



August 1, 2018

Dimensional Communications Inc.  
Attention: Mr. Paul Hagman  
1220 Anderson Road  
Mount Vernon, WA 98273

Reference: Dimensional Communications Expansion, Site Plan, Critical Areas, and SEPA Process, PL18-088, Request for Corrections and Additional Information

Dear Mr. Hagman:

The items you submitted for the above-referenced permit/approval have been reviewed by the City departments responsible for approving different aspects of your application. The following list of comments is the result of this consolidated review.

Each of the items in this list require responses and/or revised or new materials to be re-submitted to the City before any further action can be taken on this permit. Pursuant to Mount Vernon Municipal Code (MVMC 14.05.130) a hold is placed on this application and the time it takes you to respond to this list of items is excluded in calculating permit processing timeframes. Once revised/corrected materials are submitted to the City your permit processing timeframe starts again.

1. The site plans and critical area reports shall be revised to comply with Skagit County's requirements outlined in their letter dated June 29, 2018 from Leah Forbes.
2. Consistent with the WA State Department of Archaeology & Historic Preservation's June 12, 2018 letter a Professional Archaeological Survey must be completed.
3. Detail B on Sheet C6.02, Stream Construction Details, needs to be corrected to show the grade control logs installed 180-degrees from their current configuration.

A complete response to each of the items listed above is required to be submitted at the same time. Consistent with Mount Vernon Municipal Code Chapter 14.05.110(D)(3) this response must be received by our Department on or before **October 30, 2018** to avoid this application being withdrawn from consideration. Withdrawn application must be resubmitted as new applications requiring repayment of all applicable fees and processing requirements.

A complete response is required to include: 1) a written document addressing all of the comments provided (one copy), 2) new and/or updated technical reports (two copies), 3) plan corrections, identified by clouding and noted in a revision list on the plan sheet(s), being incorporated into a full set of revised plans (two copies), and 4) a transmittal that itemizes everything you are resubmitting to the City.

We look forward to working with you as this application continues to be processed. Should you have questions or comments, do not hesitate to contact me at: (360) 336-6214 or via email at: [rebeccab@mountvernnwa.gov](mailto:rebeccab@mountvernnwa.gov).

Sincerely,



Rebecca S. Lowell,  
Principal Planner

C: Doug Schwind

Enclosures:

- Letter from Skagit County Planning & Development Services dated June 29, 2018
- Letter from DAHP dated July 12, 2018



# Planning & Development Services

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1800 Continental Place ▪ Mount Vernon, Washington 98273  
office 360-416-1320 ▪ pds@co.skagit.wa.us ▪ www.skagitcounty.net/planning

June 29, 2018

City of Mount Vernon  
Development Services Department  
Attn: Rebecca Lowell, Principal Planner  
910 Cleveland Avenue  
Mount Vernon, WA 98273

Re: PL18-088, Dimensional Communications Expansion

Dear Mrs. Lowell,

Thank you for the opportunity to comment on this proposal.

Puget Consulting & Restoration was notified by email on March 21, 2018 that the following permits/approvals are needed from Skagit County prior to commencing site work: critical areas review, floodplain development permit, and grading permit. To date, we have received a critical areas review application (File #PL18-0170) and a floodplain development permit (File # FP18-0023).

We have reviewed the Critical Area Assessment Report prepared by Puget Consulting & Restoration dated June 2017. The regulatory analysis provided did not include Skagit County standards and requirements pursuant to Skagit County Code 14.24.

A Type F watercourse with a bankfull width of greater than five feet requires a 150 foot buffer (SCC 14.24.530(1)(c)). This entire buffer must be planted with native vegetation and permanently protected.

Wetland C has been identified as a Category II wetland. Pursuant to SCC 14.24.230(1)(b), a Category II wetland with a habitat score of 8 points adjacent to a high land use impact requires a 300 foot buffer. The wetland and associated buffer must be planted with native vegetation and permanently protected.

The mitigation plan will need to be modified to include these expanded planting areas. In addition, the planting plan should provide more detail as to where the different species will be installed. The mitigation monitoring plan does not provide annual performance standards. With no benchmarks between year 1 and year 7 it will be difficult to determine success or failure early on.

It is unclear whether the project proponent has considered potential impacts to offsite properties. There appears to be potential for floodplain impacts as well as encroachment onto offsite properties from expanded buffers.

Skagit County holds Protected Critical Areas on portions of the project site (AF#200007100106 and AF#200504140043). We will work with our legal counsel to determine what actions need to be taken in regards to those. The portion of the proposal within County jurisdiction will need to show compliance with SCC 14.24.090 to provide permanent protection.

Please feel free to contact our office with any questions.

Sincerely,



Leah Forbes, AICP  
Senior Planner

cc: Dimensional Communications, Paul Hagman  
Sundance Energy, Lawrence Felzer  
Puget Consulting & Restoration, Tess Cooper



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

July 12, 2018

Ms. Rebecca Lowell  
Senior Planner  
City of Mount Vernon  
910 Cleveland Ave.  
PO Box 809  
Mount Vernon, WA98273

In future correspondence please refer to:  
Project Tracking Code: 2018-04-02633  
Property: Dimensional Communications Inc Addition PL18-088  
**Re: Archaeology - Survey Requested**

Dear Ms. Lowell:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) and providing documentation regarding the above referenced project. Archaeological site 45SK40, a large precontact archaeological site, is located approximately 900 feet from the project area. The archaeological site boundaries were never fully defined and archaeological resources associated with this site may be present within the project area. Please be aware that archaeological sites are protected from knowing disturbance on both public and private lands in Washington States. Both RCW 27.44 and RCW 27.53.060 require that a person obtain a permit from our Department before excavating, removing, or altering Native American human remains or archaeological resources in Washington. Failure to obtain a permit is punishable by civil fines and other penalties under RCW 27.53.095, and by criminal prosecution under RCW 27.53.090.

Chapter 27.53.095 RCW allows the Department of Archaeology and Historic Preservation to issue civil penalties for the violation of this statute in an amount up to five thousand dollars, in addition to site restoration costs and investigative costs. Also, these remedies do not prevent concerned tribes from undertaking civil action in state or federal court, or law enforcement agencies from undertaking criminal investigation or prosecution. Chapter 27.44.050 RCW allows the affected Indian Tribe to undertake civil action apart from any criminal prosecution if burials are disturbed.

Archaeological site 45SK40 was recorded in 1953 and revisited in 1979, but the site boundaries were never defined. It is likely that the site is larger than it is currently mapped. **We request a professional archaeological survey of the project area prior to ground disturbance. If archaeological resources are present a permit from DAHP will be required under RCW 27.53. The completed survey should be submitted to DAHP and the interested Tribes for review prior to ground disturbance. DAHP will determine the need for a DAHP permit and additional archaeological work under RCW 27.53.**



Thank you for the opportunity to review this project and we look forward to receiving the survey report.  
Should you have any questions, please feel free to contact me.  
Sincerely,

A handwritten signature in blue ink that reads "Gretchen Kaehler". The signature is written in a cursive style and is followed by a long, horizontal, slightly curved line that extends to the right.

Gretchen Kaehler  
Assistant State Archaeologist, Local Governments  
(360) 586-3088  
[gretchen.kaehler@dahp.wa.gov](mailto:gretchen.kaehler@dahp.wa.gov)

cc. Scott Schuyler, Cultural Resources, Upper Skagit Tribe  
Jackie Ferry, THPO, Samish Tribe  
Kerry Lyste, Cultural Resources, Stillaguamish Tribe  
Richard Young, Cultural Resources Director, Tulalip Tribe  
Josephine Peters, THPO, Swinomish Tribe