

# **Shoreline Exemption Submittal Materials for the Sewer SCADA Systems Replacement—Pump Station 15**

## **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 15), 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 15 located at 4765 and 4808 Forest Avenue SE (Figure 1). The pump station is located within the right-of-way in a street end park (Miller Landing) adjacent to a dock and the shoreline (Attachment 1). Access to the project area is primarily on foot with minimal vehicle access. Access to the pump station is provided by a staircase from Forest Avenue SE. Interior work at the pump station will include control panel replacement, instrument demolition and replacement, and associated electrical work. Interior work at the emergency generator, located within a separate, above ground generator enclosure near the northeast portion of the property at Forest Avenue SE, includes rewiring and associated electrical work. Exterior work at the pump station will include antenna installation (8 feet tall); exterior work will not occur at the generator. Work will occur primarily below ground or within the generator enclosure with limited disturbance above grade.

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 15 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).*