



Seaborn Pile Driving  
1080 W Ewing St. Bldg B  
Seattle WA 98119  
[seabornpiledriving.com](http://seabornpiledriving.com)

## Review Response

Date: 4/12/2023

Project Name: SHL22-026 Helms Retaining Wall

Response To: SHL22-026 SUB3 Review Letter; 7234 W Ridge Rd, Mercer Island, WA

Dear Grace,

This letter is in response to the corrections for SHL22-026. Below are our responses to the questions/comments from April 3rd.

1. The current exemption references a bulkhead: "Construction of the normal protective bulkhead common to single-family residences. A "normal protective" bulkhead includes those structural and nonstructural developments installed at or near, and parallel to, the ordinary high water mark for the sole purpose of protecting an existing single-family residence and appurtenant structures from loss or damage by erosion."

The current proposed structure is a rockery/retaining wall. You will need to show how the proposed structure meets the definition of bulkhead per MICC 19.10.010: "Bulkhead: A solid or open pile of rock, concrete, steel, timber or other materials erected parallel to, and normally erected at, the ordinary high water line for the purpose of protecting adjacent property from waves or currents." If it cannot be shown, then the project will have to meet another exemption.

**The rock retaining wall (both as existing & proposed) meets the WAC definition of a normal protective bulkhead quoted above: it is a structural development installed near and parallel to the OHWM, and it serves the purpose of protecting the upland single-family residence & appurtenant structures from damage by erosion. Therefore, the project scope meets the required criteria to qualify as an exemption under WAC 173-27-040(2)(c). The exemption criteria for this project does not note that we need to meet the MICC definition, so we are moving forward with the WAC definition and previous requirements for past projects.**

**The previous correction response letter, submitted 3/24/23, includes the analysis of how the project meets all applicable city SMP standards for Bulkheads and Shoreline Stabilization Structures, per MICC 19.13.050(B).**

Thank you for your time,

Madison Johnson  
Permit Manager  
206-236-1700  
[permits@seabornpiledriving.com](mailto:permits@seabornpiledriving.com)