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**RE: SEP25-025 Clubhouse at Covenant Living**

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**From** Evinger, Matthew (ECY) <MEVI461@ECY.WA.GOV>  
**Date** Wed 10/29/2025 4:59 PM  
**To** Grace Manahan <grace.manahan@mercerisland.gov>  
**Cc** Ryan Harriman <ryan.harriman@mercerisland.gov>

Hi, Grace,

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 understanding the proposal and evaluating its consistency with the Shoreline Management Act and Mercer Island's Shoreline Master Program.

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?

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.

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

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.

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.

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

Ecology would be happy to provide additional technical assistance on this project. Please contact me at 206-743-6606 or [matthew.evinger@ecy.wa.gov](mailto:matthew.evinger@ecy.wa.gov) if you have any questions

regarding the above comments or would like to arrange a meeting to discuss them.

**Matthew Evinger** (he/him)

Regional Shoreline Planner | Northwest Regional Office

Shorelands & Environmental Assistance Program

206.743.6606 Cell

[matthew.evinger@ecy.wa.gov](mailto:matthew.evinger@ecy.wa.gov)



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**From:** Ryan Harriman <[ryan.harriman@mercerisland.gov](mailto:ryan.harriman@mercerisland.gov)>

**Sent:** Monday, September 29, 2025 11:12 AM

**To:** Deb Estrada <[Deborah.Estrada@mercerisland.gov](mailto:Deborah.Estrada@mercerisland.gov)>

**Cc:** Ryan Harriman <[ryan.harriman@mercerisland.gov](mailto:ryan.harriman@mercerisland.gov)>

**Subject:** SEP25-025 Clubhouse at Covenant Living

External Email

Good morning,

Please find the notice of application and SEPA checklist attached for SEP25-025.

Here's a link to the complete file: [https://mieplan.mercergov.org/public/SHL25-027\\_SHL25-028\\_CAO25-019\\_DEV25-007\\_SEP25-014](https://mieplan.mercergov.org/public/SHL25-027_SHL25-028_CAO25-019_DEV25-007_SEP25-014).

Please note that comments are due by 5 PM on October 29, 2025.

Best regards,

**Ryan Harriman, EMPA, AICP**

Planning Manager

City of Mercer Island – Community Planning & Development

206-275-7717 | [www.mercerisland.gov](http://www.mercerisland.gov)

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