



memorandum

date December 12, 2019

to Nicole Gaudette, Senior Planner

from Christina Hersum and Scott Olmsted, Biologists, ESA

subject CAO19-014 – Environmental Review for Headrick Property Redevelopment, Resubmittal

Environmental Science Associates (ESA) has prepared this memorandum on behalf of the City of Mercer Island (City) to provide environmental review of resubmitted materials prepared for the redevelopment proposal located at 8822 SE 62nd Street in Mercer Island, Washington. The project proposes to reconfigure an existing pool and patio, construct a new detached garage, and expand an existing driveway on Parcel 8650500040. ESA has previously reviewed the Critical Areas Study and Buffer Restoration Plan for Headrick – 8822 SE 62nd St Redevelopment (WRI, 2019), Project Plans for Headrick Garage and Pool Addition (Ned Nelson, 2019), and Muckleshoot Tribe Comment Email re: Headrick Project, most recently in our September 17, 2019 letter.

The purpose of this memo is to verify the accuracy of the Comment Response memo (dated October 25, 2019), Watercourse Classification memo (dated October 29, 2019), and revised Critical Areas Study (CAS) (dated October 25, 2019) prepared by the applicant's consultant, Wetland Resources Inc. (WRI). These documents were resubmitted with the application for CAO019-014, along with responses to our previous recommendations and confirmation that the proposal is consistent with Mercer Island City Code (MICC) Chapter 19.07. This project is vested under the November 2017 version of MICC 19.07, not the newly adopted 2019 critical areas regulations.

The applicant adequately addressed all recommendations from our September 17, 2019 review memo, providing details in the Comment Response memo, Watercourse Classification memo, and revised CAS and Buffer Restoration Plan that clarify stream classification and compliance with MICC 19.07 standards. There are no remaining environmental code requirements that need to be addressed by the applicant. A summary of previous review recommendations, updates to the CAS, and discussion provided in the Comment Response and Watercourse Classification Memos are detailed below (Table 1).

TABLE 1. SUMMARY OF ESA’S SEPTEMBER 2019 RECOMMENDATIONS AND ASSESSMENT OF THE OCTOBER 2019 RESUBMITTAL MATERIALS.

ESA’s September 2019 Recommendations	Assessment of WRI’s Comment Response Memo, Watercourse Classification Memo and CAS and Buffer Restoration Plan
<i>Recommendation 1</i>	
Provide more information regarding the stream gradient and potential for fish use to determine the stream type per the interim rule, WAC 222-016-031.	Discussion in the Watercourse Classification memo provides adequate information and justification for the stream typing of Stream A consistent with WAC 222-016-031.
<i>Recommendation 2</i>	
Revise the CAS and Buffer Restoration Plan to include impacts and mitigation for proposed stormwater infrastructure within Stream A and the 35-foot buffer.	Discussion within the Comment Response memo, and revised CAS and Buffer Restoration Plan addresses impacts and provides adequate mitigation for the proposed stormwater infrastructure within Stream A’s buffer. No stormwater infrastructure is proposed within Stream A.
<i>Recommendation 3</i>	
Revise Performance Standard 1b1 of the Buffer Restoration Plan to require 70 percent aerial cover at Year 5, including suggestions for planting species and spacing to achieve that standard.	<p>Discussion in the Comment Response memo, and the revised CAS and Buffer Restoration Plan indicate that Performance Standard 1b1 has been updated to require 70 aerial percent cover at Year 5.</p> <p>It does not appear that the densities of proposed plantings within the buffer restoration area have been increased in the Buffer Restoration Plan based on our recommendations. There is no code requirement to increase plant density, but the mitigation project is required to achieve vegetation cover performance standards or contingency measures may be necessary. Should the planting plan fail to meet the 70 percent aerial cover requirement at Year 5, then additional plant density would be required at that time.</p>
<i>Recommendation 4</i>	
Consider revising the Project Plans to avoid direct impacts to Stream A from stormwater infrastructure construction.	Discussion in the Comment Response Memo and the revised CAS indicate that direct impacts to Stream A have been avoided.

Based on our review of the October 2019 resubmittal materials, we believe that the revised CAS and Buffer Restoration Plan are consistent with MICC 19.07 requirements.

Limitations

Within the limitations of schedule, budget, and scope-of-work, we warrant that this review was conducted in accordance with generally accepted environmental science practices, including the technical guidelines and criteria in effect at the time this review was performed. No other warranty, expressed or implied, is made.

If you have any questions, please contact us at 206-576-3790.