



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

*Northwest Regional Office 3190 160th SE Bellevue, Washington 98008-5452 (425) 649-7000*

June 10, 2010

Honorable Robert Zimmerman, Mayor  
City of Monroe  
806 West Main Street  
Monroe, WA 98272

Dear Mayor Zimmerman:

**RE: Proposed Zoning Change for Eastern Monroe Limited Open Space**

I am the Washington State Department of Ecology (Ecology) Wetland Specialist for Snohomish County jurisdictions including the City of Monroe (City). As the City currently does not have a Planning Director, I was unsure of whom else to write to. The reason for this letter is to express Ecology's concerns with the proposed zoning change for the Eastern Monroe Limited Open Space (Snohomish County Tribune, March 31, 2010 and April 7, 2010). The proposed zoning change applies to approximately 60 acres currently zoned as Limited Open Space on the east side of Monroe immediately north of U.S. Highway 2. According to the City's Comprehensive Plan (2005), this land includes one of the principal remaining areas of agricultural use within the City. The rezoning proposal would allow development of the site for retail and commercial use.

There are significant physical and environmental constraints on the subject parcels including steep slopes, wetlands and streams. Commercial or retail development on these properties would present appreciable engineering and permitting challenges. High-intensity development in this area is not consistent with the goals of the Comprehensive Plan and the current Urban Conservancy designation in the City's Shoreline Master Program (SMP). Commercial/retail development of these properties could not occur without changing the Urban Conservancy designation and amending the SMP, an amendment requiring Ecology's approval.

The conversion of approximately 60 acres of open space to commercial/retail use would be a significant loss to the 375 acres of the City's Limited Open Space identified in the Comprehensive Plan. Based on Comprehensive Plan Policy LUP-1.1(1.b.), which states in part "(land)... so severely impacted by critical areas, including frequently flooded areas, steep slopes, or wetlands, that its development potential is significantly diminished...", the current Limited Open Space designation seems appropriate for these properties. The section of the Comprehensive Plan describing the existing conditions for the subject area (Eastern City Limits/US-2 and Rivmont Ridge) goes on to say the area is significantly impacted by wetlands and prone to flooding due to restricted drainage to the Skykomish

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River. The engineering and additional design needed to address the local flooding could prove costly. Not adequately assessing and accounting for the loss of flood storage could worsen the flooding on neighboring properties and infrastructure.

Site build-out would necessitate filling wetlands and streams, which would require state and federal authorization. Those impacts would require mitigating and it is unclear to what degree those impacts could be authorized or how long that process would take.

Given the significant environmental impacts associated with commercial/retail development of these properties, Ecology recommends that the City prepare an environmental impact statement. This would allow the City to evaluate alternatives to the proposal and measures that would eliminate or reduce the likely environmental impacts of the proposal.

Thank you for your time. Please let me know if you have any questions. You may reach me at (425) 649-7148 or send an e-mail to [paan461@ecy.wa.gov](mailto:paan461@ecy.wa.gov).

Sincerely,



Paul S. Anderson, PWS

Wetland Specialist

Shorelands and Environmental Assistance Program

PSA: ca

E-cc: Geoff Tallent, Ecology Shorelands & Environmental Assistance Program  
Erik Stockdale, Ecology Shorelands & Environmental Assistance Program  
Patricia Lambert, Ecology Shorelands & Environmental Assistance Program  
Jamie Bails, Washington Department of Fish and Wildlife  
Jonathan Smith, U.S. Army Corps of Engineers  
Kurt Goering, Monroe City Council  
Patsy Cudaback, Monroe City Council  
Tom Williams, Monroe City Council  
Tony Balk, Monroe City Council  
John Stima, Monroe City Council  
Margie Rodriguez, Monroe City Council