



**Request for Clean Water Act  
Section 401 Water Quality Certification  
Washington State Department of Ecology**  
**Phone: (360) 407-6076 or E-mail: [ecyrefedpermits@ecy.wa.gov](mailto:ecyrefedpermits@ecy.wa.gov)**

AGENCY USE ONLY	
Date Received:	9/7/2023
Aquatics ID No.:	142697
Team:	NWRO
Valid Request:	9/7/2023

This Section 401 Water Quality Certification (WQC) Request form identifies information needed in order to review and process a Section 401 WQC Request. Please see Department of Ecology's (Ecology) [webpage](#) for more information about the Section 401 WQC Request process.

Submit this Section 401 WQC Request form along with a [Joint Aquatic Resources Permit Application](#) (JARPA) and supporting information<sup>1</sup> to [ecyrefedpermits@ecy.wa.gov](mailto:ecyrefedpermits@ecy.wa.gov) and copy the federal permitting agency.

- A. Federal Permit or License Reference Number, if known:** NWS-2023-397  
**Department of Ecology (Ecology) Aquatics ID Number, if known:** \_\_\_\_\_  
**Project Name:** JJ PLace **County:** Skagit
- B. Project Proponent Name:** John Piazza, Jr., LaVenture Group, LLC
- C. Documentation showing that the Pre-Filing Meeting Request was submitted at least 30 days prior to submitting this Section 401 WQC Request. Attach either of the following:**
- ☐ E-mail acknowledgement of receipt from Ecology
  - ☒ Copy of previously submitted Pre-Filing Meeting Request Form
- D. A completed, signed, and dated JARPA should be submitted with this form.**
- Did you attach a JARPA?** ☒ Yes ☐ No
- E. The following is a list of documents needed for Ecology's WQC review, along with a brief explanation. Depending on the project, additional information may be requested.**

**Please let us know what information you are submitting with this WQC request form.**

Required for all projects:

1. State Environmental Policy Act (SEPA) determination and/or checklist:
  - ☒ Final SEPA determination attached
  - ☐ SEPA determination pending
  - ☐ Exempt from SEPA (see [SEPA Guidance](#))
  - ☐ SEPA is not required (e.g., federal agency projects)

---

<sup>1</sup> To submit documents over 25MB, e-mail [ecyrefedpermits@ecy.wa.gov](mailto:ecyrefedpermits@ecy.wa.gov) to request a secure link.

To request an ADA accommodation, contact Ecology by phone at (360) 407-6076 or email at [ecyrefedpermits@ecy.wa.gov](mailto:ecyrefedpermits@ecy.wa.gov), or visit <https://ecology.wa.gov/accessibility>.  
For Relay Service or TTY call 711 or 877-833-6341.

Si necesita este formulario en español, por favor, llámenos a (360) 407-6076  
o envíenos un correo electrónico a: [ecyrefedpermits@ecy.wa.gov](mailto:ecyrefedpermits@ecy.wa.gov)

2. Project drawings attached:

- ☒ Vicinity map
- ☒ Plan view
- ☐ Cross-section(s)
- ☐ Plan set
- ☐ Other: \_\_\_\_\_

3. Best management practices and construction methodology, provided in the attached:

- ☒ JARPA
- ☐ Water Quality Monitoring and Protection Plan (WQMPP)
- ☐ Project drawings, sheets: \_\_\_\_\_
- ☐ Mitigation Plan pages: Sheet 1-4
- ☒ Other document(s): See SWPP

Notes:

- This is needed for in-water work (below ordinary high water mark), including wetlands.
- Describe best management practices to be implemented to protect water quality.
- Describe construction sequencing and methodology.

4. Water quality monitoring, provided in the attached:

- ☐ Water Quality Monitoring Plan (WQMP).
- ☐ Water Quality Monitoring and Protection Plan (WQMPP is similar to WQMP, but includes best management practices).
- ☐ Other (please identify location, such as JARPA, Part 8): \_\_\_\_\_

Notes:

- Include language in the plans that allows Ecology to review and approve all substantive changes to a plan prior to implementation.
- A plan is needed when conducting work in a waterbody (e.g., creek, ditch, river, lake, pond, marine, estuarine).
- Include water quality parameters such as turbidity, oil sheen, pH (e.g., poured in-place concrete, concrete demolition), etc.
- See [State Water Quality Standards for Surface Waters](#) (Chapter 173-201A-200 or -210 WAC)
- If needed, templates are available.

Required depending on the project type:

5. Erosion and sediment control for upland work (above ordinary high water mark) that addresses stormwater during construction and long-term:

This information is included in the attached:

- ☒ JARPA
- ☐ Project drawings, sheets: \_\_\_\_\_
- ☒ Stormwater Pollution Prevention Plan, pages: C-4 thru C-6
- ☐ Mitigation Plan, pages: \_\_\_\_\_
- ☐ Other document(s): \_\_\_\_\_

6. Wetland report, including the attached:

- ☒ Wetland delineation report
- ☒ Delineation data sheets
- ☒ Wetland rating forms

Notes:

- Needed when there is a discharge (dewatering, excavation or fill) to wetlands.
- Report needs to include both a wetland delineation and rating.
- Include delineation data sheets and rating forms.
- For more information see [wetland delineation resources](#) and [hiring a qualified wetland professional](#).
- Include language in the plans that allows Ecology to review and approve all substantive changes to a plan prior to implementation.

7. Mitigation, avoidance and minimization

- ☒ Wetland [avoidance and minimization checklist](#)
- ☐ Other aquatic resource avoidance and minimization demonstration
- ☒ Mitigation Plan
- ☐ Other: \_\_\_\_\_

Notes:

- Wetland [avoidance and minimization webpage](#).

8. Mitigation plan, provided in the attached:

- ☐ Riparian Planting and Monitoring Plan (Needed when riparian vegetation is removed or modified)
- ☒ Wetland or stream/other aquatic resource Mitigation Plan
- ☐ Wetland Mitigation Bank Use Plan (use when proposing mitigation bank use)
- ☐ In-Lieu Fee (ILF) Use Plan (use when proposing ILF mitigation)
- ☐ Project drawings, sheets: \_\_\_\_\_
- ☐ Other: \_\_\_\_\_

Notes:

- Needed to offset impacts to wetland, stream, marine, or other aquatic habitat.
- Include language in the plans that allows Ecology to review and approve all substantive changes to a plan prior to implementation.
- For more information, see [wetland compensatory mitigation](#).

9. Dredging

- ☐ Dredging Plan attached
- ☐ Suitability Determination attached

Notes:

- Needed when sediments will be dredged for maintenance, navigation, or other purposes.
- Covers in-water disposal and sediment anti-degradation.
- Dredging Plan should include dredge footprint and depth, dredge type, best management practices, disposal plan, off-loading plan for upland disposal, etc.
- Include language in the plans that allows Ecology to review and approve all substantive changes to a plan prior to implementation.
- For information on suitability determinations, see [Dredged Material Management Office](#).

10. Dewatering

- ☐ Dewatering Plan attached

Notes:

- Needed for complex in-water work or management of excavated/dredged material.

- Include language in the plans that allows Ecology to review and approve all substantive changes to a plan prior to implementation.
- May also be required for some excavation projects.


**F. Required Certification Statements:**

The project proponent hereby certifies that all information contained herein is true, accurate, and complete, to the best of my knowledge and belief.

Initial mm

The project proponent hereby requests that the certifying authority review and take action on this CWA 401 certification request within the applicable reasonable period of time.

Initial mm

Signature: Mark Merkelbach  Digitally signed by Mark Merkelbach  
Date: 2023.09.07 14:23:11 -07'00' Date: 9/7/2023

Print Name: \_\_\_\_\_



# WASHINGTON STATE

## Joint Aquatic Resources Permit Application (JARPA) Form<sup>1,2</sup> [\[help\]](#)

USE BLACK OR BLUE INK TO ENTER ANSWERS IN THE WHITE SPACES BELOW.



US Army Corps  
of Engineers®  
Seattle District

AGENCY USE ONLY

Date received: 9/7/2023 MFT Link  
Rec'd Section 401 Request  
Form

Agency reference #: \_\_\_\_\_

Tax Parcel #(s): \_\_\_\_\_  
\_\_\_\_\_

### Part 1—Project Identification

1. Project Name (A name for your project that you create. Examples: Smith's Dock or Seabrook Lane Development) [\[help\]](#)

JJ Place

### Part 2—Applicant

The person and/or organization responsible for the project. [\[help\]](#)

2a. Name (Last, First, Middle)

John Piazza

2b. Organization (If applicable)

JJ Place, LLC

2c. Mailing Address (Street or PO Box)

224 Stewart Road, Suite 130

2d. City, State, Zip

Mount Vernon, WA 98273

2e. Phone (1)

2f. Phone (2)

2g. Fax

2h. E-mail

360-661-2011

john.jr@piazzaconst.com

<sup>1</sup>Additional forms may be required for the following permits:

- If your project may qualify for Department of the Army authorization through a Regional General Permit (RGP), contact the U.S. Army Corps of Engineers for application information (206) 764-3495.
- Not all cities and counties accept the JARPA for their local Shoreline permits. If you need a Shoreline permit, contact the appropriate city or county government to make sure they accept the JARPA.

<sup>2</sup>To access an online JARPA form with [\[help\]](#) screens, go to

[http://www.epermitting.wa.gov/site/alias\\_resourcecenter/jarpa\\_jarpa\\_form/9984/jarpa\\_form.aspx](http://www.epermitting.wa.gov/site/alias_resourcecenter/jarpa_jarpa_form/9984/jarpa_form.aspx).

## Part 3—Authorized Agent or Contact

Person authorized to represent the applicant about the project. (Note: Authorized agent(s) must sign 11b of this application.) [\[help\]](#)

<b>3a. Name (Last, First, Middle)</b>			
Mark Merkelbach			
<b>3b. Organization (If applicable)</b>			
Green Earth Operations			
<b>3c. Mailing Address (Street or PO Box)</b>			
3201 1 <sup>st</sup> Ave South, Suite 212			
<b>3d. City, State, Zip</b>			
Seattle, WA 98134			
<b>3e. Phone (1)</b>	<b>3f. Phone (2)</b>	<b>3g. Fax</b>	<b>3h. E-mail</b>
(206) 323-1865			mmerkelbach@greeneearthops.com

## Part 4—Property Owner(s)

Contact information for people or organizations owning the property(ies) where the project will occur. Consider both **upland and aquatic** ownership because the upland owners may not own the adjacent aquatic land. [\[help\]](#)

- ☒ Same as applicant. (Skip to Part 5.)
- ☐ Repair or maintenance activities on existing rights-of-way or easements. (Skip to Part 5.)
- ☐ There are multiple upland property owners. Complete the section below and fill out [JARPA Attachment A](#) for each additional property owner.
- ☐ Your project is on Department of Natural Resources (DNR)-managed aquatic lands. If you don't know, contact the DNR at (360) 902-1100 to determine aquatic land ownership. If yes, complete [JARPA Attachment E](#) to apply for the Aquatic Use Authorization.

<b>4a. Name (Last, First, Middle)</b>			
<b>4b. Organization (If applicable)</b>			
<b>4c. Mailing Address (Street or PO Box)</b>			
<b>4d. City, State, Zip</b>			
<b>4e. Phone (1)</b>	<b>4f. Phone (2)</b>	<b>4g. Fax</b>	<b>4h. E-mail</b>

## Part 5–Project Location(s)

Identifying information about the property or properties where the project will occur. [\[help\]](#)

- ☐ There are multiple project locations (e.g. linear projects). Complete the section below and use [JARPA Attachment B](#) for each additional project location.

<b>5a.</b> Indicate the type of ownership of the property. (Check all that apply.) <a href="#">[help]</a>			
<input checked="" type="checkbox"/> Private			
<input type="checkbox"/> Federal			
<input type="checkbox"/> Publicly owned (state, county, city, special districts like schools, ports, etc.)			
<input type="checkbox"/> Tribal			
<input type="checkbox"/> Department of Natural Resources (DNR) – managed aquatic lands (Complete <a href="#">JARPA Attachment E</a> )			
<b>5b.</b> Street Address (Cannot be a PO Box. If there is no address, provide other location information in 5p.) <a href="#">[help]</a>			
2988 East College Way			
<b>5c.</b> City, State, Zip (If the project is not in a city or town, provide the name of the nearest city or town.) <a href="#">[help]</a>			
Mount Vernon, WA, 98273			
<b>5d.</b> County <a href="#">[help]</a>			
Skagit			
<b>5e.</b> Provide the section, township, and range for the project location. <a href="#">[help]</a>			
¼ Section	Section	Township	Range
SW	16	34N	R4E
<b>5f.</b> Provide the latitude and longitude of the project location. <a href="#">[help]</a>			
• Example: 47.03922 N lat. / -122.89142 W long. (Use decimal degrees - NAD 83)			
47.434531 N lat. / -122.305689 W long.			
<b>5g.</b> List the tax parcel number(s) for the project location. <a href="#">[help]</a>			
• The local county assessor's office can provide this information.			
P104938			
<b>5h.</b> Contact information for all adjoining property owners. (If you need more space, use <a href="#">JARPA Attachment C.</a> ) <a href="#">[help]</a>			
Name	Mailing Address	Tax Parcel # (if known)	
Summerglen LLC	2710 E College Way	P24923	
Diane, Tait Dong	1620 JJ Place	P24901	
2788 College LLC	2788 E College Way	P24915	
Gill Hardeep	Not Listed	P25067	
City of Mount Vernon	Not Listed	P25244	

<b>5i.</b> List all wetlands on or adjacent to the project location. <a href="#">[help]</a>
<p><b>Wetlands on-site:</b></p> <p><b>Wetland A (39,250 sq ft./0.90 ac), Category III, 75' buffer</b></p> <p><b>Wetland B (1,069 sq ft./0.02 ac), Category III, 75' buffer</b></p> <p><b>Wetland C (6,715 sq ft./0.15 ac), Category III, 75' buffer</b></p> <p><b>Wetlands adjacent:</b></p> <p><b>Wetland A continues off-site and is estimated to be ~18.7 acres total</b></p>
<b>5j.</b> List all waterbodies (other than wetlands) on or adjacent to the project location. <a href="#">[help]</a>
<b>Trumpeter Creek (Type F) is southeast of and adjacent to the project area (in excess of 300 feet) – more info can be accessed in the JJ Place Wetland and Stream Report</b>
<b>5k.</b> Is any part of the project area within a 100-year floodplain? <a href="#">[help]</a>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Don't know
<b>5l.</b> Briefly describe the vegetation and habitat conditions on the property. <a href="#">[help]</a>
<p><b>The project is located within the Puget Sound western hemlock (<i>Tsuga heterophylla</i>) major vegetation area. The north half of the project site is situated on grass meadows dominated by reed canarygrass (<i>Phalaris arundinacea</i>), creeping buttercup (<i>Ranunculus repens</i>) and soft rush (<i>Juncus effusus</i>).</b></p> <p><b>Within the delineated meadow wetlands, herbaceous plants were dominated by reed canarygrass, soft rush, slough sedge (<i>Carex obnupta</i>), creeping buttercup, and various pasture grass species (<i>Poa</i> and <i>Agrostis</i>). A single upland area contains pasture grasses, reed canarygrass, and meadow foxtail (<i>Alopecurus pratensis</i>). The Trumpeter Creek riparian area begins at an abrupt transition midway through the site from meadow to shrub-scrub and forested wetland communities. The woody vegetation contains multiple willow species (<i>Salix sp.</i>), red alder (<i>Alnus rubra</i>), spiraea (<i>Spiraea douglasii</i>), and peafruit rose (<i>Rosa pisocarpa</i>). The emergent understory contains bare ground, creeping buttercup, American brooklime (<i>Veronica americana</i>), sedge species (<i>Carex sp.</i>), and common cattail (<i>Typha latifolia</i>).</b></p>
<b>5m.</b> Describe how the property is currently used. <a href="#">[help]</a>
<b>The project site contains a managed open grass meadow in the north half of the property which transitions to a forested riparian area associated with Trumpeter Creek in the south. The northern half of the site is bordered by a ditch and an apartment complex to the west. To the east of the northern half of the site, a berm and ditch run along the property boundary; to the east of that ditch is a large emergent wetland area that extends east to N. 30<sup>th</sup> Street and north to East College Way. This large wetland complex also contains forested and scrub-shrub riparian/wetland areas associated with Trumpeter Creek. These areas extend west 450 feet and east 650 feet.</b>
<b>5n.</b> Describe how the adjacent properties are currently used. <a href="#">[help]</a>
<b>The property is bordered on the north by East College Way and JJ Place and three small residential properties. The Summer Glen Apartments complex is located immediately adjacent to the west. The adjoining properties to the east and south are undeveloped and maintained as relic ag/pasture. Further to the south is the Trumpeter Creek forested riparian corridor.</b>
<b>5o.</b> Describe the structures (above and below ground) on the property, including their purpose(s) and current condition. <a href="#">[help]</a>



The site is currently undeveloped. There are ditches but no existing structures on the property.

**5p.** Provide driving directions from the closest highway to the project location, and attach a map. [\[help\]](#)

From I-5 North take exit 227 for WA-538/ E College Way. Turn right heading East onto E College Way. In 1.7 miles turn right onto JJ Place. Entrance to the site is at the end of JJ Place.

From I-5 South take exit 227 for WA-538/ E College Way. Turn left onto WA-538/E College Way heading East. From there directions are the same as above.

## Part 6–Project Description

**6a.** Briefly summarize the overall project. You can provide more detail in 6b. [\[help\]](#)

JJ Place, LLC is proposing a residential, multi-family apartment building located on the south side of College Way (SR 538) approximately 2 miles southeast of the Skagit River and approximately 2.15 miles southwest of Barney Lake in Mount Vernon, WA. Nearest crossroads is College Way and N 30<sup>th</sup> St approximately 0.29 miles to the east. Refer to the attached Vicinity Map for exact location (JJ Place JARPA Attachment A - Sheet 1 of 4).

Proposed is a multi-family development on an approximate four-acre site consisting of a three-story, 26,103± square foot (sf) building containing 35 dwelling units. The multi-family units will consist of 15 studio units, 10 one-bedroom units, and 10 two-bedroom units. A total of 57 parking stalls, landscaping, open spaces for the residents, and access improvements including widening JJ Place will all be part of the proposed project.

Approximately 200 linear feet (lf) of eight-inch potable water line, 120 lf of eight-inch sanitary sewer lines and structures, and 330 linear ft of eight-inch and 12-inch storm sewer conveyance lines and dry utilities (power, cable, fiber, etc) will be constructed/installed to serve the proposed development. Material will be exported and imported for site development. Specifically, an estimated 444 cubic yards (cy) of material will be exported and an estimated 444 cy of material will be imported.

Three category III wetlands and a portion of Trumpeter Creek exist on the project site. The Applicant plans on filling approximately 17,865 sf of wetlands as part of this project.

**6b.** Describe the purpose of the project and why you want or need to perform it. [\[help\]](#)

This region occurs within the Urban Grown Area (UGA) of the City of Mount Vernon. Existing properties to the north and west of this site have been developed with single-family residential homes and apartment complexes. With on-going growth and development of the Puget Sound Region and a regional housing shortage, developing remaining isolated and urban properties such as this one are a high priority for the placement of needed housing particularly in the effort to reduce urban sprawl. The addition of the proposed townhouse complex is an efficient, high-value economic use of this property and an asset to the local and regional economy. The property owner/applicant wishes to exercise their legal right to reasonable use of their property so long as permissible by the City and all other relevant regulatory agencies.

**6c.** Indicate the project category. (Check all that apply) [\[help\]](#)

☐ Commercial ☒ Residential ☐ Institutional ☐ Transportation ☐ Recreational

☐ Maintenance      ☐ Environmental Enhancement

**6d.** Indicate the major elements of your project. (Check all that apply) [\[help\]](#)

- |  |  |  |   |
|--|--|--|---|
| <input type="checkbox"/> Aquaculture<br><input type="checkbox"/> Bank Stabilization<br><input type="checkbox"/> Boat House<br><input type="checkbox"/> Boat Launch<br><input type="checkbox"/> Boat Lift<br><input type="checkbox"/> Bridge<br><input type="checkbox"/> Bulkhead<br><input type="checkbox"/> Buoy<br><input type="checkbox"/> Channel Modification | <input type="checkbox"/> Culvert<br><input type="checkbox"/> Dam / Weir<br><input type="checkbox"/> Dike / Levee / Jetty<br><input type="checkbox"/> Ditch<br><input type="checkbox"/> Dock / Pier<br><input type="checkbox"/> Dredging<br><input type="checkbox"/> Fence<br><input type="checkbox"/> Ferry Terminal<br><input type="checkbox"/> Fishway | <input type="checkbox"/> Float<br><input type="checkbox"/> Floating Home<br><input type="checkbox"/> Geotechnical Survey<br><input type="checkbox"/> Land Clearing<br><input type="checkbox"/> Marina / Moorage<br><input type="checkbox"/> Mining<br><input type="checkbox"/> Outfall Structure<br><input type="checkbox"/> Piling/Dolphin<br><input type="checkbox"/> Raft | <input type="checkbox"/> Retaining Wall (upland)<br><input checked="" type="checkbox"/> Road<br><input type="checkbox"/> Scientific Measurement Device<br><input type="checkbox"/> Stairs<br><input checked="" type="checkbox"/> Stormwater facility<br><input type="checkbox"/> Swimming Pool<br><input type="checkbox"/> Utility Line |
|--|--|--|---|

☒ Other: **35 Multi-family Dwelling Units; New Access Road and driveways; Resident parking; Private & Common Open Spaces; Landscaping; Dumpsters; Stormwater Detention, and Sanitary side-sewer and associated utilities.**

**6e.** Describe how you plan to construct each project element checked in 6d. Include specific construction methods and equipment to be used. [\[help\]](#)

- Identify where each element will occur in relation to the nearest waterbody.
- Indicate which activities are within the 100-year floodplain.

**NOTE: No portion or activity associated with this proposed project is located within a 100- or 500-year floodplain.**

**Construction sequence steps are as follows:**

- Clearing property as needed per civil plans
- Importing materials as needed to set site grade
- Extending all utilities to the building site per civil plans
- Installation of site drainage system per civil plan
- Site excavations for building foundation
- Backfilling building foundation and tie building into all utilities
- Construct the building
- Finish grading the site for asphalt, curbs and sidewalks
- Pouring all exterior concrete surfaces
- Paving the parking areas
- Installation of all landscaping per Plans

**Standard equipment is to be used and consists of excavators, dozer, dump trucks and forklift.**

**6f.** What are the anticipated start and end dates for project construction? (Month/Year) [\[help\]](#)

- If the project will be constructed in phases or stages, use [JARPA Attachment D](#) to list the start and end dates of each phase or stage.

Start Date: October 2023 End Date: Feb/June 2024 (~14-18 months to completion) ☐ See JARPA Attachment D

**6g.** Fair market value of the project, including materials, labor, machine rentals, etc. [\[help\]](#)

**~10 million US dollars**

**6h.** Will any portion of the project receive federal funding? [\[help\]](#)

- If yes, list each agency providing funds.

☐ Yes ☒ No ☐ Don't know

## Part 7–Wetlands: Impacts and Mitigation

- ☒ Check here if there are wetlands or wetland buffers on or adjacent to the project area.  
(If there are none, skip to Part 8.) [\[help\]](#)

**7a.** Describe how the project has been designed to avoid and minimize adverse impacts to wetlands. [\[help\]](#)

☐ Not applicable

The project footprint has been designed with mitigation sequencing in the following ways:

#### **Avoidance**

This proposed project is located in what is the only buildable upland area in a small portion of the parcel where historic fill had previously been placed. This is the only buildable area on this long-narrow parcel adjacent to Trumpeter Creek. The proposal is a reasonable use that requires use of the entire buildable portion of property including access to it through wetland areas; therefore, impacts to Wetlands A, B, and C are unavoidable under this proposal. Avoiding impacts to buffers was also not a feasible option at this site as all potential buildable area occurs within existing wetland buffer.

#### **Minimization**

Minimization of the impacts was not a feasible option for the applicant in their cost-benefit analysis as this lot is already primarily undevelopable and the development of this portion of it is a reasonable use. The entire footprint of buildable area on the parcel is necessary for the proposed development; therefore, minimizing impacts to wetlands is not possible.

#### **Rectification**

No temporary disturbance is proposed. All impacts are permanent.

#### **Reduction or Elimination through Preservation or Maintenance**

Proposal includes underground stormwater detention and bioswale infiltration to maintain integrity of wetland water quality function. All remaining areas of wetland on this parcel will be protected and preserved within a fenced NGPA area and off-limits to further access and development.

#### **Compensation**

On-site opportunities for mitigation were considered; however, there is no on-site opportunity to create wetland as all remaining portions of the site are already functioning jurisdictional wetland. An alternative was considered for on-site wetland rehabilitation by ditch filling and vegetation enhancement. This alternative was not selected for reasons described in the JJ Place Conceptual Mitigation Plan. See Plan for full details on avoidance, minimization, and mitigation measures.

Additionally:

- **No untreated stormwater generated from this Project's new impervious surfaces will enter wetlands.** On-site stormwater detention vaults and bio-swales will pretreat all stormwater prior to its discharge to adjacent the wetland areas. Additionally, the wetland area to the south of the site which shall receive stormwater outflows will be enhanced with planting of native trees and shrubs. This will further enhance wetland functions providing even more stormwater pre-treatment and water quality buffering prior to entering the water table or the Trumpeter Creek riparian corridor.

**Preferred Alternative:** The applicant's proposal is the preferred alternative which includes the construction of 35 multi-unit apartment complex with associated parking and driveways.

No further avoidance or minimization were possible while still allowing reasonable use of this property with an economically viable project. On-site compensatory mitigation is not an option; therefore, compensatory mitigation is proposed in two ways: 1) mitigation bank-use at the Skagit Environmental Wetland Mitigation Bank (SEB) for unavoidable direct wetland

impacts and indirect wetland buffer impacts; and 2) for reduced wetland buffers and unavoidable wetland buffer impacts the project proposes to use the City of Mount Vernon's Managed Ecosystem Alternative and contribute to its Restoration Fund. Both off-site mitigation strategies still provide a watershed-approach as this site is just upstream of the SEB and is located within the City-limits and same overall watershed as the City's restoration sites.

**7b.** Will the project impact wetlands? [\[help\]](#)

☒ Yes ☐ No ☐ Don't know

**7c.** Will the project impact wetland buffers? [\[help\]](#)

☒ Yes ☐ No ☐ Don't know

**7d.** Has a wetland delineation report been prepared? [\[help\]](#)

- If Yes, submit the report, including data sheets, with the JARPA package.

☒ Yes ☐ No

**7e.** Have the wetlands been rated using the Western Washington or Eastern Washington Wetland Rating System? [\[help\]](#)

- If Yes, submit the wetland rating forms and figures with the JARPA package.

☒ Yes ☐ No ☐ Don't know

**7f.** Have you prepared a mitigation plan to compensate for any adverse impacts to wetlands? [\[help\]](#)

- If Yes, submit the plan with the JARPA package and answer 7g.
- If No, or Not applicable, explain below why a mitigation plan should not be required.

☒ Yes ☐ No ☐ Don't know

**A Critical Areas Assessment and Mitigation Plan have been prepared and submitted with this JARPA (see Appendix A).**

**7g.** Summarize what the mitigation plan is meant to accomplish, and describe how a watershed approach was used to design the plan. [\[help\]](#)

The JJ Place Project occurs within in the Trumpeter Creek and Nookachamps sub-basin of the Lower Skagit-Samish watershed (WRIA 03/WDFW 1975). The proposed work occurs within an increasingly urbanizing watershed with known water quality and flooding problems. Trumpeter Creek does not have a designated TMDL; however, further downstream the Samish Watershed and Skagit Basin do have designated TMDLs. WRIA 3 is presumed to be identified in watershed plans for prioritizing wetland and stream restoration and water-quality improvement projects; however, an online source for this information could not be verified.

On-site mitigation opportunities were considered during the designing and mitigation sequencing phases; however, due to the lack of sufficient on-site opportunities and the relative moderate function of the remaining on-site wetlands the applicant determined that even greater functional lift opportunities exist at the SEB just downstream of the site. It was deemed a greater overall benefit to the project and to society to proceed to compensating for this project's proposed impacts at the nearby mitigation bank. According to MVMC 15.40.090(G)(6), "*when credits from a certified bank are used, replacement ratios should be*

**consistent with the requirements of the bank's certification"; therefore, in-lieu of the standard City of Mount Vernon mitigation ratios, the local mitigation bank impact-to-credit purchase ratios are applied to this proposal (see below).**

**See the JJ Place Critical Areas Report and Conceptual Mitigation Plan for full details.**

**7h.** Use the table below to list the type and rating of each wetland impacted, the extent and duration of the impact, and the type and amount of mitigation proposed. Or if you are submitting a mitigation plan with a similar table, you can state (below) where we can find this information in the plan. [\[help\]](#)

Activity (fill, drain, excavate, flood, etc.)	Wetland Name <sup>1</sup>	Wetland type and rating category <sup>2</sup>	Impact area (sq. ft. or Acres)	Duration of impact <sup>3</sup>	Proposed mitigation type <sup>4</sup>	Wetland mitigation credits to purchase
Fill	Wetland A	Depressional/ Cat. III	10,081 sf/ 0.23 ac	Permanent	Mitigation Banking	0.41
Fill	Wetland B	Depressional/ Cat. III	1,069 sf/ 0.02 ac	Permanent	Mitigation Banking	
Fill	Wetland C	Depressional/ Cat. III	6,715 sf/ 0.15 ac	Permanent	Mitigation Banking	
Fill	Wetland Buffer		20,561 sf/ 0.47 ac	Indirect/Permanent Conversion	Mitigation Banking	0.24
<b>TOTALS</b>			<b>38,426 sf/ 0.88 ac</b>	<b>Permanent</b>		<b>0.65</b>

**For complete details see the JJ Place Preliminary Mitigation Plan – Tables 3 and 4**

<sup>1</sup> If no official name for the wetland exists, create a unique name (such as "Wetland 1"). The name should be consistent with other project documents, such as a wetland delineation report.

<sup>2</sup> Ecology wetland category based on current Western Washington or Eastern Washington Wetland Rating System. Provide the wetland rating forms with the JARPA package.

<sup>3</sup> Indicate the days, months or years the wetland will be measurably impacted by the activity. Enter "permanent" if applicable.

<sup>4</sup> Creation (C), Re-establishment/Rehabilitation (R), Enhancement (E), Preservation (P), Mitigation Bank/In-lieu fee (B)

Page number(s) for similar information in the mitigation plan, if available: **Pages 6 and 7**

**7i.** For all filling activities identified in 7h, describe the source and nature of the fill material, the amount in cubic yards that will be used, and how and where it will be placed into the wetland. [\[help\]](#)

- **The source of fill is not known at this time, but will come from an approved commercial source.**
- **Approximately 3,000 cubic yards of fill will be used to construct the entrance driveway, parking lots, and apartment complex (See JARPA Attachment – Sheet 3 of 4).**

**7j.** For all excavating activities identified in 7h, describe the excavation method, type and amount of material in cubic yards you will remove, and where the material will be disposed. [\[help\]](#)

- Approximately and 3,000 sf of fill material will be removed and disposed of off-site to a designated disposal site.

## Part 8–Waterbodies (other than wetlands): Impacts and Mitigation

In Part 8, “waterbodies” refers to non-wetland waterbodies. (See Part 7 for information related to wetlands.) [\[help\]](#)

☐ Check here if there are waterbodies on or adjacent to the project area. (If there are none, skip to Part 9.)

**8a.** Describe how the project is designed to avoid and minimize adverse impacts to the aquatic environment. [\[help\]](#)

☐ Not applicable

**Trumpeter Creek is located in excess of 300 feet southeast of the proposed project site. No impacts to Trumpeter Creek or other waterbodies are associated with this proposal.**

**8b.** Will your project impact a waterbody or the area around a waterbody? [\[help\]](#)

☐ Yes    ☒ No

**8c.** Have you prepared a mitigation plan to compensate for the project's adverse impacts to non-wetland waterbodies? [\[help\]](#)

- If **Yes**, submit the plan with the JARPA package and answer 8d.
- If **No, or Not applicable**, explain below why a mitigation plan should not be required.

☐ Yes   ☒ No   ☐ Don't know

**Not applicable.**

**8d.** Summarize what the mitigation plan is meant to accomplish. Describe how a watershed approach was used to design the plan.

- If you already completed 7g you do not need to restate your answer here. [\[help\]](#)

**Not applicable.**

**8e.** Summarize impact(s) to each waterbody in the table below. [\[help\]](#)

Activity (clear, dredge, fill, pile drive, etc.)	Waterbody name <sup>1</sup>	Impact location <sup>2</sup>	Duration of impact <sup>3</sup>	Amount of material (cubic yards) to be placed in or removed from waterbody	Area (sq. ft. or linear ft.) of waterbody directly affected

<sup>1</sup> If no official name for the waterbody exists, create a unique name (such as "Stream 1") The name should be consistent with other documents provided.

<sup>2</sup> Indicate whether the impact will occur in or adjacent to the waterbody. If adjacent, provide the distance between the impact and the waterbody and indicate whether the impact will occur within the 100-year flood plain.

<sup>3</sup> Indicate the days, months or years the waterbody will be measurably impacted by the work. Enter "permanent" if applicable.

**8f.** For all activities identified in 8e, describe the source and nature of the fill material, amount (in cubic yards) you will use, and how and where it will be placed into the waterbody. [\[help\]](#)

**Not applicable.**

**8g.** For all excavating or dredging activities identified in 8e, describe the method for excavating or dredging, type and amount of material you will remove, and where the material will be disposed. [\[help\]](#)



Not applicable.

## Part 9—Additional Information

Any additional information you can provide helps the reviewer(s) understand your project. Complete as much of this section as you can. It is ok if you cannot answer a question.

**9a.** If you have already worked with any government agencies on this project, list them below. [\[help\]](#)

Agency Name	Contact Name	Phone	Most Recent Date of Contact
Skagit County	Rebecca Lowell,	360-336-6214	December 20, 2022

**9b.** Are any of the wetlands or waterbodies identified in Part 7 or Part 8 of this JARPA on the Washington Department of Ecology's 303(d) List? [\[help\]](#)

- If **Yes**, list the parameter(s) below.
- If you don't know, use Washington Department of Ecology's Water Quality Assessment tools at: <https://ecology.wa.gov/Water-Shorelines/Water-quality/Water-improvement/Assessment-of-state-waters-303d>.

☐ Yes ☒ No

**9c.** What U.S. Geological Survey Hydrological Unit Code (HUC) is the project in? [\[help\]](#)

- Go to <http://cfpub.epa.gov/surf/locate/index.cfm> to help identify the HUC.

**Pacific Northwest Region 17 - Trumpeter Creek Sub-Basin (USGS 5<sup>th</sup> HUC 171100070202)**

**9d.** What Water Resource Inventory Area Number (WRIA #) is the project in? [\[help\]](#)

- Go to <https://ecology.wa.gov/Water-Shorelines/Water-supply/Water-availability/Watershed-look-up> to find the WRIA #.

**WRIA 3 (Lower Skagit-Samish River Watershed)**

<p><b>9e.</b> Will the in-water construction work comply with the State of Washington water quality standards for turbidity? <a href="#">[help]</a></p> <ul style="list-style-type: none"> <li>Go to <a href="https://ecology.wa.gov/Water-Shorelines/Water-quality/Freshwater/Surface-water-quality-standards/Criteria">https://ecology.wa.gov/Water-Shorelines/Water-quality/Freshwater/Surface-water-quality-standards/Criteria</a> for the standards.</li> </ul> <p><input type="checkbox"/> Yes   <input checked="" type="checkbox"/> No   <input type="checkbox"/> Not applicable</p> <p><b>No in-water work is anticipated; construction will occur during the dry season.</b></p>
<p><b>9f.</b> If the project is within the jurisdiction of the Shoreline Management Act, what is the local shoreline environment designation? <a href="#">[help]</a></p> <ul style="list-style-type: none"> <li>If you don't know, contact the local planning department.</li> <li>For more information, go to: <a href="https://ecology.wa.gov/Water-Shorelines/Shoreline-coastal-management/Shoreline-coastal-planning/Shoreline-laws-rules-and-cases">https://ecology.wa.gov/Water-Shorelines/Shoreline-coastal-management/Shoreline-coastal-planning/Shoreline-laws-rules-and-cases</a>.</li> </ul> <p><input type="checkbox"/> Urban   <input type="checkbox"/> Natural   <input type="checkbox"/> Aquatic   <input type="checkbox"/> Conservancy   <input type="checkbox"/> Other: _____</p>
<p><b>9g.</b> What is the Washington Department of Natural Resources Water Type? <a href="#">[help]</a></p> <ul style="list-style-type: none"> <li>Go to <a href="http://www.dnr.wa.gov/forest-practices-water-typing">http://www.dnr.wa.gov/forest-practices-water-typing</a> for the Forest Practices Water Typing System.</li> </ul> <p><input type="checkbox"/> Shoreline   <input type="checkbox"/> Fish   <input type="checkbox"/> Non-Fish Perennial   <input checked="" type="checkbox"/> Non-Fish Seasonal</p>
<p><b>9h.</b> Will this project be designed to meet the Washington Department of Ecology's most current stormwater manual? <a href="#">[help]</a></p> <ul style="list-style-type: none"> <li><b>If No</b>, provide the name of the manual your project is designed to meet.</li> </ul> <p><input checked="" type="checkbox"/> Yes   <input type="checkbox"/> No</p> <p>Name of manual: <b>2022 Stormwater Management Manual for Western Washington (SWMMWW)</b></p>
<p><b>9i.</b> Does the project site have known contaminated sediment? <a href="#">[help]</a></p> <ul style="list-style-type: none"> <li><b>If Yes</b>, please describe below.</li> </ul> <p><input type="checkbox"/> Yes   <input checked="" type="checkbox"/> No</p> <p><b>There is no known contaminated sediment on-site nor any waterbodies on-site or adjacent that could be affected.</b></p>
<p><b>9j.</b> If you know what the property was used for in the past, describe below. <a href="#">[help]</a></p> <p><b>This site has experienced historic land alternations with the presence of ditches, agricultural practices, and soil alterations. Most of this site was logged and cleared prior to 1969, with the north half in continued hay production since that time. Two shallow excavated areas in the north (delineated as Wetlands B and C) and associated "spoil" mounds are present. The project area is zoned as R-3, multi-family residential district.</b></p>
<p><b>9k.</b> Has a cultural resource (archaeological) survey been performed on the project area? <a href="#">[help]</a></p> <ul style="list-style-type: none"> <li><b>If Yes</b>, attach it to your JARPA package.</li> </ul>

☐ Yes ☒ No

The Washington State Department of Archaeological and Historical Preservation (DAHP) online WISAARD research tool was used to identify if there were any Historic Property Inventories (HPI) on record on or near the site. No records/findings appeared on or in the near vicinity of the site according to this assessment resource. The City of Mount Vernon's typical SEPA process includes consultation with outside agencies, including potentially affected Native American tribes, to assess possible impacts to or existence of cultural and historic resources. No additional assessment efforts are proposed or expected to be necessary for this project.

**9l.** Name each species listed under the federal Endangered Species Act that occurs in the vicinity of the project area or might be affected by the proposed work. [\[help\]](#)

According to the Washington State Department of Natural Resources (WDNR) Washington Natural Heritage Program database, neither threatened/endangered plant species nor high-quality ecosystems are present in the section, township, and range in which the site is located (S16/T34N/R4E). WDFW Priority Habitats and Species (PHS) data does not identify any features within close proximity of the project site (WDFW 2020a). The remaining undeveloped portions of this property are not optimal habitat for any listed species that may occur or migrate through the project vicinity.

**9m.** Name each species or habitat on the Washington Department of Fish and Wildlife's Priority Habitats and Species List that might be affected by the proposed work. [\[help\]](#)

No listed species or priority species and habitats are known to occur within the project site or vicinity. No known affects to listed species are known to occur as a result of this proposed project.

## Part 10–SEPA Compliance and Permits

Use the resources and checklist below to identify the permits you are applying for.

- Online Project Questionnaire at <http://apps.oria.wa.gov/opas/>.
- Governor's Office for Regulatory Innovation and Assistance at (800) 917-0043 or [help@oria.wa.gov](mailto:help@oria.wa.gov).
- For a list of addresses to send your JARPA to, click on [agency addresses for completed JARPA](#).

**10a.** Compliance with the State Environmental Policy Act (SEPA). (Check all that apply.) [\[help\]](#)

- For more information about SEPA, go to <https://ecology.wa.gov/regulations-permits/SEPA-environmental-review>.

☒ A copy of the SEPA determination or letter of exemption is included with this application.

<input type="checkbox"/> A SEPA determination is pending with __ (lead agency). The expected decision date is _____.
<input type="checkbox"/> I am applying for a Fish Habitat Enhancement Exemption. (Check the box below in 10b.) <a href="#">[help]</a>
<input type="checkbox"/> This project is exempt (choose type of exemption below). <div style="margin-left: 20px;"> <input type="checkbox"/> Categorical Exemption. Under what section of the SEPA administrative code (WAC) is it exempt?            _____         </div> <div style="margin-left: 20px;"> <input type="checkbox"/> Other: _____         </div>
<input type="checkbox"/> SEPA is pre-empted by federal law.
<b>10b.</b> Indicate the permits you are applying for. (Check all that apply.) <a href="#">[help]</a>
<b>LOCAL GOVERNMENT</b>
<b>Local Government Shoreline permits:</b> <div style="margin-left: 20px;"> <input type="checkbox"/> Substantial Development    <input type="checkbox"/> Conditional Use    <input type="checkbox"/> Variance  <input type="checkbox"/> Shoreline Exemption Type (explain): _____         </div>
<b>Other City/County permits:</b> <div style="margin-left: 20px;"> <input type="checkbox"/> Floodplain Development Permit    <input checked="" type="checkbox"/> Critical Areas Ordinance         </div>
<b>STATE GOVERNMENT</b>
<b>Washington Department of Fish and Wildlife:</b> <div style="margin-left: 20px;"> <input type="checkbox"/> Hydraulic Project Approval (HPA)    <input type="checkbox"/> Fish Habitat Enhancement Exemption – <a href="#">Attach Exemption Form</a> </div>
<b>Washington Department of Natural Resources:</b> <div style="margin-left: 20px;"> <input type="checkbox"/> Aquatic Use Authorization            Complete <a href="#">JARPA Attachment E</a> and submit a check for \$25 payable to the Washington Department of Natural Resources.  <u><b>Do not send cash.</b></u> </div>
<b>Washington Department of Ecology:</b> <div style="margin-left: 20px;"> <input checked="" type="checkbox"/> Section 401 Water Quality Certification    <input type="checkbox"/> Non-Federally Regulated Waters         </div> <b>Also: 1) General Construction Stormwater Discharge Permit – WA DOE</b>
<b>FEDERAL AND TRIBAL GOVERNMENT</b>
<b>United States Department of the Army (U.S. Army Corps of Engineers):</b> <div style="margin-left: 20px;"> <input checked="" type="checkbox"/> Section 404 (discharges into waters of the U.S.)    <input type="checkbox"/> Section 10 (work in navigable waters)         </div>
<b>United States Coast Guard:</b> For projects or bridges over waters of the United States, contact the U.S. Coast Guard at: <a href="mailto:d13-pf-d13bridges@uscg.mil">d13-pf-d13bridges@uscg.mil</a> <div style="margin-left: 20px;"> <input type="checkbox"/> Bridge Permit    <input type="checkbox"/> Private Aids to Navigation (or other non-bridge permits)         </div>
<b>United States Environmental Protection Agency:</b> <div style="margin-left: 20px;"> <input type="checkbox"/> Section 401 Water Quality Certification (discharges into waters of the U.S.) on tribal lands where tribes do not have treatment as a state (TAS)         </div>
<b>Tribal Permits:</b> (Check with the tribe to see if there are other tribal permits, e.g., Tribal Environmental Protection Act, Shoreline Permits, Hydraulic Project Permits, or other in addition to CWA Section 401 WQC) <div style="margin-left: 20px;"> <input type="checkbox"/> Section 401 Water Quality Certification (discharges into waters of the U.S.) where the tribe has treatment as a state (TAS).         </div>

## Part 11—Authorizing Signatures

Signatures are required before submitting the JARPA package. The JARPA package includes the JARPA form, project plans, photos, etc. [\[help\]](#)

### 11a. Applicant Signature (required) [\[help\]](#)

I certify that to the best of my knowledge and belief, the information provided in this application is true, complete, and accurate. I also certify that I have the authority to carry out the proposed activities, and I agree to start work only after I have received all necessary permits.

I hereby authorize the agent named in Part 3 of this application to act on my behalf in matters related to this application. JP (initial)

By initialing here, I state that I have the authority to grant access to the property. I also give my consent to the permitting agencies entering the property where the project is located to inspect the project site or any work related to the project. JP (initial)

**John Piazza**

Applicant Printed Name

Applicant Signature

Date

5.5.23

### 11b. Authorized Agent Signature [\[help\]](#)

I certify that to the best of my knowledge and belief, the information provided in this application is true, complete, and accurate. I also certify that I have the authority to carry out the proposed activities and I agree to start work only after all necessary permits have been issued.

**Mark Merkelbach, PWS #001837**

Authorized Agent Printed Name

Authorized Agent Signature

Date

5/10/2023

### 11c. Property Owner Signature (if not applicant) [\[help\]](#)

Not required if project is on existing rights-of-way or easements (provide copy of easement with JARPA).

I consent to the permitting agencies entering the property where the project is located to inspect the project site or any work. These inspections shall occur at reasonable times and, if practical, with prior notice to the landowner.

**John Piazza**

Property Owner Printed Name

Property Owner Signature

Date

5.5.23

18 U.S.C §1001 provides that: Whoever, in any manner within the jurisdiction of any department or agency of the United States knowingly falsifies, conceals, or covers up by any trick, scheme, or device a material fact or makes any false, fictitious, or fraudulent statements or representations or makes or uses any false writing or document knowing same to contain any false, fictitious, or fraudulent statement or entry, shall be fined not more than \$10,000 or imprisoned not more than 5 years or both.

If you require this document in another format, contact the Governor's Office for Regulatory Innovation and Assistance (ORIA) at (800) 917-0043. People with hearing loss can call 711 for Washington Relay Service. People with a speech disability can call (877) 833-6341. ORIA publication number: ORIA-16-011 rev. 09/2018

# JJ PLACE APARTMENTS JARPA FIGURES

MOUNT VERNON, WA

SHEET LIST TABLE

SHEET NO.	SHEET TITLE
01	VICINITY MAP
02	EXISTING CONDITIONS
03	SITE PLAN AND IMPACTS
04	SECTIONS

PROJECT LOCATION MAP



VICINITY MAP



REFERENCE NUMBER:  
NWS-

APPLICANT:  
JJ PLACE, LLC  
224 STEWARD ROAD, SUITE 130,  
MOUNT VERNON, WA 98273

PROJECT LOCATION:  
MOUNT VERNON

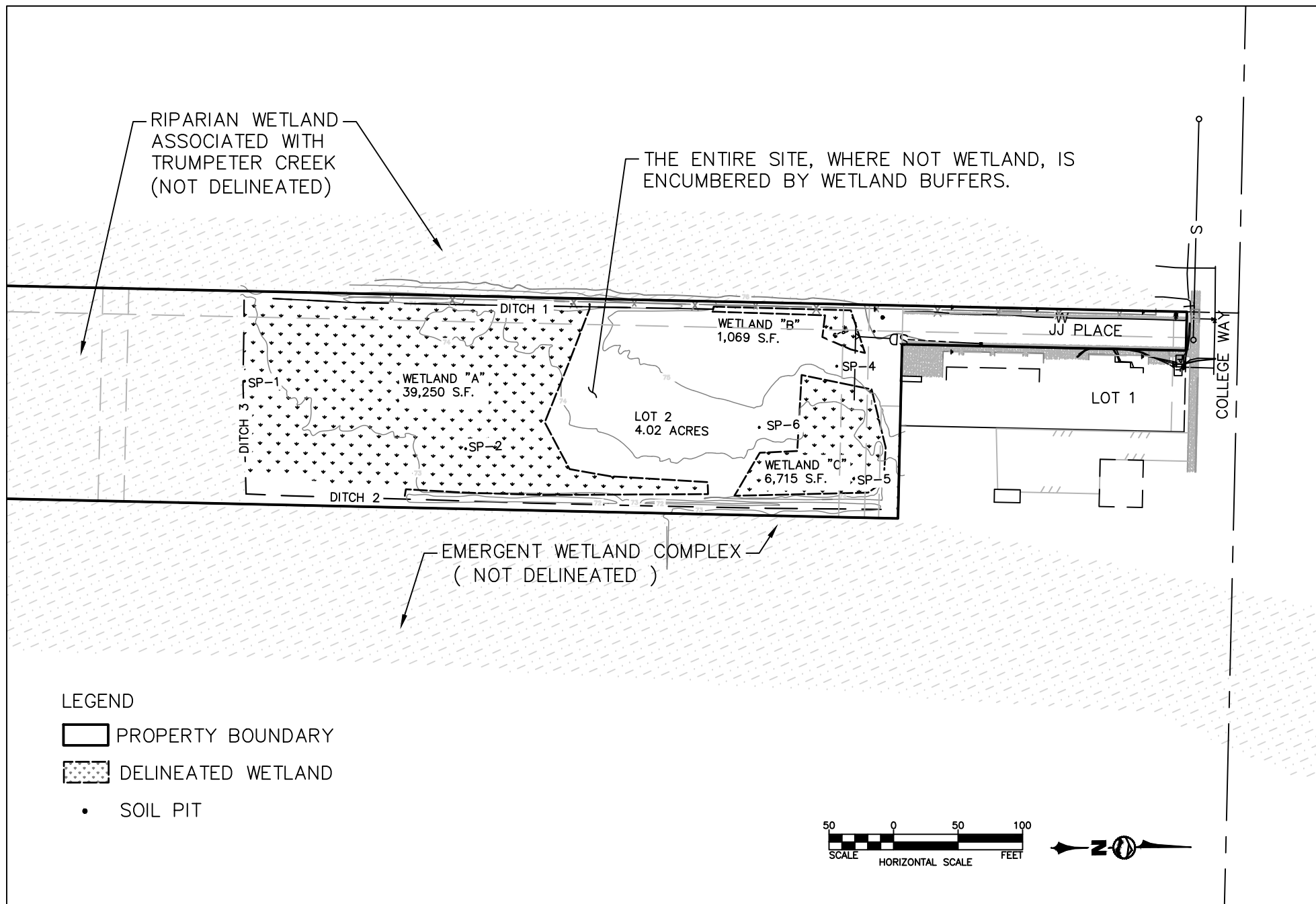
COUNTY: SKAGIT  
STATE: WA

SHEET -

LATITUDE: 48°26'04.7"N  
LONGITUDE: 122°18'19.7"W

DATE: 03/03/23

PROPOSED PROJECT:  
JJ PLACE APARTMENTS



REFERENCE NUMBER:  
NWS-

APPLICANT:  
JJ PLACE, LLC  
224 STEWARD ROAD, SUITE 130,  
MOUNT VERNON, WA 98273

PROJECT LOCATION:  
MOUNT VERNON  
COUNTY: SKAGIT  
STATE: WA

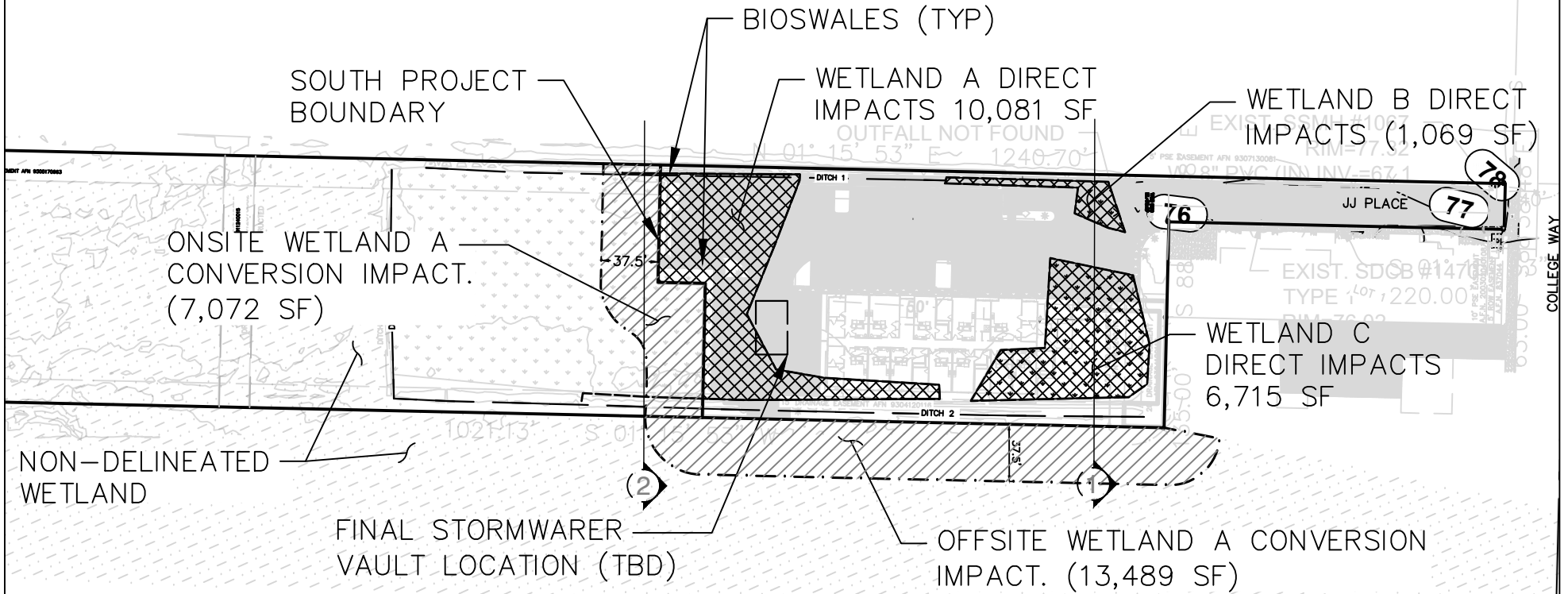
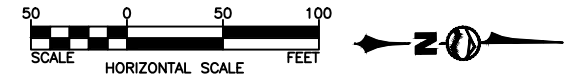
SHEET -  
LATITUDE: 48°26'04.7"N  
LONGITUDE: 122°18'19.7"W

DATE: 03/03/23

PROPOSED PROJECT:  
JJ PLACE APARTMENTS



\* NOTE: OFFSITE LINE WORK FROM MOUNT VERNON  
POTENTIAL WETLAND MAP ( MOUNT VERNON 2012)



IMPACTS	DIRECT	INDIRECT / CONVERSION
WETLAND A	10,081 SF	—
WETLAND B	1,069 SF	—
WETLAND C	6,715 SF	—
BUFFER	—	20,561 SF
TOTAL	17.865 SF	

#### LEGEND

- PROPERTY BOUNDARY
- DELINEATED WETLAND
- WETLAND BUFFER
- EXISTING WETLAND AREA TO BE FILLED (17,865 SF)
- EXISTING WETLAND AREA THAT WILL BE CONVERTED FROM A WETLAND TO A WETLAND BUFFER (20,561 SF) SEE NOTE 2
- NON-DELINEATED WETLAND
- DITCH

REFERENCE NUMBER:  
NWS—

APPLICANT:  
JJ PLACE, LLC  
224 STEWARD ROAD, SUITE 130,  
MOUNT VERNON, WA 98273

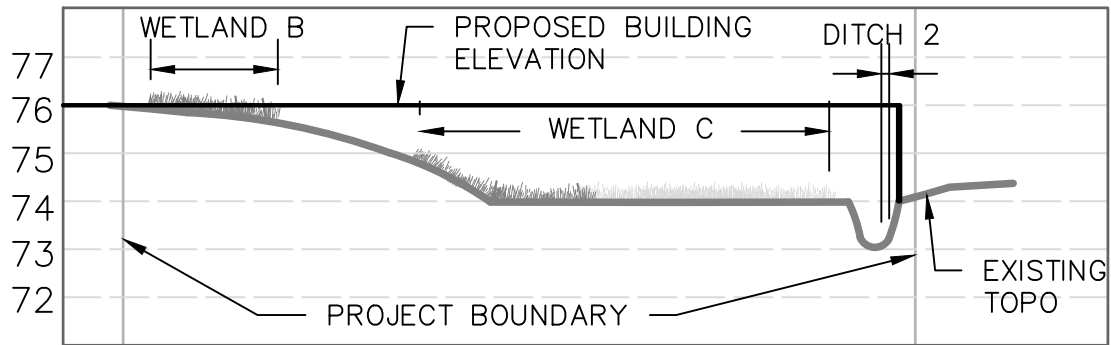
PROJECT LOCATION:  
MOUNT VERNON  
COUNTY: SKAGIT  
STATE: WA

SHEET —  
LATITUDE: 48°26'04.7"N  
LONGITUDE: 122°18'19.7"W

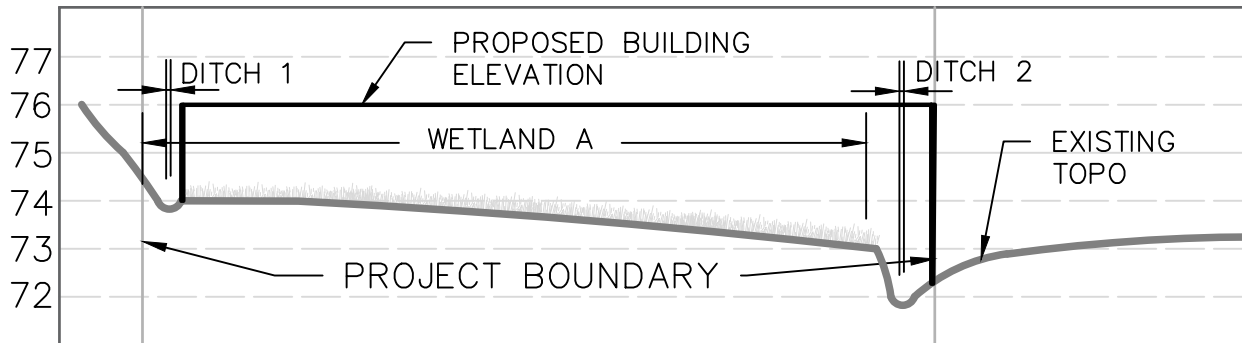
DATE: 03/03/23

PROPOSED PROJECT:  
JJ PLACE APARTMENTS





SECTION 1 HORIZONTAL 1: 40 VERTICAL:1: 4



SECTION 2 HORIZONTAL 1: 40 VERTICAL:1: 4

REFERENCE NUMBER: NWS-	APPLICANT: JJ PLACE, LLC 224 STEWARD ROAD, SUITE 130, MOUNT VERNON, WA 98273	PROJECT LOCATION: MOUNT VERNON COUNTY: SKAGIT STATE: WA	SHEET - LATITUDE: 48°26'04.7"N LONGITUDE: 122°18'19.7"W	DATE: 03/03/23 PROPOSED PROJECT: JJ PLACE APARTMENTS
---------------------------	---	--	---	--