

# Shoreline Exemption Submittal Materials for the Sewer SCADA Systems Replacement—Pump Station 18

## Project Narrative

### Introduction

Mercer Island sewer pump stations and their associated emergency back-up generators are monitored by the City's Supervisory Control and Data Acquisition (SCADA) system. SCADA is a computer-based remote operating system that provides real-time data for each of the City's sewer pump stations. The components for this system vary in age, with much of the equipment exceeding normal life expectancy and some parts no longer being available by manufacturers. Additionally, there are frequent false alarms, reliability, and usability issues within the system. The SCADA-Sewer Replacement project will upgrade the system to provide accurate alarm notifications of problems arising through the wastewater collection system and reduce the risk that an aging component may fail.

The SCADA upgrades will occur within 17 existing vaults or structures located within the City's shoreline jurisdiction. This memo and associated documents have been prepared for one of the pump station sites (Pump Station 18), and is intended to demonstrate the project's compliance with shoreline exemption requirements.

### Project Description

Mercer Island Public Works proposes to upgrade pump station and generator equipment at Pump Station 18 located at 7220 Holly Hill Drive (Figure 1). The easement is owned by the City of Mercer Island and consists primarily of unmaintained vegetation, with the pump station located slightly upland from the shoreline. Access to the pump station is provided by a driveway from Holly Hill Drive. Interior work at the pump station will include control panel replacement, instrument demolition and replacement, go/no-go panel installation, and associated electrical work. Interior work at the pump station emergency generator, located within a separate, aboveground generator enclosure further upland off Holly Hill Drive near W. Mercer Way, includes control panel installation and associated electrical work. Exterior work at both the pump station and the emergency generator will include antenna installation (8 feet tall).

Upgrades to the pump station and emergency generator are designed to not expand past the current existing footprint and to minimize the environmental impacts associated with construction. The SCADA-Sewer Equipment Upgrade is considered minor expansion of public utility structures, under MICC 19.07.120(D)(2). All repair and maintenance activities at the pump station, the emergency back-up generator, and any associated appurtenances are landward of the Ordinary High Water Mark (OHWM).

### Shoreline Exemption Request

Pump Station 18 is located within 200 feet of Lake Washington's OHWM, placing the project within the shoreline jurisdiction and subject to the regulations defined in the City of Mercer Island's shoreline code (MICC 19.13).

This project qualifies for a shoreline exemption under WAC 173-27-040(2)(b) which states:

(2) The following developments shall not require substantial development permits:

*(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.*

### **Development Application Sheet**

Attached.

### **Title Report**

Attached.

### **Development Plan Set**

Attached (see Figure 1 Site Plan Overview and Plan Instrumentation Detail Sheet)

### **Critical Areas Study**

Attached (see Critical Areas Technical Memo)

### **Arborist Report**

Not applicable; no trees will be impacted by project activities.

### **SEPA Checklist**

This project is categorically exempt from SEPA under WAC 197-11-800 (3), which states:

*(3) Repair, remodeling and maintenance activities. The following activities shall be categorically exempt: The repair, remodeling, maintenance, or minor alteration of existing private or public structures, facilities or equipment, including utilities, recreation, and transportation facilities involving no material expansions or changes in use beyond that previously existing; except that, where undertaken wholly or in part on lands covered by water, only minor repair or replacement of structures may be exempt (examples include repair or replacement of piling, ramps, floats, or mooring buoys, or minor repair, alteration, or maintenance of docks).*