



LAND SURVEYING • LAND USE PLANNING • CIVIL ENGINEERING • ENVIRONMENTAL SERVICES

Reasonable Use Narrative
August 20, 2025

City of Monroe
14841 179th Ave SE
Suite 320
Monroe, WA 98272

RE: Sayah Cabin Campground
13626 179th Ave SE, Monroe, WA 98272
Tax Parcel Number: 007778-000-003-00

Review Team:

Ray Sayah seeks to construct a cabin campground on the property listed above (see site plan prepared by Harmsen). The entire site is currently encumbered by critical areas and their buffers; therefore, a Reasonable Use Exception (RUE) is required for the proposed development. After implementation of mitigation measures, no direct impacts to critical areas nor their buffers are proposed.

Existing Conditions:

The 1.23-acre subject parcel is currently vacant; however, extensive clearing and controlled burning has taken place within the last 12-months.

Access is currently provided by a private drive that connects to 179th Ave SE: a paved arterial road that runs north to Robinhood Ln and south to Hwy 2. No formal driveway is constructed at this time.

The surrounding area is a mix of residential and commercial land uses.

Location & Zoning

The site is situated within the Snohomish Watershed; Snohomish River Basin; French Creek Subbasin; WRIA 7. The area of the site is zoned Tourist Commercial (TC).

Critical Areas:

Critical areas have previously been identified and delineated by Altmann Oliver Associates (AOA), LLC, and described in a Critical Areas Study dated January 5, 2024. A total of one Wetland (Wetland "A") and four stream segments (1, 2, 3, and Flying F Creek) were identified onsite and analyzed in the AOA Critical Areas Study.

Proposal:

The client seeks to construct a total of 7 cabins and 10 associated parking stalls, plus a 30' x 30' detached garage with upper dwelling unit. In addition to the structures, the client is also proposing a new 20' wide driveway and a 10' expansion of the existing access and utilities easement connecting to 179th Ave SE.

Drainage:

Runoff from roofs will be dispersed into areas of native growth; all walking areas are proposed to be pervious, and runoff from the road and parking areas will be treated via an ADS chamber storage system with cartridge filter catch basins.

P:\Work\Projects\2022\22-176 Sayah\DOCS\Reasonable Use Narrative.docx

EVERETT
2822 Colby Ave, Suite 300
Everett, WA 98201
425-252-1884

MOUNT VERNON
603 South First Street
Mount Vernon, WA 98273
360-336-9199

OAK HARBOR
840 SE 8th Avenue, Ste. 102
Oak Harbor, WA 98277
360-675-5973

Mitigation Measures:

Impacts to wetland buffers must be mitigated per §20.80.080 Monroe City Code (MCC), which the client has proposed in the form of Buffer Enhancement and Restoration which “will consist of the removal of invasive nonnative plant species and planting with native trees and shrubs. Implementation of the enhancement plan will significantly increase the plant species and structural diversity within the enhanced buffer areas, thereby increasing the habitat value, filtration, and screening functions of the buffer” (AOA).

Wetland impacts were avoided by locating all development outside of the wetland boundary, and by implementing a stormwater drainage plan that will not affect wetland hydrology.

Buffer impacts cannot be avoided as the entirety of the parcel is encumbered with wetland and stream buffers; a total of 27,528 sf of permanent buffer impacts, and 3,097sf of temporary impacts are proposed. Impacts to buffers are proposed to be mitigated via 21,825 sf of Buffer Enhancement & 3,097 sf of Buffer Restoration. The remaining sf of buffer impacts will be mitigated via mitigation credits at a 1:1 ratio. Credits will be purchased after permits are issued and before occupancy is allowed.

Compliance with the Critical Areas Ordinance:

Please find relevant code sections below; we have provided a brief description of how this project aligns with the requirements of said code section. Sections that appeared not to be applicable to this project or that were process related have been omitted.

§22.80.050(C)(2) Reasonable Use Exception.

If the application of this chapter would deny all reasonable use of the property, development may be allowed which is consistent with the general purpose of this chapter and the public interest; provided, that the hearing examiner, after a public hearing, finds to the extent consistent with the constitutional rights of the applicant:

a. This chapter would otherwise deny all reasonable use of the property;

The entirety of the parcel is encumbered with critical areas and their associated buffers; denial of the reasonable use exception would render this parcel valueless.

b. There is no other reasonable use consistent with the underlying zoning of the property that has less impact on the critical area and/or associated buffer;

The zoning in this area is Tourist Commercial which is designed to “provide areas for amenities in the vicinity of the Evergreen State Fairgrounds and First Air Field, such as lodging facilities, entertainment and event facilities, and ancillary commercial development, that serve the traveling public and afford direct access to major transportation corridors and regional facilities. Business parks and related land uses compatible with existing development are also encouraged within the tourist commercial zoning designation” (§22.24.010 MCC). The proposed use: a series of tent cabins, is compliant with this zoning and falls under ‘lodging facilities. No other reasonable use within the underlying zoning would propose less impacts to the critical areas/associated buffers.

c. The proposed development does not pose an unreasonable threat to the public health, safety or welfare on or off the property;

No unreasonable threat to the public health, safety or welfare on or off the property is anticipated to result from the proposed development.

d. Any alteration is the minimal necessary to allow for reasonable use of the property;

The proposed cabins are sized at 24’ x 16’ which is a reasonable size for short term lodging facilities. The proposed driveway and private drive expansion are the minimum necessary to provide safe access to the site.

e. The inability of the applicant to derive reasonable use of the property is not the result of actions by the applicant after the effective date of the ordinance codified in this chapter or its predecessor; and

The subject parcel was established in 1989 as a part of the Calvary Creek Plat.

f. The applicant may only apply for a reasonable use exception under this subsection if the applicant has also applied for a variance pursuant to Chapter 22.66 MMC, Variances.

This reasonable use exception will be submitted concurrently with a variance.

Proposed Permits:

- Reasonable Use Permit

Submitted Elements with this application:

- SEPA Checklist
- Critical Areas Study
- Delineation Report
- Critical Areas Site Plan
- Elevation Diagram
- Title Report
- Completed Reasonable Use Exception Application
- Completed Variance Submittal Packet
- Legal Description
- Assessor's Map
- Site Plan
- Deed

For additional information, please see the detailed submittal materials. Thank you for your considered review.

Sincerely,



Amy Johnson
Planning Technician
Harmsen LLC
amyj@harmssenllc.com
(360) 282-3051