



## TECHNICAL MEMORANDUM

Prepared by: Grette Associates, a division of Farallon Consulting, L.L.C.    March 22, 2024  
2709 Jahn Avenue NW, Suite H-5  
Gig Harbor, WA 98335

Prepared for: City of Medina  
Attention: Rebecca Bennett  
PO Box 144 – 501 Evergreen Point Rd.  
Medina, WA 98039

File No.: 3362-001-003

Re: 8315 Overlake Drive West – P-23-062: Third-Party Review

### 1 INTRODUCTION

The City of Medina (City) has contracted with Grette Associates, a division of Farallon Consulting, L.L.C., to assist in the review of the Ecological No Net Loss Assessment Report (the “Report”; dated January 2024) prepared by Northwest Environmental Consulting, L.L.C. This Report was prepared in support of the proposed project to install a translucent moorage cover on an existing dock (Project) located at 8315 Overlake Drive West (King County parcel 2018700240) in the City of Medina.

Given the location, with respect to critical areas, this Project is regulated under Subtitle 16.6 (Shoreline Master Program [SMP]) of the current version of the Medina Municipal Code (MMC).

As permission to access the subject property was denied by the property owner, this third-party review of the Report is based solely on information obtained from online sources.

### 2 REVIEW METHODS

#### 2.1 Site Visit

In lieu of an on-site assessment, Grette Associates utilized available online information to verify the environmental conditions summarized in the Report, and to identify all potential wetlands, streams, and fish and wildlife habitat conservation areas (FWHCAs) as defined in the Medina SMP that may be present within and adjacent to the subject property.

- U.S. Fish and Wildlife Service’s National Wetlands Inventory (NWI) Database;
- Washington Department of Fish and Wildlife’s (WDFW) Priority Habitats and Species (PHS) Database;
- The Washington Department of Natural Resources’ (WDNR) Forest Practice Application Database;
- WDFW’s SalmonScape Database.

## **2.2 Document Review**

A Grette Associates qualified professional conducted a thorough review of the Report submitted to the City. The review focused on verifying the accuracy of the descriptions within the document and compliance with the current version of the Medina SMP (Subtitle 16.6 of the MMC).

In addition to being subject to state and federal requirements, the Project must comply with the SMP's no net loss requirements defined in MMC 16.66 and the critical area requirements defined in MMC 16.67.050, which requires that all critical areas within 200 feet of a proposed project be identified. As noted above, access to the subject property was not granted; therefore, this review is based solely on the online information reviewed by Grette Associates.

## **3 REVIEW RESULTS**

Based on queried information, it appears that Lake Washington is the only critical area (i.e., wetlands, streams, and FWHCAs) on or within 200 feet of the subject property. Per MMC 16.67.080, Lake Washington is classified as a FWHCA; therefore, an applicant must submit a critical areas report meeting the requirements defined in MMC 16.67.050. The Report does not include additional information to address the critical areas reporting requirements; however, MMC 16.67.050 does allow for the director to require less information to adequately address the critical areas within a proposed project area. In Grette Associates professional opinion, given that Lake Washington is the only critical area within 200 feet of the Project, the Report contains sufficient information to address the critical area.

Per MMC 16.67.010, any proposed project subject to regulation under the SMP is required to prepare an analysis to demonstrate that no net loss of existing shoreline ecological functions will occur as a result of a project. This analysis includes, but is not limited to, the following:

- A description of existing conditions of the affected shoreline;
- Demonstration of mitigation sequencing (MMC 16.66.020);
- An impact analysis, and;
- Proposed mitigation.

With the exception of demonstrating mitigation sequencing, the Report provides a sufficient description of the existing conditions and habitats along the portion of Lake Washington within the subject property as well as includes a sufficient analysis of potential impacts that may occur as a result of the Project. The Report also includes a description of best management practices (BMPs) that will be implemented during construction. Lastly, the Report concludes that the Project will likely be limited to temporary impacts during construction and will not have an adverse impact to salmonids. Grette Associates concurs with this conclusion.

In response to ensuring no net loss of shoreline ecological function will occur, it appears the property owner will be utilizing an in-lieu fee program in response to federal permit requirements as well as planting two native trees and three native shrubs. The Report does not include a summary of any post-project monitoring to ensure survival of the native species and thus no net loss of function; however, according to the included figure set (Sheet 8.0) the proposed project will perform a post-project inspection and complete a 5-year monitoring effort for compliance with federal permit requirements. Per MMC 16.66.020, monitoring is required to be completed for any mitigation action. As such, the post-project inspection report and monitoring reports should also be provided to the City for compliance with the no net loss requirements defined in Chapter 16.66 of the MMC.

Similar to above, the director may allow for less information within a no net loss analysis if it is determined that less information is necessary to adequately address no net loss. In Grette Associates' professional opinion, the no net loss standard define in Medina's SMP is being met with the plantings and monitoring outlined in the Report.

#### **4 SUMMARY AND RECOMMENDATIONS**

In summary, Grette Associates largely concurs with the Report's determination that the Project will not result in a net loss of existing shoreline ecological functions. However, as noted above, Grette Associates recommends the City require the applicant to submit copies of the monitoring reports as outlined in the provided sheet set (Sheet 8.0) for compliance with the no net loss requirements defined in Chapter 16.66 of the MMC.

Lastly, while there are some deficiencies in the Report for compliance with the minimum reporting requirements defined in Chapter 16.66 and 16.67 of the MCC, it is Grette Associates opinion the Report provides sufficient information to adequately address no net loss and the critical areas and revisions are not necessary. This determination requires approval from the director per MMC 16.66.010 and MCC 16.67.050.

The review of the Report was conducted using the best available scientific information and methodologies and the best professional judgment of Grette Associates staff biologists. Final acceptance and approval of the Report is at the discretion of City staff.

If you have any questions regarding this review, please contact me at (253) 573-9300, or by email at [chadw@gretteassociates.com](mailto:chadw@gretteassociates.com).

Regards,



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