



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

Mercer Island, WA
ATTN: Ryan Harriman
ryan.harriman@mercerisland.gov

Dear Ryan Harriman:

Thank you for the opportunity to comment on the Commons Building at Covenant Living project (SEPA # 202504015, File#SEP25-025) located at 9150 Fortuna Drive Mercer Way, Mercer Island, WA 98040, as proposed by Randy Gross. The Washington Department of Fish and Wildlife (WDFW) is dedicated to preserving, protecting, and perpetuating the state's fish, wildlife, and ecosystems while providing sustainable recreational and commercial opportunities for fish and wildlife. In recognition of our responsibilities, we submit the following comments for the Commons Building.

Fish and Wildlife Resources and Recommendations:

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).

- 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?
- 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.

- 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.
- 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.
- 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).

Thank you for taking the time to consider our comments on this proposal to reflect better the best available science for fish and wildlife habitats and ecosystems. If you have any questions or need our resources during this process, please do not hesitate to contact me at R4Splanning@dfw.wa.gov.

Sincerely,



Beck Sessa (she/her)
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Washington Department of Fish and Wildlife

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

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