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May 14, 2025

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Mercer Island, WA 98040

## **Mercer Island Beach Club Marina (SHL24-007/SEP24-002), Environmental Peer Review**

Facet Reference No: 2410.0634.01

Dear Ryan,

This letter presents our peer review of the proposed marina reconfiguration at the Mercer Island Beach Club located at 8326 Avalon Drive in Mercer Island, Washington (parcel #3124059003). I conducted a site inspection on April 24, 2025, to verify the reported conditions. The following documents were reviewed:

- *Ecological No Net Loss Assessment Report and Critical Areas Study* (Northwest Environmental Consulting, LLC [March 2025]) (NNLR)
- Joint Aquatic Resources Permit Application Form for Mercer Island Beach Club Marina Reconfiguration Project, signed March 28-31, 2025 (JARPA)
- City of Mercer Island SEPA Environmental Checklist for Mercer Island Beach Club Marina Reconfiguration, submitted April 4, 2024 (SEPA Checklist)
- Project Plan Set prepared by Waterfront Construction, dated December 22, 2021 (Plan Set)
- *Mercer Island Beach Club Marina – Criteria Compliance Narrative*, author and date unknown (Compliance Narrative)

## **Project Summary**

The project applicant has applied for a shoreline substantial development permit, a shoreline conditional use permit, and SEPA review for the reconfiguration of the marina at the Mercer Island Beach Club. The project involves removing five of the existing docks and reconfiguring the marina to a single point access marina with a hybrid design consisting of fixed moorage slips along the shore and floating moorage slips on the lake side. The existing solid wooden docks and piles will be replaced with steel piles and steel grated decking. The project will also remove an existing log boom; remove 60

linear feet of rock and timber bulkhead; remove eight cubic yards of debris; and install 25 cubic yards of beach nourishment, two trees, and three shrubs. The bulkhead will be replaced with a pocket beach at the western end of the property.

The Compliance Narrative documents compliance with WAC 173-27-160, Review Criteria for Conditional Use Permits and applicable provision of the Mercer Island Shoreline Master Program (MICC 19.13). The NNLr concludes that temporary disturbances and elevated lake turbidity are possible during construction activities, but the long-term impacts of the project will improve ecological functions and prevent further habitat degradation, resulting in no net loss of ecological functions.

## Peer Review Findings

Facet agrees with the conclusions of the NNLr and the Compliance Narrative. The project proposal is well thought out and, upon successful implementation, should provide a net improvement of ecological function. While the overall square footage of the docks will increase, the use of grated decking with 42%-62% light transmission, will reduce net overwater shading and the associated cover preferred by juvenile salmonid predators. Replacement of old creosote piles with steel piles will improve water quality. The removal of the rock and timber bulkhead and creation of a pocket beach will improve shoreline processes, sediment transport, and nearshore habitat conditions for juvenile salmonids. The project application has demonstrated compliance with the Mercer Island SMP, with noted exceptions to MICC 19.13.050(L)5.c-d, which pertain to pile size and spacing. The pile spacing and size provisions may receive special authorization from the code official based on a demonstration of need. This is a structural engineering assessment beyond the scope of Facet’s review.

The following inconsistencies in areas and quantities are noted between the JARPA, NNLr, and Plan Set:

**Table 1.** Areas and Quantities of Project Activities by Submittal Document

<b>Activity</b>	<b>JARPA Table 8e</b>	<b>NNLR</b>	<b>Plan Set</b>
Piles to be installed (quantity)	106	93	93
Piles to be installed (SF)	54.7 SF	59.5 SF	59.6 SF
Piles to be removed (SF)	29.5 SF	111.5 SF	N/A
Decking to be installed (SF)	10,294 SF	10,202 SF	10,202 SF
Decking to be removed (SF)	7,533 SF	7,529 SF	7,533 SF

## Recommendations

While not critical to the determination that the project will result in no net loss of ecological functions and comply with the Mercer Island SMP (with the noted exceptions above), the inconsistencies in Table 1 should be rectified such that the areas and quantities of all project activities are consistent across all permitting documents.

Please contact me if you have any questions or requests for additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Kahlo", enclosed in a thin blue rectangular border.

Ryan Kahlo, PWS  
Senior Ecologist