



ECCO

October 1, 2025

Re: Permit # SHL24-028
Project Name Rontos Pier, Lifts, & Stairs
Project Address 4713 Forest Ave SE (parcel # 404500-0045)
Reviewer Molly McGuire, Planner
Department Planning & Development

Contact Evan Wehr
Contact Phone (509) 969-1994
Contact Email evan@eccodesigninc.com

Molly,

Below are our responses to the corrections in your letter dated February 18, 2025. Your original comments are in **bold italics** followed by our response in plain text.

Corrections

- 1. Repeat Comment from Review Letter 1: 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).**

Applicant Response: Lot coverage calculations have been added to sheet 15 of the revised plans.

Review Letter 2 Comment: This sheet should include the area in square feet of the two shoreline areas for me to determine the percentage of lot coverage and hardscape. Maximum hardscape and lot coverage shall be 10 percent between 0-25' from the OHWM and 30 percent between 25-50' from the OHWM.

Sheet 16 (formerly 15) has been revised to include the area of the two shoreline areas as requested.

- 2. *MICC 19.13.020(A) allows for legally nonconforming structures to be maintained, repaired, renovated, remodeled, and completely replaced to the extent that nonconformance with the standards and regulations of this chapter is not increased. The regulations of this chapter provide three options for moorage facilities: 1) MICC 19.13.050(F)(1) for new and expanded moorage facilities; 2) MICC 19.13.050(F)(2) for replacement, repair and maintenance of overwater structures including moorage facilities; or 3) MICC 19.13.050(F)(3) for alternative development standards for moorage facilities that do not meet the standards of (F)(1) or (F)(2).***

Since the proposed development is for the repair of an existing, legally nonconforming dock, it must comply with all of the standards in MICC 19.13.050(F)(2). This section provides the standards for maintenance, repair, and complete replacement of legally nonconforming moorage facilities. If the development cannot meet these standards, then the legal nonconforming status



ECCO

is lost and it must comply with all of the standards of MICC 19.13.050(F)(3), including (F)(3)(b), where the maximum width must comply with the width of moorage facilities standards specified in subsection D of this section (Table D).

As proposed, the dock does not meet the width of moorage facilities standards in subsection D. Please provide a demonstration of compliance with MICC 19.13.050(F)(2) or (F)(3). If the alternative development standards in (F)(3) are requested to be applied to the project, the project must comply with all of the standards.

The project has been revised to comply with MICC 19.13.050 (F)(2). Less than 50 percent of the pier's framing elements will be replaced. A detail showing this has been added to sheet 7 of the revised plans.

Please feel free to contact me if you have any questions or if you require any additional information.

Regards,

Evan Wehr