



**City of Bellevue
Development Services Department
Land Use Staff Report**

Proposal Name: Backyard Cleaning

Proposal Address: 12122 SE 10th Street

Proposal Description: The applicant requests a Critical Areas Land Use Permit to remove retaining walls between 1 feet to 3 feet high within the steep slope buffer. A total of 3,037 square feet of the steep slopes and buffer will be restored with native groundcover, understory plants and trees. This project is associated with Enforcement Action, 21-102398-EA.

File Number: 23-102960-LO

Applicant: Vickie Huang

Decisions Included: Critical Areas Land Use Permit
(Process II. LUC 20.30P)

Planner: Amy Tarce, Senior Land Use Planner

**State Environmental Policy Act
Threshold Determination:** **Exempt**

Director's Decision: **Approval with Conditions**
Rebecca Horner, Director
Development Services

By: Elizabeth Stead
Elizabeth Stead, Land Use Director
Development Services

Application Date: February 13, 2023
Notice of Application Publication Date: May 25, 2023
Decision Publication Date: June 29, 2023
Appeal Deadline: July 13, 2023

For information on how to appeal a proposal, visit the Permit Center at City Hall or call (425) 452-6800. Appeal of the Decision must be made to the City's Clerk's Office by 5 p.m. on the date noted above for appeal deadline.

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1. Site Plan and Mitigation Planting Plan
2. Geotechnical Report, 03/10/2022 and Addendum, 11/09/2022 – Neo Geotechnical Associates, Inc. (in file)
3. Critical Areas Report, 11/12/2022 – Altmann Oliver Associates, LLC (in file)

I. Proposal Description

This project involves the removal of retaining walls in the steep slope buffer that were installed without the required City of Bellevue permits, including a Critical Areas Land Use Permit and a Clearing and Grading Permit. The applicant has proposed to mitigate the disturbance in the steep slope buffer by removing the retaining walls and restoring the upper portion of the steep slopes. Restoration include backfilling the disturbed areas with structural soils and revegetating the upper section of the steep slopes critical area and steep slope buffers. The proposal is in response to enforcement action 21-102398-EA initiated by the City on February 4, 2021. A stop work order was issued before the retaining walls could be completed and the impacted area backfilled and landscaped. The applicant has also removed three significant trees in the steep slope buffer within the last 5 years without permit approval.

The applicant began the construction of a series of terraces supported by modular block walls that range in height from one (1) foot to three (3) feet in the steep slope buffer area. The walls are spaced several feet apart and extend east to west across the property with local return walls. The applicant also cleared the understory in the steep slopes, and removed some large tree trunks associated with the cutting down of three significant trees in the steep slope and steep slope buffer several years prior that were also not permitted. The tree stumps are still evident on site and shown on Figure 1, Existing Conditions below.

Proposed mitigation: The proposal will remove the modular block walls and restore the steep slopes by removing loose fill and replacing with structural fill and replanting the steep slopes and buffers with native plants and 15 trees in accordance with the specifications in the City of Bellevue Critical Areas Handbook (see attached Mitigation and Restoration Plan). This activity is proposed under a Critical Areas Land Use Permit and will be constructed under a clearing and grading permit.

II. Site Description, Zoning, Land Use and Critical Areas

A. Site Description

The subject property is a single-family residence located at 12122 SE 10th Street with a lot size of approximately 12,330 square feet. A single-family residence and associated improvements are located on the southern upland section of the property. A steep slope critical area exists north of the residence in the backyard, and slopes down to the rear property line. Three trees in the steep slopes and steep slope buffer were cut down without a Tree Removal permit prior to 2021. (See Figure 1). The existing retaining walls are on slopes of 30% or less grade. The remaining areas of the slope are covered with vegetation including several significant trees and invasive plants such as English ivy and Himalayan blackberries (See attachment "Site Plan and Mitigation Plan" for details).

There are no wetlands or floodplains in the property although there is a wetland running east to west at the perimeter of the West Kelsey Creek Open Space, located north of SE 9th Place which abuts the rear property line of the project site.

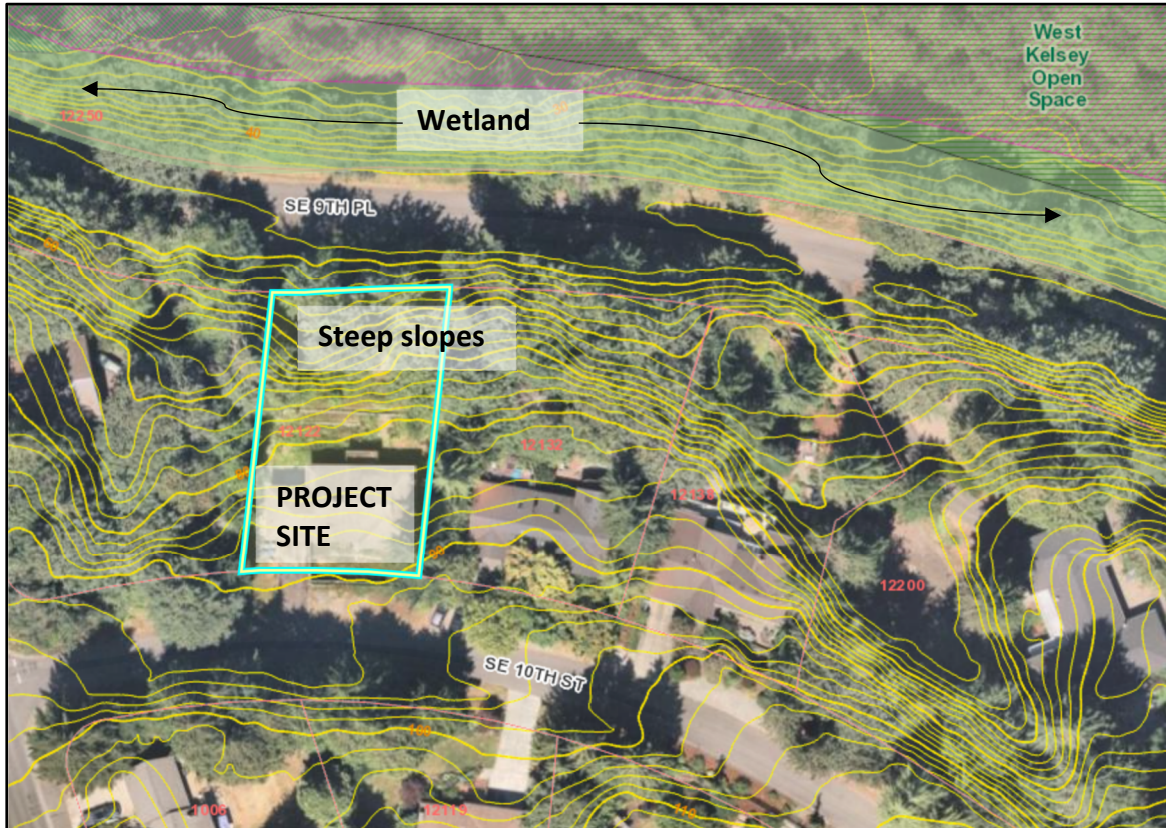
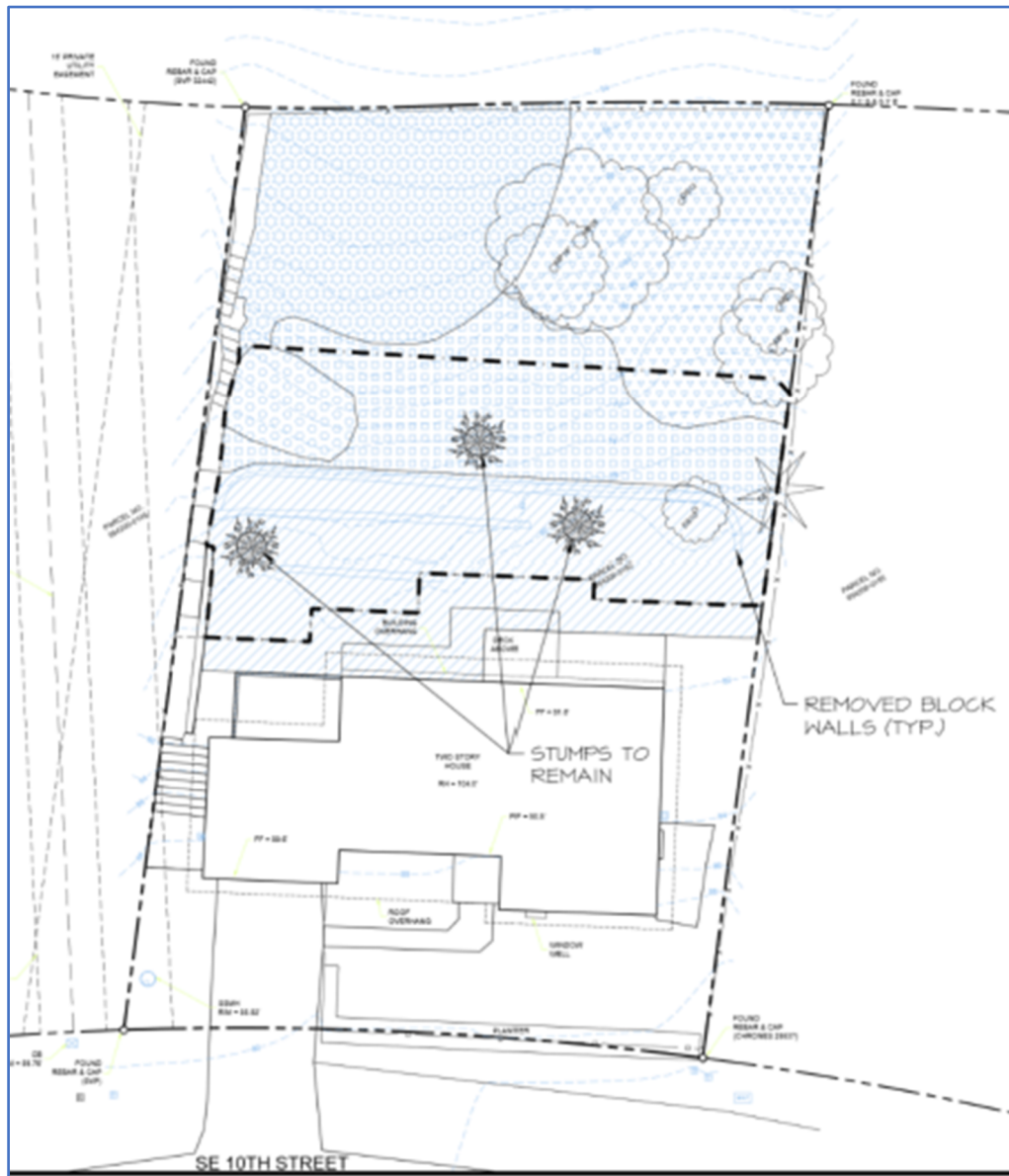


Figure 1 Existing Site Conditions



PLAN LEGEND	
	PROPERTY LINE
	5' BSEL
	RECENTLY CLEARED WITH TRACE HIMALAYAN BLACKBERRY - 2,204 SF
	HAZELNUT, CHERRY LAUREL SAPLINGS, SWORD FERN, INDIAN PLUM - 249 SF
	30% WESTERN RED CEDAR, SWORD FERN, INDIAN PLUM, PACIFIC BLACKBERRY - 70% OPEN - 1,321 SF
	WETLAND AREA - EMERGENT AND HERBACEOUS VEGETATION - 1,476 SF
	SWORD FERN, INDIAN PLUM, PACIFIC BLACKBERRY - 75% WESTERN RED CEDAR COVER, TRACE HIMALAYAN BLACKBERRY - 1,736 SF
	STEEP SLOPE RESTORATION AREA PER GEOTECHNICAL ENGINEER - 3,037 SF

Figure 2 Mitigation and Restoration Plan

B. Zoning

The property is zoned R-3.5 Single-family and is surrounded by residential areas of the same zoning designation (see Figure 3). The property is also within the Critical Areas Overlay District and is regulated by the standards and regulations of the LUC 20.25H due to the presence of a steep slope critical area.

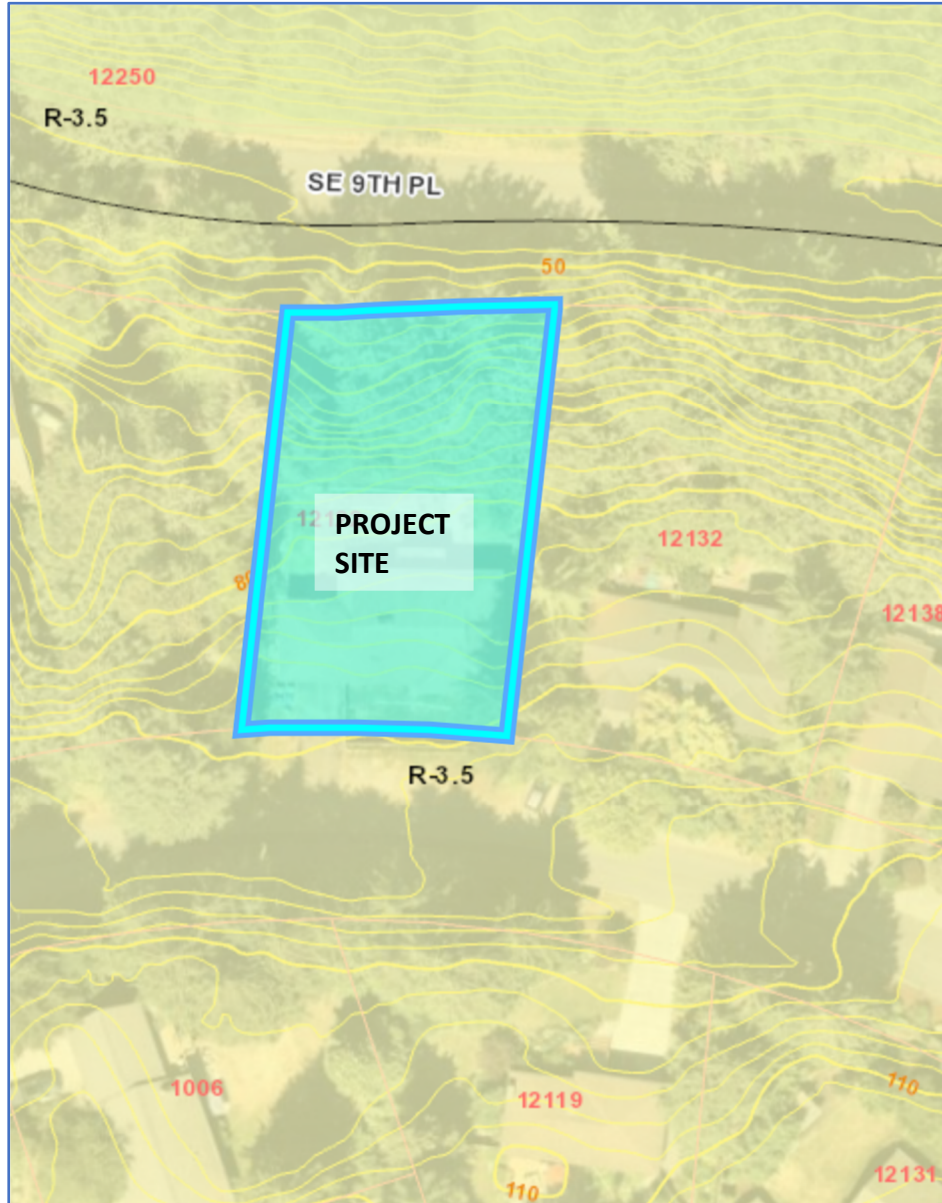


Figure 3 Zoning Designation

C. Land Use Context

The site's Comprehensive Plan Land Use Designation is Single-Family Medium Density (SF-M). Similarly, development in the vicinity of the site is single-family Medium Density residential use, SF-M. A permanent open space further north of

the property, West Kelsey Creek Open Space, is designated Public Facility/Single-Family Medium Density, PF/SF-M (See Figure 4 for Comprehensive Plan Map).

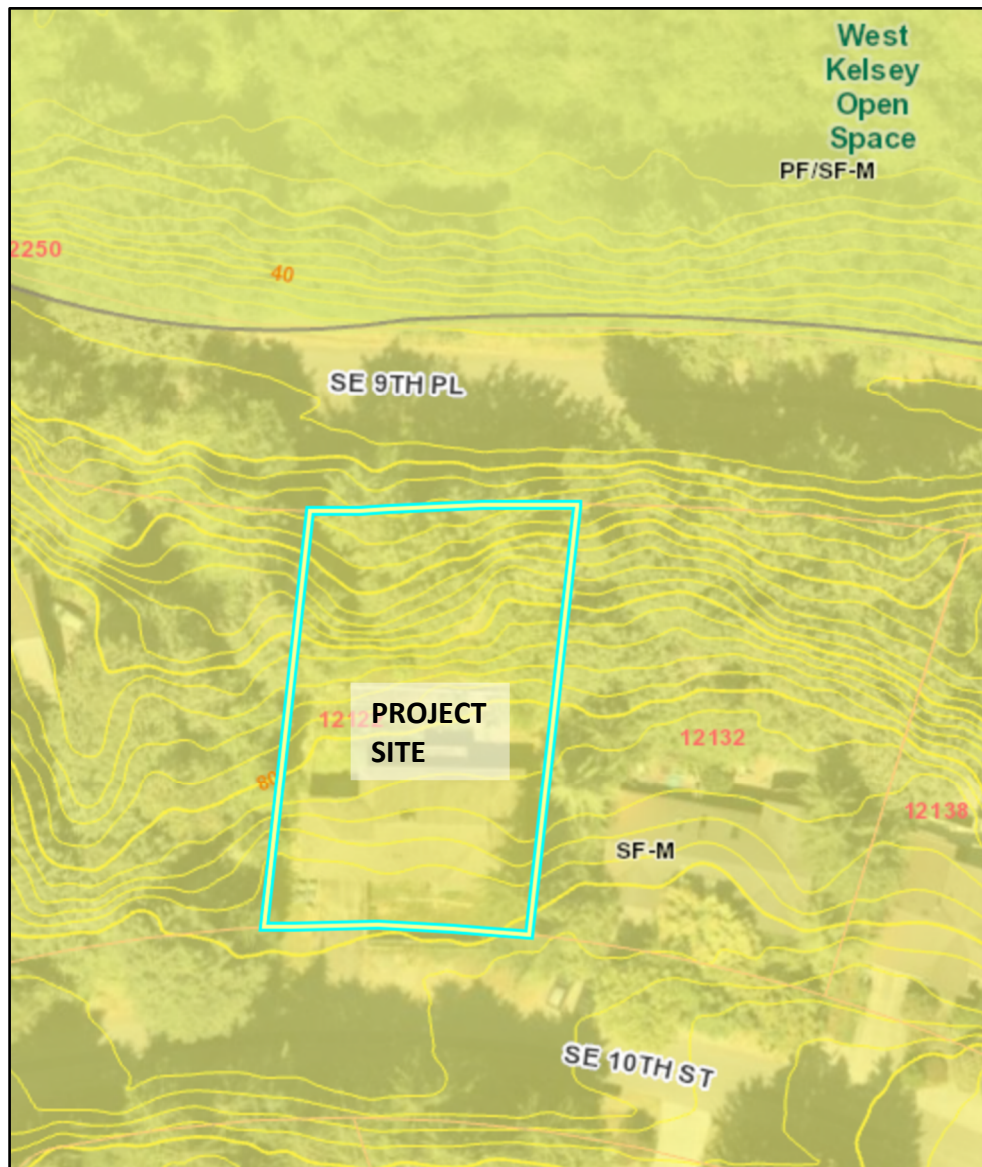


Figure 4 Comprehensive Plan Land Use Designation

D. Critical Areas Functions and Values

1. Geologic Hazard Areas

Geologic hazards pose a threat to the health and safety of citizens when development is inappropriately sited in areas of significant hazard. Some geologic hazards can be reduced or mitigated by engineering, design, or modified construction practices. When technology cannot reduce risks to acceptable levels, building in geologically hazardous areas is best avoided.

Steep slopes may serve several other functions and possess other values for the City and its residents. Some of Bellevue's remaining large blocks of forest are located in steep slope areas, providing habitat for a variety of wildlife species and important linkages between habitat areas in the City. These steep slope areas also act as conduits for groundwater, which drains from hillsides to provide a water source for the City's wetlands and stream systems. Vegetated steep slopes also provide a visual amenity in the City, providing a "green" backdrop for urbanized areas enhancing property values and buffering urban development.

2. Habitat Associated with Species of Local Importance

The increase in human settlement density and associated intensification of land use known as urbanization has a profound and lasting effect on the natural environment and wildlife habitat (McKinney 2002, Blair 2004, Marzluff 2005, Munns 2006), is a major cause of native species local extinctions (Czech et al 2000), and is likely to become the primary cause of extinctions in the coming century (Marzluff et al. 2001a). Cities are typically located along rivers, on coastlines, or near large bodies of water. The associated floodplains and riparian systems make up a relatively small percentage of land cover in the western United States, yet they provide habitat for rich wildlife communities (Knopf et al. 1988), which in turn provide a source for urban habitat patches or reserves. Consequently, urban areas can support rich wildlife communities. In fact, species richness peaks for some groups, including songbirds, at an intermediate level of development (Blair 1999, Marzluff 2005). Protected wild areas alone cannot be depended on to conserve wildlife species. Impacts from catastrophic events, environmental changes, and evolutionary processes (genetic drift, inbreeding, colonization) can be magnified when a taxonomic group or unit is confined to a specific area, and no one area or group of areas is likely to support the biological processes necessary to maintain biodiversity over a range of geographic scales (Shaughnessy and O'Neil 2001). As well, typological approaches to taxonomy or the use of indicators present the risk that evolutionary potential will be lost when depending on reserves for preservation (Rojas 2007). Urban habitat is a vital link in the process of wildlife conservation in the U.S.

III. Consistency with Land Use Code Requirements:

A. Zoning District Dimensional Requirements:

The site is located in the R-3.5 Land Use (zoning) District. Development associated with this proposal is limited to restoring the steep slope buffer and planting of native vegetation on the steep slopes and buffer. With the limited scope of work of this proposal, compliance to the dimensional requirements in the Land Use Code residential district was not an issue.

B. Critical Areas Requirements LUC 20.25H:

Consistency With Land Use Code Critical Areas Performance Standards of LUC 20.25H.055.C.3 The proposal is deemed as “Vegetation Management” under LUC 20.25H.055.C.3.i.vi and vi. The following performance standards, when applicable, shall be incorporated in the design of development on sites with steep slope geologic hazard critical areas, buffers, or structure setbacks. The incorporation of performance standards is required to be documented prior to building permit or clearing and grading permit approval to install the proposed stabilization measures.

Geotechnical report and site analysis prepared by Cobalt Geosciences, LLC, dated September 13, 2021 and March 22, 2023 were submitted as part of the permit and evaluated stabilization measures and feasibility of avoidance. The initial Geotechnical report analyzed the impacts of the retaining walls on the steep slope buffer. Between the first review and second review of the proposed project, the Applicant decided to remove the retaining walls, backfill the affected steep slope buffer, and restore the steep slope vegetation. Therefore, no modification to the critical areas or critical area buffer is proposed with the revised scope of work.

The steep slopes will be restored by planting native vegetation listed in the City of Bellevue Critical Areas Handbook. The modular concrete blocks that serve as retaining walls to the terraced backyard will be removed, and the loose fill and vegetation debris will also be removed. Structural fill will be used to stabilize the disturbed steep slope buffer, in accordance to the specifications of the Geotech Report. The proposed restoration of the steep slope and steep slope buffer will result in restoring the natural grade and will significantly increase the native vegetation cover and biodiversity in the steep slope and steep slope buffer. A Five-Year Monitoring and Maintenance Plan will be required to ensure successful establishment of the trees and native vegetation in the steep slopes.

Further review to ensure the recommended slope stabilization as described in the Geotechnical Report is followed will be conducted at the Clearing and Grading Permit review. All evaluations and recommendations submitted as part of the permit package and used in the city’s evaluation of the proposal were completed by licensed qualified professionals. **See Conditions of Approval in Section IX of this report.**

ii. Consistency with LUC 20.25H.125

In addition to generally applicable performance standards set forth in LUC [20.25H.055](#) and [20.25H.065](#), [development](#) within a landslide hazard or

steep slope [critical area](#) or the [critical area](#) buffers of such hazards shall incorporate the following additional performance standards in design of the [development](#), as applicable. The requirement for long-term slope stability shall exclude designs that require regular and periodic maintenance to maintain their level of function.

Performance standards A, B, D, E, F, G, H. and I, which refer to structures and impervious area, do not apply to this project.

Performance Standard C: The proposed [development](#) shall not result in greater risk or a need for increased buffers on neighboring properties;

Finding: The extent of vegetation management is limited to the backyard of the project site and include restoring the structural integrity of the steep slope and steep slope buffer by removing loose fill and replacing with structural soil.

Performance Standard J. Areas of new permanent disturbance and all areas of temporary disturbance shall be mitigated and/or restored pursuant to a [mitigation](#) and restoration plan meeting the requirements of LUC [20.25H.210](#). (Ord. 5680, 6-26-06, § 3)

Finding: As described previously, this proposal will effectively mitigate impacts to the steep slopes and steep slope buffer by rectifying an unpermitted disturbance to the steep slope buffer and clearing of vegetation in the degraded existing steep slopes. No new structures, retaining walls or impervious areas are proposed to be located in the steep slopes or steep slope buffers and proposed planting of trees and native vegetation will restore the degraded steep slope area that was previously disturbed and backfilling after the retaining walls are removed will restore the steep slope buffer area.

IV. Public Notice and Comment

Public Notice (500 feet): May 25, 2023

Minimum Comment Period: June 8, 2023

As prescribed in LUC 20.35.210.A, the Notice of Application for this project was published in the City of Bellevue weekly permit bulletin on May 25, 2023. It was mailed to property owners within 500 feet of the project site. No comments were received from the public as of the writing of this staff report.

V. Summary of Technical Reviews

A. Clearing and Grading

The Clearing and Grading Division of the Development Services Department has

reviewed the proposed site development for compliance with Clearing and Grading codes and standards. The Clearing and Grading staff found no issues with the proposed development.

VI. State Environmental Policy Act (SEPA)

The proposed action involves 3037 square feet of steep slope buffer mitigation that consists of removal of retaining walls, backfilling the disturbed area with structural soils, and revegetation of the steep slopes where invasive species of vegetation were removed. Per WAC 197-11-800(2)(e), excavation, grading, filling and landscaping associated with an exempt project are also exempt from SEPA review.

VII. Decision Criteria (LUC 20.30P.140)

A. Critical Areas Land Use Permit Decision Criteria 20.30P

The proposal, as conditioned below, meets the applicable regulations and decision criteria for a Critical Areas Land Use permit pursuant to LUC Section 20.30P.

a) The proposal obtains all other permits required by the Land Use Code; and

Finding: The applicant will apply for the necessary clearing and grading permit.

b) The proposal utilizes to the maximum extent possible, the best available construction and design & development techniques which result in the least impact on the critical area and critical area buffer; and

Finding: The Geotechnical Report prescribes the proper removal of the retaining walls and loose fill, as well as the recommendations for restoring the integrity of the steep slope buffer with the use of structural soils. The mitigation planting plan will improve the ecological functions of the steep slope with the planting of native plants and trees. By following the Geotechnical Engineer's recommended actions and the mitigation planting plan by the landscape architect, all negative impacts to the steep slopes and steep slope buffer will be eliminated.

The review of this permit is reliant upon the findings of qualified professionals submitted by the applicant as part of this proposal. The property owner will be required to execute a Hold Harmless Agreement releasing the City from liability for any improvements within the critical area

or critical area buffer. **See Conditions of Approval in Section IX of this report.**

- c) **The proposal incorporates the performance standards of Part 20.25H to the maximum extent applicable, and;**

Finding: As discussed in Section III of this report, the proposal meets the performance standards of LUC Section 20.25H.055.C.1 for “Repair and Maintenance” and LUC Section 20.25H.125 for areas of geological hazards.

- d) **The proposal will be served by adequate public facilities including street, fire protection and utilities; and**

Finding: The site is adequately served by existing public facilities.

- e) **The proposal includes a mitigation or restoration plan consistent with the requirements of LUC Section 20.25H.210; and**

Finding: The applicant proposes a vegetation restoration plan, covering over 3,000-square feet of the steep slope and steep slope buffer where it is currently degraded. The planting plan will be further reviewed during the Clearing and Grading Permit review for compliance with LUC 20.25H.210. **See Conditions of Approval in Section IX of this report.**

- f) **The proposal complies with other applicable requirements of this code.**

Finding: As conditioned and discussed in this report, the proposal complies with all applicable code requirements including, but not limited to, performance standards for development in geologic hazard areas and Critical Areas Land Use permit decision criteria.

VIII. Conclusion and Decision

After conducting the various administrative reviews associated with this proposal, including Land Use Code consistency, SEPA, City Code and Standard compliance reviews, the Director of the Development Services Department does hereby **approve with conditions** the proposed rockery retaining wall.

Note- Expiration of Approval: In accordance with LUC 20.30P.150 a Critical Areas Land Use permit automatically expires and is void if the applicant fails to file for a Clearing and Grading permit or other necessary development permits within one year of the effective date of the approval.

IX. Conditions of Approval

The applicant shall comply with all applicable Bellevue City Codes and Ordinances including but not limited to:

<u>Applicable Ordinances</u>	<u>Contact Person</u>
Clearing and Grading Code- BCC 23.76	Savina Uzunow, 425-452-7860
Utilities – BCC 24	Jeremy Rosenlund, 425-452-7683
Land Use Code- BCC 20.25H	Amy Tarce, 425-452-2896

The following conditions are imposed under the Bellevue City Code or SEPA authority referenced:

- 1. Mitigation and Restoration Plan:** The applicant shall submit a restoration plan for on-site restoration of native planting that adheres to the minimum standards, species, and planting densities found in the City of Bellevue's Critical Areas Handbook or as recommended by a qualified professional.

Authority: Land Use Code 20.25H.055.C.3.i.v.
Reviewer: Amy Tarce, Land Use

- 2. Clearing and Grading Permit Required:** Approval of this Critical Areas Land Use Permit does not constitute an approval of any development permit. An application for a clearing and grading permit must be submitted and approved before construction can begin. Plans submitted as part of any permit application shall be consistent with the activity permitted under this approval.

Authority: Land Use Code 20.30P.140
Clearing & Grading Code 23.76.035
Reviewer: Savina Uzunow, Clear and Grading

- 3. Geotechnical Review:** The project geotechnical engineer must review the final plans, including all foundation, retaining wall, shoring, and vault designs. A letter from the geotechnical stating that the plans conform to the recommendations in the geotechnical report and any addendums and supplements must be submitted to the clearing and grading section prior to issuance of the construction permit.

Authority: Clearing & Grading Code 23.76.050
Reviewer: Savina Uzunow, Clear and Grading

- 4. Geotechnical Monitoring:** The project geotechnical engineer of record or his representative must be on site during critical earthwork operations. The

geotechnical engineer shall observe all excavations and fill areas. In addition, the engineer shall monitor the soil cuts prior to construction of rockeries and verify compaction in fill areas. The engineer must submit field report in writing to the DSD inspector for soils verification and foundation construction. All earthwork must be in general conformance with the recommendations in the geotechnical report.

Authority: Bellevue City Code 23.76.160

Reviewer: Savina Uzunow, Clear and Grading

5. **Rainy Season Restrictions:** No clearing and grading activity may occur during the rainy season, which is defined as October 1 through April 30 without written authorization of the Development Services Department. Should approval be granted for work during the rainy season, increased erosion and sedimentation control measures, representing the best available technology must be implemented prior to beginning or resuming site work.

Authority: Bellevue City Code 23.76.093

Reviewer: Savina Uzunow, Clear and Grading

6. **Clearing Limits and Temporary Erosion & Sedimentation Control:** Prior to the initiation of any clearing or grading activities, clearing limits and the location of all temporary erosion and sedimentation control measures shall be field staked for approval by the on-site clearing and grading inspector.

Authority: Bellevue City Code 23.76.060 and 23.76.090

Reviewer: Savina Uzunow, Clear and Grading

7. **Restoration for Areas of Temporary Disturbance:** In order to restore temporary disturbance within critical areas, a restoration plan shall be submitted for review and approval by the City of Bellevue prior to the issuance clearing and grading permit 22-103717-GJ. The plan shall include documentation of existing site conditions, proposed restoration measures to return the site and any disturbance off-site to its existing conditions per LUC 20.25H.220.H, prescribed maintenance activities to ensure plant survival, and monitoring requirements (including reporting) to document success/failure.

Authority: Land Use Code 20.25H.220.H

Reviewer: Amy Tarce, Land Use

8. **Hold Harmless Agreement:** Prior to clearing and grading permit approval, the applicant or property owner shall submit a hold harmless agreement releasing the City of Bellevue from any and all liability associated with the installation of slope stabilization measures. The agreement must meet city requirements and

must be reviewed by the City Attorney's Office for formal approval.

Authority: Land Use Code 20.30P.170

Reviewer: Amy Tarce, Land Use

- 9. Maintenance and Monitoring Plan:** Maintenance and monitoring is required for five years after plant installation. A maintenance and monitoring plan with goals and objectives must be included with the restoration plan and submitted under the clearing and grading permit.

Authority: Land Use Code 20.30P.140; 20.25H.220

Reviewer: Amy Tarce, Land Use

- 10. Cost Estimate:** A cost estimate based on the cost to install, maintain, and monitor the planting is required to be submitted under the clearing and grading permit.

Authority: Land Use Code 20.30P.140

Reviewer: Amy Tarce, Land Use

- 11. Installation Device:** To ensure the required slope vegetation restoration and restoration of areas of temporary and permanent disturbance is completed, an installation assurance device is required in an amount equal to 150% of the cost of mitigation planting. The amount is determined by a cost estimate submitted as part of the building permit.

Authority: Land Use Code 20.30P.140 and 20.25H.220

Reviewer: Amy Tarce, Land Use

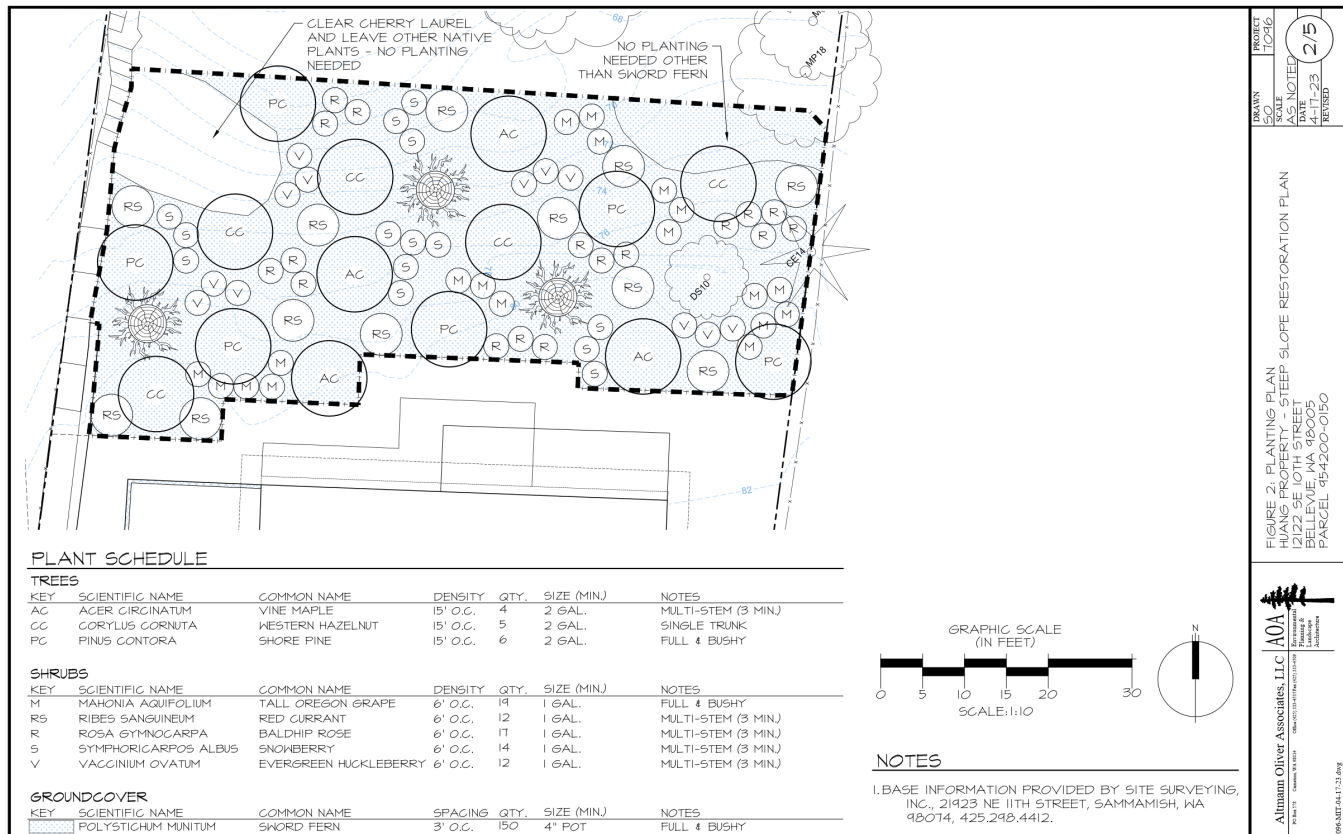
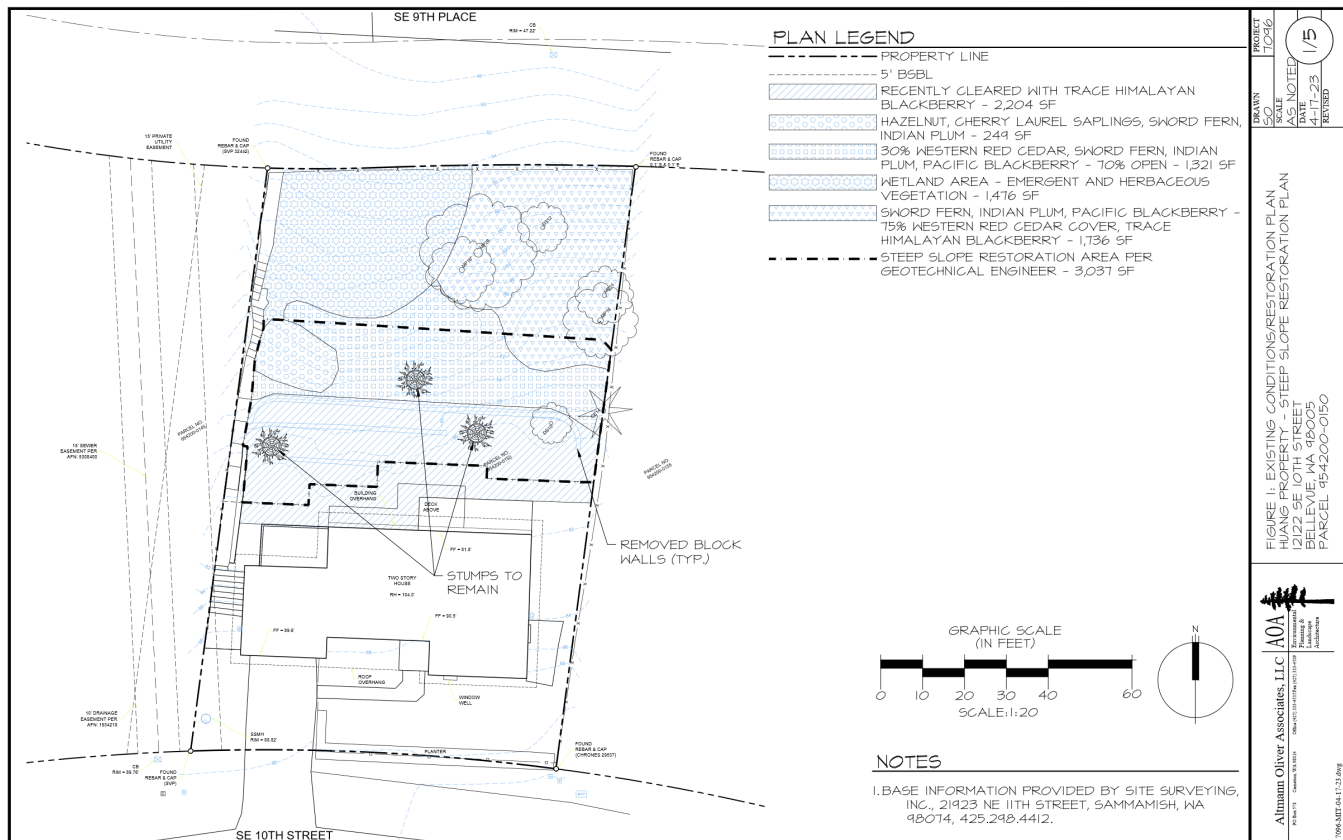
- 12. Maintenance and Monitoring Assurance Device:** A maintenance assurance device in an amount equal to 20% of the cost of plants and for five years of maintenance labor and materials is required to ensure the plants are maintained and monitored. Release of this assurance device is contingent upon receipt of documentation reporting successful establishment in compliance with the approved management plan.

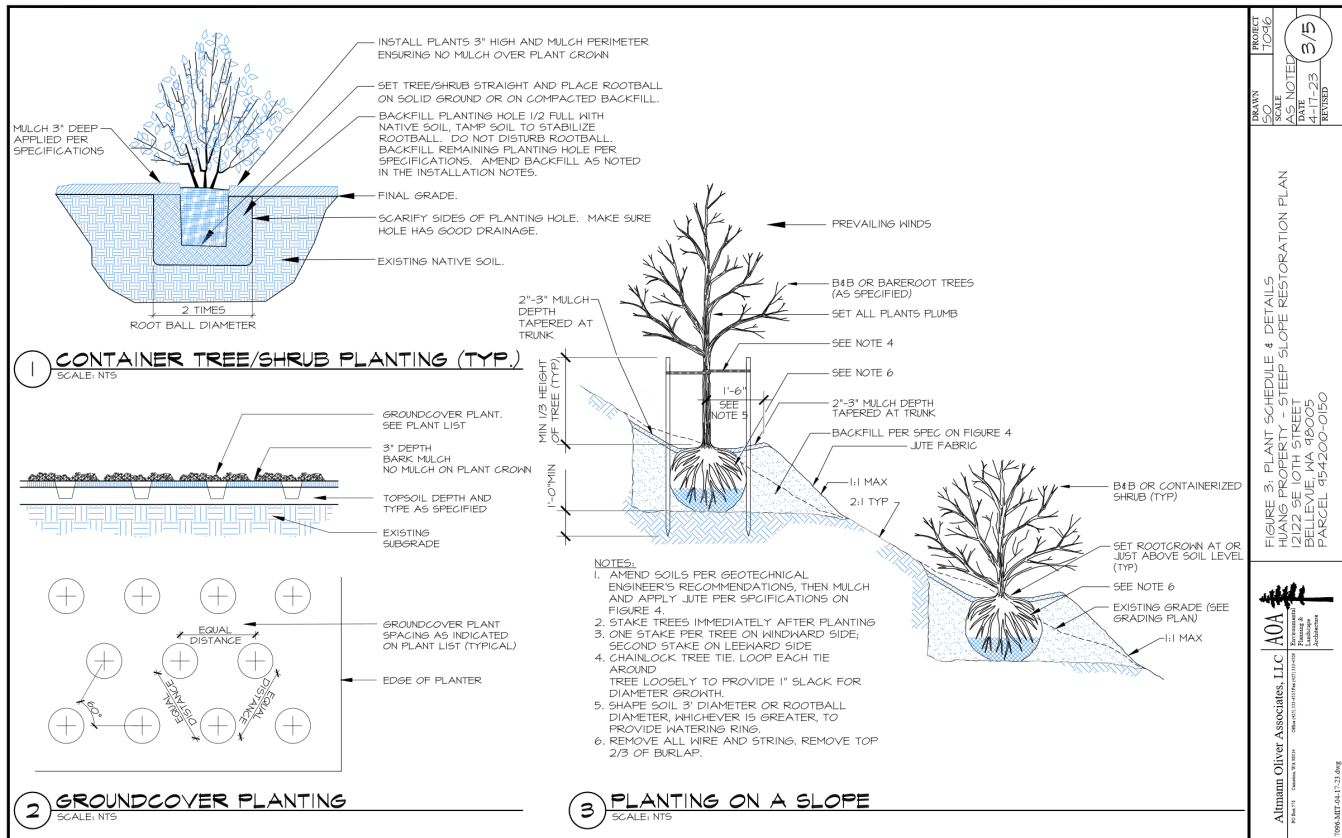
Authority: Land Use Code 20.30P.140; 20.25H.220


Reviewer: Amy Tarce, Land Use

ATTACHMENT 1 SITE PLAN

23-102960-LO Backyard Cleaning





MAINTENANCE & MONITORING PLAN		<div>PROJECT 17036</div> <div>AS NOTED DATE 4/25/23 REVISED 5/5</div> <div>FIGURE 5: MAINTENANCE & MONITORING PLAN HUANG PROPERTY STEEP SLOPE RESTORATION PLAN 7475 SLOAN STREET BELLEVUE, WA 98005 PARCEL 954200-0150</div> <div><div>AAO Altmann Oliver Associates, LLC 10400 1st Avenue, Suite 100 Bellevue, WA 98004 206.531.1100 www.altmanno.com</div><div> Planning & Architecture</div></div> <div>1996-SMT Ed. 11-23-09g</div>
<p>CONSTRUCTION MANAGEMENT</p> <p>1. Prior to commencement of any work in the steep slope, the clearing limits will be staked and all existing vegetation to be saved will be clearly marked. A pre-installation meeting will be held at the site to review and discuss all aspects of the project with the owner, aao, the geotechnical engineer and the civil engineer.</p> <p>2. A biologist will supervise plan implementation during construction to ensure that objectives and specifications of the steep slope plan are met.</p> <p>3. Any necessary significant modifications to the design that occur as a result of unforeseen site conditions will be jointly approved by the City of Bellevue and the biologist prior to their implementation.</p> <p>MONITORING METHODOLOGY</p> <p>1. The monitoring program will be conducted twice yearly (in the beginning and end of the growing season) for a period of five years, with reports submitted annually (at the end of the growing season) to the City of Bellevue.</p> <p>2. Vegetation establishment within the steep slope restoration areas will be monitored during each field visit with a record kept of all plant species found.</p> <p>3. Photo-points will be established from which photographs will be taken throughout the monitoring period. These photographs will document general appearance and progress in plant community establishment in the restoration areas. Review of the photos over time will provide a semi-quantitative representation of success of the restoration plan.</p> <p>PERFORMANCE STANDARDS</p> <p>Success of plant establishment within the steep slope and shoreline setback enhancement areas will be evaluated on the basis of percent survival of planted species.</p> <p>1. Native woody cover will be a minimum of: 10% at construction completion, 15% at year 1, 20% at year 2, 30% at year 3 and 60% at year 5.</p> <p>2. There will be 100% survival of all woody planted species throughout the mitigation planted area at the end of the first year of planting. For years 2-5, success will be based on an 85% survival rate or similar number of recolonized native woody plants.</p> <p>3. Exotic and invasive plant species will be maintained at levels below 10% total cover. Removal of these species will occur immediately following the monitoring event in which they surpass the above maximum coverage. Removal will occur by hand whenever possible.</p> <p>MAINTENANCE (M) & CONTINGENCY (C)</p> <p>1. Established performance standards for the project will be compared to the monitoring results in order to judge the success of the restoration project.</p> <p>2. Contingency will include many of the items listed below and would be implemented if these performance standards are not met.</p> <p>3. Maintenance and remedial action on the site will be implemented immediately upon completion of the monitoring event, (unless otherwise specifically indicated below).</p> <p>- replace dead plants with the same species or a substitute species that meet the goal of the enhancement plan (C)</p> <p>- re-plant areas after reason for failure has been identified (e.g., moisture regime, poor plant stock, disease, shade/sun conditions, wildlife damage, etc.) (C)</p> <p>- Irrigate following plant installation for five years (M)</p> <p>PERFORMANCE BOND</p> <p>1. A performance bond or other surety device will be posted with the City of Bellevue by the applicant to cover the costs of steep slope restoration plan implementation (including labor, materials, maintenance, and monitoring).</p> <p>2. The bond or assignment may be released in partial amounts in proportion to work successfully completed over the five year monitoring period, as the applicant demonstrates performance and corrective measures.</p>		