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February 3, 2026

Re: Permit # SHL25-030 & SEP25-019
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
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Molly,

Below are our responses to the corrections in your letter dated December 8, 2025. Your original comments are in ***bold italics*** followed by our response in plain text.

Corrections

1. ***In addition to the Criteria Compliance Narrative for MICC 19.07.130, the expansion of the bulkhead to include the new lake access stairs should also comply with the standards in MICC 19.13.050(B). Please provide a Criteria Compliance Narrative for this section as well.***

The lineal footage of the bulkhead is not being expanded. A small section of the bulkhead is being replaced with rock stairs and should fall under MICC 19.13.050 (B) 1. By tiering the bulkhead back to create stairs it will reduce the reflection of waves off of that section of the bulkhead which will reduce scouring along the shoreline and the negative impacts of the bulkhead. Below I have listed the criteria of MICC 19.13.050(B) and how the project meets them.

1. *An existing shoreline stabilization structure may be replaced with a similar structure if there is a demonstrated need to protect principal uses or structures from erosion caused by currents or waves, and the following conditions shall apply:*
 - i. *The replacement structure should be designed, located, sized, and constructed to assure no net loss of ecological functions.*

The proposed stairs are not a full replacement of the existing bulkhead. They are just a modification to a small section of the bulkhead to create lake access. A no net loss report has been submitted with the application that includes the stairs. The stairs will be sloped more relative to the existing rock bulkhead which will reduce the reflection of waves that cause scouring along the shoreline.

- ii. *Replacement walls or bulkheads shall not encroach waterward of the ordinary high water mark or existing structure unless the primary structure was occupied prior to January 1, 1992, and there are overriding safety or*

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environmental concerns. In such cases, the replacement structure shall abut the existing shoreline stabilization structure. Soft shoreline stabilization measures that provide restoration of shoreline ecological functions may be permitted waterward of the ordinary high water mark.

The proposed stairs will not encroach further waterward of the ordinary high water mark.

- iii. For purposes of this section standards on shoreline stabilization measures, "replacement" means the construction of a new structure to perform a shoreline stabilization function of an existing structure which can no longer adequately serve its purpose. Additions to or increases in size of existing shoreline stabilization measures shall be considered new structures.

The proposed stairs are a modification to a small section of the existing bulkhead to provide lake access. It will not increase the lineal footage of shoreline stabilization at the site.

- iv. Construction and maintenance of normal protective bulkhead common to single-family dwellings requires only a shoreline exemption permit, unless a report is required by the code official to ensure compliance with the above conditions; however, if the construction of the bulkhead is undertaken wholly or in part on lands covered by water, such construction shall comply with SEPA mitigation.

SEPA and a no net loss report have been completed for the project.

2. Please provide the calculations for determining that no more than 50 percent of the structural elements of the dock will be repaired and/or replaced per MICC 19.13.050(F)(2)(ix).

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. Calculations have 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

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