 8.2, 8.5, 8.8, 8.9, 10.2, 12.1, 12.3, 12.4, 12.5, 12.6, 12.7, and 12.16

Given the above, SPF respectfully requests the proposed UGA expansion be withdrawn from this round of Comprehensive Plan updates until such time the proper studies and analysis can be completed and the UGA expansion request can conform to the above cited Countywide Planning Policies.

If you have any questions about our comments please do not hesitate to contact me by phone at 360-336-3974 or by e-mail at [allenr@skagitonians.org](mailto:allenr@skagitonians.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'Allen Rozema', followed by a long horizontal line extending to the right.

Allen Rozema  
Executive Director