

September 13, 2013

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CITY OF MONROE

City of Monroe  
Attention: Melissa Sartorius, SEPA Official  
806 W. Main Street  
Monroe, WA 98272

**RE: Written Comments Regarding Draft Environmental Impact Statement  
East Monroe Comprehensive Plan Amendment and Subsequent Rezone**

Dear Ms. Sartorius:

We welcome this opportunity to provide written comments on the Draft Environmental Impact Statement on the East Monroe Comprehensive Plan Amendment and Subsequent Rezone ("DEIS"). Given the issues raised by the EIS and the past history relating to former attempts to effect a Comprehensive Plan Amendment and Rezone of the East Monroe site, we believe the comment period and expected date of issuance of the final EIS should be extended to assure that all interested parties have an appropriate opportunity to provide informed comments on the DEIS.

The DEIS concludes that of the three alternatives identified, Alternative 2 is the best alternative and recommends a Comprehensive Plan Amendment and Subsequent Rezone of the site from Limited Open Space ("LOS") to General Commercial ("GC"). We dispute such conclusion as the current LOS zoning is the most appropriate and consistent with the MMC 18.10.045 given the lack of public facilities available to the site and the fact that the site is severely impacted by critical areas. Another alternative that should be addressed is agricultural use given the location and neighboring property usage and flood plain issues.

Prior to effecting a Comprehensive Plan Amendment and Subsequent Rezone, the City should prepare a baseline analysis of whether a rezone from LOS to GC presents an economically viable opportunity for commercial development of the East Monroe site. The DEIS has identified that of the approximately 43-acre site, only 11 acres are developable. An economic challenge facing any commercial development is the fact that there are no public facilities or utilities currently available to the site. Sewer, water, gas, electric and other necessary facilities and utilities would need to be brought from the City of Monroe to the site at significant cost. In addition to these costs, there are serious questions as to WSDOT's willingness to provide access to the site without significant cost and challenges of construction of a signalized intersection or roundabout improvement at Calhoun Road along with a frontage road, or an entirely new intersection with left turn and right turn lanes and widening for site access. The City should fully explore the access issue with WSDOT before committing to a

*Submitted @ 9:50 9/13/2013*

Comprehensive Plan Amendment and Rezone. It would be inappropriate to effect a rezone without assurance that access could be provided to the site without undue expense to any potential developer.

The DEIS should also address the impact of trip generation fees that could be imposed as a result of any commercial development.

Finally, the DEIS identifies considerable critical area mitigation that will be required which also presents economic issues to any potential development.

At a minimum, a baseline study should be completed by City staff or preferably by a qualified independent third party to establish that the East Monroe site can be developed for commercial purposes and is economically viable. In our view, the limited development potential (11 out of 43 acres), coupled with the significant cost of bringing public facilities and securing access to Highway 2 and other critical area mitigation, will preclude this site from being developed for commercial purposes for the foreseeable future.

As contiguous property owners to the north of the East Monroe site, we have serious concerns as to whether the DEIS has adequately addressed the environmental impacts of securing compensatory flood storage on site. The DEIS acknowledges in Section 3.1 that much of the East Monroe site is below the 100-year floodplain, thus presenting significant risk of flooding to the developable area of the site. To mitigate against these flood risks, the DEIS contemplates that there will be extensive "cut and fill" activity to bring the developable area of the property above the 67-foot 100-year floodplain level. In light of this extensive "cut and fill" activity, further study is required to confirm that the contiguous property to the north will not be adversely impacted by the diversion and displacement of water caused by either the fill that will elevate the developable area of the site, or using the stream/slough areas as water storage either on a temporary basis during construction/development of the site, or on a permanent basis. The steep slopes to the north are at significant risk of slope degradation, erosion and landslides resulting from an increase in the water level which will result from the displacement and diversion of water and runoff from the fill area. The DEIS should provide detailed analysis of the relevant earth work calculations, including cross sections and other calculations, showing that the proposed grading and fill is properly balanced, as well as a detailed drawing of the areas to be graded. To allow full comment on this important issue, the DEIS should include a current topographical survey of the East Monroe site and a grading plan detailing the areas to be "cut and filled", including the cubic yards of fill required and the areas from which fill is to be removed.

We do not believe the DEIS adequately addresses the issues of flooding on the East Monroe site. Attachment 5 is a photograph of the damage to property adjacent to the site. As can be seen, a 1959 flood resulted in the railroad tracks and bed being destroyed by the force of the Skykomish River. In the July 23, 2012 Hearing Examiner's decision, he stated: "The Responsible Official has an obligation to use the best available science to identify the extent to which the Project Area is subject to flood

inundation, regardless of what FIRM is legally applicable. The best available evidence is that the majority of the developable portion of the Project Area is subject to up to about eight feet of flood inundation during the 100-year flood event; the best available science is that US 2 does not function as a levee to protect the Project Area from flood inundation (it is punctured by two, three-foot-plus culverts associated with the oxbow slough).” The DEIS needs to more fully address this flooding issue particularly as to the “best available science.”

As noted earlier, the DEIS identifies that the site currently lacks public facilities and utilities and would require significant costly extension of sewer, water and other utilities from existing locations to the site. The DEIS identifies that the water line would need to be extended approximately 1.15 miles. The City will need to assure that neither the City nor its tax payers will bear any financial burden associated with the bringing of public facilities and utilities to the site, and assure that the sole financial responsibility will be on the owner of the site and/or the developer.

In terms of traffic and public safety issues, the traffic analysis needs to consider the extensive back-ups that occur routinely on weekends and holidays proceeding from east to west entering the City of Monroe. Such traffic back-ups will adversely impact the commercial viability of development of the site given the reluctance of people to visit the site because of such traffic back-ups. The traffic problem may increase the risk of traffic accidents and other public safety concerns.

Given the “cut and fill” proposed approach to developing the site, and the fact the DEIS identifies that the site has peat, the DEIS will need to provide further discussion and analysis of whether any commercial development will need in the way of foundations, pilings and other subsurface support. Any such foundation and bearing support that may be required should be addressed in the DEIS, as well as the impact on the commercial viability of any potential development.

The City of Monroe should actively seek input from affected governmental agencies before the DEIS is finalized and the Comprehensive Plan Amendment and Rezone is considered by the City Council. To do otherwise is imprudent and could put the City in an awkward and compromised situation. Let’s get all the facts and input before action is taken with respect to the East Monroe site. The City owes as much to its citizens.

To further support our position, attached are the following:

Attachment 1 – Recent comparative sales of commercial property in Monroe evidencing that the proposed site, based on its developable potential and added estimated development costs, is financially nonviable.

Attachment 2 – Estimated development costs of the East Monroe property.

Attachment 3 – The financial impact of the proposed LOS to GC rezone on contiguous property owners whose property value will be reduced in the aggregate

by approximately \$4,000,000, resulting in significant reduced property tax revenues for affected governmental agencies.

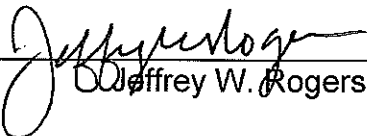
Attachment 4 – Other issues warranting further review by PACE.

Attachment 5 – A photograph from October, 1959, evidencing the force of the Skykomish River on property adjacent to the East Monroe site and the damage that could ensue from future floods to any development of the East Monroe site.

We respectfully submit that these issues be more fully addressed in the final DEIS.

Very truly yours,

  
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Lowell Anderson

  
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Jeffrey W. Rogers

Comparative Values

**Walmart, 24 Acres (1,045,440 sq ft)**

Approx. sale price	<u>\$7,500,000</u>	= \$7.17 sq ft
	1,045,440 sq ft	

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Existing Sale from the City (public record)

**Providence Medical, 5 Acres (217,800 sq ft)**

Sale Price	<u>\$2,500,000</u>	= \$11.48 sq ft
	217,800 sq ft	

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**East Monroe Property, 42.81 Acres 1,864,804 sq ft**

Price based on 11.33 developable acres	<u>\$2,700,000</u>	= \$5.47 sq ft
	493,535 sq ft	

Add estimated development costs	<u>\$11,200,000</u>	= \$22.69 sq ft
	493,535 sq ft	

(See attachment 2)

<b>Total East Monroe Property</b>		<b>=\$28.16 sq ft</b>
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Note: East Monroe Property costs approximately 4 times more than Walmart.

East Monroe Property costs approximately 2.5 times more than Providence.

Attachment 2

Estimated Development Costs of East Monroe Property

Frontage Road (2 Lane Asphalt road in Rural Area)	\$1,750,000
Roundabout	\$5,000,000
Electricity (to site)	\$ 100,000
Water and Sewer	\$2,000,000
Natural Gas (excluded from DEIS) to site	\$1,600,000
Cut, Fill and Landscape Ref Fig 10 & 11	\$ 750,000
Piling unknown (may be required in build area)	\$0
	<hr/>
	<b>\$11,200,000</b>

Rezone changed from Limited Open Space to General Commercial

## **Financial Impact**

Approximately 40 homes on Ridge **reduced value**

of **\$100,000 each = \$4,000,000**

Non view homes excluded

### **Reduces tax fees for:**

- ✓ Monroe School District No. 103
- ✓ Fire District 03
- ✓ City of Monroe
- ✓ Monroe Library CAP FAC area
- ✓ Public Hospital #1 Valley General

### **Appendix C: GeoEngineers Geotechnical Soils Evaluation**

Little description of foundation and bearing values of building site.

Should have deep soil logs of building area.

### **Appendix D: Wetland Resources Inc., Sht 2, 3 & 4.**

Does not show Southern portion of site and culvert under State Highway.

Refers to Ditch only.

### **Appendix E: FEMA – Firm Map 53061C1377G (Preliminary)**

Map submitted is not dated September 16, 2005 nor stamped January 12, 2007 as specified in Title 14 Floodplain regulations 14.01.050.

Additionally, no base flood elevation of 66 feet is shown in project area as stated on page 36 of PACE DEIS.

## **3.12 Utilities**

Natural Gas (omitted from DEIS)



Attachment 5



Flood of 3-9 - C.N.R.R. bridge