



September 21, 2023

Mercer Island Community Planning & Development
Attn: Molly McGuire
9611 SE 36th Street
Mercer Island, WA 98040

RE: Laban Remodel – 10 Brook Bay Rd – Applicant’s Response to ESA 7/31/23 Peer Review

Wetland Resources, Inc. (WRI) received written correspondence from the City’s third-party reviewer (ESA) for the Laban Remodel (memo date: 7/31/23, authors: Maggie Bradshaw and Rachelle Tews, subject: 2301-163 SUB1 Peer Review Request; 10 Brook Bay Rd, Mercer Island, WA 98040). The following narrative re-states all ESA recommendations, as stated on page 2/3 of the review memo, as italicized, indented text. The applicant’s response immediately follows as justified, normal text.

Though the project is generally consistent with the requirements of MICC 19.07.130, additional measures to protect environmental quality may be required. The CAS could provide additional information regarding the hardscape removal and provide a simple planting palette of native shrubs within the area.

Applicant’s response:

-Page 2 of the revised 9/21/23 CAS provides additional information regarding the hardscape removal.
-The Mercer Island City Code states that mitigation measures for watercourse and watercourse buffer impacts “shall achieve equivalent or greater ecological function...” The proposed project achieves equivalent or greater function by reducing lot coverage and hardscape area, and is therefore in compliance with MICC 19.07.180.E.

Per MICC 19.07.100, applicants shall implement sequential measures to avoid, minimize, and mitigate impacts to environmentally critical areas and associated buffers. Though briefly mentioned in the CAS, ESA recommends a more thorough analysis of how mitigation sequencing has been applied be added to the CAS.

Applicant’s response:

A more thorough mitigation sequencing analysis has been provided on page 3 of the revised 9/21/23 CAS.

Please reach out with any additional questions.

Wetland Resources, Inc.

Niels Pedersen
Senior Wetland Ecologist, PWS #3087

Enclosure: Revision 1 9/21/23 Critical Area Study