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SKAGIT COUNTY  
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Skagit County Planning Dept.  
Skagit County Planning Commission  
County Courthouse  
Continental Place  
Mount Vernon, Wa. 98273

July 31, 2017

RE: Comments on proposed- Permitting of Non-motorized trails in the Industrial Forest – Natural Resource Lands (IF-NRL) Zoning Designation.

Want to stress a few points from FOSC comments submitted July 21.

Friends of Skagit County opposes the proposed changes to allow non-motorized trails within Industrial Forest IF lands without permits. While we do not support changing county codes at the request of a single project, we do think that limiting the change to the proposed project is more appropriate than making the change for all IF lands in the county. We understand that the proposal was reviewed and approved by the Dept. of Commerce for GMA compliance. We request the county resubmit the proposal to Dept. of Commerce to determine if limiting the change to a one-time project in one location, in IF as part of a cooperative recreation area with Darrington is compliant with GMA.

Can a IF landowner acquire a single trailhead permit, then create as many trails as they want on their property without permits?

At what point does non-motorized trails compromise the use of the forest land as IF and what are the standards to determine when a conversion happens?

Who monitors users damages to the land, water and forest?

How would not requiring a permit for NMT recreation on private Industrial Forest lands lessen conflicts?

Permits allow the county to know location, contact information of landowners, provide emergency services and fire protection. County's history in developing trails is very poor such as failing to provide location markers for emergencies and Sheriff Reports, failing to address SEPA issues such as erosion on trails. Permits provide data. Without permits how would data be determined or monitored for evaluating whether the county has actually identified and protected IF/NRL.

Fire hazard from public users is a liability concern for private landowners. County Commissioners passed a clear resolution prohibiting new developments without adequate fire protection. We consider trails to be a development, and fire protection must be addressed in development of non-motorized trails and trailheads.

Planning staff has failed to present this proposal to the Forest Advisory Board for their expertise, yet staff has already published their uninformed response to FOSC July 21 comments without even considering the expertise of the Forest Advisory Board. In fact we recommend the Planning Commission limit the Planning Dept. Staff Reports to just issues the Planning Commission members request clarified from now on.

We see absolutely no advantages to allow NMT construction without being required to get permits.

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*Randy Good*