



Date: 4-29-2026  
Project Name: Aqua Dock  
Parcel: 252404-9080  
Address: 6855 W Mercer Way, Mercer Island, WA 98040

**RE: SHL25-037 & SEP25-020 Review Letter 4; 6855 W Mercer Way, Mercer Island, WA 98040**

To whom it concerns,

Seaborn Pile Driving is in receipt of the following requests for additional information related to permits **SHL25-037 & SEP25-020**. Please see responses below:

1. SUB2 Review Comment: In my previous review letter, I requested documentation that you comply with MICC 19.13.050(F)(2) for the repair of the legally nonconforming moorage facility. It appears that the scope of work has changed to a complete demolition of the existing pier and reconstruction of a new pier. Please provide documentation that the project complies with MICC 19.13.050(F)(1) for new and expanded moorage facilities. Please note that when calculating the surface coverage of the moorage facility, the boatlift must be included in this calculation per the definition of "moorage facility" in MICC 19.16.010.

*Moorage facility: Any device or structure used to secure a boat or a vessel, including piers, docks, piles, lift stations or buoys*

SUB2 Applicant Response: A compliance matrix has been included in resubmittal outlining relevant sections noted above. The boatlift will not have coverage above the surface as no moorage cover is proposed. If you would like the physical surface area of the below water portions of the boatlift, please advise.

SUB3 Review Comment: The compliance matrix includes reference to the alternative development standards in MICC 19.13.050(F)(3). Documentation that the proposed development complies with these alternative development standards is required, including the demonstration of no net loss of ecological function. The No Net Loss Report submitted in one of the previous submittals was for the original scope of work when the project was a repair and replacement of a portion of the existing dock. Please provide an updated No Net Loss Report for the new scope of work to comply with MICC 19.13.050(F)(3)(iv). Additionally, documentation that the proposal complies with MICC 19.13.050(D) Table D is required, as mandated by MICC 19.13.050(F)(3)(ii). Finally, the code compliance matrix states that the project falls under WAC 173-27-040(2)(b), which is not correct since this is no longer repair and maintenance. Please remove this reference.

SUB3 Applicant Response: The matrix has been updated to address alternative development standards in MICC 19.13.050(F)(3) and standards found in MICC 19.13.050(D) Table D.



References to WAC 173-27-040(2)(b) have been removed from the revised matrix. An updated No Net Loss Report has also been included in resubmittals.

**SUB4 Review Comment:** The criteria compliance matrix for MICC 19.13.050(D) Table D does not include the height limit for mooring piles, diving boards, and diving platforms. There are two mooring piles proposed, but the heights of which are not explicitly labeled on the plan set or included in the criteria compliance matrix. **Please provide documentation that the mooring piles comply with the maximum height of 10 feet above the elevation of the OHWM.**

Additionally, the response to MICC 19.13.050(F)(1)(vi) for pile spacing and size is not complete. The first set of piles must be at least 18 feet from the OHWM AND 10 inches in diameter or less; AND additional piles must be at least 18 feet apart and not greater than 12 inches in diameter. **Please provide demonstration of compliance with the entirety of this standard.**

**RESPONSE:** The matrix has been updated to include height information found in MICC 19.13.050(D). Pile configuration has been updated as well. Please see revised plans and matrix (both attached) for additional information.

If you have questions or need additional information, please reach out using the contact information provided.

Thanks,

**Katherine Rupert**

Permit Technician

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