



5309 Shilshole Avenue, NW  
Suite 200  
Seattle, WA 98107  
206.789.9658 phone  
206.789.9684 fax

[www.esassoc.com](http://www.esassoc.com)

# memorandum

date February 7, 2020

to Sherrie Ringstad, City of Mill Creek

from Jessica Redman, Wetland Ecologist

subject 7C's Pool House– Revised Buffer Averaging Plan Review

At the request of the City of Mill Creek (City), ESA reviewed the *Buffer Averaging Plan for 7C's Pool House* (hereinafter referred to as the Revised Plan), prepared by Wetland Resources (revised November 11, 2019) for the property located at the southern corner of the intersection between North Creek Drive and Dumas Road (Snohomish County Parcel Number 28053100203700). The property is currently undeveloped. The applicant has submitted a formal application for development of an approximately 10,000 square foot (SF) recreational building that will include an indoor pool and be used as a swim school. Parking, concrete sidewalks, stormwater facilities, and associated utilities will also be a part of the proposed development. The property contains one Category III wetland which is allotted a 100-foot buffer per Mill Creek Municipal Code (MCMC) 18.06.930. To accommodate the development, the applicant is proposing buffer averaging. ESA reviewed a previous version of the buffer averaging plan for the project (dated August 22, 2019) and conducted a site visit on October 4, 2019. Findings were presented to the City in the technical memorandum titled *7C's Pool House – Buffer Averaging Plan Review* (dated October 15, 2019).

In the October 15, 2019 memorandum, ESA stated that the proposed project met all the requirements of buffer averaging under MCMC 18.06.930.C. However, the project did not provide compensatory mitigation for the alteration of the buffer as required by MCMC 18.06.610 – *General Mitigation Requirements*. In response to the October 15, 2019 memorandum, Wetland Resources developed the Revised Plan to include the addition of habitat features to the buffer to mitigate for these alterations. After review of the Revised Plan, ESA has the following comments regarding the revised submittal documents:

- As mentioned in the October 15<sup>th</sup> memorandum, ESA agrees with the boundary of the onsite wetland (Wetland A).
- As mentioned in the October 15<sup>th</sup> memorandum, ESA agrees that Wetland A is a Category III wetland, warranting a 100-foot buffer.

- As mentioned in the October 15<sup>th</sup> memorandum, ESA agrees that the proposed project has met all the requirements for buffer averaging per MCMC 18.06.930.C and the proposed buffer averaging will not result in a net loss of buffer function or area.
- ESA agrees that the proposed project has proposed sufficient mitigation through the addition of habitat features which will enhance habitat function at the site, and therefore, has met the requirements of MCMC 18.06.610.
- In conclusion, we have determined that the 7C's Pool House project is consistent with MCMC 18.06 – *Environmentally Critical Areas*.