

Comment on MUP 3041461-LU



To: Seattle Department of Construction and Inspections

From: Jennifer Marriott, PWS

Date: 10 March 2025

Property: East Harrison Street End – Comment on MUP 3041461-LU

This memo is intended to provide input based on reading the ECA wetland corrections notice to the Friends of Hidden Beach application for proposed modifications to the East Harrison Street End.

We'd like to ensure the critical areas report dated December 11, 2024 is in the City records for this application (**attached**). In addition to providing my analysis, the report summarizes two previous wetland delineations done in 2011 and 2017 by different wetland scientists, one letter submitted by a third wetland scientist in August 2024 who did not do a delineation, and previous City comments that documented the onsite wetland. Details on the wetland are in the 2024 report, as well as discussed in the copies of the previous reports provided in the appendix of the 2024 report. In addition to current findings of a wetland, a wetland was verified onsite at two (2) different times over the last 14 years. At a minimum, given that lake levels and thus wetland hydrology have not significantly changed in this same time period, the wetland has been degraded into its current condition, which lacks the vegetation it once had.

This is one of the clearest examples of documented degradation of wetland vegetation that I have observed. Many disturbed sites and wetlands lack the solid documentation of "before and after" conditions that this site possesses. But at the East Harrison Shoreline Street End, two (2) separate reports delineating a wetland have been submitted and approved by the City of Seattle in 2011 and 2017. The public use of this site ensures that a series of photos are recorded in Google Maps that are publicly available from 2019 through current, as well as those photos on the website of Friends of Hidden Beach. The degradation of this shoreline has been documented in some fashion since the first wetland report in 2011, with substantial degradation occurring as uses have changed in nature and intensified over the last several years. In addition to the documented vegetation loss, it appears that shoreline erosion is also occurring. While sediment transport is a natural shoreline process, shoreline erosion is exacerbated when wetland vegetation that stabilizes the shoreline is lost. This is in turn worsened by people and dogs walking, running, and digging in the wetland and wetland buffer.

In addition to the clear degradation of the wetland and wetland buffer that has occurred over the last several years, the shoreline environment is being damaged by excessive human and pet use. The photos over time show substantially more grasses on the shoreline in past years, as recently as 2019 and 2022 (see Google Maps photos in the 2024 Critical Areas Report). Currently none of these grasses remain to protect the shoreline today. The goal of the Shoreline Master Program is to find the balance between critical areas and human use of shorelines so that both actions are protected yet also provided for. The very first purpose of Seattle's Shoreline Master Program is to "[p]rotect the ecological functions of the shoreline areas". SMC 23.60A.002.B.1. Ecological functions extend beyond just critical areas, and the impacts of development on ecological functions in the shoreline environment are often not contained simply within the footprint

of development. It is crucial that impacts to ecological functions from the development proposed in MUP 3041461-LU be evaluated for the Shoreline Street End as a whole, not just the disturbance areas of the redevelopment.

Similarly, the process of defining critical area impacts, justifying the impacts to critical areas, and outlining how the impact will be addressed and mitigated are crucial elements to any project that affects a site containing critical areas, as does the East Harrison SSE. This requirement to identify and protect or mitigate impacts to critical areas is relevant to any type of impact, including human uses that cause impacts, whether intentional or unintentional. Pedestrian uses of shorelines cause vegetation loss and increase soil erosion. As one example, people frequently run dogs off-leash at the East Harrison Shoreline Street End and there are many photos documenting off-leash dogs and the digging and damage that they cause to the shoreline, wetland, and wetland buffer. Off-leash dogs are not allowed at the East Harrison Shoreline Street End, as the small sign at the top of the Shoreline Street End states. This, however, does not deter people from continuing to use this street end for off-leash dog use and continuing the degradation to ecological (critical areas broadly, both shoreline and wetland) functions. There is no signage informing people of the wetland, wetland buffer, or ecologically sensitive areas. Both physical protection and specific signage are needed to protect the ecological functions from uses that damage the shoreline environment. Standard best management practices (BMPs) to protect wetlands include fencing to preclude sensitive areas from intrusion, natural barriers to delineate and protect critical areas and their buffers, and signage to ensure shoreline users know where critical areas are located that require additional caution.

I plan to again visit the East Harrison Shoreline Street End to observe and document the conditions of the critical area and shoreline in March and will share those observations with you.

Attachment: *Critical Areas Report – Existing Conditions for the East Harrison Street End*, revised 11 December 2024, prepared by Wet.land, LLC.