



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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January 10, 2017

The Honorable Kristiana Johnson, President  
City of Edmonds Council  
121 Fifth Avenue North  
Edmonds, WA 98020

**RE: City of Edmonds Response to Department of Ecology's June 27, 2016, Conditional SMP Approval**

Dear Ms. Johnson:

Thank you for your October 19, 2016, letter in response to the Department of Ecology's (Ecology) conditional approval of the City of Edmonds (City) Shoreline Master Program (SMP) update. For required changes one through six, the City has either accepted Ecology's required changes or offered alternatives that Ecology finds are consistent with the SMA and Ecology guidelines, and are consistent with the original intent of the required changes. This letter formally accepts the City's final determination on Ecology's required changes one through six. The amended text provided by the City in Attachment E – Revised (10/19/2016) will become part of the approved SMP amendment through Ecology's final action.

We have only one remaining issue. The City has proposed alternatives to Ecology's required change seven and eight concerning Edmonds Marsh buffers and setbacks. We recognize the intense community interest and engagement surrounding the marsh. Over the past few months, Ecology staff have attended many Council meetings and engaged in robust discussions among citizens and Councilmembers. I have met personally with representatives of Friends of the Marsh and the Port of Edmonds to hear their perspectives.

Ecology understands the importance of preserving and improving the Edmonds Marsh. We believe this is a common interest among all involved parties. However, Ecology is concerned the City's proposed alternatives must be clarified for consistency with the purpose and intent of Ecology's original change.<sup>1</sup> The difficulty remains how to achieve this objective given the surrounding land uses, and the near absence of a marsh buffer within the Urban Mixed IV shoreline environment.

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<sup>1</sup> WAC 173-26-120(7)(b)(ii).



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To that end, Ecology proposes two options for clarifying the SMP that would address our concerns, as well as the interests of the community. Please review the attached "Ecology Response to City Alternatives." The attached document responds to the City's thoughtful *Evaluation of Scientific and Regulatory Consideration Related to Ecology's Required Changes 7 and 8.*

Each of these options clarify how appropriate mitigation would be established during redevelopment of the Urban Mixed Use IV environment through site specific assessments that acknowledge existing conditions. These suggested change are consistent with RCW 90.58.100 (use of scientific information) and WAC 173-26-201(2)(c) & (e) (protection of ecological functions and environmental impact mitigation).

We appreciate the City's continued work on the SMP. There are many positive aspects to the SMP update that will benefit the City's Puget Sound and Lake Ballinger shorelines. The Edmonds Marsh issue is the last remaining issue related to the Edmonds SMP update process. I believe all parties interested in the outcome of the SMP have a common interest in protecting and improving the quality of Edmonds Marsh for future generations. We hope the options we have provided will help us reach a final resolution.

We would like the opportunity to present these options to Council, answer questions you may have, and conclude the SMP update process. Please contact Joe Burcar of our Northwest Regional Office at (425) 649-7096 or [joe.burcar@ecy.wa.gov](mailto:joe.burcar@ecy.wa.gov).

Sincerely,



Maia D. Bellon  
Director

cc: Dave Earling, Mayor, City of Edmonds  
Shane Hope, Edmonds City Development Services  
Friends of the Edmonds Marsh  
Bob McChesney, Executive Director, Port of Edmonds