



LEROY SURVEYORS & ENGINEERS, INC.

Surveying • Engineering • Geology • Septic Design • GPS • GIS Mapping

Exhibit 3.g

Biologist Submittal Narrative Memo



TECHNICAL MEMORANDUM

To: Barb Kincaid, AICP
City of DuPont Director of Public Services
Department of Community Development
1700 Civic Drive
DuPont, WA 98327

Date: December 4, 2023

From: Grette Associates, LLC
2709 Jahn Ave NW, Suite H-5
Gig Harbor, WA 98335

Re: Champions Center Development (PLNG2023-002): Critical Areas Submittal Narrative

Mustard Seed Legacy Development LLC ("Mustard Seed") is proposing the construction of an approximately 22,850 SF Religious Assembly building with interconnected parking lots, coordinated landscaping and lighting, and a 3,000 SF accessory retail building within the City of DuPont. Also included in the proposal are accessory uses for electric vehicle charging facilities that would be open to the general public. The proposed development would occur on four existing lots (proposed to be reconfigured into three lots) located at the corner of DuPont-Steilacoom Road and Barksdale Avenue within the City of DuPont. The parcel numbers for the existing lots are 0119362039, -2009, -2012, and -2043.

Portions of the existing site contain wetland and stream habitat along with their required buffers. The north and west portions of the site contain Bell Marsh, a large wetland complex. In the south end of the wetland, a large stormwater outfall empties into the wetland from a stormwater pond south of I-5 on Joint Base Lewis-McChord. This outfall forms the headwaters of a stream that flows through the wetland, exiting the wetland in the northeast corner and eventually emptying into Sequelitchew Creek. The existing wetland and stream along with their buffers are discussed in the Critical Areas Report prepared for the project by Grette Associates (2019).

Mustard Seed is applying for a Critical Areas permit for the project. The purpose of this technical memorandum is to document the project's compliance with the City of DuPont's Critical Area permit submittal requirements. Specifically, this technical memorandum details how the project satisfies the permit review criteria found in DuPont Municipal Code (DMC) 25.105.080(4)(a).

DMC 25.105.080 Critical area permit submittal requirements

(4) Permit Review Criteria

- (i) Mustard Seed and their design team have gone to considerable lengths to design the project such that impacts to critical areas and buffers regulated by the City of DuPont are avoided and minimized. Earlier concepts included impacts to wetlands, streams, and a significant oak stand on the property. Significant changes to the design have resulted in the minimization of environmental impacts, including no direct impacts to wetlands or

streams, and minimal impacts to wetland and stream buffers and the preservation of most of the oak trees on the property. To offset the remaining impacts to buffers on the site, Mustard Seed proposes to enhance the remaining wetland and stream buffers, including removal of invasive and non-native vegetation and planting of native tree and shrub species. See the Buffer Enhancement Plan and Habitat Management Plan submitted with this application

- (ii) The proposed project does not pose any threat to public health, safety, or welfare on or off the site. The project has been designed in accordance with all applicable planning and engineering requirements imposed by the City of DuPont for the safety and welfare of the public.
- (iii) The proposed project is consistent with the general purposes of this chapter and the public interest. Development of the project, including responses to site constraints such as the wetland, stream, oak stand, and their respective buffers, will comply with all applicable provisions of Chapter 25.105 of the DMC. As such, the project will result in the protection and enhancement of the wetland, stream, remaining oak trees, and buffer habitat on the site, in furtherance of the general purposes of DMC Chapter 25.105 and of the public interest.
- (iv) The project proposes to reduce portions of the standard wetland buffer and stream buffer on the site to accommodate the extents of the project. As such, a Buffer Enhancement Plan (wetland buffer reduction) and a Habitat Management Plan (stream buffer reduction) have been prepared in accordance with DMC 25.105.050. These plans describe enhancement and monitoring actions meant to mitigate any adverse impacts to the wetland and stream critical areas on the site.
- (v) The Buffer Enhancement Plan and Habitat Management Plan are consistent with the best available science for protecting the functions and values of the wetland, stream, and buffer habitat within the property. Both plans provide for the enhancement of buffer areas through the removal of invasive vegetation and planting of native species, which is intended to improve wildlife habitat, provide screening from human activities, and provide improved runoff filtration. Both plans also provide for long-term monitoring to ensure success of the enhancement and functioning of the buffer areas.
- (vi) The proposed project is consistent with other applicable regulations and standards. As the project was redesigned to avoid direct impacts to wetlands or streams, no environmental permits or authorizations are required from State or Federal agencies, such as the WA State Department of Ecology or the U.S. Army Corps of Engineers. Furthermore, the project team has been in close communication with the City of DuPont throughout the design process to ensure all applicable City environmental regulations and standards are met by the proposal.