

February 13, 2026

Ms. Grace Manahan, Code Compliance Officer  
City of Mercer Island  
9611 SE 36<sup>th</sup> Street  
Mercer Island, WA 98040

**Re: Comment Response Letter #1  
Covenant Living at the Shores  
Mercer Island, WA  
Langan Project No.: 792005114**

Dear Grace:

Thank you for your review of the Covenant Living documents and your comments. The Covenant Living team have collaborated to prepare the comment responses below and hope you find the resolution of the review comments acceptable. Please feel free to contact me with any questions or coordination items you have.

**CITY OF MERCER ISLAND COMMUNITY & DEVELOPMENT, GRACE MANAHAN**

**Planning**

1. A landscaping plan is required for any area disturbed outside of the building footprints and installation on hardscape and must be installed prior to final inspection per MICC 19.07.160(B)(2)(d).

*Response: A landscaping plan is included with the resubmittal. Please see sheet L-401 and L-402.*

2. Provide a draft Disclosure and Notice on Title. Once reviewed it will need to be recorded with the King County Recorder's Office. Please let me know if you have any questions about this.

*Response: Please refer to the draft Disclosure and Notice on Title document included with this resubmittal.*

3. Have your Geotech provide a memo addressing mitigation sequencing. See MICC 19.07.100- Mitigation sequencing, address each measure listed specifically.

*Response: Mitigation Sequencing is addressed in Section 2.3 of the Critical Area Study and No Net Loss (CAS&NNL) Plan prepared by Wetland Resources, Inc.*

4. Have your Geotech review the plans and provide a post design memorandum confirming the design is consistent with their recommendations.

*Response: Please see the attached letter from the project geotechnical engineer.*

5. Provide a diagram showing the calculations of both existing and proposed lot coverage and hardscape within the two shoreline areas (0-25' and 25-50' landward from the OHWM) for compliance with MICC 19.13.050(A)(Table C).

*Response: Please see the diagram and table below, which are also included in the plan set on sheet C-1.1. Section MICC 19.13.050(A) Table C limits hardscape and lot coverage within 0 to 25 feet to 10% and 25 to 50 feet to 30% from the OHWM. The table below lists these coverages for the proposed project.*

	<b>0 to 25 feet</b>	<b>25 to 50 feet</b>
Total Area	17,585 SF	18,031 SF
Hardscape	1,425 SF (8.1%)	2,194 SF (12.2%)
Meets Code?	Yes, 10% is max allowed	Yes, 30% is max allowed

6. The Shoreline Landscaping Plan shown on sheet L-400 needs to be revised to be consistent with MICC 19.13.050(K)(4)(i)+(iv). The proposed vegetation needs to extend the whole shoreline, and the plants are required to be Puget Lowland Natives. Please update the plant schedule to indicate what plants are Puget Lowland Natives. Please also confirm if the shoreline landscape area calculations are for the whole shoreline area or the 20-foot vegetation area required per MICC 19.13.050(K)(4)(i).

*Response: Please see the revised landscape plan sheet L-401. The vegetation has been extended along the shoreline and plants are native species. The plant schedule is also updated to reflect these revisions. The landscape area calculations are shown on sheet L-401.*

7. Label Ordinary High-Water Mark on Plans.

*Response: The OHWM is labeled on the plans.*

8. MICC 19.13.050(K)(3)(ii), "In areas documented to contain archaeological resources by the office of archaeology and historic preservation, a site inspection or evaluation is required by a professional archaeologist in coordination with affected Indian tribes."
  - a. The Snoqualmie Tribe has requested an archaeological review be performed for this project. This is in an area the Snoqualmie Tribe considers culturally significant and has a high probability to have unknown archaeological deposits.

If any archaeological work is performed, the Snoqualmie Tribe request notification. An Inadvertent Discovery Plan (IDP) should not be used in lieu of archaeological investigation. Cultural and archaeological resources are non-renewable and are best discovered prior to ground disturbance.

- b. Please provide an archaeological review prior to ground disturbance for this project.

*Response: An archeological review is currently ongoing, with a preliminary summary of results memo issued by ESA, dated January 23, 2026 included with this resubmittal package. The final report is anticipated to be issued in late February, 2026. Please note the Snoqualmie Tribe was present during the field investigation work. No archaeological or culturally significant findings were discovered, and preliminary indications are that the building is not eligible for historical listing.*

9. Label required yard setbacks consistent with MICC 19.03.010 as well as proposed eastern side yard setback.

*Response: The required and requested side yard setbacks have been added to the site plan on the eastern side of the site. The front and rear side yard setbacks are not applicable for the proposed development given the shoreline setback implemented to the north is greater than the 25-foot rear yard setback and distance of the proposed development from the south property line along N. Mercer Way far exceeds the required 20-foot front yard setback.*

10. Show how all improvements within the piped watercourse setback are allowed per MICC 19.07.180(C)(8), specifically the proposed buried sewer, buried stormwater, and buried water supply.

*Response: Improvements in the piped watercourse setback include grading, hardscape, 90 lineal feet of buried sewer crossing, 47 lineal feet of buried water supply line, and one fire hydrant. Grading and hardscape are allowed in the watercourse setback pursuant to MICC 19.07.180.C.8. Proposed utilities are an allowed modification under MICC 19.07.130.A.3 because they are considered reconstruction of legally established nonconforming structures.*

11. Setback Deviation Code Compliance Narrative:

- a. Please provide a breakdown of the square footage of development within the piped watercourse setback and wetland buffer with and without the granting of the setback deviation.
- b. Please specify how the deviation will not result in any materially detrimental condition to the public welfare or be injurious to the property or improvements in the vicinity, nor the zone which the property site is situated.
- c. Please further explain in detail how the deviation will not alter the character of the neighborhood, nor impair the appropriate use or development of adjacent property.

- d. Please provide specific policies and provisions from the Comprehensive Plan in which the deviation is consistent with to demonstrate compliance with MICC 19.06.110(C)(2)(d): The deviation is consistent with the policies and provisions of the comprehensive plan and the development code.
- e. Please explain how the basis for requesting the deviation is not the direct result of a past action by the current or prior property owner.
- f. Further explain the constraint by including information about the fire access road in your response to MICC 19.06.110(C)(2)(f) and how this deviation would allow the roadway to be located outside of the piped watercourse setback.
- g. In your response to MICC 19.06.110(C)(2)(g) again clearly break down the square footage of the building pad within the piped watercourse setback and wetland buffer with and without the granting of the setback deviation.

*Response: Please see the revised setback deviation request memo attached separately to this submittal package.*

#### 12. Code Compliance Matrices:

- a. Add a Code Compliance Matrix to speak to WAC 172-27-160.
- b. Update 19.07.170 MICC and MICC 19.07.190 Code Compliance Matrix where the response is "Landscape Architect" and provide more information.
- c. The MICC 19.07.180 Code Compliance Matrix states there are no watercourses present. The Critical Area Study and No Net Loss Plan prepared by Wetland Resources Environmental Consulting states there is a piped watercourse present. Please update Code Compliance Matrix to speak to the piped watercourse.
- d. Complete MICC 19.07.130, MICC 19.07.170, and MICC 19.07.160 Code Compliance Matrix.
- e. Update MICC 19.07.190(C)(8)(d) Code Compliance Matrix. A permeable drive surface is still considered lot coverage per the definition in MICC 19.16.010. Chapter 19 MICC does not review impervious vs pervious, all material that is not considered softscape will either be hardscape or lot coverage and is not allowed within the wetland buffer area.
- f. Update MICC 19.07.190(C)(8)(g) and MICC 19.07.190(E)(1,2,3, and 4) Code Compliance Matrix to explain how.
- g. Revise MICC 19.07.190(E) as the wetland is being altered by having the fire turn around located in the buffer.
- h. Provide more information in the Code Compliance Matrix for MICC 19.07.160(B) to explain how.
- i. Complete MICC 19.03.010 Code Compliance Matrix to speak to how the proposed design meets each item.
- j. Complete MICC 19.13.050, MICC 19.13.040, MICC 19.13.030 and MICC 19.13.010 Code Compliance Matrix, specifically where it is indicated that a response will be "provided at a later date".

- k. Update the Code Compliance Matrix for MICC 19.07.160 to speak to the seismic area, specifically MICC 19.07.160(B).
- l. The Code Compliance Matrix for MICC 19.06.020 states the temporary signage will be depicted on site plan. Staff cannot locate the signage on the site plans. Please clarify.
- m. The Code Compliance Matrix for MICC 19.10.090 states "see arborist report for information". No arborist report was included with application materials. Please provide this arborist report for review.
- n. Complete the Code Compliance Matrix for MICC 19.10.080 to show compliance with the tree protection standards.
- o. On sheet L-400 of the plan set it shows a proposed reduction is required replacement trees. Please complete the Code Compliance Matrix for MICC 19.10.070 to show compliance.
- p. Provide more information in the Code Compliance Matrix for MICC 19.10.060(B).
- q. The interim regulations for design standards in all zones outside of the town center and the design review process can be found in Ordinance No. 25C-11. Please update your Code Compliance Narrative to include the new language included in the interim regulations.

*Response:*

- a. A section has been added for WAC 172-27-160.*
- b. Section 19.07 has been revised.*
- c. Responses have been updated to reflect the presence of the piped watercourse.*
- d. Sections MICC 19.07.130, MICC 19.07.170, and MICC 19.07.160 have been revised.*
- e. MICC 19.07.190(C)(8)(d) has been updated.*
- f. Responses have been updated to explain 'how.'*
- g. Response has been revised. Navix respond to line 71.*
- h. Responses have been updated to explain 'how.'*
- i. The responses in this section have been revised.*
- j. MICC 19.13.050, MICC 19.13.040, MICC 19.13.030 and MICC 19.13.010 have been updated.*
- k. This section has been revised to address seismic.*
- l. This section has been updated to state that no temporary signage is shown on the plans.*
- m. Please see the Arborist Report, which is included with this submittal.*
- n. MICC 19.10.080 has been updated to show compliance with the tree protection standards. Please also refer to the Arborist report.*
- o. MICC 19.10.070 is updated to show compliance.*
- p. MICC 19.10.060(B) has been updated.*
- q. The narrative has been updated to include language from the interim regulations.*

13. A Transportation Concurrency Application is required per MICC 19.20.030.

*Response: An updated traffic concurrency application is included with the resubmittal. Note that the proposed project generates zero net new trips.*

14. Please review and prepare a response to the third-party peer review completed by Facet.

*Response: The following narrative provides the applicant's response to each of the five bullet-point "Recommendations" from Facet's Environmental Peer Review (date: 10.29.25).*

1. Update the CAS & NNL Plan to document compliance with shoreline vegetation requirements per MICC 19.13.020.K.4.

*Response: Section 6.1 Overview of the revised CAS & NNL Plan documents compliance with native vegetation coverage requirements for areas within 20 feet of the OHWM of Lake Washington.*

2. Include a plant schedule in the NNL plan so proposed species and density can be reviewed.

*Response: Section 6.2 Shoreline Vegetation Planting Plan of the revised CAS & NNL Plan includes a plant schedule. See also THW Landscape Plan.*

3. Provide a bond quantity worksheet to cover planting shown on the NNL plan (MICC 19.07.080).

*Response: Appendix F of the revised CAS & NNL Plan provides a bond quantity worksheet based on the THW Landscape Plan.*

4. Update the CAS to address maintenance and monitoring requirements and performance standards for the 5-year establishment period (MICC 19.07.080).

*Response: Maintenance and monitoring requirements are addressed in Section 6.0 Shoreline Vegetation Planting and Monitoring Plan of the revised CAS & NNL Plan.*

5. Review the tree removal plan/inventory to ensure proposed 2:1 tree replacement aligns with MICC 19.10.070.

*Response: The overall tree replacement plan (32 trees removed, 93 trees installed) is consistent with the ratios and locations prescribed in MICC 19.10.070. See Tree Solutions Inc. arborist report and THW Landscape Plan. The tree replacement ratio discussed in the revised CAS & NNL Plan is based on removal and installation within shoreline jurisdiction and is only intended to support the Shoreline No Net Loss Assessment.*

15. Please review and prepare a response to the geotechnical peer review completed by Michele Lorilla.

*Response: Please see the attached response letter from the geotechnical engineer, Terra Associates.*

16. Public comments were received by the following individuals, please respond to each comment provided:
- a. Beck Sessa (Washington Department of Fish and Wildlife), received on 10/23/2025.
  - b. Additional comment provided by Beck Sessa (Washington Department of Fish and Wildlife), received on 10/23/2025
  - c. Matthew Evinger (WA State Department of Ecology), received 10/29/2025
  - d. Aaron Webster (Snoqualmie Indian Tribe), received 10/29/2025
  - e. Petition provided by the residents of Covenant Living at the Shores on Mercer Island, received on 10/26/2025
  - f. Petition provided by the residents of Covenant Living at the Shores on Mercer Island, received on 10/19/2025
  - g. Bart Dawson, received on 10/29/2025
  - h. Lola Dean, received on 10/27/2025
  - i. Michael Finn, received on 10/28/2025
  - j. Jinny McCarty, received on 10/28/2025
  - k. Geraldine M Williams, received 10/29/2025
  - l. Elisabeth Bahn, received 10/29/2025

**16.a. Response to DEPARTMENT OF FISH AND WILDLIFE, Beck Sessa:**

The applicant proposes to expand an existing building and add impervious surfaces and utilities within 200 feet of Lake Washington. Given the proximity of this development to Lake Washington, a lake known for salmonids utilizing this area, the Department is concerned that it may adversely impact fish and their aquatic habitat (WAC 220-660-100).

1. We would like to know what the proposed plan is for the existing stream and water flow. Is this stream being contained within the existing outfall or being

redirected to the new system? If being redirected, what is the plan for the existing downstream connection point to Lake Washington and the current culverts? Will these be abandoned in place or removed?

*Response: The “new system” manages stormwater generated by new impervious surfaces and the roof of the proposed building. Figure 1 of the CAS&NNL Plan provides naming conventions for all existing buried storm pipes and surface drainage channels on and near the Covenant Shores property.*

*The feature described as “Surface Drainage” receives stormwater collected mostly from within the subject property (green lines labeled Surface Drainage Network). No modifications to the Surface Drainage are proposed; it will continue to receive stormwater collected from the subject property and will continue to discharge via open channel directly to the lake.*

*The featured labeled “Buried Pipe 1” conveys some portion of a natural stream that flows as a surface channel through Gallagher Hill Open Space, and which also collects stormwater from N Mercer Way and possibly other locations. No modifications to BP1 are proposed.*

*The feature labeled “Buried Pipe 2” collects stormwater from the northwestern portion of the Covenant Shores property and drains directly to the lake. No modifications to BP2 are proposed.*

2. If the downstream vegetated channel is abandoned, we request the preservation of this existing habitat, even if it was originally manmade. A site visit showed that natural processes are present, so we consider it a fish habitat. If you are removing the existing water influence and installing a new connection point, we would like more vegetation planted as mitigation.

*Response: The “downstream vegetated channel” is described in the revised CAS & NNL Plan as “Surface Drainage.” See Figure 1 – Aerial Overview. This feature conveys stormwater generated throughout the subject property. This channel will not be modified or “abandoned.” Regardless, more vegetation is proposed as mitigation. See THW Landscape Plan. See also Appendix D – Sheet 2/3.*

3. Additionally, we also require more information on the new dissipation pad. WDFW requires the outfall to be located approximately 10 feet landward of the OHWL, if possible, and installed with a rock splash pad for energy dissipation (WAC 220-660-260). We also recommend planting shrubs, or live stakes, throughout the dissipation pad, e.g., red-osier dogwood or willow.

*Response: The new stormwater outfall has been located farther than ten feet from the lake specifically to avoid impacts to Lake Washington, as required by the Mercer Island City Code. Native plants are proposed between the outfall and the lake for energy dissipation. See THW Landscape Plan. See also Appendix D – Sheet 2/3.*

4. If the mitigation sequence (WAC 197-11-768) is assessed and avoidance of impacts is infeasible, a complete mitigation plan must be provided to indicate how and where the planting will be done to mitigate the buffer reduction to fulfill no-net loss requirements.

*Response: Section 7.0 Shoreline No Net Loss Plan of the Revised CAS & NNL Plan specifically addresses no net loss and Section 2.3 addresses mitigation sequencing pursuant to the MICC. Over 10,000 square feet of native planting along the shoreline is proposed due to the increase in hardscape within shoreline jurisdiction.*

5. Finally, we encourage people planning hydraulic projects to submit a general concept (pre-application) for review through the Aquatic Protection Permitting System (APPS). You may contact your local habitat biologist, Maria McNaughton (maria.mcnaughton@dfw.wa.gov or 360-890-2975), at any stage of the planning process to ask questions and get technical feedback on project design and compliance with WAC 220-660 (the Hydraulic Code).

*Response: Noted.*

**16.b. Response DEPARTMENT OF FISH AND WILDLIFE, BECK SESSA 10.23.25 (2/2)**

1. There was one last comment from our F&W Biologist, Chris Anderson, on this project (SEPA#202504015), because their SEPA checklist mentioned potential great blue herons in the vicinity. WDFD asks that any activity be reported to our region's wildlife biologist, Chris (Christopher.Anderson@dfw.wa.gov or +14253412054), as soon as possible, so we can work with the applicant to ensure appropriate considerations are taken. Especially report any nesting behaviors, such as herons carrying twigs, or nests with eggs or young.

Since great blue herons are state protected (RCW 77.15.130), to avoid potential violations, we always recommend appropriate on-the-ground field surveys by a consultant or biologist – not only administrative ones – to document occurrences for due diligence if herons are suspected to be nearby.

*Response: The site inspection included a wildlife habitat assessment (Section 5.0 Wildlife Habitat Assessment), prepared by a qualified professional, that made both direct and indirect observations of avian species usage. No direct or indirect indications of great blue heron presence were noted. Due to proximity to the lake, great blue heron is likely to occur in regular concentrations, but no nests or rookeries present on or near the site and no observational evidence suggests otherwise.*

**16.c. Response DEPARTMENT OF ECOLOGY, MATTHEW EVINGER**

Thank you for the opportunity to provide early input on this application for a shoreline conditional use permit. Please consider the following comments and questions for the record:

We have not seen in the application materials the reason why the proposal would require a shoreline conditional use permit or how the proposal would meet the SCUP criteria of WAC 173-27-160. These are essential to the understanding the proposal and evaluating its consistency with the Shoreline Management Act and Mercer Island's Shoreline Master Program.

1. The proposed expansion of impervious surface in shoreline jurisdiction is substantial, which would have a non-zero impact even where it would replace lawn. It appears there are more opportunities to avoid and minimize impacts by reducing expansion of impervious surface. What is the need for the expansions where they are proposed? Why could they not happen outside shoreline jurisdiction?

*Response: The size of the proposed structure is limited by the piped watercourse setback, side yard setback, and fire access requirements. This plan represents a scaled-back version of the applicant's desired use of property. Furthermore, most of the proposed increase in impervious surface in shoreline jurisdiction results from a city-imposed requirement to provide a fire truck access point and turnaround. This improvement cannot happen outside shoreline jurisdiction due to site configuration.*

2. MICC 19.13.020.K.4.i requires that new development exceeding 1,000 square feet include establishment of a vegetation area: a swath within 20 feet of the ordinary high-water mark and extending along the entire shoreline of the parcel providing at least 75 percent cover by plants native to Puget Sound. MICC 19.13.020.K.4.iii requires multi-story vegetation in the vegetation area. The proposal appears to be inconsistent with the code section; the plants should be Puget lowland natives and should provide at least 75 percent cover to the full extent of the vegetation area.

*Response: A landscape plan has been developed by THW that provides 75% cover within 20 feet of the OHWM of Lake Washington, in accordance with the MICC. The revised CAS&NNL Plan describes plan compliance with the MICC.*

3. Many of the proposed replacement plants are not native to the Puget Sound lowlands. Native plants would be better replacement functions lost in the development and bring the proposal closer to achieving no net loss of shoreline ecological function.

*Response: The THW Landscape Plan is consistent with MICC requirements and includes many native plants that are native to the Puget Sound lowlands.*

4. The proposal includes the use of in-lieu fees to replace removed trees. MICC 19.13.020.C.2.i permits off-site mitigation but states a clear preference for on-site mitigation. It is unclear why the proposal would not exclusively use on-site mitigation.

*Response: All trees replacement will occur on the site. No use of in-lieu fee is proposed.*

5. MICC 19.07.180.C.8 lists allowed developments in a piped watercourse setback, but does not include stormwater, sewer, or water supply infrastructure. The proposal would install all three. The proposal appears to be inconsistent with the code.

*Response: The piped watercourse setback presently contains a network of existing utilities that serve the Covenant Living property. The applicant's proposal continues this legal non-conforming use in the setback.*

6. It is not yet clear to Ecology whether the surface drainage is or is not a stream; this may merit further review.

*Response: Noted. In any case, no alterations to the "Surface Drainage Feature" described in the CAS&NNL Plan are proposed.*

**16.d. Response to Aaron Webster (Snoqualmie Indian Tribe), received 10/29/2025:**

*Response: An archeological review is currently ongoing, with a preliminary summary of results memo issued by ESA, dated January 23, 2026 included with this resubmittal package. The final report is anticipated to be issued in late February, 2026. Please note the Snoqualmie Tribe was present during the field investigation work. No archaeological or culturally significant findings were discovered, and preliminary indications are that the building is not eligible for historical listing.*

**16.e through I, Residents of Covenant Shores.**

*Response: Covenant Living embraces its history and the history of our buildings and grounds. We will ensure that a tribute to the Lodge building is included in our planning. We encourage input into the design, layout and aesthetics of proposed buildings at the Covenant Living communities. We hear the suggestions specific to this project and would like to highlight that we are in the conceptual phase of the design process. As such, there will be future iterations and advancements that will more clearly reflect a Pacific Northwest character and feel for the exterior and interior of the building.*

*The new building will also be designed to meet the City and relevant building codes. Roof structure and drainage performance will be accounted for in the design. Trees on site will be retained to the degree feasible. Some removals will be necessary to provide for the new building, parking, utilities, and the code-required fire lane. Tree replacements and new landscaping will be provided with the new project. Please review the updated landscape and tree protection plans.*

*It is important to take into consideration that we want to maximize the services that we can provide the residents of Covenant Living at the Shores while working within the confines of the allotted building footprint. Please feel free to keep your suggestions coming and we look forward to information sharing sessions that will be an important part of the project's development.*

## **FIRE COMMENTS**

1. On sheet A-100 "Please provide a section drawing demonstrating that the fire access road is not encroached at 13'6" above access road grade. Provide this analysis for NW, NE and SE corners." 2. On sheet C-3.0 "Fire access road may not exceed 10% grade."

*Response: Please see Section 2, sheet A-200 for a section showing that the building overhang over the fire access drive aisle is over 37 feet above the roadway elevation.*

*Please refer to sheet C-2.0 Conceptual Grading Plan for pavement slope information. The roadway grading has been revised to lower the steepest grade to less than 10%.*

2. On sheet C-3.0 "Fire access road may not exceed 10% grade."

*Response: The grading has been revised to be less than 10%.*

3. On sheet C-4.0 near fire truck turnaround "Locate hydrant in this area"

*Response: The area where the hydrant is requested is on top of an existing storm drainage pipe that conveys a piped watercourse, which has an associated 45-foot setback area. The purpose of the 45-foot setback is to allow for future daylighting opportunities. Per MICC 19.07.180(C)(8), no new utilities are allowed in the setback area. We propose locating the hydrant at the east end of the turnaround facility as a compromise, as this would provide a hydrant at the turnaround facility and would be located near the building, so future daylighting of the piped watercourse would not be affected.*

4. On sheet C-4.0 "Provide modeled fire flow for each hydrant showing fire flow 1,750 GPM at 20 psi residual pressure for 3 hours."

*Response: The proposed site plan shows a 5-foot offset of the building from the 45-foot piped watercourse setback area to allow room for a private fire main loop around the building, while also providing space for the required 26-foot wide fire lane. This site plan is dependent on the*

*approval of a side yard setback variance request to reduce the required 20-foot side yard setback to 10 feet.*

*If the side yard variance request and the proposed site plan are not approved, then the project might not provide a looped fire main, which would change the water model. Given this uncertainty, the project requests approval to defer the fire flow modelling to be submitted with the Site Development (construction) permit submittal. Please confirm this is acceptable.*

5. On sheet C-4.0 on southern portion of fire truck turnaround "Provide an additional hydrant in this location."

*Response: A hydrant has been added at the northeast corner of the building. The comment requested the hydrant on the east side of the fire lane. However, there is a cut retaining wall and guard rail along this corner, so the new hydrant is shown on the west (building) side of the fire lane. Please confirm this is acceptable.*

6. On Sheet C-4.0 at southeast corner of proposed building "Locate this hydrant on the building-side of the fire access road."

*Response: The proposed hydrant is now shown at the southeastern corner of the new building, as requested.*

7. On sheet C-4.0 "Locate the FDC and support hydrant on the building-side of the access road."

*Response: The City has stated that no new utilities will be allowed in the 45-foot setback area of the piped watercourse. Therefore, the FDC and support hydrant are shown on the south side of the drive aisle. Please confirm this is acceptable.*

## **GEOTECHNICAL PEER REVIEW, MICHELE LORILLA**

1. This letter provides comments related to the CAO25-019 permit review.  
The submitted geotechnical report for this permit is identified as draft and dated May 18, 2023. According to the geotechnical engineer, at the time of the report, site development and building plans were not available. Please have the geotechnical engineer of record provide an updated, non-draft geotechnical design report for the proposed development. This updated report should address all project elements requiring geotechnical design and construction recommendations and requirements of MICC 19.07.160.B.3.

*Response: Please refer to the updated report dated February 6, 2026, and the Geotechnical Engineering Plan Review letter dated February 6, 2026, both prepared by Terra Associates, the project geotechnical engineer.*

Should you have any questions regarding the comment responses contained herein, please do not hesitate to contact me at 425.845.3829 or by email. Thank you for your review.

Sincerely,  
**Langan Engineering and Environmental Services, LLC**



Joe Taflin, P.E. LEED AP  
Principal  
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