



**STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY**

*Northwest Regional Office 3190 160th SE Bellevue, Washington 98008-5452 (425) 649-7000*

November 1, 2018

Christi Amrine, Senior Planner  
City of Mill Creek, Planning and Development Services  
15728 Main Street  
Mill Creek, WA 98012

**RE: Ecology Additional Comments on the Farm at Mill Creek**

Dear Ms. Amrine:

Thank you for requesting my technical assistance with wetland analysis of the Farm at Mill Creek property located in the City of Mill Creek. I previously commented on this site in a letter dated July 17, 2018. Based on my review of the revised project documentation listed below and a site visit on October 26, 2018, I offer my findings and recommendations.

***Literature Sources Reviewed***

The most recent project submittal that was reviewed by the Washington Department of Ecology (Ecology) included:

- *Water Elevation Measurement Map and Profile—The Farm at Mill Creek*, prepared by Talasaea Consultants, Inc., dated December 10, 2017
- *Response to Ecology comment letter of July 17, 2018—The Farm at Mill Creek*, prepared by Talasaea Consultants, Inc., dated October 4, 2018
- *Critical Areas Report and Conceptual Mitigation Plan—The Farm at Mill Creek*, prepared by Talasaea Consultants, Inc. dated October 18, 2018
- *Summary of Mitigation Plan—The Farm at Mill Creek*, prepared by Talasaea Consultants, Inc., dated October 18, 2018

***Project Location and Description***

The Farm at Mill Creek property is located at 3830- and 4008- 132<sup>nd</sup> Street SE. This 17.4-acre property consists of two lots (Parcel # 28053300200200 and 28053300200300). The proposed action involves constructing seven retail buildings, three residential/retail buildings, a five-story parking structure, additional surface parking stalls, and associated utilities and storm water facilities.

Talasaea Consultants identified a Category III wetland (Wetland A) on the western portion of the property. According to City of Mill Creek municipal code (18.06.930), Category III

wetlands with a high intensity land use require 100' buffers. The proposed development will encroach into this buffer anywhere from 30-98', which constitutes paper fill of 1.12 acres of Wetland A.

On-site mitigation proposed for this conversion of wetland into buffer, consists of 4.04 acres of wetland enhancement and 0.65 acres of buffer enhancement such as removing invasives and planting native species. Additional off-site mitigation involves preservation of a 61-acre area that includes Thomas Lake and wetlands associated with Penny Creek. Within this preservation area there will be 5.75-acres of habitat enhancement and creation of a trail and boardwalk system for the public.

### ***Ecology Findings***

I reviewed the revised mitigation plan and letters prepared by Talasaea to see whether my previous comments (letter dated July 17, 2018) were addressed and whether the revised proposal is acceptable.

In my July 17 letter, I questioned why Talasaea separated the wetland rating units at the first beaver dam along Penny Creek and didn't rate the entire wetland complex. Based on my review of their survey of water surface elevations and my observations from the site visit, I now concur that this break is justified.

In my July 17 letter, I disagreed with the rating of Wetland A as Category III because I think it should be a Category II wetland. Based on a review of the Talasaea letter dated October 4, 2018 and my site visit I have itemized my findings below.

- Talasaea lowered their scores for the characteristics of surface water outflow in water quality question D1.1 and hydrologic support question D4.1 and these scores are inconsistent. I disagree with their rating but it does not change their score.
- Talasaea responded to my comments on water quality questions D1.3 and D2.4 with an explanation on how they answered these questions. I now concur with their ratings so this does not change their score.
- Talasaea responded to my comment on habitat question H1.2 with an explanation on how they answered this hydroperiod question. They agree that four hydroperiods are present, so the score for question H1.2 should be 3 instead of 2.
- Talasaea responded to my comment on habitat question H1.4 with an explanation on how they answered this interspersed habitats question. They rated it as moderate while I believe it should be high so the score for question H1.4 should be 3 instead of 2.
- Talasaea responded to my comment on habitat question H3.1 with an explanation on how they answered this priority habitat question. They rated it as moderate but I believe four priority habitats are present so the score should be 2.
- Based on these revised scores the habitat site potential should be high instead of moderate and the habitat value should be high instead of moderate. This would increase the score to 21 for a Category II wetland instead of a Category III.

According to City of Mill Creek municipal code (18.06.930), Category II wetlands with a high intensity land use require 200' buffers. This increases the acreage of paper fill in Wetland A that needs to be mitigated so the Credit-Debit worksheet should be revised by Talasaea to account for this additional acreage. However, it appears that there would be enough credit generated by the preservation area to offset these additional debits.

I support the proposed on-site mitigation consisting of wetland and buffer enhancement, and the off-site mitigation in the 61-acre preservation area. Permanent protection of the Thomas Lake bog area and wetland habitat associated with Penny Creek will be a significant asset to the community. However, I still have concerns with reducing the buffer of Wetland A down to 2' in one location to maximize the footprint of this development. Because there will be temporary construction impacts from installing a retaining wall, I recommend providing at least 5' of buffer so there is enough room for a row of shrubs to grow.

If you have any questions or would like to discuss my findings, please give me a call at (425) 649-7199 or send an email to [Doug.Gresham@ecy.wa.gov](mailto:Doug.Gresham@ecy.wa.gov).

Sincerely,

A handwritten signature in black ink that reads "Doug Gresham". The signature is written in a cursive, flowing style.

Doug Gresham, PWS  
Wetland Specialist  
Shorelands and Environmental Assistance Program

By email

E-cc: Joe Burcar, Ecology  
Dave Teesdale, Talasaea Consultants  
Jessica Redman, Environmental Science Associates