



## Exhibit 16

15728 Main Street, Mill Creek, WA 98012  
Administration 425-745-1891  
Police 425-745-6175  
All Other Departments 425-551-7254

July 25, 2018

Sean Mallon, PE  
PACLAND – Seattle  
1505 Westlake Avenue North, Suite 305  
Seattle, Washington 98109

SUBJECT: TRC COMMENTS FOR CUBES SELF-STORAGE, PL2018-0013

Dear Mr. Mallon:

The City's Technical Review Committee (TRC) met on July 25, 2018, to review the above-referenced application. The TRC is comprised of City staff and staff from other agencies with jurisdiction. The purpose of the meeting was to:

- 1) Review the application for consistency with the City's adopted plans, policies and regulations;
- 2) Obtain comments from other affected agencies and districts; and
- 3) Determine the environmental impacts of the project pursuant to the State Environmental Policy Act (SEPA).

A number of issues/concerns and the need for additional information were identified at the TRC meeting. A brief description of these items, organized by department/agency making the comments, is included below.

### City of Mill Creek Public Works and Development Services Department

- 1) The City's environmental consultant, ESA has reviewed the Critical Areas Report and has comments to be addressed, see attached memorandum dated July 20, 2018.
- 2) The SEPA Checklist needs to be revised per the attached comments and updated. Please correct all references to the high-impact 200-foot buffer in the SEPA as well as all technical reports and memos. Show the 100-foot buffer on the site plan.

### City of Mill Creek Public Works Department

The City's consulting engineering firm, Perteet Engineering, reviewed the traffic study, drainage report and plan and geotechnical report. Perteet's comments to be addressed are contained in the attached drainage and traffic review memos dated July 13, 2018. Marked up plan and reports that are referenced in the review memo are also attached.

Traffic Report: Perteet's review, Condition 5, recommends collecting volumes at the site for comparison purposes. As an alternative, the Trip Generation Comparison prepared by Heath and Associates, Inc. could be updated using the currently developed portion of the site (2.46 acres) rather than the 4 acres that was used and using the correct storage facility square footage (90,425) rather than the 88,305 square feet that was used. Perteet's traffic review, Condition 1, states that access should be coordinated with WSDOT. Update the SEPA Checklist to reflect the updated traffic calculations.

Mill Creek Municipal Code (MCMC) Section 16.02.080 states that only one access point shall be allowed per developed parcel or lot unless otherwise approved by the City Engineer. Please provide a brief justification for maintaining the two access points either in the project narrative or in the traffic report.

### Snohomish County Fire District No. 7

Snohomish County Fire District No. 7 mitigation will be required. An estimate of the required mitigation is included in the Preliminary Development Impact Mitigation Checklist.

### Alderwood Water and Wastewater District

The City received comments from Development Engineer Scott Smith in an email dated July 24, 2018, which is attached. A Developer Extension Agreement (DEA) is required for the water and sewer work. The DEA is a separate application, review and approval process with Alderwood that will require its own plan set and submittal. Please contact Scott Smith directly for more information on the DEA process and/or clarification on the District's comments.

### Washington State Department of Transportation (WSDOT)

The City received comments from WSDOT in an email dated July 25, 2018, which is attached. Peter Alm, the project contact for WSDOT, requested that the site's channelization plan be submitted for review. It would be beneficial if this could happen prior to the public hearing. The construction plan and traffic control plan he requested may be submitted in conjunction with the civil plan review.

### Washington State Department of Ecology (DOE)

DOE submitted comments in a letter dated July 25, 2018, which is attached. The DOE commented on the 200-foot buffer, which underscores the importance of updating all the reports, plans, etc. to reflect the low impact use and 100-foot buffer prior to the City issuing the SEPA determination when all of the agencies will again have a chance to comment. DOE also expressed concern about the lack of detail in the conceptual mitigation plan. The City will require a final mitigation plan, wetland agreement, and performance bond for wetland improvements prior to beginning construction.

### The following agencies did not submit comments:

- Snohomish County Public Works
- City of Mill Creek Police Department
- Frontier Communications
- Community Transit
- Department of Ecology
- Snohomish County PUD

### Preliminary Development Impact Mitigation Checklist

A preliminary estimate of SEPA impact mitigation fees due later in the development review process is attached in the Preliminary Development Impact Mitigation Checklist.

### Conclusion

Please be aware that the above comments are intended to address the major concerns raised to date by the City and other agencies with jurisdiction and are based on the plans and information received. They are not to be interpreted as recommended Conditions of Approval.

### Next Steps

The City has stopped the 120-day time period for processing the application pending receipt of the revised SEPA checklist, drainage report, critical areas report, geotechnical report, traffic study and Binding Site Plan set. After the required items are submitted to the City per this letter, the SEPA determination can be issued and a public hearing before the Hearing Examiner can be scheduled. Be advised that you will be directly billed for the City's Consultant reviews and the Hearing Examiner expenses. Please resubmit online through mybuildingpermit.com.

Should you have any questions about the review process, or should you want to set up a meeting to discuss the issues addressed in this letter in more detail, please call me at (425) 921-5738.

Sincerely,



Sherrie Ringstad  
Associate Planner

Enclosures:

1. Redlined SEPA Checklist
2. Review Memorandum from Perteet Engineering dated July 13, 2018  
Binding Site Plan Redlines  
Preliminary Technical Information Report Redlines
3. Traffic Memorandum from Perteet Engineering dated July 13, 2018  
Traffic Report Redlines
4. Critical Areas Review Memorandum from ESA dated July 20, 2018  
Critical Areas Report Redlines
5. Alderwood Water District comments dated July 24, 2018
5. Email Comments from WSDOT dated July 25, 2018
6. Letter from DOE dated July 25, 2018
7. Preliminary Development Impact Mitigation Checklist

Copy to: David Pruin, Gramor Development Washington, LLC  
Travis Cheshire, PACLAND  
Director of Public Works & Development Services  
Manager of Development Services  
Supervising Engineer

David Pruin  
Gramor Development Washington, LLC  
950 North 72<sup>nd</sup> Street, Suite 100  
Seattle, Washington 98103

## TECHNICAL MEMORANDUM

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2707 Colby Avenue, Suite 900, Everett, WA 98201 | P 425.252.7700

To: Sherrie Ringstad, Associate Planner, City of Mill Creek

From: Brian Caferro, PE, Perteet

Date: July 13, 2018

Re: Review Comments for Cubes Self Storage

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This memorandum provides review comments for the Cubes Self Storage development project in the City of Mill Creek. Submittal materials were reviewed based on the project's compliance with the City of Mill Creek Municipal Code and the minimum requirements of the 2012 Stormwater Management Manual for Western Washington (SWMMWW), as amended in December 2014. Review comments are specific to drainage, grading, and TESC elements only.

### Plans

#### Sheet D-1.1 (Preliminary ESC Plan)

- Include City Standard details for silt fence, construction sequence, sediment pond, etc. on a detail sheet with the next submittal.
- Call out what type of access road material is being used and at what thickness.
- Move the upper silt fence to the top of the slope.
- Provide sediment pond calculations with the next drainage report submittal.
- Provide inlet protection for the four existing catch basins across SR 527.

#### Sheet C-2.0 (Preliminary Grading and Drainage Plan)

- The control structure rim is 1.5 feet above the pond access road. Move out of roadway or revise design so rim is not sticking up out of the road.
- Top and bottom surface areas of the live storage zone cannot be the same if there are side slopes present, which appears to be the case.
- Double check the bioretention cell surface area. It appears to be about 1,400 SF and not 1,620 SF.
- What is the 2-year storm event water surface elevation in the detention pond? Need to make sure it is not backing up into the bioretention cell. Maximum drawdown time of 48 hours within the bioretention cells needs to be maintained.

### Drainage Report

- Page 3 – City requires the 100 year event for conveyance design. Both the rational and SBUH methods are allowed.
- Minimum Requirements (MR)
  - MR #1: This requirement has been met.
  - MR #2: A SWPPP, based on the most recent Ecology template, needs to be prepared and submitted for review prior to the start of construction.
  - MR #3: If source control is required then state what BMPs will be used. If it is not required then state why.

**MEMORANDUM**

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- MR #4: This requirement has been met.
- MR #5: This requirement has been met. Infiltration is not feasible based on geotechnical investigation.
- MR #6: This requirement appears to have been met. Bioretention facility size needs to be confirmed.
- MR #7: The detention pond sizing calculations has an infiltration rate. However, the pond is supposed to have a liner to prevent infiltration. Re-size pond without infiltration.
- MR #8: This requirement has been met.
- MR #9: An operation and maintenance manual still needs to be provided.
- Page 14 – Replace the terms “rate” and “conditions” with “durations” in the first paragraph as shown in the attached report redlines.
- Page 15 – Is the detention pond area included in the proposed basin? The detention pond area needs to be included in the pond sizing calcs if they aren’t already.
- Page 15 – With a pond liner and a high groundwater elevation, will there be any upheaving from buoyance effects? If so, then an underdrain may need to be added around the pond perimeter.
- Page 15 – Provide a basin map which delineates the areas tributary to the bioretention cell and detention pond.
- Page 15 – Does the bioretention cell also need a liner?
- Page 17 – The storm event for conveyance calculations needs to be the 100-year event.
- Page 17 – A backwater analysis also needs to be performed.
- WWHM Calcs Page 5 – Area of bioretention cell needs to be included in the calcs, if it isn’t already.
- WWHM Calcs Page 7 – Detention pond sizing should not have infiltration occurring.
- WWHM Calcs Page 7 – Calcs show vertical sides, which is not the case. One side is entirely sloped (access road side) and the others are partially sloped before becoming vertical. Revise calcs accordingly.

**Geotechnical Report**

- Page 20 – Last paragraph, change “Snohomish County” to “Ecology.”

**Critical Areas Report**

- Page 5 – Last sentence of 6.2, change to the 2012 Stormwater Management Manual for Western Washington, as amended in 2014.



CUBES SELF-STORAGE MILL CREEK  
TRIP GENERATION COMPARISON

*CITY OF MILL CREEK, WA*



Prepared for: Chris Flyckt  
Pacland Engineering  
1505 Westlake Avenue North, Suite 305  
Seattle, WA 98109

May 2018

# CUBES SELF-STORAGE MILL CREEK TRIP GENERATION COMPARISON

## 1. INTRODUCTION

This report summarizes traffic impacts of the proposed CUBES Self-Storage Mill Creek project in comparison to the traffic currently emanating from the site as part of the retail nursery. The findings of this study is to provide a review of the traffic impacts created by the change of use for review by the city of Mill Creek and the WSDOT.

## 2. PROJECT DESCRIPTION

3.6 acre

2019

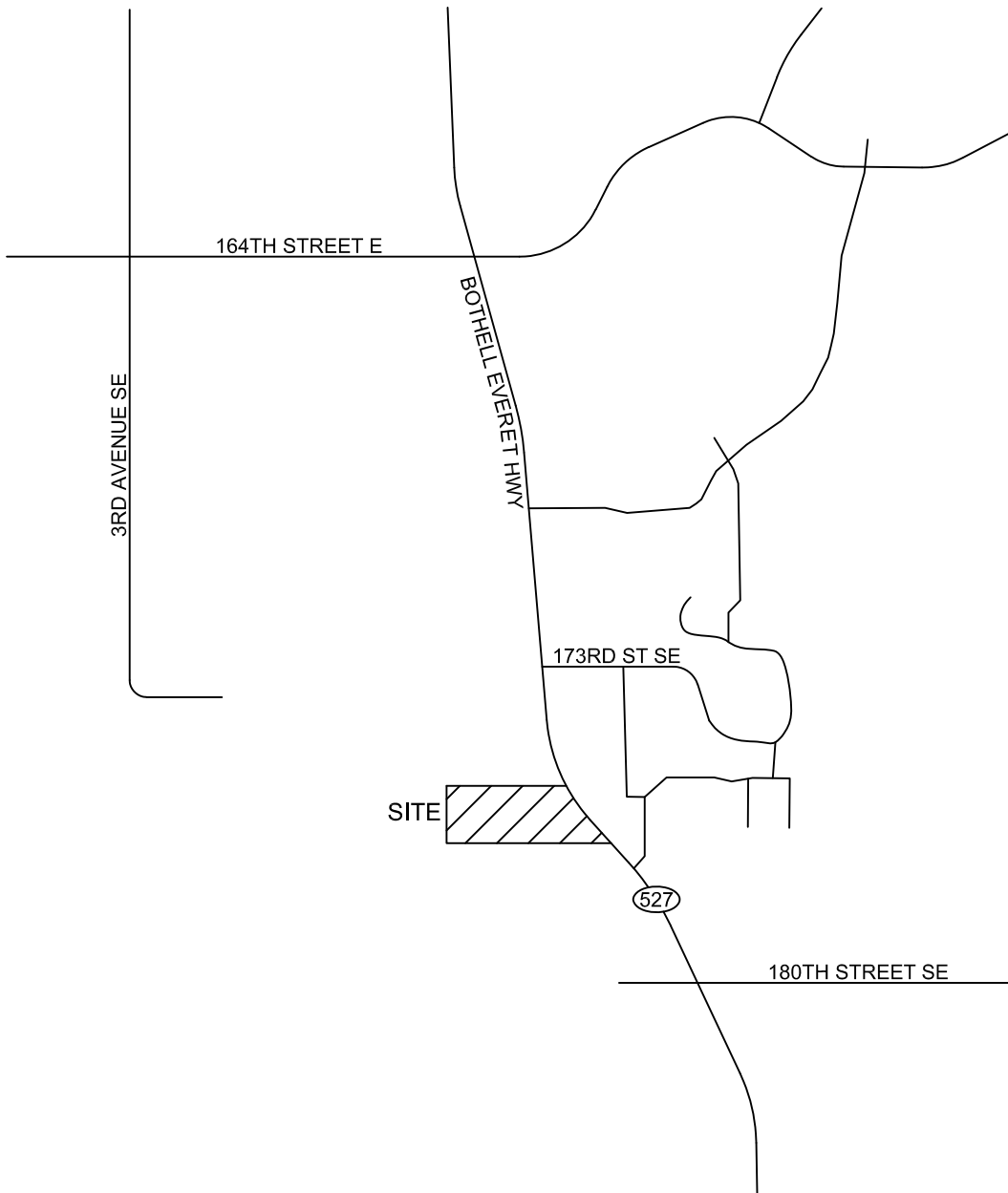
90,425

The CUBES Self-Storage Mill Creek project proposes to construct an 88,305 square foot mini-warehouse in the City of Mill Creek. The project is located at 17414 Bothell Everett Highway. Access to the site will the two existing entrances onto the Bothell Everett Highway. The current use is a 4 acre nursery with over 20,000 square feet of enclosed space. The area surrounding the project is a mix of residential and commercial land uses. The buildout year of the site is expected to be around 2018. Figure 1 on the following page shows the vicinity of the area along with the street network servicing the site. The general configuration of the project is shown on the site plan on Figure 2.

## 3. EXISTING CONDITIONS

### 3.1 Surrounding Roadway System

The site will primarily be served by the *Bothell Everett Highway (SR-527)*, which is a north-south, multilane State Route that borders the east side of the property. The speed limit is posted at 45 mph in the vicinity of the site. Typically, the cross section of the roadway is two lanes of travel in either direction along with a center two-way left turn lane. Paving is asphalt and lane widths are around 11 feet. Shoulders are curb, gutter, and sidewalk or paved in some areas. Bike lanes are provided in the vicinity of the mini-warehouse site. Grades are level.



HEATH & ASSOCIATES  
TRAFFIC AND CIVIL ENGINEERING

CUBES SELF STORAGE  
VICINITY MAP & ROADWAY SYSTEM  
FIGURE 1



### 3.2 Public Transit

A review of the Community Transit regional bus schedule transit service is provided in the vicinity of the site. Route 105 serves from the Mariner Park & Ride to Bothell between the hours of 4:42 AM and 10:45 PM. Stops are provided along SR 527. Route 435 runs from Mill Creek to Seattle. Service is available from 5:34 AM to 6:55 PM. Stops are provided along SR-527. The mini-warehouse use has less demand than the existing nursery use.

### 3.3 Sight Distance at Access Driveways

Assessments of the proposed access driveways were made to determine whether or not adequate entering sight distance (ESD) can be provided for project traffic. Sight distance requirements were obtained from the *American Association of State Highway and Transportation Officials* (AASHTO) standards for outbound movements. Based on preliminary examinations of the proposed access location, sight distance requirements are met. Measurements at the proposed entrances are summarized in Table 1 below.

The sight distance for the site access will be reviewed at the time of civil plan review.

**Table 1**  
*Entering Sight Distance (ESD)*  
*Measurements given in feet*

Roadway	Posted Speed Limit	Direction	Recommended	Available
Bothell Everett Hwy And Both Entr.	45 mph	North	500	>600
		South	500	>600

## 4. TRIP GENERATION COMPARISON

Trip generation is used to determine the magnitude of project impacts on the surrounding street system. Data presented in this report was taken from the Institute of Transportation Engineer's publication *Trip Generation*, 10th Edition. The designated land uses studied for the site are defined as Nursery (Garden Center - LUC 817) for the existing use and Mini-Warehouse (LUC 151) for the proposed use. Volumes for the peak hours are shown on the following page in Table 2. Given, are average daily trips (ADT), AM peak hour and PM peak hour trip generation volumes for each of the uses. The independent variable for the Nursery use was assumed to be the 4 acres for the property versus the 20,000 square feet of enclosed space which is beyond the data limits in the ITE manual.

**Use the 2.46 developed acres**

**TABLE 2**  
Project Trip Generation - Difference

Time Period	Exist Nursery	New Mini WH	Difference
ADT	432 vpd	133 vpd	-299 vpd
AM Peak Inbound	6 vph	5 vph	-1 vph
AM Peak Outbound	5 vph	4 vph	-1 vph
<b>AM Peak Total</b>	<b>11 vph</b>	<b>9 vph</b>	<b>-2 vph</b>
PM Peak Inbound	16 vph	7 vph	-9 vph
PM Peak Outbound	16 vph	8 vph	-8 vph
<b>PM Peak Total</b>	<b>32 vph</b>	<b>15 vph</b>	<b>-17 vph</b>

(vpd: vehicles per day; vph: vehicles per hour)

Use 2.46 developed acres for the calculations - rather than 4 acres. Or use actual counts as recommended by Pertert.

## 5. CONCLUSIONS AND MITIGATION

90,425

2.46

The CUBES Self-Storage Mill Creek project proposes to remove an existing 4 acre nursery-garden center and replace it with a 88,305 square foot mini-warehouse. The site location is at 17414 Bothell Everett Highway in the City of Mill Creek. Access to the site will be provided by the same two entrances currently serving the nursery.

On a daily basis, an estimated 299 trips would be removed from the site. The AM peak hour would see a reduction of 2 trips and the PM peak hour would see a reduction of 17 trips.



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 July 20, 2018

to Tom Rogers, City of Mill Creek

from Jessica Redman, Associate Biologist

subject Cubes Self Storage – Critical Areas Report and Conceptual Mitigation Plan Review

At the request of the City of Mill Creek (City), Environmental Science Associates (ESA) reviewed the *Critical Areas Report and Conceptual Mitigation Plan – Cubes Self Storage*, prepared by Talasaea Consultants, Inc. (dated June 22, 2018, and hereinafter referred to as the Report). The property for the proposed project is a 6.6-acre parcel located at 17414 State Route (SR) 527 in Mill Creek, WA (Snohomish County Parcel 27050700401300). The parcel is currently used as a plant nursery and garden store with parking and several associated outbuildings. The applicant has submitted a formal application of development of an approximately 90,000 square foot (SF), 3-story storage facility (Project). A site plan developed by PacLand (dated June 25, 2018) was also reviewed. The storage facility will consist of two separate buildings (Building A North and Building A South). In addition to the buildings, the Project includes the construction of a driveway, 25 parking spaces, and stormwater improvements including a stormwater detention pond and a bioretention cell. The purpose of this review is to determine if the proposed project complies with Mill Creek Municipal Code (MCMC) Chapter 18.06 – *Environmentally Critical Areas*.

ESA visited this site on April 20, 2016 while reviewing an application for the adjacent site to the south. A second site visit was conducted on November 1, 2017 and was also attended by the applicant and their biologist (Talasaea).

## Report Summary

According to the Report, one wetland (Wetland A) occurs onsite. Wetland A is part of the large North Creek wetland complex that extends offsite to the west. Wetland A is a Category II wetland, which requires a 200-foot buffer per Mill Creek Municipal Code (MCMC) 18.06.930. No direct impacts to the wetland are proposed. However, a portion of the proposed development would encroach into the standard 200-foot buffer; the applicant is requesting that the encroachment be permitted under the Reasonable Use provisions of MCMC 18.06.430. With the exception of the stormwater facilities, the majority of the development will occur in areas of the buffer that have already been impacted by grading and fill to accommodate current and previous uses. In these areas, existing grades will generally be maintained. The proposed stormwater facilities will be located immediately west of the proposed building and parking lot. A dispersion trench would be located downslope of the stormwater

pond, within the wetland buffer. According to the plan sheets, grading will occur in this area to accommodate the facilities.

To offset the impacts to the buffer of Wetland A, the applicant is proposing the following:

- Wetland Enhancement – 36,733 SF of Wetland A will be enhanced through the removal of invasive species and the subsequent planting of native trees and shrubs,
- Buffer Restoration – 27,647 SF of the buffer of Wetland A will be restored through the removal of existing structures, refuse, debris, and invasive species. Generally, this area is the location of the proposed stormwater facilities and will be planted with native shrubs and trees post-construction,
- Buffer Enhancement – 11,889 SF of the buffer of Wetland A will be enhanced through the removal of invasive species and the subsequent planting of native trees and shrubs.

Post-construction the mitigation area will be monitored for a period of five years to ensure goals, objectives, and performance standards are met. Details of the monitoring plan were not included in the Report, and will be submitted in a final mitigation plan at a later date.

## **Review Comments and Recommendations**

Based on the site visits and document review, we have the following comments and recommendations:

- Based on conversations with the City, the City considers stormwater facilities to be a low-impact land use and therefore, the standard buffer width of Wetland A should be 100 feet. We recommend the Report be revised to include a 100-foot buffer. We also recommend the 100-foot buffer be included on Sheets W1.0 through W3.0 and the site plan.
- Page 5 of the Reports states “the design has been completed to meet or exceed the stormwater requirements as required by the City of Mill Creek, which is currently using the *February 2005 DOE Stormwater Management Manual for Western Washington*.” However, per MCMC 15.14.060, the City has adopted the *2012 Stormwater Management Manual for Western Washington, as amended in December 2014*. We recommend the Report be revised to include this manual and stormwater facilities be modified as necessary to meet the requirements of the adopted manual.
- We recommend a detailed monitoring plan be developed per MCMC 18.06.630 to ensure mitigation efforts are successful. Monitoring should be performed for a minimum of 5 years and may be extended if the deemed necessary by the director.
- We agree that the proposed development meets the requirements of reasonable use per MCMC 18.06.430. Though some alteration of existing contours will be required to install the stormwater facilities, we believe only the minimum alterations necessary are being proposed to accommodate these facilities. Furthermore, the mitigation proposed would reduce the developed footprint of the site from 2.46 acres to 1.84 acres; remove all structures, trash, and debris, from the buffer; and subsequently plant the buffer and on-site wetland with structurally diverse native vegetation; all which will provide an ecological functional lift to the buffer and increase protection of the wetland.

- We understand from the Project’s SEPA Checklist that contaminated fill material and soils are present onsite. We recommend that the wetland be avoided during the removal of the soils and fill material. We also recommend that the hazardous material supervisor is aware of the buffer enhancement work to ensure contaminated soils are properly removed and appropriate soil is brought onsite for the restoration and enhancement work.

Based on our review, we have determined that the *Critical Areas Report and Conceptual Mitigation Plan – Cubes Self Storage* is reasonable with respect to MCMC Chapter 18.06 –*Environmentally Critical Areas*

**From:** Scott Smith <SSmith@awwd.com>  
**Sent:** Tuesday, July 24, 2018 7:28 AM  
**To:** Sherrie Ringstad  
**Cc:** Tom Rogers; Christi Amrine; Hortillosa, Gina  
**Subject:** RE: TRC Scheduled for CUBES Self-Storage

I will be unable to attend the TRC meeting on 7/25, but following are AWWD comments on the proposed CUBES self storage facility.

- 1) A Developer Extension agreement (DEA) will be required for the water and sewer work on the project. The DEA is a separate application, review and approval process with Alderwood that will require its own plan set and submittal. The applicant can contact me directly for more information on the DEA process and clarification on the comments below.
- 2) The public sewer main will need be extended from the proposed manhole on the Learning Experience project to the northern property line as shown on the preliminary plans. The sewer main should be located outside the WSDOT right-of-way.
- 3) A 6-inch side sewer will be required for each individual building, and sewer pre-treatment (PT) facilities may also be required. A Commercial Use Survey will be required with the DEA application to screen for PT requirements.
- 4) Each building will require an individual domestic water meter per AWWD Development Standards 2-2.130. The domestic and irrigation meters will also require appropriate backflow prevention, either an RPBA or DCVA, depending on building uses noted in the Commercial Use Survey.
- 5) Each building will also likely require an individual fire service line with a DCDA for backflow prevention per AWWD standard detail WD-20. This requirement is subject to review by an internal committee as part of the DEA process.
- 6) All meters and backflow prevention vaults should be located at the property line and outside the drive aisle and parking areas.
- 7) While not a direct water / sewer issue, I believe your City code and State law only allow for one access point on the property, not two driveways as shown. It is also up to WSDOT to determine the operational conditions, i.e. RIRO or full access for turn movements.

Let me know if you have any questions or need clarification on anything. Thank you.

**Scott Smith, P.E.**  
Development Engineer  
Engineering & Development Department  
Alderwood Water & Wastewater District  
3626 156th Street SW. Lynnwood, WA 98087  
Direct 425-741-7977 \* Fax 425-742-4562  
[www.awwd.com](http://www.awwd.com)

Please include the AWWD project number and name in the subject line (if applicable) for our record management purposes.

For example; DE 2753G SDS Manor or W2704 Smith Water Main. Thank you.

This email is a public document and is subject to public disclosure if requested by another party.

**From:** Alm, Peter <AlmP@wsdot.wa.gov>  
**Sent:** Wednesday, July 25, 2018 7:57 AM  
**To:** Sherrie Ringstad  
**Cc:** Frantz, Randy  
**Subject:** RE: TRC Scheduled for CUBES Self-Storage  
**Attachments:** Site\_Plan+6.25.2018.pdf

Hello Sherrie,

Thank you for your email and I'll be your point of contact for this project. At this point I only have a few recommendations (below), but when available, please send me the following three items which I will need to have reviewed and approved. The three items are; (1) the site's construction plans where the site impacts SR 527 including curbs and gutters, (2) the site's channelization plan and (3) the site's traffic control plan.

In regards to your access questions please see chapter 540 of the [WSDOT Design Manual](#). I believe at this location SR 527 is a Class 3 highway. Also, it was noticed that the detectable warning surface at the curbs were setback a bit, but they need to be located at the back of curb (circled red on the attached site plan).

Please contact me if you have any questions.

Thank you,  
**Peter Alm**  
WSDOT – NW Region Development Services  
**206-440-4711**  
PO Box 330310 MS 240  
15700 Dayton Avenue North  
Seattle, WA 98133-9710

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**From:** Sherrie Ringstad <[sherrier@cityofmillcreek.com](mailto:sherrier@cityofmillcreek.com)>  
**Sent:** Tuesday, July 24, 2018 8:10 AM  
**To:** Pazooki, Ramin <[PazookR@wsdot.wa.gov](mailto:PazookR@wsdot.wa.gov)>  
**Subject:** FW: TRC Scheduled for CUBES Self-Storage

Good Morning,  
Have you had a chance to review the CUBES Self-Storage project? Will WSDOT have comments on the access (to SR 527)? The existing use (a nursery), which has been there many years has two entries. Can these two access points be maintained with the new use? Currently one of the driveways is restricted to RIRO only and the northern most entry is allowed full access. Will that change?  
Thanks  
Sherrie



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

*Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000  
711 for Washington Relay Service • Persons with a speech disability can call (877) 833-6341*

July 25, 2018

Ms. Sherrie Ringstad  
City of Mill Creek  
15728 Main Street  
Mill Creek, WA 98012

**Re: Cubes Self-Storage Project, 17414 Bothell-Everett Hwy.  
Project# PL2018 0014, Ecology SEPA# 201803614**

Dear Ms. Ringstad:

Thank you for the opportunity to provide comments on the **Cubes Self-Storage Project**. Based on review of the State Environmental Policy Act (SEPA) checklist associated with this Project, the Department of Ecology (Ecology) has the following comments:

**SHORELANDS AND ENVIRONMENTAL ASSESSMENT PROGRAM**

**Doug Gresham, [Doug.Gresham@ecy.wa.gov](mailto:Doug.Gresham@ecy.wa.gov) at (425) 649 7199**

Thank you for sending information on the proposed Cubes Self-Storage project located in Mill Creek. Based on my review of the project documentation, I recommend the applicant reduce the amount of buffer encroachment and provide a detailed mitigation plan.

Literature Sources Reviewed

The project submittal reviewed by the Washington Department of Ecology (Ecology) included:

- Critical Areas Report and Conceptual Mitigation Plan-Cubes Self-Storage, Mill Creek, prepared by Talasaea Consultants, Inc., dated June 22, 2018.
- Site Plan Drawings for Cubes Self-Storage, prepared by PacLand, dated June 25, 2018.
- Environmental Checklist for Cubes Self-Storage, prepared by Gramor Development Washington LLC, dated June 25, 2018.

Project Location and Description

The project site is located at 17414 Bothell-Everett Highway, in Mill Creek, Snohomish County, Washington. This 3.6-acre property (Parcel # 27050700401300) contains a plant nursery and disturbed areas. The proposed action by Gramor Development Washington,

Ms. Sherrie Ringstad  
July 25, 2018  
Page 2

LLC involves constructing a three-story self-storage building, parking areas, access driveways, storm water facilities, and associated utilities.

Talasaea identified a Category II wetland (Wetland A) on the western edge of the property, which extends off-site. According to City of Mill Creek municipal code (18.06.930.B), Category II wetlands require 200-foot buffers. The proposed development will significantly encroach into this buffer, so they requested a reasonable use exception (18.06.430).

Compensatory mitigation for this buffer encroachment involves 36,733 square feet of wetland enhancement, 27,647 square feet of buffer restoration, and 11,889 square feet of buffer enhancement. This enhancement and restoration includes removing infrastructure, amending the soil, invasive species removal, and supplemental planting of native species.

### Ecology Concerns

I am concerned with the proposed reduction of the 200-foot buffer down to approximately 50 feet in order to accommodate the development footprint. Although the wetland buffer has historically been disturbed by greenhouses and nursery buildings, this non-conforming land use does not have to be continued into the future based on existing regulations. It appears there are other reasonable economic uses of this property that do not require reducing the buffer down to 50 feet.

The conceptual mitigation plan lacks many details on how enhancement and restoration would be implemented. More information should be provided on mitigation goals, objectives, performance standards, and monitoring methods. The City should require a final mitigation plan following the standards in Wetland Mitigation in Washington State – Part 1: Agency Policies and Guidance (Ecology Publication #06-06-011a).

Thank you for considering these comments from Ecology. If you have any questions or would like to respond to these comments, please contact the commenter listed above.

Sincerely,



Tracy Nishikawa  
SEPA Coordinator

Sent by email: Sherrie Ringstad, [sherrier@cityofmillcreek.com](mailto:sherrier@cityofmillcreek.com)

cc: David Pruin, Gramor Development Washington, LLC

ecc: Doug Gresham, Ecology

# City of Mill Creek

## Development Impact Mitigation Fee Program

The City of Mill Creek uses the authority granted in MCMC 17.48 to assess fees to mitigate identified impacts of new development on public facilities/services. Public facilities for which mitigation is required and the typical fees<sup>1</sup> assessed are listed below:

Project Name: Cubes Self-Storage			
Facility/Service		Mitigation	
City of Mill Creek Neighborhood Parks *			
Where land acquisition and development are necessary. (see note below)	\$3,304.40	Per owner-occupied (condominium/single-family) unit	N/A
	\$2,227.41	Per renter-occupied (multifamily) unit	
Where only development is necessary.	\$2,863.76	Per owner-occupied (condominium/single-family) unit	N/A
	\$1,930.38	Per renter-occupied (multifamily) unit	
City of Mill Creek Community Parks * (see note below)	\$1,738.67	Per owner-occupied (condominium/single-family) unit	N/A
	\$1,171.99	Per renter-occupied (multifamily) unit	
City of Mill Creek Transportation	\$3,000.00	Per PM Peak Hour vehicle trip on identified road segment (subject to verification of Traffic Study)	TBD
Snohomish County Transportation	N/A	Determined by Snohomish County Public Works – Call 388-6440 for information	N/A
Snohomish County Fire Protection District # 7	\$365.00	Per equivalent dwelling unit (2,400 square feet)	\$13,753.20
Everett School District (Fees effective as of January 1, 2018)	\$4,284.00	Per single-family dwelling unit	N/A
	\$0.00	Per multifamily dwelling unit with zero-one bedroom	
	\$2,233.00	Per multifamily dwelling unit with two or more bedrooms	

\* The public park and recreation facilities mitigation assessments shown above reflect the 25 percent discount authorized in Resolution 2013-503; for the full assessment amounts see the resolution. The twenty-five percent discount shall remain in full force and effect until such time as the Council adopts a resolution altering the discount rate and/or the formulas.

The following supporting documents are available on the Master Permit Application page of the City's website:

1. MCMC 17.48 - Development Impact Mitigation Ordinance
2. City of Mill Creek Resolution 2013-503 RE Park Impact Mitigation
3. City of Mill Creek Ordinance 2011-735 RE Traffic Impact Mitigation
4. City of Mill Creek/Snohomish County Interlocal Agreement RE Traffic Impact Mitigation
5. City of Mill Creek/Snohomish County Fire Protection District No. 7 Interlocal Agreement RE Fire Facilities/Services Impact Mitigation
6. City of Mill Creek/Everett School District Interlocal Agreement RE School Facilities Impact Mitigation
7. Letter from the Everett School District Updating School Mitigation Fees, dated December 13, 2017