

**Joan E. Cook**

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**From:** Lefebvre, Eileen [Eileen.Lefebvre@providence.org] on behalf of Rogers, Jeff [Jeffrey.Rogers@providence.org]  
**Sent:** Tuesday, March 13, 2012 8:44 AM  
**To:** Joan E. Cook  
**Cc:** 'baa444@comcast.net'; 'vanderkj68@hotmail.com'  
**Subject:** East Monroe Economic Development Group, LLC Proposal to Amend Comprehensive Plan  
**Attachments:** Untitled.pdf

Attached please find a letter respectfully submitted by Lowell Anderson, Keith J. Vander Houwen and myself regarding the above matter. We would appreciate if you would forward it to the City of Monroe Planning Commission (David Demarest, Bill Kristiansen, Paul Loots, Wayne Rodland, Jeff Sherwood and Bridgette Tuttle) and also to Brad Feilberg, P.E. Public Works Director for the City.

Thank you.  
Jeff Rogers

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March 13, 2012

CITY OF MONROE  
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MAR 14 2012

City of Monroe Planning Commission

David Demarest  
Bill Kristiansen  
Paul Loots, Chair  
Wayne Rodland  
Jeff Sherwood  
Bridgette Tuttle

COMMUNITY DEVELOPMENT

**RE: East Monroe Economic Development Group, LLC Proposal to Amend Comprehensive Plan**

Dear Commissioners:

We welcome the opportunity to submit comments on the Draft Phased Environmental Impact Statement ("DPEIS") regarding the proposed amendment to the City of Monroe Comprehensive Plan to change the land use designation and a concomitant rezone changing the zoning classification of approximately 50 acres of land in East Monroe from Limited Open Space to General Commercial. As contiguous property owners to the property that is subject of this proposal, we have expressed numerous concerns over the past several years concerning any attempt to effect a rezone from Limited Open Space to General Commercial. Stated simply, we do not believe the City of Monroe should proceed with a Comprehensive Plan Amendment without a specific project proposal as a rezone from Limited Open Space to General Commercial would open the door to a wide-range of development possibilities and uses for the subject property which would have a profound and irrevocable impact.

Comment noted.

We are puzzled by the City's seemingly about face as it issued a Determination of Significance last July that the proposed change from Limited Open Space to General Commercial was likely to have a significant adverse impact on the environment and, thus, an DPEIS was required. The Determination of Significance identified a number of environmental elements that were within scope of the DPEIS and solicited comments from governmental agencies and members of the public. We submitted a letter outlining a number of concerns we have as contiguous property owners.

Notwithstanding, the Determination of Significance issued last summer in the DPEIS, the City has determined that the mere Comprehensive Plan Amendment and concomitant rezone from Limited Open Space to General Commercial would not in and of itself have environmental significance. We believe the initial Determination of Significance and the numerous environmental challenges faced by any commercial development on the property refutes the position that a mere Comprehensive Plan Amendment and rezone does not have environmental significance.

Comment noted. A phased EIS is provided for in WAC 197-11-060(5). This non-project proposed action is a policy decision for the City Council on the type of land use that will be allowed on the eastern gateway to the City of Monroe. The dpEIS outlines the potential impacts that may occur with future development if the land use designation and zoning classification are amended. As there is no specific proposal

for development at this time there are no specific impacts to analyze. The use of a phased EIS recognizes that while the proposed action does not have any significant environmental impacts there may be future impacts and , as such, requires further environmental review when specific projects are proposed.

As we have previously identified, a rezone from Limited Open Space to General Commercial does open the door for commercial development that will have significant and irrevocable environmental impacts including:

**Earth-Related Impacts** [redacted]

- The adjoining properties to the north have steep slopes with 40%+ grades that have had a history of slides which undoubtedly will be worsened by any commercial development of the subject property;
- Commercial development will result in an increase in the stream flow resulting in erosion and slope degradation;
- Prior to a Comprehensive Plan Amendment and rezone, the potential development impact on slides, erosion and slope degradation should be carefully considered.

**Water-Related Adverse Impacts** [redacted] Comments noted.

- Commercial development of the subject property will adversely affect the existing stream and wetlands that are on the subject property and could adversely impact the Skykomish River to which the stream is connected;
- The stream and adjoining Skykomish River is a sensitive habitat for native salmon and other fish which could be impacted by any commercial development, and should be analyzed before a rezone is approved.

**Noise, Aesthetics/Light and Glare** [redacted] Comments noted.

- Any commercial development of the subject property will have significant noise impact and disruption to adjoining residential property owners and the overall aesthetics of the adjoining residential neighborhood. In addition, a rezone will create significant light and glare to the adjoining residential neighborhood.

**Flood Hazard Area** [redacted] Comments noted.

- The subject property has been the subject of numerous floods over the past 20+ years, including significant flooding in 1990, 1995, 1996 and 2006. In 1996, the subject property was under several feet of water. Currently, FEMA is in the process of updating its flood maps and it is likely that once the FEMA maps are updated, the subject property will be an increased flood hazard area. We attach a chart (Exhibit 1) that evidences that much of the subject property is below the base flood elevation of sixty seven feet (67'). As such, it would be imprudent to proceed with a Comprehensive Plan Amendment and rezone which would allow development when the property may be subject to greater restrictions under an updated FEMA flood hazard area.

**Access to Subject Property** [redacted] Comments noted.

- One of the serious limitations to any commercial development is appropriate access from the subject property to Highway 2. Given the traffic safety issues regarding Highway 2, the Washington Department of Transportation is justifiably concerned about access to the subject property. Once again, until there is a

clear cost-effective plan to address the access issues, the City should not undertake a Comprehensive Plan Amendment nor a rezone from Limited Open Space to General Commercial.

While we understand cost issues are not encompassed in the DPEIS, common sense would indicate that addressing the many environmental, access, utility and related issues will present significant cost to any development and may render such development economically infeasible. Given these costs, the property should not be rezoned unless and until a specific development proposal is presented so that the property is not rezoned General Commercial and sits idle for numerous years without a realistic chance for development.

As identified earlier, we believe the property is currently appropriately zoned as Limited Open Space given that it lacks the full-range of public services and facilities, and the fact that it is severely impacted by critical areas. Comment noted.

Once again, we believe the proposed Comprehensive Plan Amendment and concomitant rezone should not occur until a complete and final comprehensive EIS addresses the many environmentally sensitive and critical areas that would be adversely affected by any commercial development on the subject property. Moreover, we believe that any rezone not be considered until a specific development proposal is presented with a financially viable developer addressing the significant environmental issues including flood hazards, slides and erosion affecting contiguous property owners, and access to Highway 2 issues, among others. Comments noted.

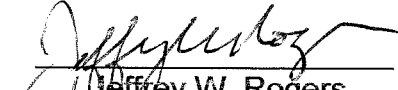
We also request information as to whether any appeals relating to this process will be through administrative hearings or through a direct judicial appeal.

Respectfully submitted,

Appeals on the the adequacy of an EIS are heard by the hearing examiner per Monroe Municipal Code 20.04.200(B).

  
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Lowell Anderson

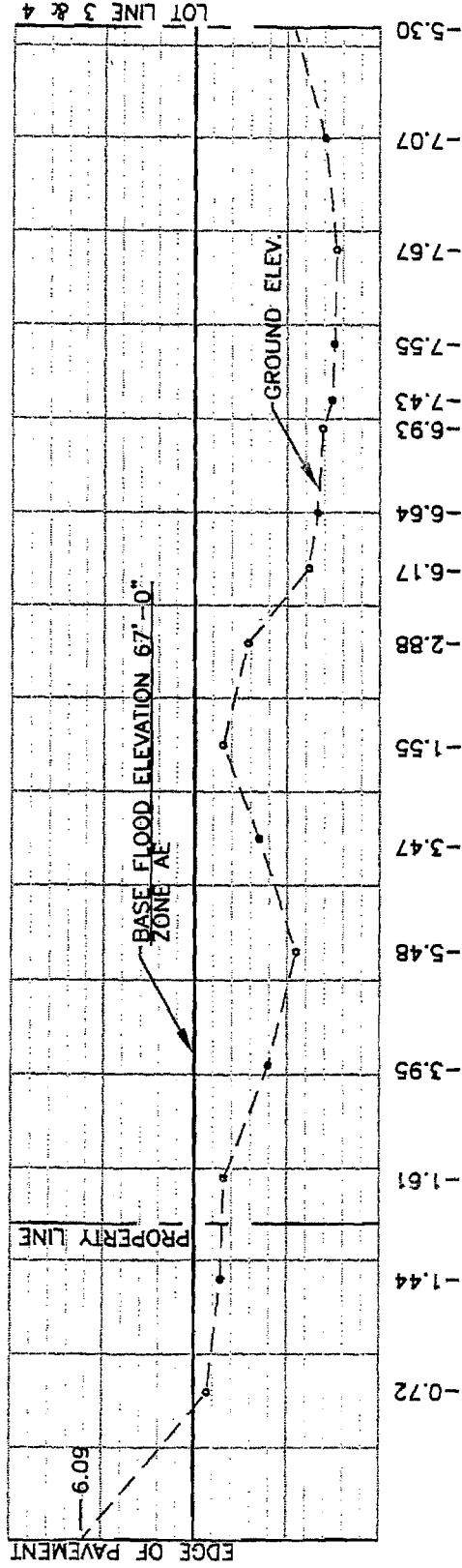
  
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Keith J. Vander Houwen

  
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Jeffrey W. Rogers

Attachment

cc: Brad Feilberg, P.E. Public Works Director, City of Monroe  
806 W. Main Street  
Monroe, WA 98272

EXHIBIT 1



**SECTION @ APPROX. LOT LINE 4  
(LOOKING WEST)**

SCALE: 1"=100± H., 1"=10'± V.

REF. TOPOGRAPHICAL SURVEY SHT. 1 OF 1 DATED 5/25/99

**SADLER/BARNARD & ASSOC. INC.**