

King County  
**Initial Infiltration and Inflow Reduction Project Alternatives Analysis Report**

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**APPENDIX D.**  
**PERMITTING REQUIREMENTS**

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April 2009



**Permitting Technical Memorandum  
King County Inflow and Infiltration Project  
King County, Washington**

March 6, 2009

Submitted To:  
Mr. Jeffrey Lykken  
Tetra Tech  
1420 Fifth Avenue, Suite 600  
Seattle, Washington 98101

By:  
Shannon & Wilson, Inc.  
400 N 34<sup>th</sup> Street, Suite 100  
Seattle, Washington 98103

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## TABLE OF CONTENTS

	Page
1.0 MINI-BASIN ISS003 .....	1
1.1 Required Permits .....	1
1.1.1 Street Use Permit – City of Issaquah (Issaquah) .....	1
1.1.2 Side Sewer Permit – Issaquah .....	1
1.1.3 Clearing and Grading Permit – Issaquah .....	2
1.1.4 Shoreline Management Act (SMA) Review – Issaquah .....	2
1.1.5 Critical Areas Review – Issaquah .....	2
1.1.6 SEPA – King County (the County) .....	3
1.2 Other Potential Permits .....	3
2.0 MINI-BASIN BEL031 .....	3
2.1 Required Permits .....	4
2.1.1 Right-of-Way (ROW) Use Permit – City of Bellevue (Bellevue) .....	4
2.1.2 Side Sewer Permit – Bellevue .....	4
2.1.3 Clearing and Grading Permit – Bellevue .....	4
2.1.4 Critical Areas Review – Bellevue .....	4
2.1.5 SEPA – County .....	5
2.2 Other Potential Permits .....	5
3.0 MINI-BASIN BLS002 .....	5
3.1 Required Permits .....	5
3.1.1 Street Use Permit – County .....	5
3.1.2 Clearing and Grading Permit – County .....	6
3.1.3 Critical Areas Review – County .....	6
3.1.4 SEPA – County .....	6
3.1.5 Bald Eagle Management Plan - WDFW .....	6
3.1.6 National Bald Eagle Management Guidelines – U.S. Fish and Wildlife Service (USFWS) .....	7
3.2 Other Potential Permits .....	7
4.0 CLOSURE .....	7

**LIST OF TABLES**

**Table No.**

1	Estimated Permit Timeline King County Infiltration/Inflow Project Mini-Basin ISS003
2	Estimated Permit Timeline King County Infiltration/Inflow Project Mini-Basin BEL031
3	Estimated Permit Timeline King County Infiltration/Inflow Project Mini-Basin BLS002

**LIST OF FIGURES**

**Figure No.**

1	Mini-Basin ISS003 (2 sheets)
2	Mini-Basin BEL031
3	Mini-Basin BLS002

**PERMITTING TECHNICAL MEMORANDUM  
KING COUNTY INFLOW/INFILTRATION PROJECT  
KING COUNTY, WASHINGTON**

This technical memorandum summarizes the local, state, and federal permits that may be needed for the proposed sewer rehabilitation work in targeted properties in mini-basins ISS003, BLS002, and BEL031. It is our understanding that the proposed rehabilitation work will be limited to pipe bursting, with the potential for small amounts of cure-in-place lining and open cut construction.

**1.0 MINI-BASIN ISS003**

We understand that within mini-basin ISS003, King County (the County) plans to conduct sewer rehabilitation work on 37 properties identified as easy and 76 properties identified as medium on the ISS003 Parcel Difficulty Ratings map (Figure 1). This project will require permits from the City of Issaquah (Issaquah) and the County. If the project team cannot avoid work within wetlands or streams, state and federal permits will also be required.

**1.1 Required Permits**

**1.1.1 Street Use Permit – City of Issaquah (Issaquah)**

A street use permit will be required by Issaquah for work conducted within an existing street right-of-way (ROW). The street use permit application should include a traffic control plan and drawings showing where work will occur.

**1.1.2 Side Sewer Permit – Issaquah**

A side sewer permit may be required for work on existing side sewers located on private property or in the public ROW. The project approach will be to conduct work under a blanket side sewer permit. Bonita McPherran of Issaquah's Public Works Department manages side sewer permits for the City. She is out of the office until December 9, 2008. Based on our discussion with an Issaquah permit technician, Issaquah generally issues separate side sewer permits for each individual property. Further investigation and communication with Ms. McPherran is needed to determine whether the City will issue a blanket side sewer permit.

The side sewer permit application should include drawings showing the size and location of the existing structures on the property and the full course of the proposed side sewer from the public sewer to the structure. The permit application must indicate whether any easements would be required and whether they have been obtained and recorded with the County.

### **1.1.3 Clearing and Grading Permit – Issaquah**

Issaquah does not require a clearing and grading permit for earthwork conducted by utilities in an existing street ROW. If earthwork is not in an existing street ROW, Issaquah will require a clearing and grading permit for disturbance of 1,000 square feet (sf) or more of vegetation and/or movement of 30 cubic yards (cy) or more of earth. A clearing and grading permit is also required for any earthwork or clearing in a critical area.

### **1.1.4 Shoreline Management Act (SMA) Review – Issaquah**

Six easy parcels and 12 medium parcels identified within mini-basin ISS003 are located within Issaquah's preliminary shoreline jurisdiction (Figure 1, Sheet 1) and would require SMA review. A shoreline exemption or a Shoreline Substantial Development Permit (SSDP) is required, under SMA, for work conducted within shoreline jurisdiction.

Additional investigation and coordination with the design team is required to determine whether work within the shoreline jurisdiction is needed and whether the proposed work will qualify for an exemption to the SMA under Washington Administrative Code 173-27-040(2)(b) for normal maintenance or repair of existing structures or developments. If proposed work cannot be modified to fit into an exempted activity, an SSDP may be required.

### **1.1.5 Critical Areas Review – Issaquah**

It is our understanding that the project will avoid impacts to wetlands and streams. However, 16 easy parcels and 38 medium parcels identified within mini-basin ISS003 may extend into wetland or stream buffers (see Figure 1, Sheet 2). Work within wetland or stream buffers will require a critical areas review by the Issaquah. If work is conducted within undisturbed wetland or stream buffers, mitigation may be required.

Based on the targeted properties in mini-basin ISS003, proposed work will likely require a critical areas review. Critical areas review and any mitigation plans for impacts to critical areas must be submitted with the State Environmental Policy Act (SEPA) review application.

For the purposes of this assessment, buffer widths are based on our field reconnaissance and background review of approximate wetland and stream boundaries and stream classes. This assessment assumes the highest standard wetland buffer width required under Issaquah Municipal Code. Wetland delineation and rating assessments, to determine wetland categories, would be required to provide a more precise determination of wetland buffer extents.



### **1.1.6 SEPA – King County (the County)**

The proposed work is likely not SEPA exempt because there may be changes and/or expansions in the sewer system. SEPA review will be required for work in all the project areas by the lead local agency, the County, and will be limited to completing an environmental checklist. Critical area evaluations and proposed mitigation will be addressed in the SEPA environmental checklist. Based on the King County Infiltration/Inflow Pilot Study and the nature and location of the proposed work, we anticipate that SEPA review of the project will result in a Mitigated Determination of Non-Significance.

### **1.2 Other Potential Permits**

It is our understanding that no work in-water (including wetlands and streams) will occur, that ground disturbance will be less than 1 acre, and the project does not have a federal nexus (e.g. federal funding, work on federal land, or federal permitting.) Therefore, no state or federal permits will be required. However, if work in-water (including wetlands and streams) is proposed then the following permits may be required:

- ▶ Hydraulic Project Approval (HPA) from the Washington State Department of Fish and Wildlife (WDFW).
- ▶ Clean Water Act (CWA) Section 404 Permit from the Army Corps of Engineers.
- ▶ CWA Section 401 Water Quality Certification from the Washington State Department of Ecology (Ecology).

If ground disturbance greater than 1 acre will occur then a National Pollutant Discharge Elimination System (NPDES) Permit will be required by Ecology.

If the project has a federal nexus, compliance with National Environmental Policy Act (NEPA) and Section 7 of the Endangered Species Act (ESA) will be required.

## **2.0 MINI-BASIN BEL031**

We understand that within mini-basin BEL031, the County plans to conduct sewer rehabilitation work on 82 properties identified as easy and 25 properties identified as medium on the BEL031 Parcel Difficulty Ratings map (Figure 2). This project will require permits from the City of Bellevue and King County. If the project team cannot avoid work within wetlands or streams, state and federal permits will also be required.

## **2.1 Required Permits**

### **2.1.1 Right-of-Way (ROW) Use Permit – City of Bellevue (Bellevue)**

Bellevue will require a ROW use permit for work conducted within an existing ROW. The right of way use permit application should include a traffic control plan and drawings showing where work will occur.

### **2.1.2 Side Sewer Permit –Bellevue**

Bellevue may require a side sewer permit for work on existing side sewers. The project approach will be to conduct work under a blanket side sewer permit. Further investigation is required to determine how the Bellevue will issue side sewer permits.

The side sewer permit application should include drawings showing the size and location of the existing structures on the property and the full course of the proposed side sewer from the public sewer to the structure. The permit application must indicate whether any easements would be required and whether they have been obtained and recorded with the County.

### **2.1.3 Clearing and Grading Permit – Bellevue**

Bellevue will require a grading permit for the removal or destruction of 1,000 sf or more of vegetation and/or movement of 50 cy or more of earth.

### **2.1.4 Critical Areas Review – Bellevue**

It is our understanding that the project will avoid impacts to wetlands and streams. However, three easy parcels and three medium parcels identified within mini-basin BEL031 may extend into wetland buffer (see Figure 2). If work cannot be avoided within wetland buffers, a critical areas review will be required. If work is conducted within undisturbed wetland buffer, mitigation may be required. Critical areas review and any mitigation plans for impacts to critical areas must be submitted with the SEPA review application.

For the purposes of this assessment buffer widths are based on our field reconnaissance and background review of approximate wetland boundaries. This assessment assumes the highest standard buffer width required under Bellevue Municipal Code. A wetland delineation and rating assessment, to determine wetland category, would be required to provide a more precise determination of wetland buffer extent.

### **2.1.5 SEPA – County**

The proposed work is likely not SEPA exempt because there may be changes and/or expansions in the sewer system. SEPA review will be required for work in all the project areas by the lead local agency, the County, and will be limited to completing an environmental checklist. Critical area evaluations and proposed mitigation will be addressed in the SEPA environmental checklist. Based on the King County Infiltration/Inflow Pilot Study and the nature and location of the proposed work, we anticipate that SEPA review of the project will result in a Mitigated Determination of Non-Significance.

## **2.2 Other Potential Permits**

It is our understanding that no work in-water (including wetlands) will occur, that ground disturbance will be less than 1 acre, and the project does not have a federal nexus (e.g., federal funding, work on federal land, or federal permitting.) Therefore, no state or federal permits will be required. However, if work in-water (including wetlands) is proposed then the following permits may be required:

- ▶ CWA Section 404 Permit from the U.S. Army Corps of Engineers.
- ▶ CWA Section 401 Water Quality Certification from Ecology.

If ground disturbance greater than 1 acre will occur, then a NPDES Permit will be required by Ecology. If the project has a federal nexus, compliance with NEPA Section 7 of the ESA will be required.

## **3.0 MINI-BASIN BLS002**

We understand that within mini-basin BLS002, the County plans to conduct sewer rehabilitation work on 292 properties identified as easy and 51 properties identified as medium on the BLS002 Parcel Difficulty Ratings map (Figure 3). This project will require permits from the County, WDFW, and the U.S. Fish and Wildlife Service (USFWS). If the project team cannot avoid work within wetlands, streams, or 200 feet from Lake Washington, additional local, state, and federal permits will also be required.

## **3.1 Required Permits**

### **3.1.1 Street Use Permit – County**

A street use permit will be required by the County for work conducted within an existing street ROW. The street use permit application should include a traffic control plan and drawings showing where work will occur.

### **3.1.2 Clearing and Grading Permit – County**

The County will require a clearing and grading permit for any earthwork in critical areas and/or earthwork of 100 cy or more in non-critical areas.

### **3.1.3 Critical Areas Review – County**

It is our understanding that the project will avoid any impacts to wetlands and streams. However, 18 easy parcels and one medium parcel identified within mini-basin BLS002 may extend into stream buffer (see Figure 3). If work cannot be avoided within the stream buffer, a critical areas review will be required. If work is conducted in undisturbed stream buffer, mitigation may be required.

In addition, a bald eagle nest was observed in the southeast portion of the project area. If work is conducted within 400 feet of an active bald eagle nest, then a critical areas review will be required. Any work within 800 feet of a nest may also be subject to seasonal restrictions under the County's Critical Areas Ordinance. Mitigation for work conducted in the vicinity of the bald eagle nest, may include work windows or other restrictions.

Critical areas review and any mitigation plans for impacts to stream buffers or wildlife habitat conservation areas must be submitted with the SEPA review application.

### **3.1.4 SEPA – County**

The proposed work is likely not SEPA exempt because there may be changes and/or expansions in the sewer system. SEPA review will be required for work in all the project areas by the lead local agency, the County, and will be limited to completing an environmental checklist. Critical area evaluations and proposed mitigation will be addressed in the SEPA environmental checklist. Based on the King County Infiltration/Inflow Pilot Study and the nature and location of the proposed work, we anticipate that SEPA review of the project will result in a Mitigated Determination of Non-Significance.

### **3.1.5 Bald Eagle Management Plan - WDFW**

Bald eagle habitat is protected in Washington State under the Bald Eagle Protection Law of 1984. If work will occur between 400 feet and 800 feet from the project area nest, a Standard Management Plan will be required by WDFW. Standard management plans are pre-approved by WDFW and restrict removal of trees. If work will occur within 400 feet of the nest, a Site-Specific Management Plan will be required. The Site-Specific Management Plan will establish conditions to ensure activities will have minimal impact on bald eagles.

### **3.1.6 National Bald Eagle Management Guidelines – U.S. Fish and Wildlife Service (USFWS)**

Bald eagles are protected under federal law by the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. The USFWS is currently developing a permitting process for activities that are likely to impact bald eagles. Activities that comply with the National Bald Eagle Management Guidelines (May 2007) will not require review by USFWS.

Proposed work that will occur within 660 feet of an active or alternate bald eagle nest, will not comply with National Bald Eagle Management Guidelines and will require coordination with the USFWS. The proposed work may be subject to seasonal restrictions, clearing restrictions, and other requirements.

### **3.2 Other Potential Permits**

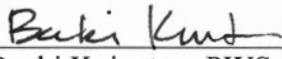
It is our understanding that no work will occur within 200 feet of Lake Washington. However, if work is proposed within 200 feet of Lake Washington, a SMA review will be required by the County.

Additionally, we understand that no work in-water (including streams) will occur, that ground disturbance will be less than 1 acre, and the project does not have a federal nexus (e.g., federal funding, work on federal land, or federal permitting). Therefore, state or federal permits requirements will be limited to bald eagle protection. However, if in-stream work is proposed then the project will require a HPA from WDFW. If ground disturbance greater than 1 acre will occur then a NPDES Permit will be required by Ecology. If the project has a federal nexus, compliance with NEPA and Section 7 of the ESA will be required.

## **4.0 CLOSURE**

Several local permits will be required for the proposed project. If work will occur directly in wetlands or streams, several state and/or federal permits may also be required. Tables 1 – 3 summarize the permits likely required for this project, supporting documents, and estimated time of permit issuance.

**SHANNON & WILSON, INC.**

  
Becki Kniveton, PWS  
Senior Wetland Biologist

BXE:BSK:KLW/bxe

**TABLE 1. ESTIMATED PERMIT TIMELINE  
KING COUNTY INFILTRATION/INFLOW PROJECT  
MINI-BASIN ISS003**

Permit	Trigger	Issuing Agency	Permit Application Materials	Comments	Time to Prepare and Submit Application	Estimated Time of Permit Issuance
<b>Required Permits</b>						
Street Use Permit	Work within an existing street right-of-way	City of Issaquah	1) Street Use Permit Application; 2) Traffic Control Plan; 3) Design drawings showing intended use of right-of-way; 4) Paving restoration or schematic		2 weeks	2 to 3 weeks
Side Sewer Permit/Utility	Any modification of an existing side sewer		1) Side Sewer Permit Application 2) Drawings showing the size and location of the existing structures the proposed side sewer. 3) Proof of any required easements that have been recorded with King County		2 weeks after easements are obtained	2 to 3 weeks
Clearing and Grading Permit	Disturbance of 1,000 sf or more of vegetation and/or movement of 30 cy or more of earth outside of an existing right-of-way. Any clearing or grading within a critical area		1) Design drawings showing clearing and grading limits; 2) Pre-application site visit to verify the presence or absence of environmentally critical areas	Permit would not be required if less than 1,000 sq of clearing or less than 30 cubic yards of grading will occur outside of existing street right-of-way or any clearing	2 weeks	reviewed concurrently with SEPA
Shoreline Management Act Review	Construction within the shoreline jurisdiction including 200 ft from Issaquah Creek and associated wetlands		1) Shoreline Exemption Request letter, or 2) Shoreline Substantial Development Permit application with design drawings (30-60% design) and a completed SEPA Checklist and determination will be required for a SSDP	A shoreline exemption permit may be issued if work in shoreline jurisdiction qualifies under WAC 173-27-040(2)(b) as normal maintenance or repair of existing structures or developments	2 weeks for a Shoreline Exemption Permit.; 5 to 6 weeks for a Shoreline Substantial Development Permit (SSDP)	8 weeks for a Shoreline Exemption Permit; 5 months for an SSDP
Critical Areas Review	Work conducted within a critical area, including wetland and stream buffers		1) Wetland and/or stream delineation and assessment; 2) Wetland and/or stream mitigation plan		5 to 6 weeks after 70 percent design is complete	1 to 3 months
SEPA	Any proposed government action defined in the SEPA Rules (WAC 197-11-704), that is not categorically exempt (WAC 197-11-800 through 890)	King County	State Environmental Policy Act (SEPA) Checklist and wetland and/or stream mitigation plan		5 to 6 weeks after 70 percent design is complete	45 days after application is deemed complete
<b>Potentially Required Permits</b>						
Hydraulic Project Approval (HPA)	Construction activities that will occur over or in streams	Washington Department of Fish & Wildlife	1) JARPA form; 2) Stream mitigation plan; 3) Design drawings and specifications with maps; 4) SEPA decision letter	Permit will not be required unless work occurs over or in streams	3 to 6 weeks after 70 percent design is complete	45 calendar days after the application is deemed complete and SEPA compliance is complete
Section 404 Permit	Construction activities that will occur within waters of the United States, including streams and non-isolated wetlands	U.S. Army Corps of Engineers	1) Joint Aquatic Resource Permits Application (JARPA); 2) Biological Assessment/Essential Fish Habitat Assessment; 3) Wetland and/or stream delineation report; 4) Wetland and/or stream mitigation plan; 5) Design drawings and specifications with maps	Permit will not be required unless work occurs in streams or wetlands	4 to 6 weeks after 70 percent design is complete	4 to 12 months, depending on project complexity
Section 401 Permit and Coastal Zone Management Act approval	Construction activities that will occur within waters of the State, including streams and wetlands	Washington Department of Ecology	1) JARPA form; 2) Wetland and/or stream delineation report; 3) Wetland and/or stream mitigation plan	Permit will not be required unless work occurs in streams or wetlands	5 to 6 weeks after 70 percent design is complete	3 months
National Pollution Discharge Elimination System (NPDES) (for construction)	Disturbance of >1 acre		Storm Water Pollution Prevention Plan (SWPPP)	Permit will not be required for less than 1 acre of earthwork	typically prepared and submitted by contractor	30 days

**TABLE 2. ESTIMATED PERMIT TIMELINE  
KING COUNTY INFILTRATION/INFLOW PROJECT  
MINI-BASIN BEL031**

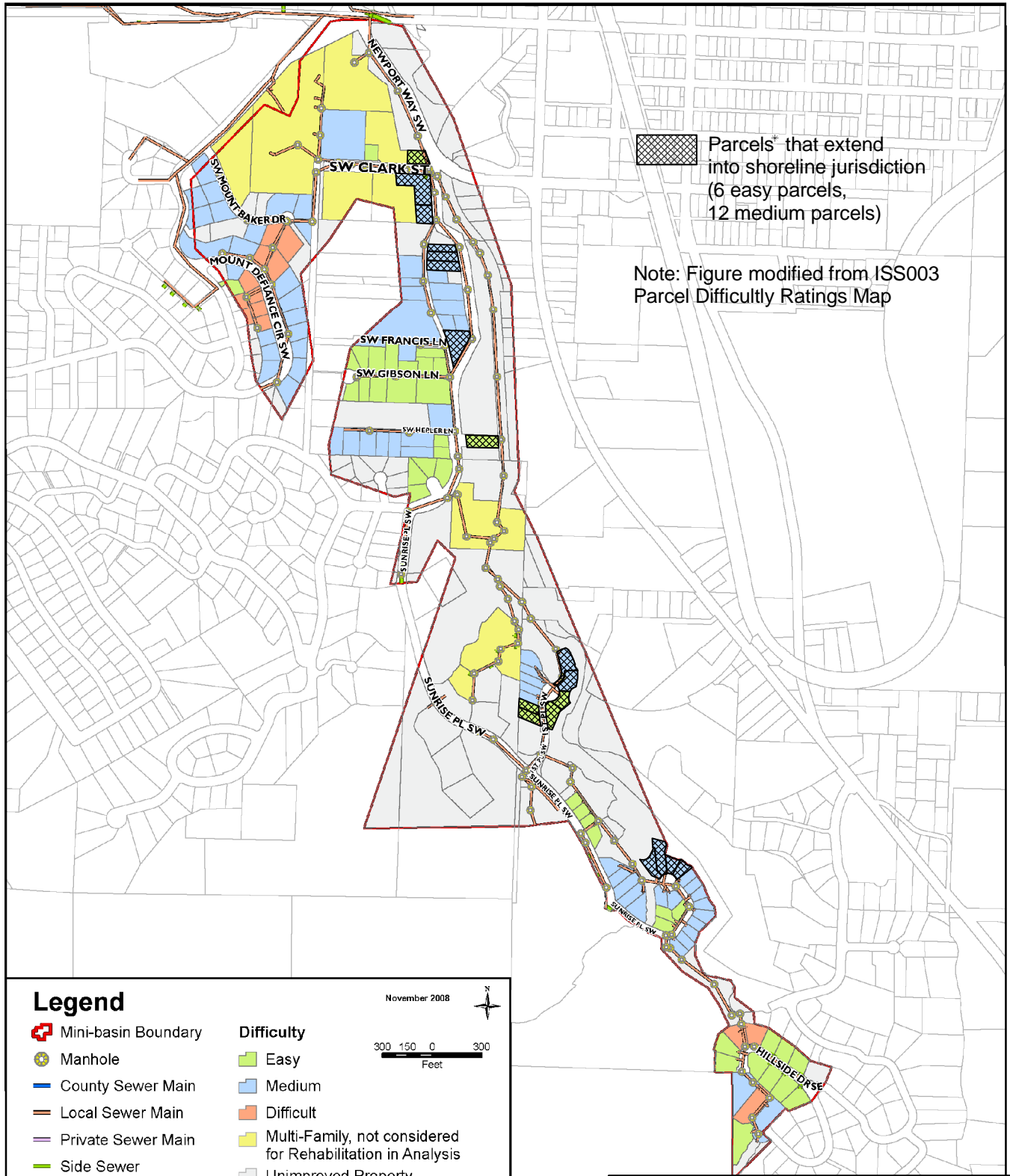
Permit	Trigger	Issuing Agency	Permit Application Materials	Comments	Time to Prepare and Submit Application	Estimated Time of Permit Issuance
<b>Required Permits</b>						
Right of Way Use Permit	Any activity the disrupts traffic, restricts access or modifies any infrastructure within the right of way	City of Bellevue	1) Right of Way Use Permit Application; 2) Traffic Control Plan; 3) Design drawings showing intended use of right-of-way; 4) Paving restoration or schematic		2 weeks	2 to 3 weeks
Side Sewer Permit/Utility	Work conducted on side sewers		1) Side Sewer Permit Application 2) Drawings showing the size and location of the existing structures the proposed side sewer. 3) Proof of any required easements that have been recorded with King County		2 weeks after easements are obtained	2 to 3 weeks
Clearing and Grading Permit	Removal or destruction of 1,000 square feet or more of vegetation and/or movement of 50 cubic yards or more of earth.		1) Design drawings showing clearing and grading limits; 2) Pre-application site visit to verify the presence or absence of environmentally critical areas		2 weeks	reviewed concurrently with SEPA
Critical Areas Review	Work conducted within a critical area, including wetland buffers		1) Wetland delineation and assessment; 2) Wetland mitigation plan		5 to 6 weeks after 70 percent design is complete	1 to 3 months
SEPA	Any proposed government action defined in the SEPA Rules (WAC 197-11-704), that is not categorically exempt (WAC 197-11-800 through 890)	King County	State Environmental Policy Act (SEPA) Checklist and wetland mitigation plan		5 to 6 weeks after 70 percent design is complete	45 days after application is deemed complete
<b>Potentially Required Permits</b>						
Section 404 Permit	Construction activities that will occur within waters of the United States, including streams and non-isolated wetlands	U.S. Army Corps of Engineers	1) Joint Aquatic Resource Permits Application (JARPA); 2) Biological Assessment/Essential Fish Habitat Assessment; 3) Wetland and/or stream delineation report; 4) Wetland and/or stream mitigation plan; 5) Design drawings and specifications with maps	Permit will not be required unless work occurs in streams or wetlands	4 to 6 weeks after 70 percent design is complete	4 to 12 months, depending on project complexity
Section 401 Permit and Coastal Zone Management Act approval	Construction activities that will occur within waters of the State, including streams and wetlands	Washington Department of Ecology	1) JARPA form; 2) Wetland and/or stream delineation report; 3) Wetland and/or stream mitigation plan	Permit will not be required unless work occurs in streams or wetlands	5 to 6 weeks after 70 percent design is complete	3 months
National Pollution Discharge Elimination System (NPDES) (for construction)	Disturbance of >1 acre		Storm Water Pollution Prevention Plan (SWPPP)	Permit will not be required for less than 1 acre of earthwork	typically prepared and submitted by contractor	30 days



**TABLE 3. ESTIMATED PERMIT TIMELINE  
KING COUNTY INFILTRATION/INFLOW PROJECT  
MINI-BASIN BLS002**

Permit	Trigger	Issuing Agency	Permit Application Materials	Comments	Time to Prepare and Submit Application	Estimated Time of Permit Issuance
<b>Required Permits</b>						
Street Use Permit	Work within an existing street right-of-way	King County	1) Street Use Permit Application; 2) Traffic Control Plan; 3) Design drawings showing intended use of right-of-way; 4) Paving restoration or schematic		2 weeks	2 to 3 weeks
Clearing and Grading Permit	Any earthwork in critical areas and/or earthwork of 100 cubic yards or more in non-critical areas.		1) Design drawings showing clearing and grading limits; 2) Pre-application site visit to verify the presence or absence of environmentally critical areas	Work within 800 ft of a bald eagle nest may be subject to seasonal restrictions under the County's Critical Area Ordinance	2 weeks	reviewed concurrently with SEPA
Critical Areas Review	Work conducted within a critical area, including stream buffers and within 400 ft of a bald eagle nest		1) Stream and/or wildlife habitat assessment; 2) Stream and/or wildlife habitat avoidance and mitigation plan		5 to 6 weeks after 70 percent design is complete	1 to 3 months
SEPA	Any proposed government action defined in the SEPA Rules (WAC 197-11-704), that is not categorically exempt (WAC 197-11-800 through 890)		State Environmental Policy Act (SEPA) Checklist and wetland and/or wildlife habitat avoidance and mitigation plan		5 to 6 weeks after 70 percent design is complete	45 days after application is deemed complete
Bald Eagle Management Plan	Work within 800 feet of a bald eagle nest	WDFW	For a Site-Specific Management Plan: 1) Parcel/vicinity map; 2) Site map showing location of nest, structures, conifers over 24 dbh and location of activities		A site visit by WDFW may be required for a Site-Specific Management Plan	<1 week for a Standard Management Plan; 2-6 weeks for a Site-Specific Management Plan
National Bald Eagle Management Guidelines	Work within 660 ft of an active or alternate nest	USFWS	No permitting process is currently established. Coordination with USFWS will be required			
<b>Potentially Required Permits</b>						
Hydraulic Project Approval (HPA)	Construction activities that will occur over or in streams	Washington Department of Fish & Wildlife	1) JARPA form; 2) Stream mitigation plan; 3) Design drawings and specifications with maps; 4) SEPA decision letter	Permit will not be required unless work occurs over or in stream	3 to 6 weeks after 70 percent design is complete	45 calendar days after the application is deemed complete and SEPA compliance is complete
Section 404 Permit	Construction activities that will occur withinwaters of the United States, including streams and non-isolated wetlands	U.S. Army Corps of Engineers	1) Joint Aquatic Resource Permits Application (JARPA); 2) Biological Assessment/Essential Fish Habitat Assessment; 3) Wetland and/or stream delineation report; 4) Wetland and/or stream mitigation plan; 5) Design drawings and specifications with maps	Permit will not be required unless work occurs in streams or wetlands	4 to 6 weeks after 70 percent design is complete	4 to 12 months, depending on project complexity
Section 401 Permit and Coastal Zone Management Act approval	Construction activities that will occur within waters of the State, including streams and wetlands	Washington Department of Ecology	1) JARPA form; 2) Wetland and/or stream delineation report; 3) Wetland and/or stream mitigation plan	Permit will not be required unless work occurs in streams or wetlands	5 to 6 weeks after 70 percent design is complete	3 months
National Pollution Discharge Elimination System (NPDES) (for construction)	Disturbance of >1 acre.		Storm Water Pollution Prevention Plan (SWPPP)	Permit will not be required for less than 1 acre of earthwork	typically prepared and submitted by contractor	30 days





**King County**

Department of  
Natural Resources and Parks  
**Wastewater Treatment  
Division**

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King County I/I  
King County, Washington

## MINI-BASIN ISS003

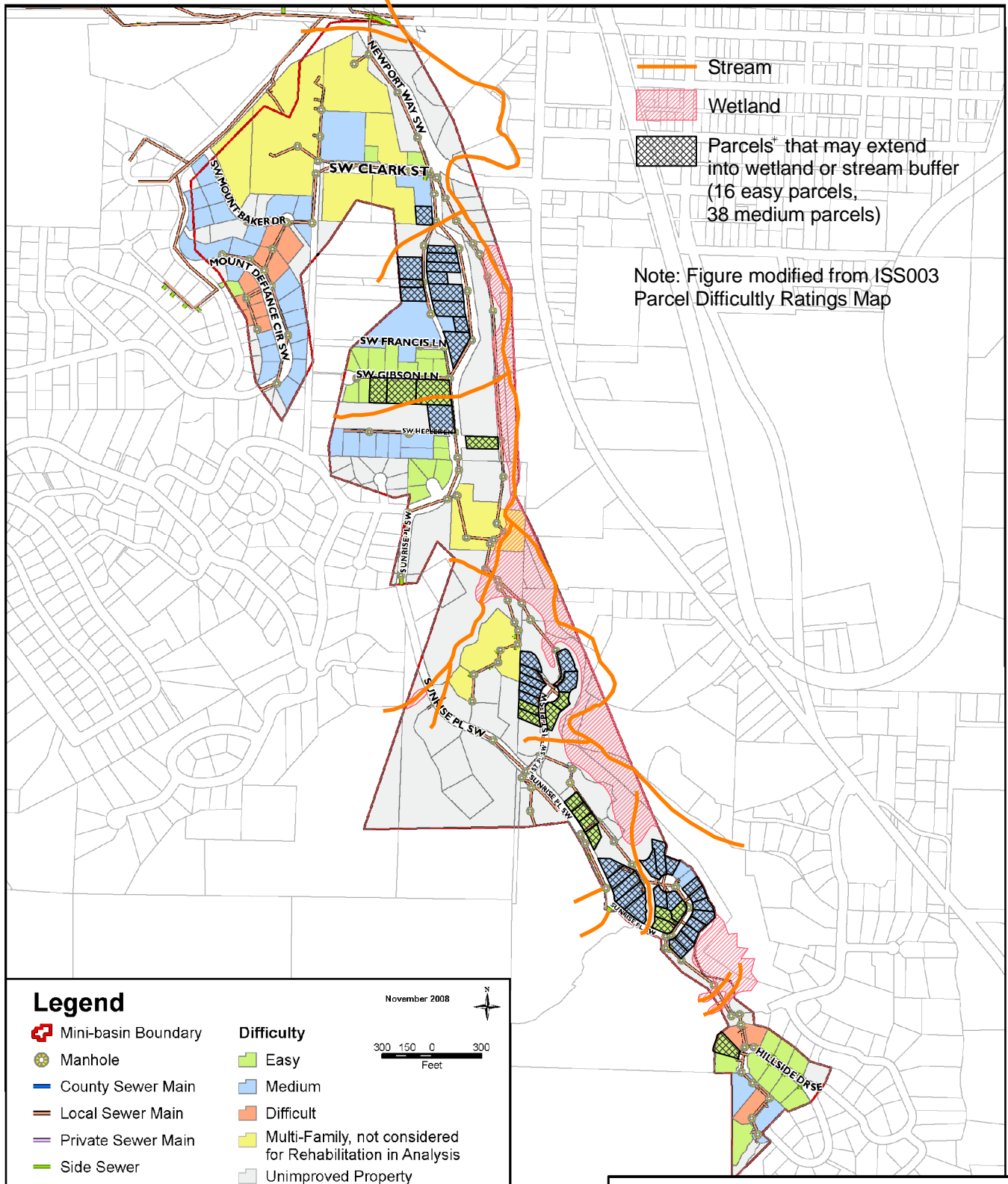
December 2008

21-1-20792-008

**SHANNON & WILSON, INC.**  
GEOTECHNICAL AND ENVIRONMENTAL CONSULTANTS

**FIG. 1**  
Sheet 1 of 2

\*Based on guidance from Tetra Tech, only easy and medium parcels were assessed.

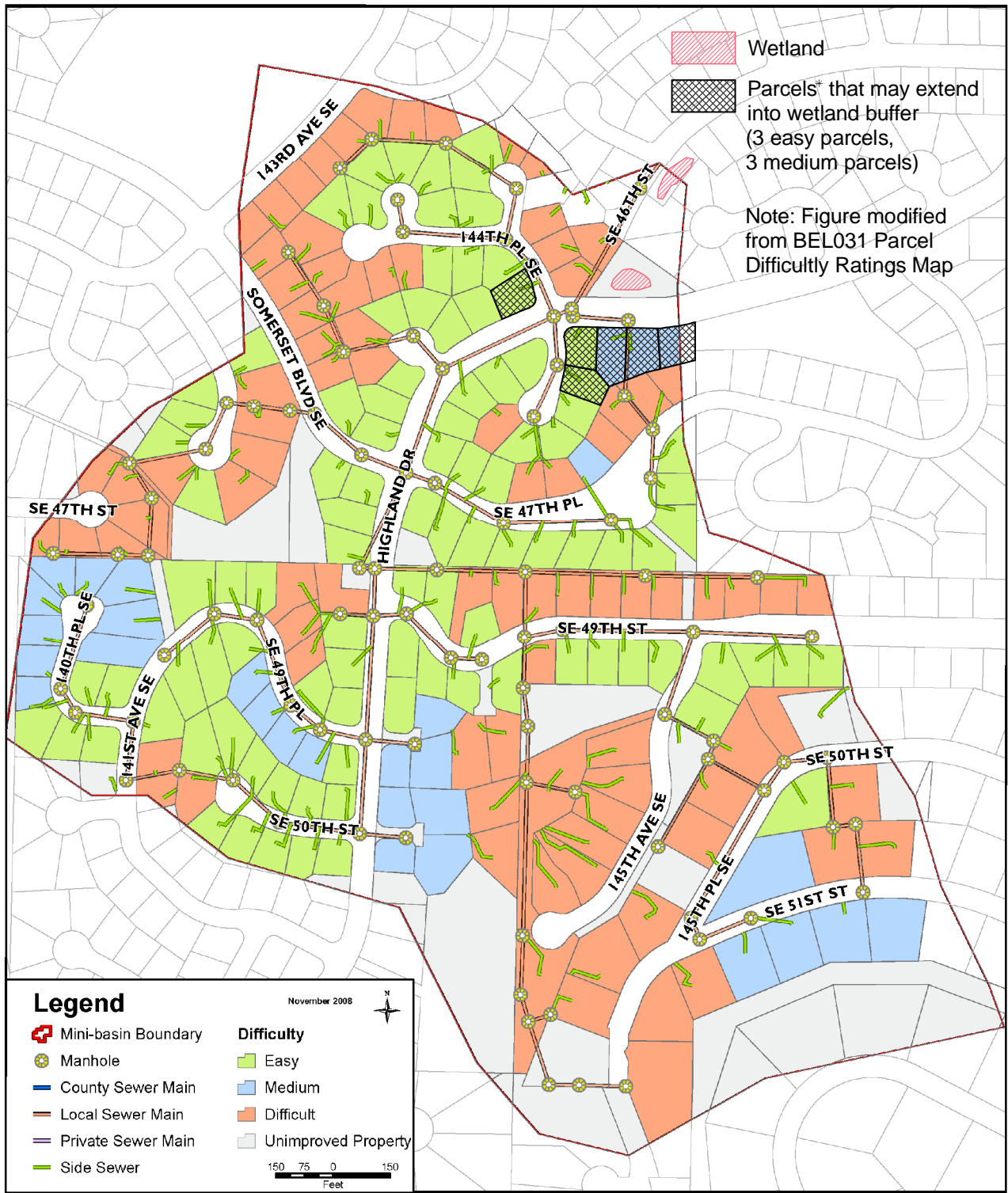


**King County**

Department of  
Natural Resources and Parks  
**Wastewater Treatment  
Division**

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\*Based on guidance from Tetra Tech, only easy and medium parcels were assessed.



**King County**

Department of  
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**Wastewater Treatment  
Division**

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King County I/I  
King County, Washington

## MINI-BASIN BEL031

December 2008

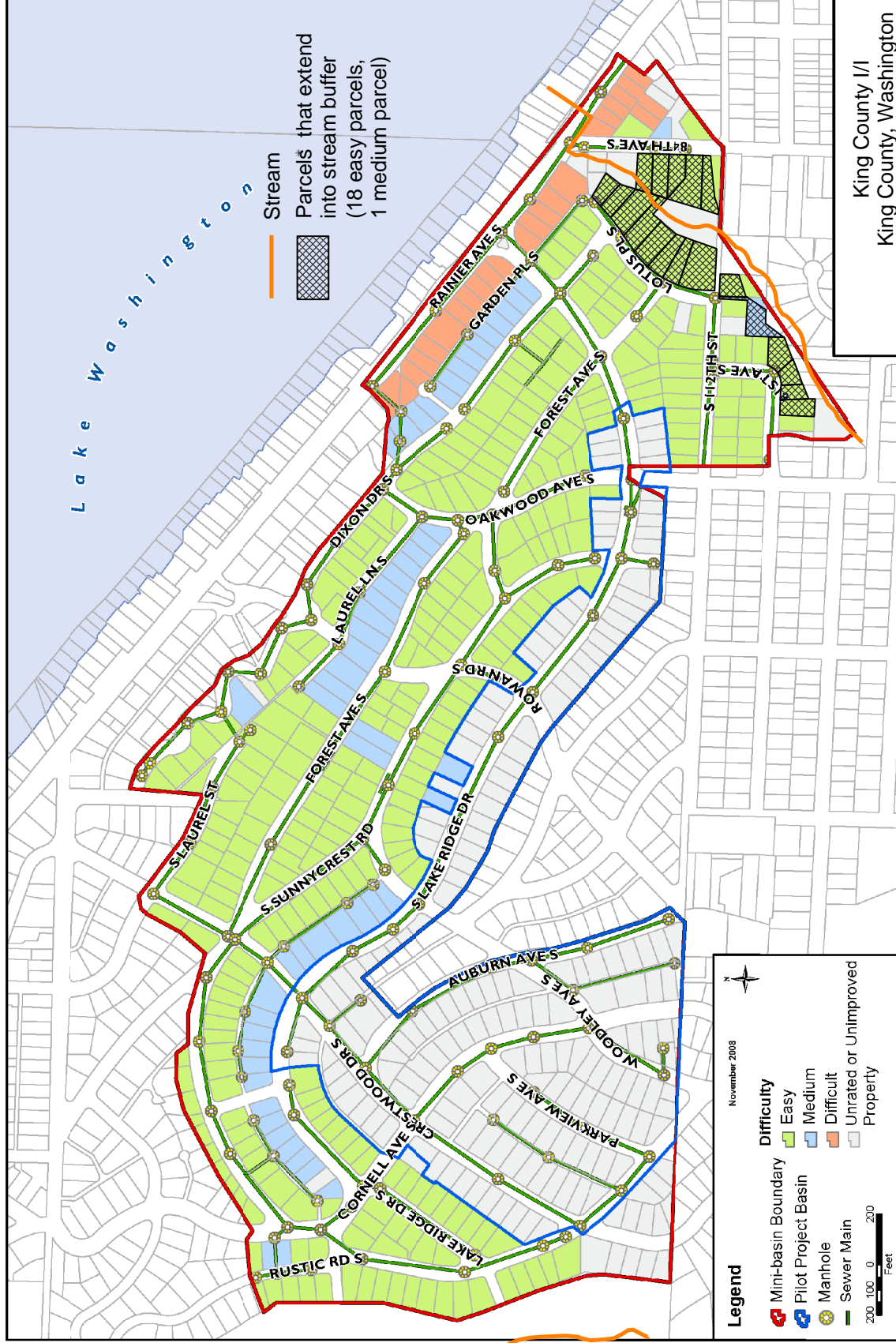
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**SHANNON & WILSON, INC.**  
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**FIG. 2**

\*Based on guidance from Tetra Tech, only easy and medium parcels were assessed.





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File Name: K:\wqwa\_11\Bosway\BLS002\_difficulty\_report.mxd  
Data Source: King County

King County I/I  
King County, Washington

### MINI-BASIN BLS002

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Note: Figure modified from BLS002 Parcel Difficulty Ratings Map  
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