



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

August 19, 2011

Brad Feilberg, P.E., Public Works Director
City of Monroe
806 West Main Street
Everett, WA 98272

CITY OF MONROE
RECEIVED

AUG 19 2011

COMMUNITY DEVELOPMENT

Dear Mr. Feilberg:

RE: Ecology SEPA Comments for East Monroe Scoping

Thank you for sending a copy of the scoping notice for the proposed East Monroe land use designation change to the Washington State Department of Ecology (Ecology) for our review and comment. As the Ecology Wetland Specialist responsible for Snohomish County, I wish to have the following comments entered for the record. This proposal involves changing the Comprehensive Land Use designation from Limited Open Space to General Commercial for portions of six parcels immediately north of U.S. Highway 2 near the eastern city limits.

Ecology supports the determination by the City of Monroe (City) that this proposal is likely to have a significant adverse impact on the environment. Given the potential for significant impacts to critical areas (i.e., wetlands, streams, steep slopes and frequently flooded areas) and shorelands, farmland, traffic and City infrastructure, an environmental impact statement (EIS) is the appropriate document to assess the proposed redesignation and project implementation. The EIS should include an analysis of regulatory requirements and consistency with the Growth Management Act requirement to designate and protect critical areas and agricultural lands (RCW 36.70A.040(3)(b)).

Relative to wetlands, the EIS should examine the environmental and economic costs of project construction in the Limited Redesignation and Full Redesignation alternatives. This assessment should include the costs associated with the permitting and mitigation needed for any wetland or in-water work. Wetlands are mapped throughout the project site, wetlands that appear to be associated with shorelines of the state and subject to regulation under the state Shoreline Management Act (RCW 90.58) as well as the applicable requirements of state law (see RCW 90.48 and WAC 173.201A) and the Clean Water Act (33 USC §1341) and 40 CFR Section 121.2. Filling wetlands would require state and federal authorization, in addition to any local approval, and mitigation would be required to compensate for the loss of wetland and any other waters of the state. The EIS should include an analysis of the environmental impacts from filling these wetlands (e.g., loss of flood storage, loss of wildlife habitat and diminished water quality improvement capacity)

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RE: Ecology SEPA Comments for East Monroe Scoping
August 19, 2011
Page 2

and assess the costs of mitigation for the proposed wetland fill. The mitigation analysis should include the state and federal mitigation standards found in *Wetland Mitigation in Washington State – Part 1: Agency Policies and Guidance (Version 1)* (Ecology Publication #06-06-011a).

We look forward to receiving a copy of the EIS for our review and comment. If you have any questions or would like to discuss my comments, please give me a call at (425) 649-7148 or send an email to paan461@ecy.wa.gov.

Sincerely,



Paul S. Anderson, PWS
Wetland Specialist
Shorelands and Environmental Assistance Program

PSA: ca

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
Dave Somers, Snohomish County Council