

January 25, 2026
Project No. 24-0145

Attention: Russell Palanchuck

Subject: **Mitigation Sequencing Statement per MICC 19.07.100**
FILE NO. CAO25-007
9734 SE 40TH STREET
MERCER ISLAND, WA 98040
KING COUNTY PARCEL NO. 265550-0176

Dear Russell Palanchuck,

This memorandum is submitted in response to the City of Mercer Island's Review Letter 6 (File No. CAO25-007), dated December 16, 2025. As stated in the letter:

"Have your Geotech update their report or provide a memo addressing mitigation sequencing. See MICC 19.07.100 - Mitigation sequencing, address each measure listed specifically."

In accordance with MICC 19.07.100, this memo documents how each of the required mitigation sequencing steps (A through F) has been considered and implemented for the proposed residential project at 9734 SE 40th Street. The geotechnical evaluation and recommendations are based on our field exploration, site reconnaissance, and laboratory testing as documented in our Geotechnical Engineering Report No. 24-0145, dated January 28, 2025.

MITIGATION SEQUENCING PER MICC 19.07.100

A. Avoiding the impact altogether by not taking a certain action or parts of an action

The applicant has evaluated reasonable alternatives to avoid impacts to geologically hazardous areas and associated buffers. Due to site constraints, including parcel size, slope configuration, and existing encumbrances, the project cannot be reasonably constructed outside the mapped steep slope areas. The site is almost entirely constrained by critical area designations, and complete avoidance would render the property unbuildable. The proposed structure has been located to minimize encroachment into steep slopes and buffers, and no development is proposed within known landslide hazard zones. The current siting represents the least impactful and technically feasible configuration based on engineering, grading, and zoning considerations.

In accordance with MICC 19.07.100, this approach represents a good faith effort to avoid impacts while allowing a permitted residential use.

B. Minimizing impacts by limiting the degree or magnitude of the action and its implementation

The design and construction plan incorporates several strategies to minimize impacts to geologically hazardous areas:

- The development footprint has been reduced to the minimum necessary to support the residence and required access.
- No slope cutting, undercutting, or modification of natural slope angles is proposed.
- Excavations will be limited to the building footprint and utility corridors.
- Although the project has received approval for wet season construction, additional precautions will be implemented to manage erosion and drainage during periods of increased rainfall.
- Temporary erosion and sediment control measures, including silt fencing, straw wattles, inlet protection, and stabilized construction access, will be installed prior to site disturbance and maintained throughout construction.
- Foundations will bear on dense native glacial soils or compacted structural fill to reduce settlement risk and maintain slope stability.

These measures reflect the use of best available technology and accepted geotechnical practices to minimize environmental and geotechnical impacts, even under wet season conditions.

C. Rectifying the impact by repairing, rehabilitating, or restoring the affected environment

All temporary disturbances will be restored following construction. Specific measures include:

- Regrading and contouring disturbed areas to blend with existing site topography.
- Stabilizing slopes using mulch, hydroseed, or erosion control blankets.
- Replanting with native or adapted vegetation to promote long-term stability.
- Removing temporary erosion control elements once vegetation is established.

The objective is to return the site to a stable and functional condition that supports long-term slope integrity and drainage performance.

D. Reducing or eliminating the impact over time through preservation and maintenance operations

Long-term protection of site stability and drainage will be achieved through:

- Installation of permanent drainage systems including perimeter footing drains and tightlined roof drains to direct stormwater away from steep slopes.
- Final grading to promote positive drainage away from structures and slopes.
- Ongoing maintenance of vegetated areas and drainage features by the property owner.
- Avoidance of irrigation or direct discharge onto steep slope areas.

These measures are intended to preserve the mitigation functions over the life of the development and prevent future instability or erosion.

E. Compensating for the impact by replacing, enhancing, or providing substitute resources or environments

Given the limited scope and low-risk nature of the proposed project, compensatory mitigation is not proposed. All temporary and localized impacts will be addressed through minimization, restoration, and long-term site management. The project will not diminish the geotechnical or hydrological function of the slope area.

F. Monitoring the impact and taking appropriate corrective measures

Geotechnical observation and special inspection will be performed during construction to verify compliance with the recommendations provided in the approved geotechnical engineering report. Observation will focus on critical construction phases, including subgrade preparation, placement and compaction of structural fill, and footing subgrade conditions prior to concrete placement.

Monitoring documentation, including Daily Field Reports (DFRs), will be prepared as applicable and made available to the City upon request. Copies of the DFRs will be maintained on site for reference during construction. If conditions are encountered that differ from those anticipated in the geotechnical report, appropriate corrective measures will be identified and implemented in coordination with the project team and City staff to maintain the intent and effectiveness of the approved mitigation measures.

CONCLUSION

The proposed development has been designed and will be implemented in a manner consistent with the mitigation sequencing requirements of MICC 19.07.100. Based on our subsurface characterization and engineering judgment, it is our professional opinion that the project:

- Minimizes risk to geologic hazard areas
- Does not create new slope instability or exacerbate existing conditions
- Can be constructed and maintained safely with implementation of the outlined mitigation measures

We recommend approval of the mitigation approach as described. Please contact MP Engineering if additional clarification or coordination is required during permit processing or construction.

LIMITATIONS

This memorandum is based on site conditions observed during the geotechnical investigation and the project information available at the time of preparation. Subsurface conditions may vary across the site. If unexpected conditions are encountered during construction, MP Engineering should be notified to evaluate whether revisions are necessary. This memorandum does not relieve the contractor of responsibility for construction means, methods, or site safety.

Sincerely,

MP Engineering, PLLC



Date: 01-25-2026

Minjae (MJ) Park, P.E.
Principal Geotechnical Engineer



Date: 01-25-2026

Jintae (James) Lee, Ph.D., P.E.
Geotechnical Specialist