

TECHNICAL MEMORANDUM

Date: December 20, 2025
To: Leah Davis, Associate Planner
King County Department of Local Services, Permitting Division
From: Bill Rehe, Senior Consultant
Subject: SHOR24-0045; Findlay Bulkhead Request for Additional Information #1

Introduction

The overall goal of this project is to replace the aging and deteriorating timber bulkhead with a more shore friendly structure that continues to protect the shoreline while allowing access to the beach for individuals with mobility issues. The existing timber bulkhead is starting to deteriorate and is allowing sloughing of upland material. This scour pocket is creating unsafe conditions. We are proposing to remove the timber bulkhead and replace it with a setback bulkhead approximately 5 feet landward and bioengineered shoreline protection utilizing a combination of anchored logs, glacial erratic, beach nourishment and native riparian plantings. The existing beach access stairs will also be replaced with a beach access trail that terminates above OHW.

Project activities avoid and reduce new permanent impacts to critical areas by occurring landward of the existing bulkhead and above ordinary high water. Potential impacts to aquatic buffers will be minimized by conducting project related actions in areas of previous land use impacts and in the upland. The proposed project will result in a net reduction of impacts to the aquatic area (marine riparian) and the buffer by removing the existing treated timber bulkhead and stairs, and replacing it with a setback bulkhead, habitat features, and riparian plantings. The project will reestablish approximately 230 square feet of upper intertidal habitat, remove treated wood and replace invasive species with native plantings.

The following shoreline compliance narrative addressing how the proposed project meets the exemption allowances in WAC 173-27-040 and the shoreline stabilization standards in KCC 21A.25.170 is provided in response to King County's April 18, 2025, letter requesting additional information for permit application SHOR24-0045.

[Washington Administrative Code \(WAC\) 173-27-040 Developments exempt from substantial development permit requirement.](#)

The following narrative demonstrates the proposed project meets the exemption allowances in WAC 173-27-040

WAC 173-27-040(2)(b): Normal maintenance or repair of existing structures or developments, including damage by accident, fire or elements. "Normal maintenance" includes those usual acts to prevent a decline, lapse, or cessation from a lawfully established condition. "Normal repair" means to restore a development to a state comparable to its original condition, including but not limited to its size, shape, configuration, location and external appearance, within a reasonable period after decay or partial destruction, except where repair causes substantial adverse effects to shoreline resource or environment. Replacement of a structure or development may be authorized as repair where such replacement is the common method of repair for the type of structure or development and the replacement structure or development is comparable to the original structure or development including but not limited to its size, shape, configuration, location and external appearance and the replacement does not cause substantial adverse effects to shoreline resources or environment.

The proposed project maintains and repairs the lawfully constructed shoreline protection build prior to 1977. We are proposing to restore the shoreline protection to a state that is comparable to its original condition in the sense that it will continue to protect the shoreline from wind and wave driven erosion and allow continued beach access in a way that reduces adverse effects to the shoreline resources and environment. Although the replacement structure will be similar in size, shape, configuration and general appearance, we are proposing to move the structure approximately 5 feet landward to reduce impacts to shoreline processes and reestablish valuable upper intertidal habitat. This practice has become the "common method of repair" and it is preferred by most natural resource agencies.