



# memorandum

date           October 17, 2022

to             City of Mercer Island Department of Community Planning & Development

from          Jimmy Kralj, ESA

subject       Mercer Island Sewer SCADA Systems Replacement—Pump Station 4 (2239 60th Avenue SE) -  
**Critical Areas Technical Memo**

## Introduction

Environmental Science Associates (ESA) is under contract with Brown & Caldwell to assist with the City of Mercer Island Sewer SCADA Systems Replacement project at Pump Station Site 4. The pump station is located at 2239 60<sup>th</sup> Avenue SE, within the City of Mercer Island. The project area includes the pump station and associated emergency generator and the areas immediately surrounding both structures.

The pump station is located within the developed Washington State Department of Transportation (WSDOT) right of way. Access is provided from 60<sup>th</sup> Avenue SE via a paved driveway (Attachment 1). The pump station includes an above ground control building and a below ground ventilation vault located underneath the I-90 bridge, and a wet well located north of the bridge, also within WSDOT ROW. Interior work includes control panel replacement and associated electrical work at the control building, and instrument installation in the ventilation vault. Exterior work at the control building will include installing an 8-foot tall antenna (the City of Mercer Island has already secured an approved WSDOT permit for this work). Exterior work at the wet well includes demolition of an outdoor control station panel.

Based on the scope of work described above, the project is a “minor expansion of a public utility structure and conveyance system and their associated facilities” (MICC 19.07.120.D.2). As such, per MICC 19.07.120.D.2, it is exempt from review and compliance with this chapter, provided all activities shall use reasonable methods to avoid and, if avoidance is not possible, minimize impacts to critical areas and buffers to the greatest extent feasible consistent with MICC 19.07.100, mitigation sequencing.

The purpose of this technical memorandum is to document all critical areas within 200 feet of the project area and address how the project will avoid or minimize impacts to critical areas and buffers in accordance with MICC 19.07.120.D.2.

## Methods

Based on discussions with the City of Mercer Island’s Department of Community Planning and Development staff on February 4, 2022, the critical areas assessment is limited to a desktop review of GIS data given the minor nature of the work activities within existing developed sites.

## Mitigation Sequencing

Mercer Island City Code (MICC) 19.07.100 requires applicants to avoid, minimize, and mitigate impacts to environmentally critical areas and associated buffers. To that end, Contractor will access the pump station and generator and bring in materials in a manner to avoid and minimize impacts to the project area. Laydown areas will be required to stage control panels and electrical equipment; however, no vegetation clearing or ground disturbance is proposed as part of this work. No mitigation is proposed as part of the project.

## Critical Areas

A critical areas field investigation was not conducted due to the nature of the work and lack of site disturbance. City planning staff determined that a delineation was not required during a pre-application meeting (L. Anderson, personal communication, February 4, 2022). Rather, the review is based on publicly available critical areas information, as documented in this memo.

### ***Wetlands and Streams***

No wetlands are mapped within 200 feet of the project area. Additionally, there are no piped or un-piped water courses within 200 feet of the project area (Figure 1).

### ***Landslide Hazard Areas***

Portions of the area surrounding Pump Station 4 are identified by Mercer Island as steep slope and landslide hazard area (Mercer Island, 2022). According to MICC 19.07.160.C, Development Standards – Landslide Hazard Areas, development within landslide hazard areas requires an approved critical area study. However, under MICC 19.07.120.D.2, projects that involve minor expansion of public utility facilities, both above and below ground, are exempt from review and approval, but must comply with code requirements to avoid or minimize impacts to the greatest extent feasible. The project will meet the requirements of MICC 19.07.120.D.2, through the following methods.

- The project area will be accessed from paved areas.
- No soil disturbance, including excavation will be conducted at the project area; all work at the pump station will be contained to an existing above-ground control building and in-ground vault/dry well structures.

Accordingly, the project will not exacerbate conditions related to landslide, erosion, and seismic hazards and no geotechnical report is required (MICC 19.07.160.B.3).

### ***Fish and Wildlife Habitat Conservation Areas***

According to MICC 19.07.170 areas where state or federally listed endangered, threatened, sensitive, or candidate species, or species of local importance, have primary association are designated as Fish and Wildlife Habitat Conservation Areas (FWHCA). Priority habitats and areas associated with priority species identified by the Washington State Department of Fish and Wildlife (WDFW) are considered FWHCA as well.

However, no work will occur below the ordinary high water mark of Lake Washington and per MICC 19.07.120.D.2, projects that involve minor expansion of public utility facilities, both above and below ground, are exempt from review and approval, but must comply with code requirements to avoid or minimize the impacts to the greatest extent feasible. The project will meet the requirements of MICC 19.07.120.D.2, through the following methods.

- Noise associated with the work will be minimal and will not exceed background levels at the project area.
- Additionally, no trees within the project area will be disturbed.

Accordingly, this project will not result in any impacts to any Fish and Wildlife Conservation Areas within the vicinity of the project area.

## **Shoreline**

Projects located within 200 feet of shorelines of the state (Lake Washington) are regulated under the Mercer Island Shoreline Master Program (MICC 19.13). According to MICC19.13.D.1 exemptions and exceptions within shoreline jurisdiction are found in WAC173-27-040, 173-27-044, and 173-27-045. This project, as normal maintenance or repair of an existing structure, meets the criteria of WAC173-27-040(2)(b) and, therefore, is exempt from a substantial development permit.

## **Summary**

All proposed activities will be performed to avoid impacts to designated critical areas and their buffers in conformance with the mitigation sequencing standards contained in MICC 19.07.100. Therefore, the project is compliant with the critical area development standards defined in MICC 19.07.

If you have any questions, please call Jimmy Kralj at 206.204.6966.

## References:

City of Mercer Island. 2022. Information and Geographic Services GIS Portal.  
<https://chgis1.mercergov.org/Html5Viewer/Index.html?viewer=PubMaps&viewer=PubMaps>.

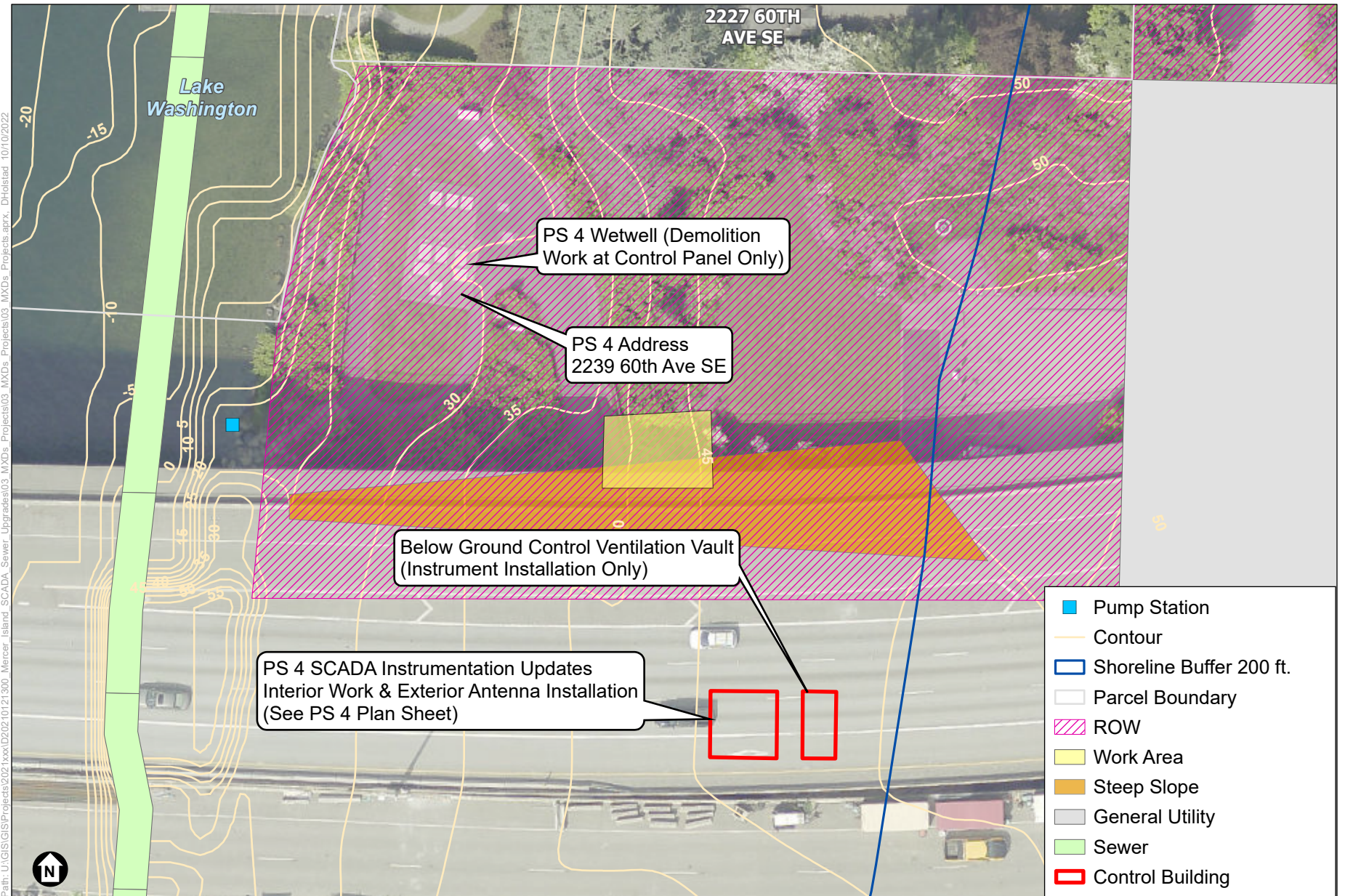
## Attachment 1



*View of access upland of Pump Station 4*



*Pump Station 4 with access from Lake WA or land*



SOURCE: King County, 2019; Carollo, 2022; City of Mercer Island, 2022

Mercer Island SCADA Sewer Improvements

\*Seismic, erosion, and potential slide areas not shown



**Figure 1**  
Pump Station #4  
Site Plan Overview