

# **Ecological No Net Loss Assessment Report**

Prepared for

**Pisco Residence**  
**6000 SE 20<sup>th</sup> St**  
**Mercer Island, WA 98040**

Prepared by



Northwest Environmental Consulting, LLC  
600 North 36<sup>th</sup> Street, Suite 423  
Seattle, WA 98103  
206-234-2520

**January 2026**

## Purpose

The purpose of this report is to fulfill the requirements of City of Mercer Island Shoreline Master Program by assessing overall project impacts and proposed mitigation to determine if the project meets the “No Net Loss” General Regulation of the Shoreline Master Program.

No Net Loss is defined as “a balancing of unavoidable shoreline ecological function losses with replacement for those losses so that further reduction to shoreline ecological functions of ecosystem-wide processes may be prevented.”

The property is being permitted for a bulkhead repair and creation of a beach cove.

## Location

The subject property is located at 6000 SE 20<sup>th</sup> Street, Mercer Island, Washington (see Appendix A – Sheet A1.0). The parcel is on the waterfront of Lake Washington that contains several endangered fish species listed under the Endangered Species Act and Washington State designated priority fish species.

## Project Description

The proposed work includes repair of the existing 180.5-foot long rock bulkhead. The proposed work includes removal and replacement of the existing rocks as needed and adding crushed rock and filter fabric behind the bulkhead to allow proper drainage from behind the bulkhead.

A 20 foot section of the existing bulkhead will be removed and beach nourishment material will be put in it's place. The removal of the bulkhead will remove approximately 35 cubic yards of material from the lake and the bulkhead removal will remove 449 square feet of reclaimed land from the shoreline. Beach nourishment material will be placed to create a beach per WDFW specifications. See sheets A2.0 to A5.0.

During construction, a floating boom and weighted silt curtain will surround the work barge and pier. See sheet A6.0.

A planting plan will be installed using native plants as shown on Sheet A7.0 and A8.0

Project drawings are included in Attachment A.

## Approach

Northwest Environmental Consulting LLC (NVEC) biologist Brad Thiele conducted a site visit on January 9, 2026, to evaluate conditions on site and adjacent to the site. NVEC also consulted the following sources for information on potential critical fish and wildlife habitat along this shoreline:

- Washington Department of Fish and Wildlife (WDFW): Priority Habitats and Species online database (<http://apps.wdfw.wa.gov/phsontheweb/>)

- WDFW SalmonScape online database of fish distribution and ESA listing units (<https://apps.wdfw.wa.gov/salmonscape/>)
- Mercer Island GIS online database (<https://chgis1.mercergov.org/Html5Viewer/Index.html?viewer=PubMaps&viewer=PubMaps>)

## Site Description

The subject property is a shoreline tract in a residential neighborhood. It has shoreline on its western boundary with single-family homes to the northeast and south.

The parcel is maintained as lawn. The shoreline is armored with a basalt bulkhead with planting beds along the shoreline with mostly ornamental plants. A few native plants are present including Oregon grape, red osier dogwood, and kinnikinnick. The substrates along the shore are sand with gravel and interspersed cobble starting about 10 feet from shore. Patchy Eurasian milfoil was present starting about 30 feet from shore.

A dock is present with a moorage bay and fingers. A boat lift and dual personal watercraft lifts are present along the dock.

The neighboring shorelines are landscaped with bulkheads and docks with various landscaping. See attached photos in Appendix B- Photos.

## Species Use

WDFW's PHS mapping and SalmonScape mapping tools show the following salmonid species using Lake Washington for migration and/or rearing: residential coastal cutthroat (*Oncorhynchus clarkii*), winter steelhead (*O. mykiss*), Dolly Varden/bull trout (*Salvelinus malma*), sockeye salmon (*O. nerka*), fall Chinook (*O. tshawytscha*), coho salmon (*O. kisutch*), and kokanee (*O. nerka*). The SalmonScape database maps the site as accessible to the Endangered Species Units (ESU) of Threatened Chinook and steelhead. Juveniles migrate and may rear in the waters near the project when traveling from spawning sites on other lake tributaries to the lakes system's outlet at the Hiram M. Chittenden Locks. The project site is accessible to any fish migrating or rearing in the lake.

The shoreline is not mapped as a Sockeye spawning location, but a spawning area is located to the south of the project under the I-90 bridge.

Priority Habitats and Species mapping does not map any features within 2,500 feet of the site except for Lake Washington.

The City of Mercer Island GIS Portal does not indicate any watercourses at the site.

## Project Impacts and Conservation Measurements

### **Direct Impacts:**

#### **Sediments:**

Repair of the existing rock bulkhead and removal of a section has the potential to create turbidity. Any disturbed soils landward of the bulkhead will be stabilized upon completing the

work.

Additionally, the tug and barge propwash may disturb sediments temporarily when making trips to and from the site. The project will meet state water quality standards.

Juvenile salmonids could be temporarily displaced or stressed by increased turbidity. A floating boom will be placed around the pier to contain floating debris to the project site and a floating silt boom will be installed around in-water work areas to prevent turbidity from leaving the work area should it occur. The project will meet state water quality standards.

**Shoreline:** The rock bulkhead provides more surface area and creates an uneven surface that helps to attenuate wave action along the shoreline and reduces the occurrence of reflecting waves compared to concrete bulkheads.

Removal of a section of bulkhead will reduce the occurrence of reflecting waves that cause additional sediment erosion from the lakebed along the bulkhead. The beach will help stabilize substrates along the shoreline while maintaining sorted substrates in the nearshore.

Planting native vegetation will increase the habitat functions of the shoreline by creating shade along the shoreline that will be an improvement from the existing baseline habitat conditions at the project site. The plantings will increase overhanging cover for fish, structural diversity for birds and wildlife, detritus for aquatic invertebrates and long-term recruitment of woody material and other allochthonous food sources. The proposed planting plan is included (see Appendix A - Sheet 7.0).

**Lakebed:** The lakebed will be expanded by 449 square feet when the bulkhead is removed. This will benefit the aquatic environment by increasing the area of the lakebed.

**Noise:** Construction equipment will create noise audible to neighbors and in-water. Noise disturbance will be short-term and should have negligible effects on fish and wildlife in the area because work will be completed during the in-water work window when juveniles are not likely to be present.

**Potential spills:** Short-term risks include the potential for spills that can occur with any equipment operation. The potential harm to the aquatic environment is minimized because a trained crew will be onsite that will implement spill containment measures should a spill occur. If a spill should occur, the Department of Ecology will be notified per permit conditions.

***Indirect Impacts:***

No changes to overwater coverage will occur due to this project.

**Recreational Boating:** Recreational boating has been identified as a limiting factor for salmonid populations in Lake Washington. The bulkhead repair and reconfiguration will not introduce additional boating to Lake Washington.

***Other Conservation measures:***

**Work window:** The work will be completed during the prescribed in-water work window for this area of Lake Washington (July 16 to April 30). Operating within this time frame helps protect Chinook salmon, steelhead, bull trout and other salmonid fish species by doing work when juvenile fish are not expected to be present.

**Best Management Practices:** Applicable BMPs will be used such as a floating boom around the in-water work area that will contain any floating debris that may escape during demolition and construction. The barge will have a perimeter containment sock to absorb oil and grease

that may wash from the barge during construction.

Hazardous material containment supplies such as spill absorbent pads, and trained personnel will be required onsite during any phase of construction where machinery is in operation near surface waters.

**In-lieu Fee:** The shoreline on the subject property will be planted with native, overhanging vegetation. The project requires approval from the National Marine Fisheries Service (NMFS). NMFS has developed a calculator to determine appropriate mitigation costs for proposed in-water structures in Lake Washington. This calculator has established a fund that owners can pay into if they are not willing or cannot find mitigation to offset impacts from the project. The owner is not able to complete the required mitigation at the subject property required by NMFS and the property owners will pay into the in-lieu fee program to mitigate project impacts. An in-lieu fee program is defined as follows:

“A program involving the restoration, establishment, enhancement, and/or preservation of aquatic resources through funds paid to a governmental or non-profit natural resources management entity to satisfy compensatory mitigation requirements... Similar to a mitigation bank, an in-lieu fee program sells compensatory mitigation credits to permittees whose obligation to provide compensatory mitigation is then transferred to the in-lieu program sponsor.” (Fed. Reg. 40 CFR Part 230)

The fee has been determined using the Restoration And Permitting (RAP) Calculator for Lake Washington and will be paid to King County Water & Land Resources Division. The RAP program has funded restoration projects through the King County Conservation District. Project elements include removal of overwater structures, derelict pilings, including creosote, and restoration of Taylor Creek. <https://kingcounty.gov/en/dept/dnrp/nature-recreation/environment-ecology-conservation/wetlands/mitigation-reserves-program/restoration-and-permitting-program>

## Conclusion

Juvenile Chinook salmon, and other salmonids, rear and migrate along the Lake Washington shoreline. Lake Washington is a Shoreline of the State.

There will be temporary impacts from noise and disturbed sediments during construction.

The project will minimize construction effects on the environment by following the prescribed fish window and using applicable BMPs to prevent construction spills, turbidity, and floating debris from escaping the area. The construction crew will retrieve all dropped items from the bottom and dispose of them properly. The effects of construction will be short term.

Maintaining the bulkhead can cause reflecting waves that cause erosion of bottom substrates. The use of a rock bulkhead helps attenuate wave action during lake high water over a solid vertical structure. The removal of the bulkhead and creation of beach will allow waves to splash onto the beach reducing wave action along the shoreline that can cause erosion and reduce sorting of shoreline substrates. The new beach area will be beneficial to the aquatic environment by increasing the area of the lake bottom by 449 square feet and reduction of reflecting waves.

A shoreline planting plan will be implemented that will add a western red cedar and shorepine and three native shrubs. The native plantings will improve natural shading, create allochthonous

food sources and will eventually be a source of woody materials improving shoreline conditions at the site in the long-term.

The owner has also opted to pay into the In Lieu Fee program that will be used for conservation projects that benefit salmon habitat in King County.

This project has been designed to meet current residential dock standards and will use Best Management Practices to reduce project impacts. The conservation measures are designed to improve ecological functions or prevent further degradation of habitat **and will result in No Net Loss of ecological functions**. The removal of 449 square feet of material from the lake to create a beach area and implementing a planting plan will improve ecological baseline conditions at the site.

## Document Preparers

Brad Thiele

Biologist

31 years of experience

Northwest Environmental Consulting, LLC. (NVEC)

The conclusions and findings in this report are based on field observations and measurements and represent our best professional judgment and to some extent rely on other professional service firms and available site information. Within the limitations of project scope, budget, and seasonal variations, we believe the information provided herein is accurate and true to the best of our knowledge. Northwest Environmental Consulting does not warrant any assumptions or conclusions not expressly made in this report or based on information or analyses other than what is included herein.

## REFERENCES

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ThruFlow. 2020. Legacy Series. Online. Accessed September 2020 at <https://thruflow.com/products/legacy/>.

US Army Corps of Engineers (USACE). 2004. Final Biological Evaluation, Regional General Permit: Construction of New or Expansion of Existing Residential Overwater Structures and Driving of Moorage Piling. Lake Washington, Lake Sammamish, the Sammamish River and Lake Union, Including the Lake Washington Ship Canal, in the State of Washington.

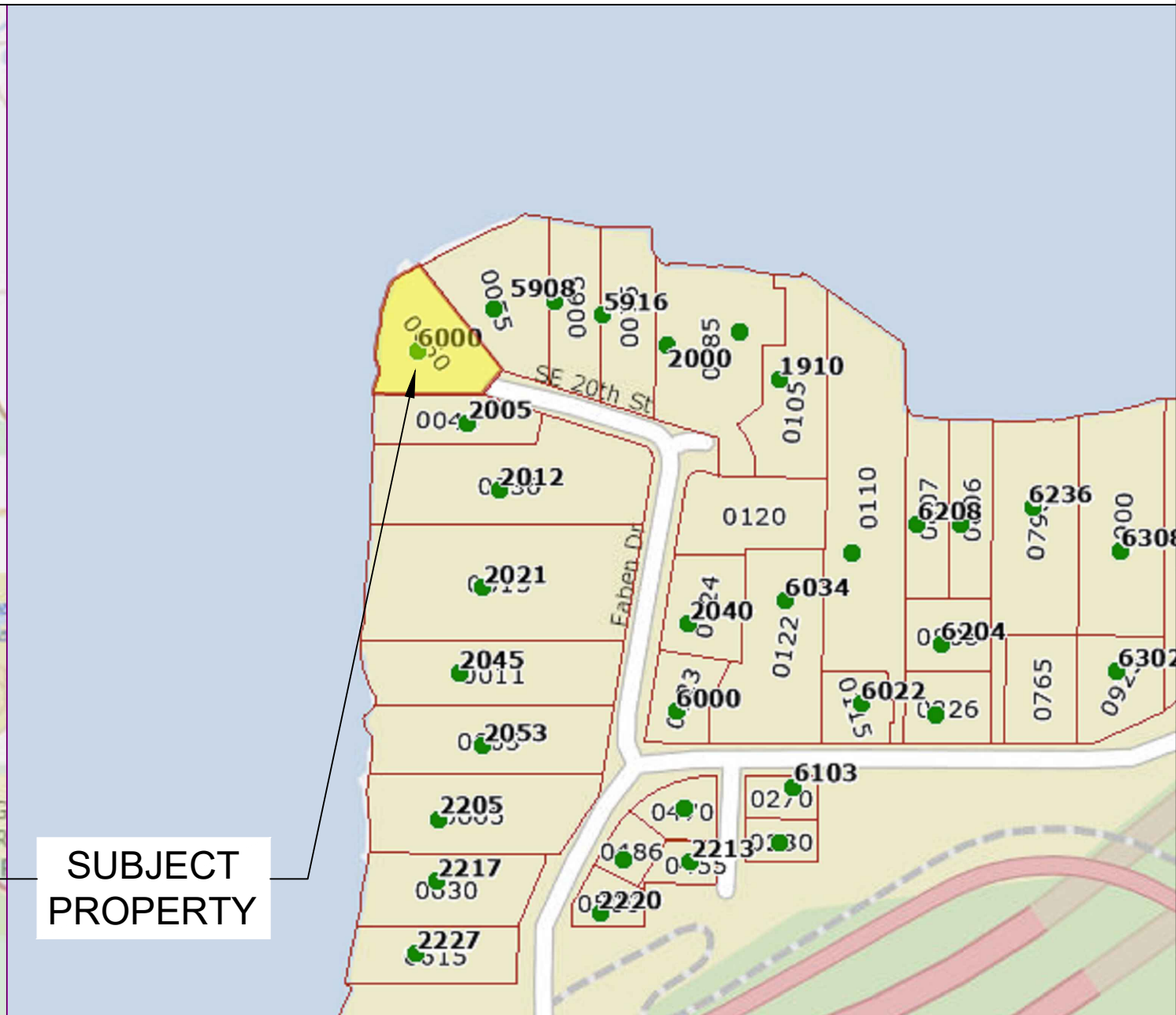
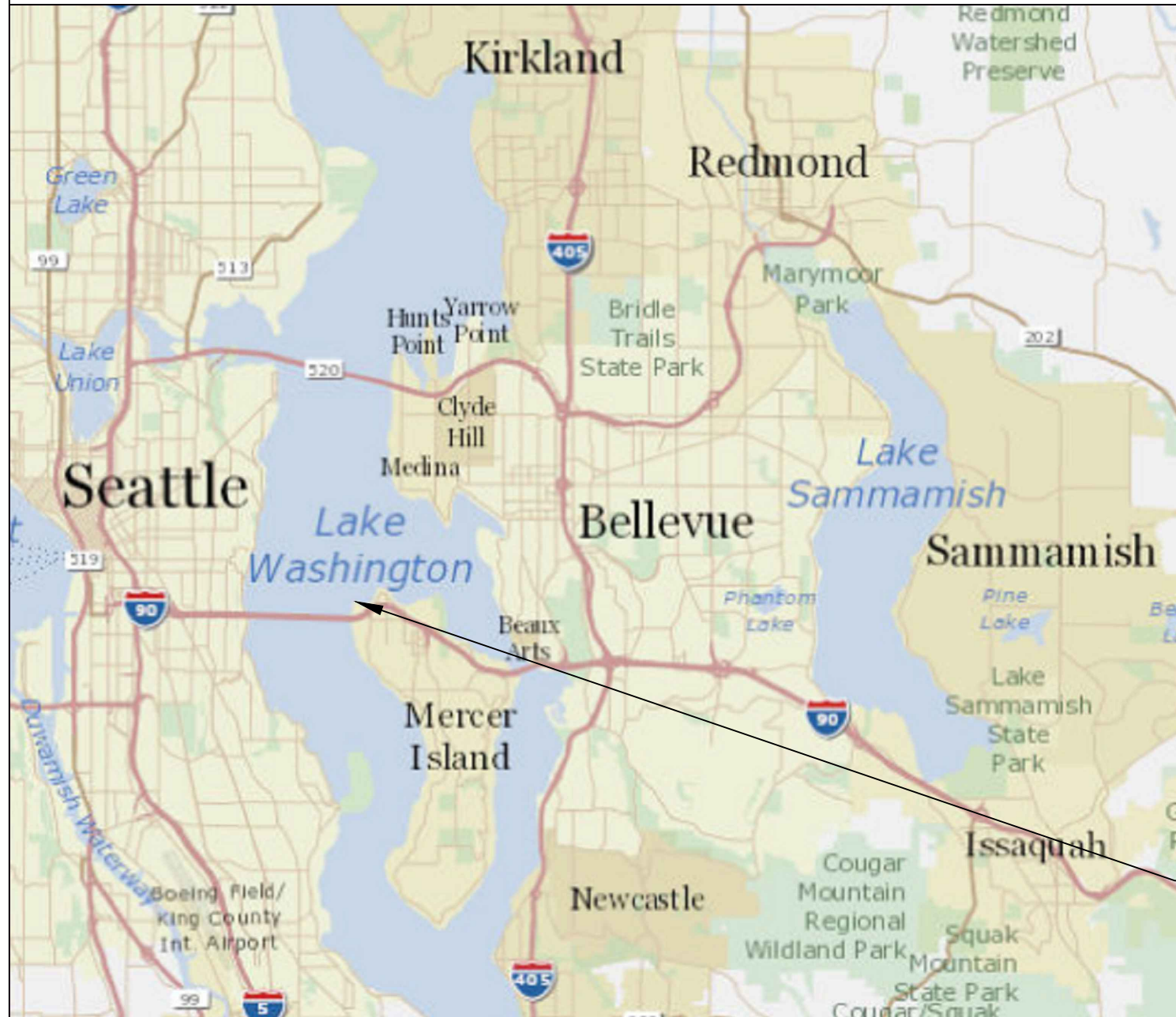
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WDFW. 2026. SalmonScape. Online database. Accessed January 2026 at <http://apps.wdfw.wa.gov/salmonscape/>

# **Appendix A: Figures and Project Drawings**

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# SITE PLAN



**SUBJECT  
PROPERTY**

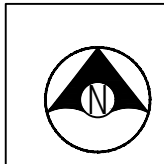
Pin: 243970-0050

Legal Description: FABENS POINT WATERFRONT TRS 9 & POR 10 SWLY OF LN BEG AT SE COR OF SD LOT WH SE COR IS N 39 DEG 37 MIN 41 SEC E 21.60 FT FR MOST SLY COR RNNG TH NWLY PLW SWLY LN TO NWLY LN THOF & SH LDS ADJ

Plat Block:  
Plat Lot: 9-10

Parcel  
LAT: 47.59259  
LONG: -122.25363

Dock  
LAT: 47.592658  
LONG: -122.253899



Seaborn Pile Driving  
1080 W Ewing St  
Seattle, WA 98119

Office: 206-236-1700 ext. 5  
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Scope of Work: We propose to repair 180'-6" of bulkhead.

County: King County  
Location: Lake Washington

Applicant: Pisco Residence  
6000 SE 20TH ST  
Mercer Island, WA 98040

Datum: CORPS OF ENGINEERS 1919  
SE Quarter Of Section 02, Township 24, Range 04

Adjacent Owners:  
TALL CRAIG E  
2005 FABEN DR 98040

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Created: 05/31/2024

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5904 SE 20TH ST

**SHEET  
1.0**

# GENERAL NOTES:

MATERIALS SPEC LIST:

**Boat Lifts:** Aluminum

- \* SL10014ARW - 146" x 191"
- \* Dual PWC Lift - 122" x 132"

**Sewer:**

- \* All sewer is field verified by probing the lake bed manually during the allowed work windows for the area.

CODE REFERENCES: Mercer Island

**We are applying for the permit to be reviewed under the:**

**“Bulkheads and Shoreline Stabilization Structures” per MIMC 19.13050(B)(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:

The replacement structure should be designed, located, sized, and constructed to assure no net loss of ecological functions.

**NNL Report attached.**

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 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.

**Replacement bulkhead will not encroach waterward of OHWM.**

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.

**Replacement bulkhead will have no additions or increase in size.**

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.

**Replacement bulkhead will not be constructed over lands covered by water.**

Pier & Bulkhead legally established under 0711-201 02/08/2008

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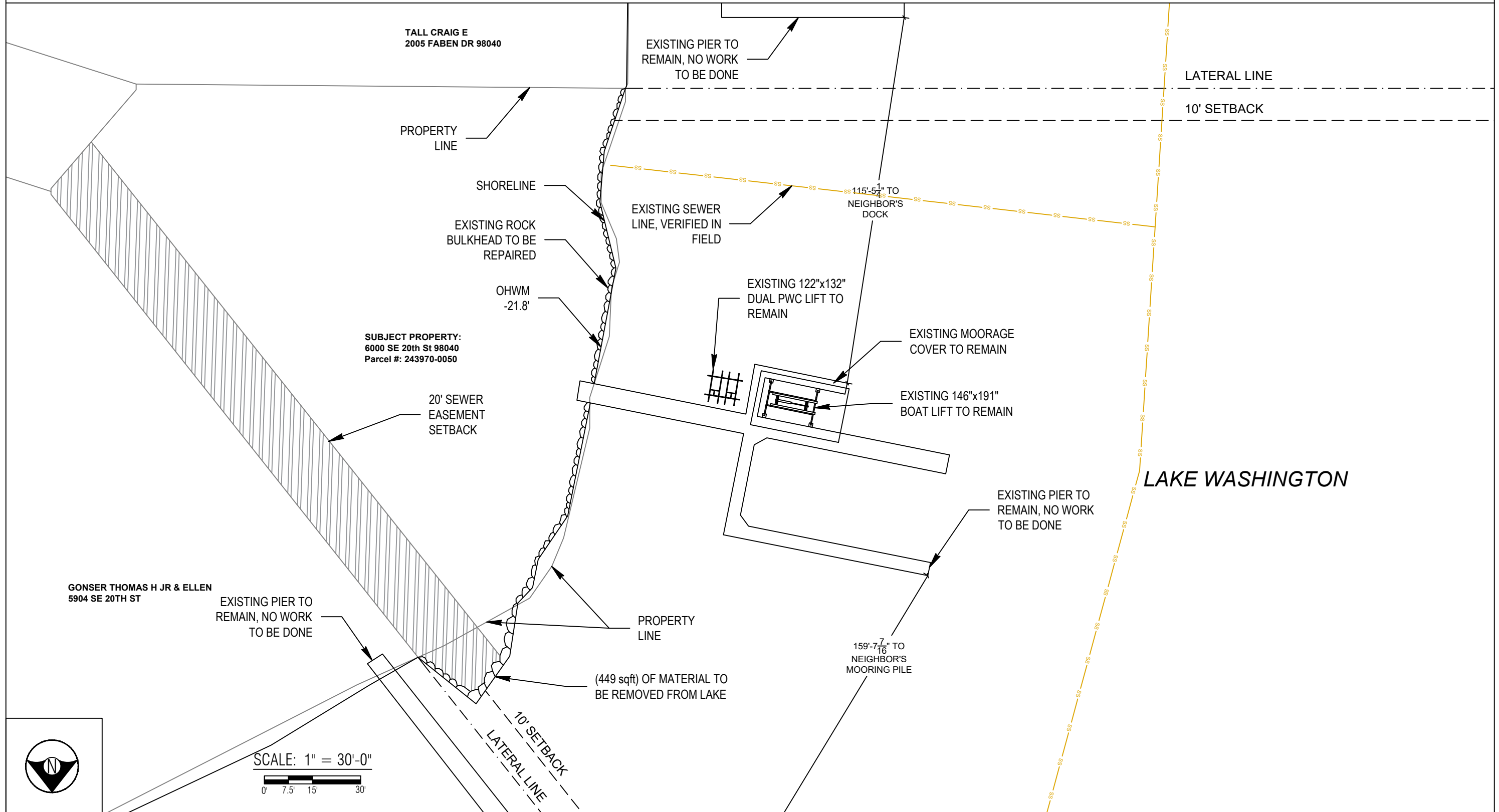
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Scope of Work: We propose to repair 180'-6" of bulkhead.

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2.0**

# EXISTING CONDITIONS

**\*\*CLEAN UP LAKE AROUND PROJECT\*\***



Datum: CORPS OF ENGINEERS 1919  
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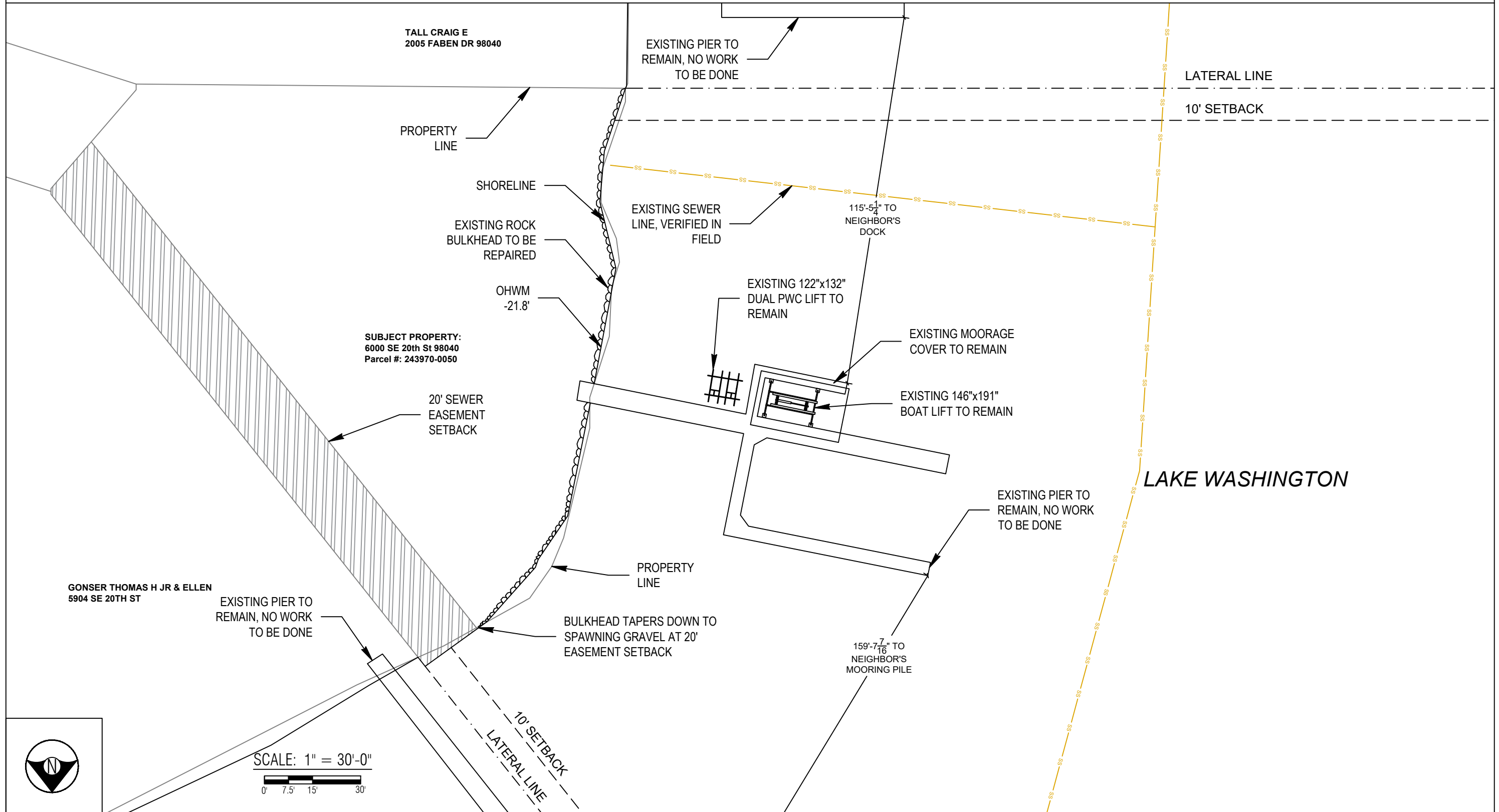
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NWS-2023-XXX  
PAGE 3 OF 10

# PROPOSED CONDITIONS

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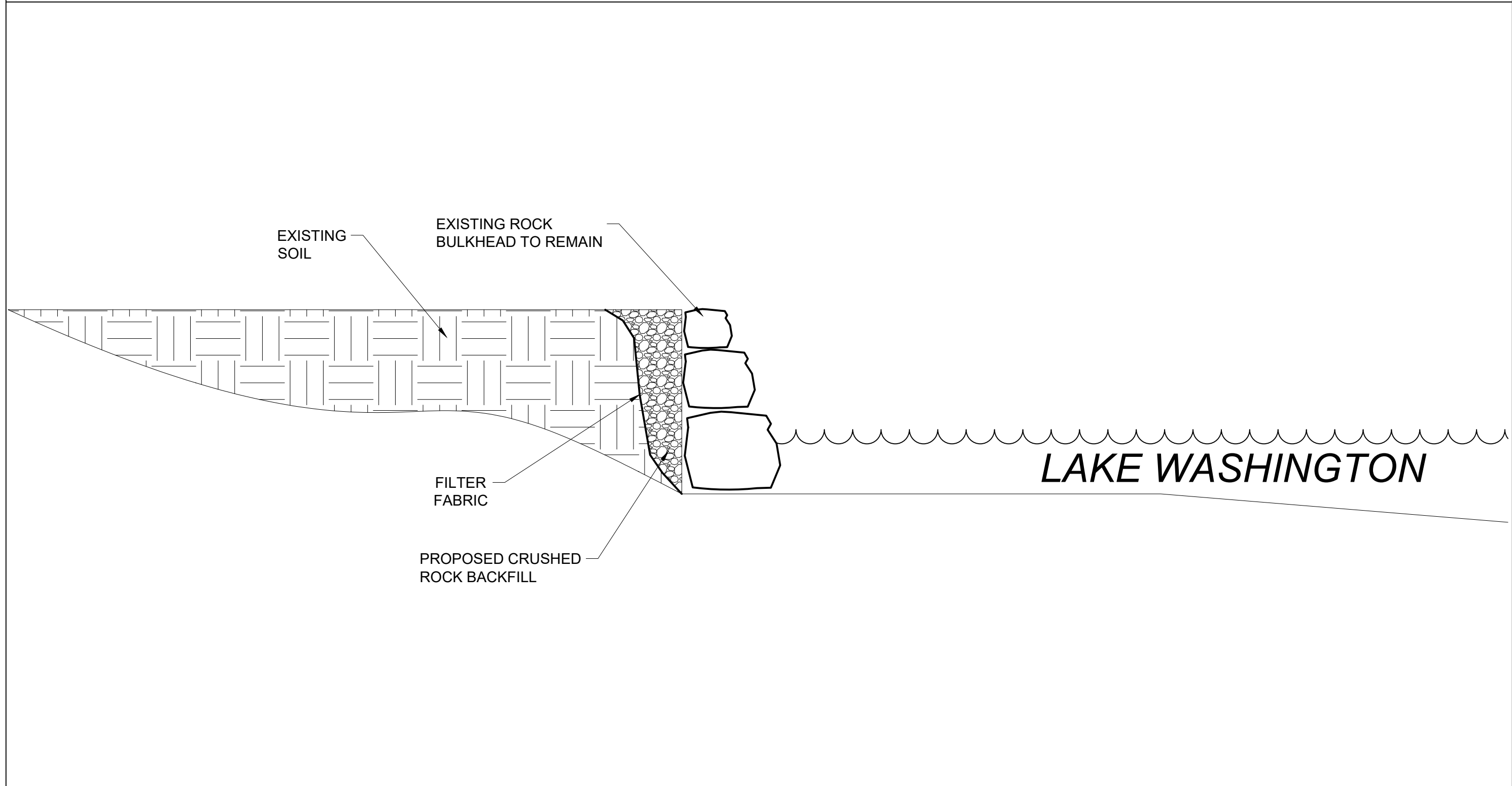
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PAGE 4 OF 10

# BULKHEAD SECTION



PLAN VIEW



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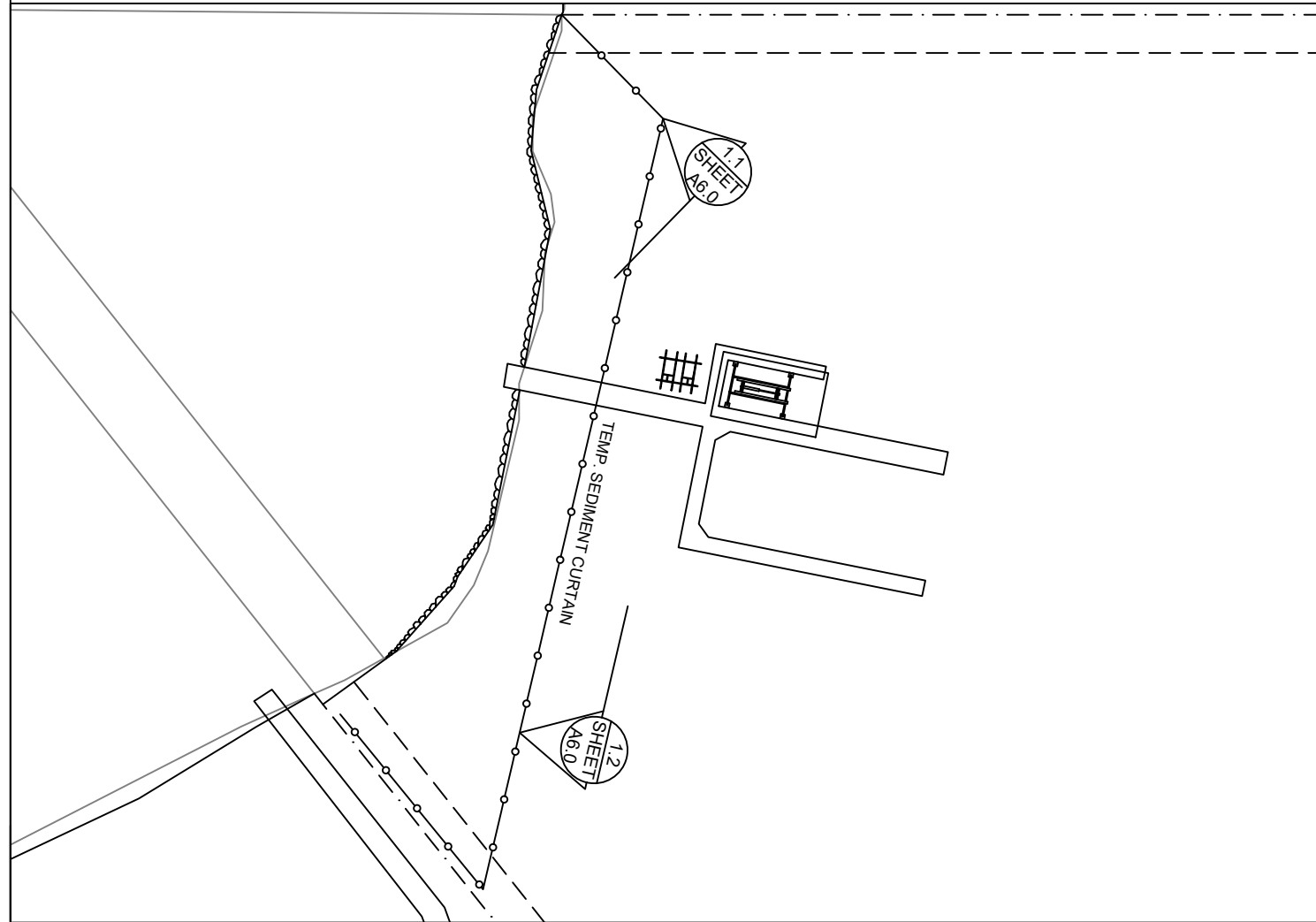
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# BMP INFORMATION

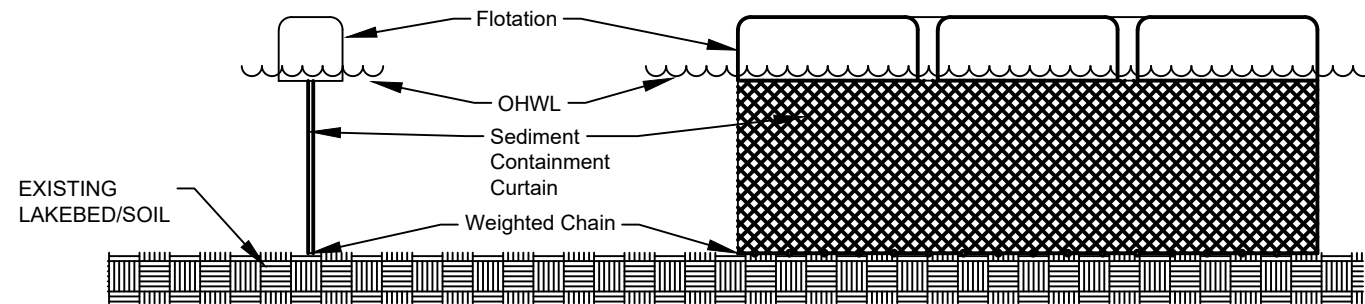


## BMP NOTES:

- A. Constant vigilance shall be kept for the presence of protected fish species during all aspects of the proposed action, particularly during in-water activities such as vessel movement, deployment of anchors & spuds, pile driving, dredging, and placement of gravels and other fill.
  1. The project manager shall designate an appropriate number of competent observers to survey the project site and adjacent areas for protected species, including the presence of fish as conditions allow.
  2. Visual surveys shall be made prior to the start of work each day, and prior to resumption of work following any break of more than an hour. Periodic additional visual surveys throughout the work day are strongly recommended.
  3. All in-water work shall be done during the in-water work window for the waterbody. Where there is a difference between the USCOE and WDFW work windows, the overlap of the two shall apply.
  4. All pile driving and extraction shall be postponed or halted when obvious aggregations or schooling of fish are observed within 50 yards of that work, and shall only begin/resume after the animals have voluntarily departed the area.
  5. When piloting vessels, vessel operators shall operate at speeds and power settings to avoid grounding vessels, and minimize substrate scour and mobilization of bottom sediments.
- B. No contamination of the marine environment shall result from project-related activities.
  1. Appropriate materials to contain and clean potential spills shall be stored and readily available at the work site and/or aboard project-related vessels.
  2. The project manager and heavy equipment operators shall perform daily pre-work equipment inspections for cleanliness and leaks. All heavy equipment operations shall be postponed or halted should a leak be detected, and shall not proceed until the leak is repaired and the equipment is cleaned.
  3. To the greatest extent practicable, utilize biodegradable oils for equipment that would be operated in or near water.
  4. Fueling of land-based vehicles and equipment shall take place at least 50 feet away from the water, preferably over an impervious surface. Fueling of vessels shall be done at approved fueling facilities.
  5. Turbidity and siltation from project-related work shall be minimized and contained through the appropriate use of erosion control practices, effective silt containment devices, and the curtailment of work during adverse weather and tidal/flow conditions.
  6. All wastes shall be collected and contained for proper disposal at approved upland disposal sites appropriate for the material(s).
  7. When removing piles and other similarly treated wood, containment curtain must fully enclose the work area. Wood debris, oils, and any other materials released into lake waters must be collected, removed, and properly disposed of at approved disposal sites.
  8. All in- and over-water wood cutting would be limited to the minimum required to remove the subject wood component, and all cutting work should be enclosed within floating containment curtain.
  9. When removing piles, no actions shall be taken that would cause adhering sediments to return to lake waters.
  10. Above-water containment shall be installed around removed piles to prevent sediment laden waters from returning to lake waters.
  11. Construction staging (including stocking of materials, etc.) will occur on the supply barge.
  12. All Exposed wood to be used on the project will be treated with a an agency approved treatment.

DETAIL 1.1

DETAIL 1.2



DETAIL 1.1 & 1.2



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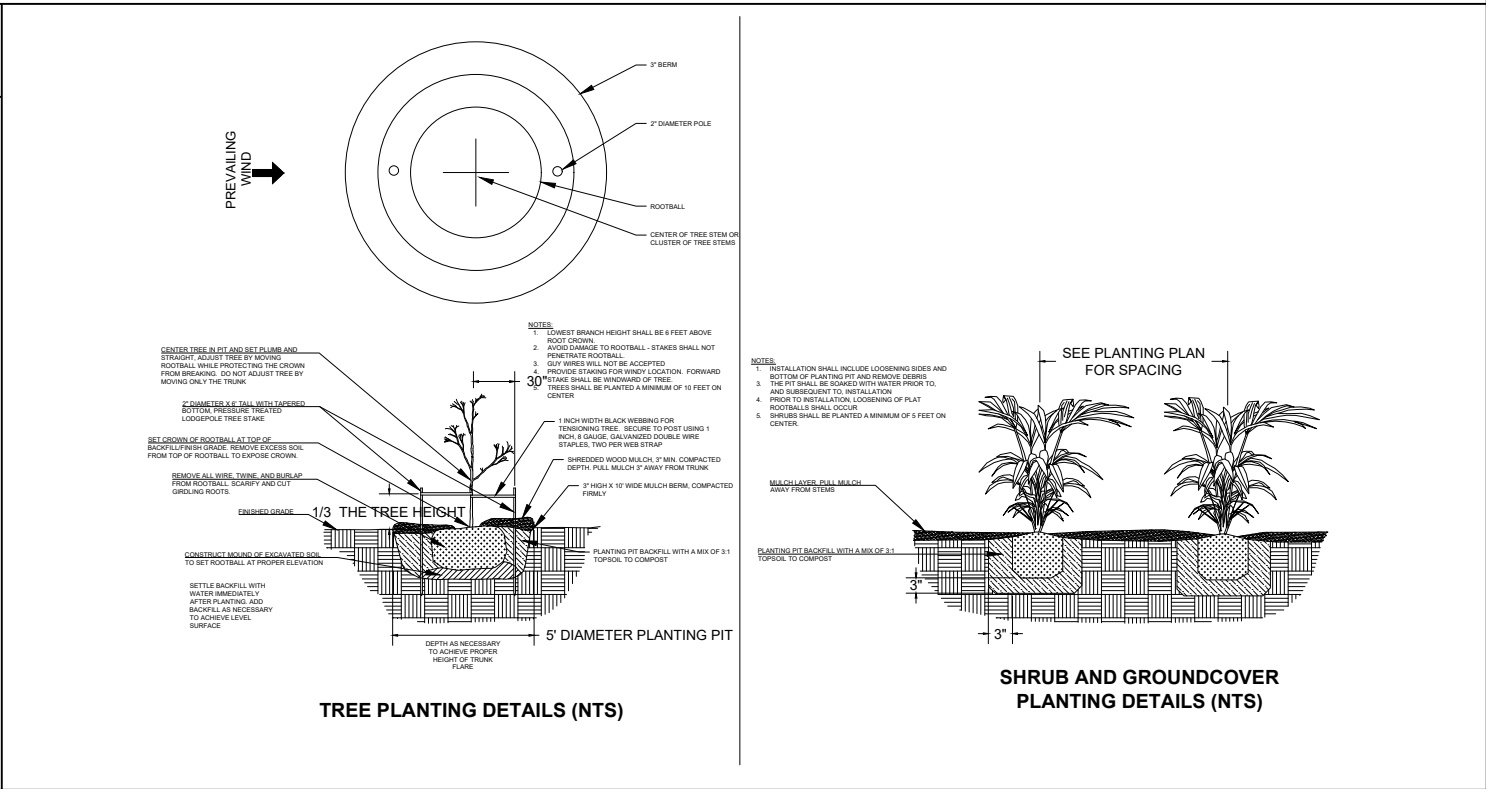
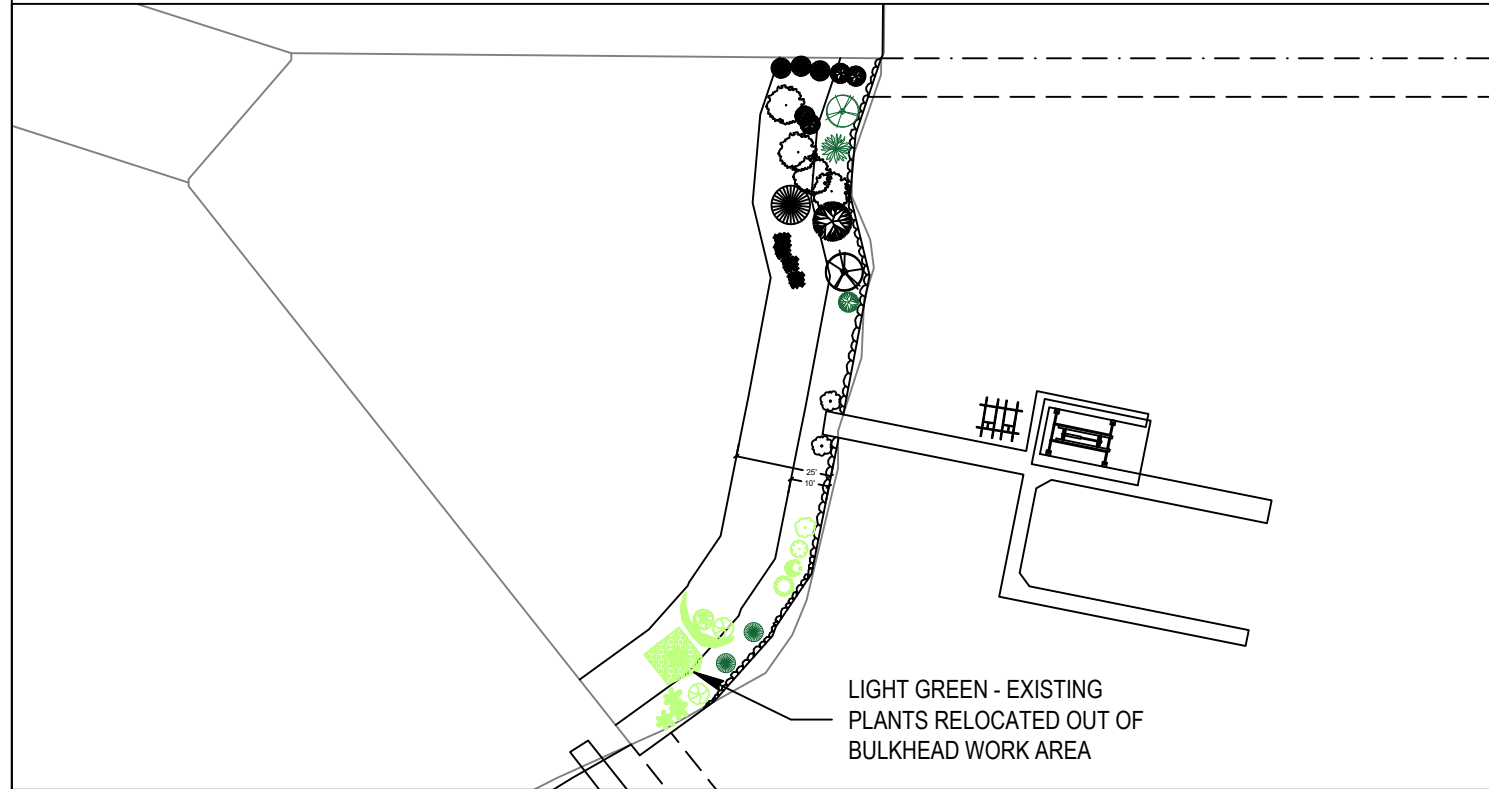
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# MITIGATION PLAN



**Notes:**

1. The property owner shall implement and abide by the shoreline planting plan, including the installation of the identified species, in the identified locations. Shrubs shall be planted at least five feet on center, and trees shall be planted at least ten feet on center.
2. For best plant survival, planting should be completed the first October through March period concurrent with or immediately following the work authorized by this permit. A report, as-built drawing and photographs demonstrating the plants have been installed or a report on the status of project construction will be submitted to the U.S. Army Corps of Engineers, Seattle District, Regulatory Branch, within 12 months from the date of permit issuance. This reporting requirement may be met by completing and submitting a U.S. Army Corps of Engineers approved Report for Mitigation Work Completion form.
3. The property owner shall preserve in good health 100% of shoreline planting plan vegetation for as long as the structures that have been permitted under the RAP program remain in place. Plants that die must be replaced with the appropriate plant type (i.e. tree for tree, shrub for shrub) from the RAP Plant List.
4. The property owner shall monitor the survival of shoreline planting plan vegetation for five years (Monitoring Years 1-5) after the U.S. Army Corps of Engineers accepts the as-built report. The property owner shall also submit annual monitoring reports to the U.S. Army Corps of Engineers each year during this period. Each annual monitoring report will include written and photographic documentation that the performance standards are being met, including documentation of plant mortality and replacement. Photos will be taken from established points and used repeatedly for each monitoring year. In addition to photos at designated points, photo documentation will include a panoramic view of the entire planting area. Submitted photos will be formatted on standard 8 1/2 x 11" paper, dated with the date the photo was taken, and clearly labeled with the direction from which the photo was taken. The photo location points will be identified on an appropriate drawing. Annual shoreline planting monitoring reports will be submitted to the U.S. Army Corps of Engineers, Seattle District, Regulatory Branch, by November 31 of each monitoring year. This reporting requirement may be met by completing and submitting a U.S. Army Corps of Engineers approved Mitigation Planting Monitoring Report form.

PROPOSED PLANTING SPECIES/QUANTITIES				
SYMBOL	LATIN NAME	COMMON NAME	QTY	SIZE
	<i>Thuja plicata</i>	Western Red Cedar	1	3 ft
	<i>Pinus contorta v contorta</i>	Shore pine	1	3 ft
	<i>Rosa nutkana</i>	Nootka Rose	1	1 Gallon
	<i>Philadelphus lewisii</i>	Mock Orange	2	1 Gallon

PLANTS: Shrubs to be installed 5ft on center and trees to be installed 10ft on center.

**BUILT BY SEABORN**  
ESTD 1947

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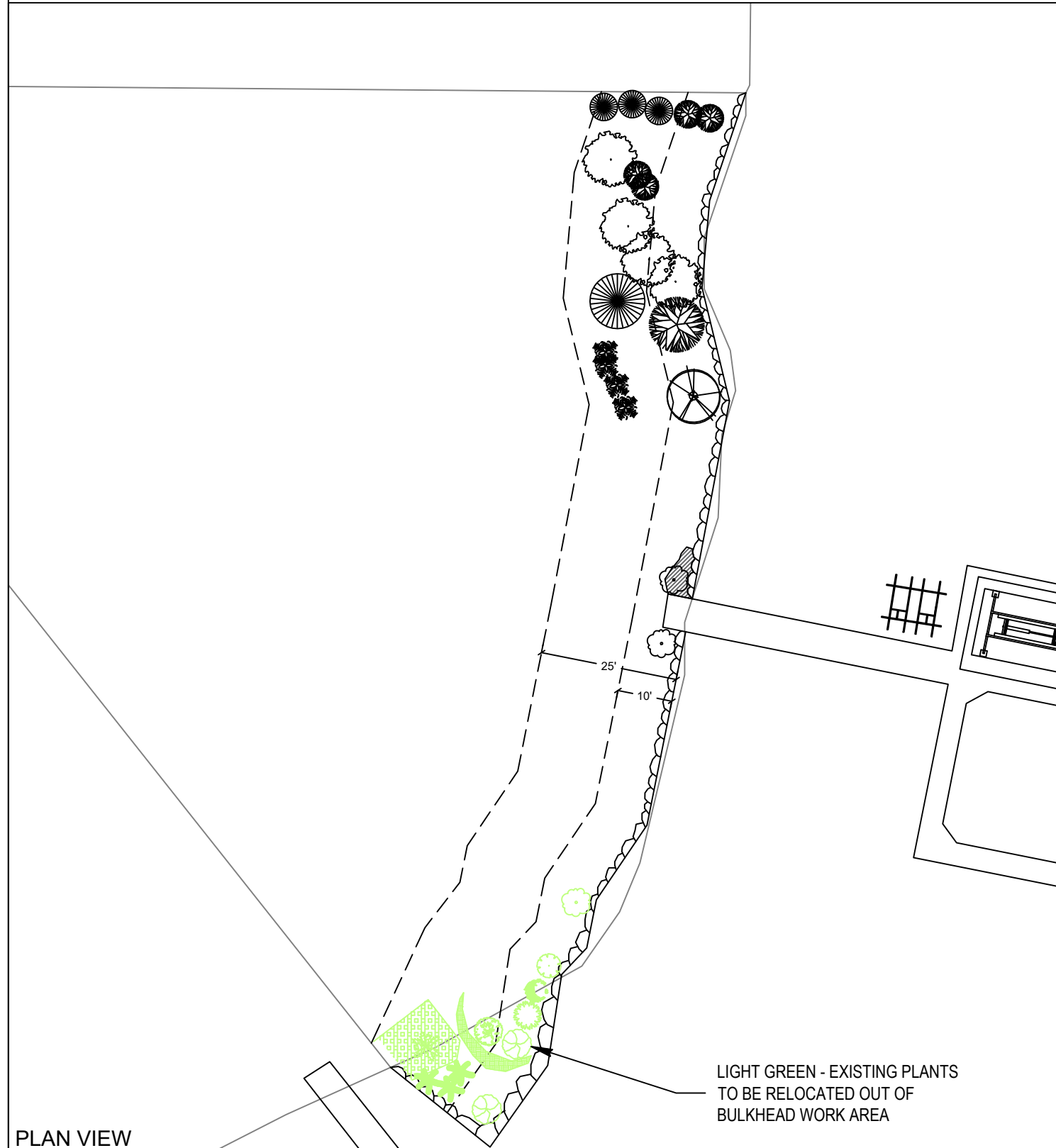
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**SHEET 7.0**

NWS-2023-XXX  
PAGE 7 OF 10

# EXISTING PLANT PLAN



SYMBOL	NAME	QUANTITY
	Oregon Grape	2
	Alpen Rose	1
	Pacific Rhododendron	4
	Sitka Willow	1
	Western Red Cedar	1
	Japanese Holly	1
	Windmill Palm	1
	Rockspray Catonester	3
	Redesier Dogwood	1
	Serbian Dogwood	1
	Purple Penguin	2
	Azalea	1
	Japanese Pieris	1
	Siberian Iris	--
	Water Birch	1
	Japanese Euronymus	3
	Bigleaf Hydrangea	1
	Malabar Melastone	--

EXISTING PLANTS TABLE      \*Plants in green require relocation - see Mitigation Plan

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Seattle, WA 98119

Office: 206-236-1700 ext. 5  
[www.seabornpiledriving.com](http://www.seabornpiledriving.com)

Scope of Work: We propose to repair 180'-6" of bulkhead.

Datum: CORPUS OF ENGINEERS 1919  
SE Quarter Of Section 02, Township 24, Range 04

Adjacent Owners:  
TALL CRAIG E  
2005 FABEN DR 98040

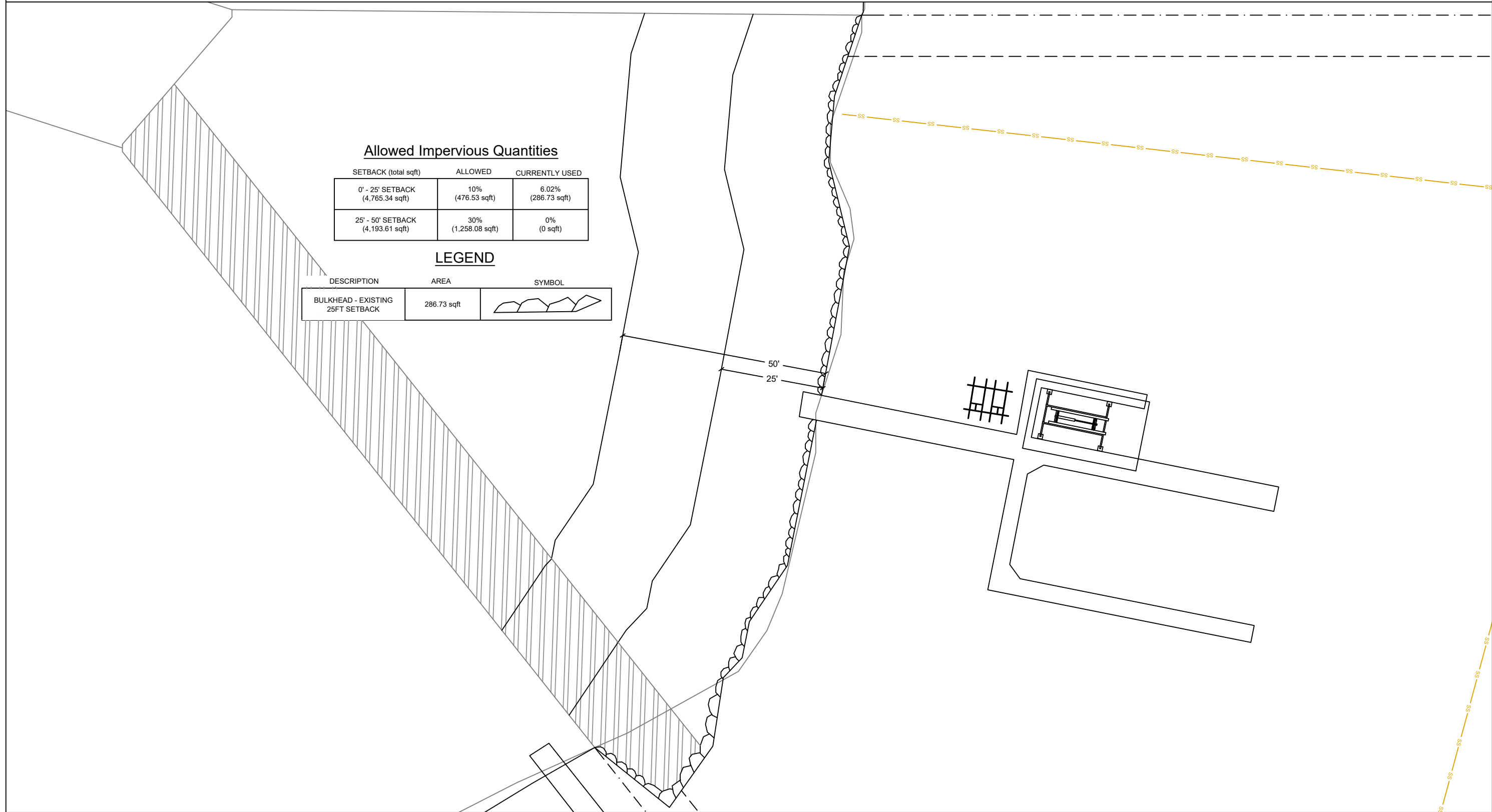
Applicant: Pisco Residence  
6000 SE 20TH ST  
Mercer Island, WA 98040

County: King County  
Location: Lake Washington

GONSER THOMAS H JR & ELLEN  
5904 SE 20TH ST

Created: 05/31/2024  
Last Updated: 1/23/2026 11:25 AM Kady

# HARDSCAPE CALCULATION DRAWING - EXISTING



County: King County  
 Location: Lake Washington

Applicant: Pisco Residence  
 6000 SE 20TH ST  
 Mercer Island, WA 98040

Datum: CORPS OF ENGINEERS 1919  
 SE Quarter Of Section 02, Township 24, Range 04

Adjacent Owners:  
 TALL CRAIG E  
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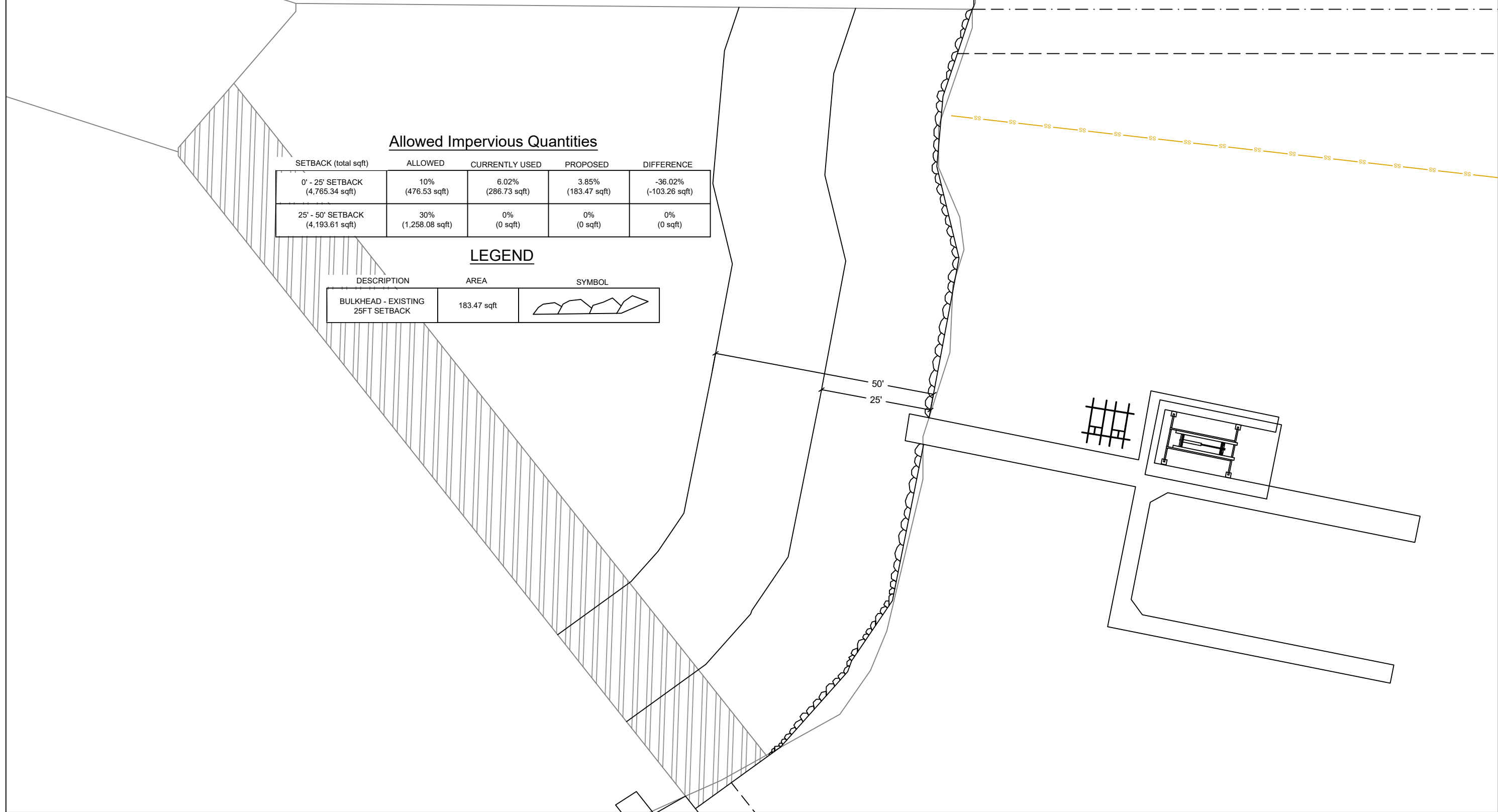


Seaborn Pile Driving  
 1080 W Ewing St  
 Seattle, WA 98119

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# HARDSCAPE CALCULATION DRAWING - PROPOSED



### Allowed Impervious Quantities

SETBACK (total sqft)	ALLOWED	CURRENTLY USED	PROPOSED	DIFFERENCE
0' - 25' SETBACK (4,765.34 sqft)	10% (476.53 sqft)	6.02% (286.73 sqft)	3.85% (183.47 sqft)	-36.02% (-103.26 sqft)
25' - 50' SETBACK (4,193.61 sqft)	30% (1,258.08 sqft)	0% (0 sqft)	0% (0 sqft)	0% (0 sqft)

### LEGEND

DESCRIPTION	AREA	SYMBOL
BULKHEAD - EXISTING 25FT SETBACK	183.47 sqft	

County: King County  
 Location: Lake Washington  
 Applicant: Pisco Residence  
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**SHEET 10.0**

## **Appendix B: Site Photographs**

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Photo 1 - Existing dock looking waterward.



Photo 2 - Existing dock looking shoreward showing bulkhead to be replaced.



Photo 3 - Existing shoreline north of dock. The cove will be placed in this section.



Photo 4 - Section of bulkhead to be repaired south of the dock.



Photo 5 - Conditions north of the site.



Photo 6 - Conditions south of the site.