



## PLANNING & DEVELOPMENT SERVICES

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August 27, 2008

Margaret Fleek  
Planning Director, City of Burlington  
833 S. Spruce Street  
Burlington, WA 98233

**RE: City of Burlington and Dike District #12 Determination of Significance and Request for Comments on Scope of EIS**

Dear Margaret:

Thank you for the opportunity to comment on the Scope of the Environmental Impact Statement (EIS) for the proposed construction of 100-year certified levees and other flood control measures deemed necessary to protect the City of Burlington Urban Growth Area; modification of the City's urban growth area (UGA) to accommodate future flood control measures; and other measures as proposed in the legal notice published August 12, 2008 (SVH-2645). Skagit County Planning and Development Services appreciate the City of Burlington's desire to protect the city, people, and property from the risk of flooding and to plan for its long-term future.

In addition to the issues mentioned in the legal notice, the County requests that the EIS also address the following land use and flood hazard protection matters:

1. Countywide Planning Policies (CPPs), specifically including (but not limited to):
  - CPP 1, Urban Growth
  - CPP 2, Reduce Sprawl
  - CPP 8, Natural Resource Industries, including agriculture
  - CPP 9, Open Space and Recreation
  - CPP 10, Environment, specifically, specifically CPP 10.13
2. The 2002 Framework Agreement Among Skagit County, the City of Burlington, the City of Mount Vernon, the City of Anacortes, the City of Sedro-Woolley, and the Town of LaConner, specifically in regards to processes and procedures for conducting regional planning in an integrated, coordinated and on-going manner, and for modifying UGA boundaries.

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3. The Urban Growth Area Modification Criteria as approved by the Growth Management Act Steering Committee.
4. UGA designation criteria found in Chapter 2, the Urban, Open Space and Land Use Element of the Skagit County Comprehensive Plan, specifically, but not limited to: policies 2A-1.1 through 2A-1.5.
5. Policies regarding frequently flooded areas found in (defined as lands in the floodplain subject to a one- percent or greater change of flooding in any given year) found in Chapter 5, the Environment Element, of the Skagit County Comprehensive Plan, specifically including, but not limited to: policies 5A-5.2, 5A-5.3 (e-k), and 5A-5.5.
6. The flood protection project should be evaluated holistically in a coordinated, comprehensive, and equitable manner consistent with other flood control measures being considered in the update to the 1989 Skagit County Comprehensive Flood Control Management Plan and in the U.S. Army Corps of Engineer's Skagit River Flood Damage Reduction and Ecosystem Feasibility Study (Skagit River GI).
7. Levees often provide a false sense of security because they are subject to failure as witnessed in the Katrina disaster and the recent flooding in the Midwest. For your consideration in this regard refer to the attached position paper "*National Flood Policy Challenges Levees: The Double-edged Sword*" prepared in 2007 by the Association of State Floodplain Managers, (ASFPM), a non-profit professional organization dedicated to the reduction of flood losses in the United States. The flood protection project should include a well planned, feasible and periodic exercise of an evacuation plan should a levee fail, similar to recommendation #19 of this paper.

With the exception of the referenced document in #7 above, you should have copies of the countywide planning policies; the framework agreement; urban growth area modification criteria; and, the county comprehensive plan. If necessary, the Department can provide you these documents for review and reference upon your request.

Once again, the County thanks you for the opportunity to comment on the Scope of the EIS and look forward to continuing to work with you in a cooperative manner to coordinate land use planning and flood hazard mitigation efforts to protect the lives and interests of residents of the City of Burlington, other jurisdictions and municipalities, and Skagit County as a whole.

Sincerely,



Gary R. Christensen, AICP  
Director

Attachment: National Flood Policy Challenges Levees: The Double-edged Sword

Cc: Gary Rowe; Will Honea; Jim Voetberg; Tom Karsh; Ric Boge; Mark Watkinson; Tim DeVries; and Kirk Johnson