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**SKAGIT CONSERVATION DISTRICT**

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April 22, 2013

Skagit County Hearing Examiner  
1800 Continental Place  
Mount Vernon WA 98273

Subject: Public Comment on Shorelines Permit Application PL12-0144

To whom it may concern:

Skagit Conservation District (SCD) would like to comment on the application for Shorelines Substantial Development Permit No. PL1-0144 for expanding Skagit County Dike, Drainage and Irrigation District No. 12's (DD12) levee along the Skagit River. Our interest in this permit follows from our participation in Skagit County's Comprehensive Flood Hazard Management Planning (CFHMP) process and from our work with Skagit County Drainage District 21 to respond to impacts to agricultural drainage in the East Fork Nookachamps Valley, caused by DD12's long term program of expanding its downstream levees.

While the public notice describes the proposed project as an "...extension of the levee maintenance project initiated by the City of Burlington ...," the project in fact represents a significant expansion of the levee system. Raising the levee will exacerbate flooding upstream in the Nookachamps at river flood stages that exceed the existing levee elevation. Despite efforts of Skagit County government to identify flood hazard management solutions that will benefit as broad a range of stakeholders as is practicable, DD12's current proposal focuses on its and the City of Burlington's own localized interests, at the expense of other county stakeholders.

SCD opposes the piecemeal approach to flood management that the current permit application represents, and urges DD12 focus more seriously on supporting the county's efforts to develop a truly comprehensive approach that addresses flood risk management along the entire river and not just within DD12's boundaries.

SCD appreciates this opportunity to provide comments on this permit application.

Sincerely,

Tom Slocum, PE  
District Engineer