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June 11, 2021

AOA-6234

Greg Arms greg@milestonenw.com

SUBJECT: Interrupted Watercourse Buffer for Milestone Preliminary Short Plat

7621 SE 22<sup>nd</sup> Street, Mercer Island WA (Parcel 531510-1846)

City File # PRE20-019

Dear Greg:

On June 10, 2021 I conducted a site review on the subject property. The purpose of the reconnaissance was to assess whether a small portion of the outer 120-foot watercourse buffer that extends into the northeast corner of the site is functionally interrupted by the two paved access roads that separate the site from the off-site watercourse.

## **Existing Critical Areas**

One Type F watercourse is located off-site to the east on King County Waste Water property (Parcel 531510-0945). This watercourse was recently delineated and described as part of the North Mercer Pump Station improvement project (CAO19-020). Type F watercourses in the City of Mercer Island require a standard 120-foot buffer per MIMC 19.07.180.C.1.

The standard 120-foot buffer from the off-site stream extends into the northeast corner of proposed Lot 2 on the subject property. The area of buffer on the site currently consists primarily of old yard area vegetated with ornamental rhododendron, grasses, bracken fern (*Pteridium aquilinum*), dandelion (*Taraxacum officinale*), common horsetail (*Equisetum arvense*), and creeping buttercup (*Ranunculus repens*).

The on-site portion of the watercourse buffer is currently separated from the stream by both the paved access road to the existing pump station facility as well as a second paved access road for the residence located at 7627 SE 22<sup>nd</sup> Street.



Existing paved access road separating on-site portion of buffer at right from off-site watercourse.



View of existing paved access drive to pump station.

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## **Functional Assessment**

Stream buffers in general provide key functions including shade and temperature regulation, flood conveyance, water quality protection and pollutant removal, nutrient cycling, sediment transport, bank stabilization, woody debris recruitment, wildlife habitat, and microclimate control. The remnant portion of the stream buffer on the site, however, is generally not able to provide these functions due to its separation from the watercourse by two paved access roads that interrupts the buffer functions. Furthermore, it is my understanding that a buffer enhancement plan has already been designed for the off-site buffer located on the King County property.

## **Conclusion and Recommendation**

The City of Mercer Island can waive the critical area study requirement for a project per MIMC 19.07.110.C if a development proposal will not have an impact on the critical area or its buffer.

The critical area study requirement may be waived or modified if the applicant demonstrates that the development proposal will not have an impact on the critical area or its buffer in a manner contrary to the purposes and requirements of this chapter.

It is our recommendation that you request a determination from the City that the extent of the functional buffer ends at the east side of the off-site roadway to the east and would therefore not encroach into the subject property since: 1) the small remnant standard buffer located on the subject property is separated from the off-site watercourse by two paved access roads and does not currently provide any significant functional benefit to the stream, and 2) any potential off-site mitigation options have already been prepared for the County property as part of the pump station improvement project.

If you have any questions, please give me a call.

Sincerely,

ALTMANN OLIVER ASSOCIATES, LLC

John Altmann Ecologist

Attachment

