

SHORELINE EXEMPTION PROJECT NARRATIVE

This Shoreline Exemption application is made in tandem with permit application 2309-061, a request to replace an existing deck in situ, reusing the existing footings to the fullest extent possible. The narrative below will describe how this project meets the criteria for exemption per WAC 173 27-040.2.b: normal maintenance or repair of existing structures.

This deck is part of an existing single family residence, located at 4327 Forest Ave SE, recently purchased by the Grant & Natasha Garcia. At the time they took ownership, this existing deck was in a state of advanced deterioration, as described in the inspection report, and was deemed unsafe for their children. At some point in the past, the originally-permitted deck (consisting of open cedar decking on joists) had plywood, a thick mortar/concrete base & tile installed on top. The additional weight and lack of proper drainage on the now-impervious surface contributed to the deterioration of the underlying structural system and necessitates its replacement. Only the existing footings can and will be re-used, per the structural plans submitted.

Section 2b of WAC 173 27-040 reads as follows:

Normal maintenance or repair of existing structures or developments, including damage by accident, fire or elements. "Normal maintenance" includes those usual acts to prevent a decline, lapse, or cessation from a lawfully established condition. "Normal repair" means to restore a development to a state comparable to its original condition, including but not limited to its size, shape, configuration, location and external appearance, within a reasonable period after decay or partial destruction, except where repair causes substantial adverse effects to shoreline resource or environment. Replacement of a structure or development may be authorized as repair where such replacement is the common method of repair for the type of structure or development and the replacement structure or development is comparable to the original structure or development including but not limited to its size, shape, configuration, location and external appearance and the replacement does not cause substantial adverse effects to shoreline resources or environment;

Under permit 2309-061, we propose to restore the deck to a state comparable to its original permitted condition, within the original footprint, at the same elevation and omitting the unpermitted surface additions. Also, the replaced framing will meet current structural & code requirements and be of rot-resistant materials (pressure-treated). The external appearance will be substantially comparable to the original, except the new railing shall be a code-compliant cable railing (the original railing would not meet current code requirements).

As noted by the project geotechnical engineer in his geotechnical evaluation, the proposed work "will have little to no impact on the existing site conditions and that the global stability of the property will improve due to the reduction in surcharge pressures with a lighter-weight deck." We are only replacing the deck elements above grade; with the exception of two, all the existing footings will be re-used, limiting ground disturbance and environmental impact. Along with improved stability, this project will introduce better erosion control than the previous impervious deck. Therefore, we assert that the proposed repair will cause no substantial adverse effects to shoreline resources or the environment. On the contrary, site conditions will be improved.

As noted above, the state of the deck at the time the owners took possession of the property was not salvageable by any common method. Not only was the added tiled surface impractical to remove, the substantial amount of weight it added exceeded the original deck's design criteria and compromised its framing beyond the point where direct repair would be feasible or desirable from a life safety standpoint. Therefore, replacement of the deck would be the common repair methodology.

In summation, this project complies with each aspect of section 2b of WAC 173 27-040: it is being undertaken in a reasonable time frame; it will result in a deck substantially comparable, in fact nearly identical, to the original; it will have no adverse effect on the shoreline or environment; and replacing the deck as opposed to repairing the existing is the most straightforward and commonly accepted method to achieve all this. Therefore, we believe the shoreline exemption should be approved under WAC 173 27-040 section 2b.

Thank you for considering this request.