



October 25, 2019

Ned Nelson  
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Bainbridge Island, WA 98110

**RE: Headrick Garage and Pool Addition (CAO19-014) - Applicant's Response to 9.17.19 City Review Comments**

Wetland Resources, Inc. (WRI) recently received a letter from City of Mercer Island planning staff (date: September 17, 2019, subject line: Review Comments for File No. CAO19-014 - Headrick Garage and Pool Addition 8822 SE 62<sup>nd</sup> Street, Mercer Island, WA 98040; King County Tax Parcel #865050-0040). The letter requests additional information prior to finalizing the application. The following narrative re-states all comments made by City staff as italicized, indented text, which are immediately followed by the applicant's response as justified, normal text. This memo is intended to provide adequate information for City staff to complete review of the Critical Areas Determination for this project.

*1. The City agrees that Stream A is a seasonal stream. There are no records of fish use in Stream A, therefore WRI contends that this watercourse should be classified as a Type 3 stream per MICC 19.07.070. The City does not fully agree with the Type 3, non-fish bearing stream classification of Stream A based upon observations during our site visit and the rules of WAC 222-16-031. The WAC rules state that fish use is presumed for waters with 2 feet or greater bankfull width and 16 percent or less gradient. The stream gradient is not provided in the Critical Area Study. More information regarding the stream gradient is needed to determine fish use and stream type classification.*

**Applicant's response:** Based on observed steep topography using publicly available LIDAR information, the applicant took physical measurements in an area immediately downstream of the subject property. Stream gradient was determined to be 21°, which precludes fish use according to the WAC. A formal memo was drafted to support the applicant's findings (date: 10.29.19, title: RE: Headrick Garage and Pool Addition Watercourse Classification Memo - CAO19-014). This memo is provided as an enclosure to this review comment response letter.

*2. Please revise the Critical Area Study to address permanent and temporary impacts to the buffer or Stream A resulting from proposed stormwater infrastructure construction and to include mitigation for these impacts. Consider revising the plans to avoid direct impacts to Stream A from stormwater infrastructure construction.*

**Applicant's response:** Temporary and permanent impacts are addressed in a revised Critical Area Study (date: 10.25.19, title: Critical Area Study for Headrick Garage and Pool Addition - 8822 SE 62<sup>nd</sup> St). The plan has been revised to avoid directly impacting Stream A. Impacts and mitigation are specifically discussed on the following pages of the report, which is included as an enclosure to this letter: Page iv (Executive Summary), Page 2 (Section 1.2 Project Description), Page 3 (Section 1.4 Critical Area Impacts and Mitigation), and Pages 10-17 (Section 4.0 Buffer Restoration Plan).

3. According to Performance Standard 1b1 of the Buffer Restoration Plan, installed and native volunteer species shall achieve 50 percent aerial cover by Year 5. Please increase aerial cover to 70 percent as 50 percent aerial cover is a low requirement for Year 5 aerial cover performance standards. To help achieve 70 percent aerial cover by Year 5, the following is recommended based on the proposed plantings and quantities: increase the density of proposed plantings (e.g. use 4-foot spacing for shrubs and 2-foot spacing for groundcovers); and/or install additional salmonberry plantings rather than strawberry groundcover plantings.

**Applicant's response:** Areal cover has been increased to 70 percent for Year 5 in the revised Critical Area Study. See Page 15 (Section 5.1 Goals, Objectives, and Performance Standards).

*Wetland Resources, Inc.*

A handwritten signature in black ink, appearing to read "Niels Pedersen", with a long horizontal flourish extending to the right.

Niels Pedersen  
Senior Wetland Ecologist, PWS #3087

*Enclosures:*  
*Watercourse Classification Memo,*  
*Revision 1 Critical Area Study for Headrick Garage and Pool Addition - 8822 SE 62<sup>nd</sup> St*