



State of Washington

Department of Fish and Wildlife, Region 4

Region 4 information: 16018 Mill Creek Blvd, Mill Creek, WA 98012 | phone: (425)-775-1311

October 23, 2025

City of Mercer Island
ATTN: Molly McGuire
molly.mcguire@mercerisland.gov

Hello Molly McGuire,

We would like to discuss the City of Mercer Island Rezone & New PSM Facility project (SEPA #202504012, File#SEP25-017) located at 9601, 9611 SE 36th St, Mercer Island, WA 98040, as proposed by Kellye Hilde. The Washington Department of Fish and Wildlife (WDFW) is responsible for preserving, protecting, and perpetuating the state's fish, wildlife, and ecosystems while providing sustainable recreational and commercial opportunities for fish and wildlife. Recognizing our responsibilities, we will submit the comments for the Rezone & New PSM Facility. Other comments may be offered in the future.

Fish and Wildlife Resources and Recommendations:

The applicant proposes to increase impervious surfaces, reconstruct and expand one overwater structure, and construct one new overwater structure over a Type F stream. Given the proximity of these developments to a wetland associated with the unnamed tributary to Lake Washington, which is known for salmonids utilizing this area, several concerns arise. The Department is concerned that reducing buffer distance at this location may adversely impact fish and their aquatic habitat (WAC 220-660-100).

- Per the Department's management recommendations, the provided materials must document the average bankfull width of the channel in the project reach and include hydraulics. We request to see the critical areas report and the hydraulic analysis once they are prepared.
- We require side profiles to be included in the plan set for the new structure. The new structure is necessary to meet the fish passage structure criteria, including unimpeded fish passage, as well as convey the 100-year flow and associated debris (WAC 220-160-200)

- WDFW would prefer the new structure design be changed to a bridge if possible (WAC 220-660-190 & 200). Although initial costs may be higher, it will save money over time with lower maintenance costs and will not become a barrier for fish in the future.
- Additionally, if the mitigation sequence (WAC 197-11-768) is assessed and avoidance of impacts is infeasible, then, considering the benefits lost from mature tree removal, and to fulfill no-net-loss requirements, we recommend a minimum of a 4:1 replacement ratio to mitigate the buffer reduction and tree removal. We also recommend planting native coniferous tree species near the stream to maximize shade. If cutting down trees is part of the plan, we would like to see them utilized on site, such as for making benches, fencing, or Large Woody Material (LWM) in the wetland system.
- Finally, due to its proximity to a regulated stream and given the two water crossing structures, this project will require an HPA. Consequently, we encourage people planning hydraulic projects to submit a general concept (pre-application) for review through the [Aquatic Protection Permitting System \(APPS\)](#). At any stage of the planning process, you may contact your local habitat biologist, Maria McNaughton (maria.mcnaughton@dfw.wa.gov or 360-890-2975), to ask questions and get feedback on project design and compliance with WAC 220-660 (the Hydraulic Code).

Thank you for taking the time to consider our comments on this proposal, which aim to better align it with state regulations and the best available science for fish and wildlife habitats and ecosystems. Please do not hesitate to contact me with any questions or if you need our technical assistance or resources during this process.

Sincerely,



Beck Sessa (she/her)
Biologist, Habitat Division
Washington Department of Fish and Wildlife

R4Splanning@dfw.wa.gov
425.651.9790

Cc: Maria McNaughton, Habitat Biologist, maria.mcnaughton@dfw.wa.gov

Beck Sessa, Habitat Biologist, R4Splanning@dfw.wa.gov