



April 10, 2026

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Re: SHL26-008 Request for Information 1

This memorandum is in response to SHL26-008 Request for Information 1 sent on March 13, 2026. It aims to clarify the intent of the proposed repair/replacement for the sanitary sewer lift station/vault as part of the Luther Burbank Park Waterfront Improvements Project (Permit Application # 2509-100).

Existing Conditions

The seasonal restrooms at the Luther Burbank Park waterfront are served by a sanitary sewer lift station/vault located within the concrete tie-back slab that supports the bulkhead along Lake Washington. The lift station/vault is positioned approximately 4 feet landward of the bulkhead. The lift station was installed in the 1970s during development of Luther Burbank as a public park property. Replacement of the existing sewer pump and sewer line connection to the restrooms was planned during renovations of the Boiler Building (Permit #2302-156). During construction in summer 2024, the contractor discovered that the lift station was leaking substantially, and the sewer pump and sewer line could not be replaced as originally intended. The project team determined that, due to planned excavation as part of the plaza soil cleanup action directed by the Washington State Department of Ecology, the lift station should be repaired as part of the Luther Burbank Park Waterfront Improvements Project. The restroom facility was subsequently closed to the public in 2024 and remains closed until the sewer vault can be repaired.

Design Alternatives Analysis

The project team evaluated several options for designing the sewer lift station repair, including:

- Option 1: Leave the existing sewer lift station as-is and install the pump system as planned for the 2024 Boiler Building project.
- Option 2: Seal the existing sewer lift station to slow or stop the inflow of lake/groundwater and install the new pump system.
- Option 3: Replace the existing lift station in its current location.
- Option 4: Relocate the lift station to a suitable location within the waterfront plaza.

Option 1 was determined to be infeasible. Inflow of lake water and groundwater through the leak would likely increase pump cycling frequency and the volume pumped through the sewer system. This additional load could result in system overcapacity, potentially causing system damage or public health risks such as sewage backups. Therefore, only Options 2 through 4 are evaluated against the criteria set forth in WAC 173-27-040(2).

Is the proposed repair a common method of repair for the type of structure or development?

Options 2 through 4 could be considered common methods of repair; however, Options 2 and 3 are not preferred for this project.

Option 2 (replacement in existing location) is not preferred because the current lift station is over 50 years old, does not meet current sanitary sewer size standards or City sizing requirements, and has already failed. Replacing the station in the same location would not resolve existing siting constraints. The station is located within a confined walkway approximately 4 feet from the bulkhead along Lake Washington, which limits access and would make ongoing maintenance and future repairs challenging.

Option 3 was determined to be infeasible due to structural constraints. The existing lift station lies within the concrete tie-back slab that supports the bulkhead. Construction in this area could compromise the structural integrity of the bulkhead.

Option 4 is the preferred method of repair for the following reasons:

- Relocates the lift station within the waterfront plaza (approximately 27 feet from the existing location), moving it farther from the shoreline.
- Installs an alarm system to detect leaks or failures, improving system monitoring and early warning for potential issues.
- Reduces public health risks by increasing separation from the shoreline in the event of an overflow, providing additional response time for operations staff to identify and mitigate potential releases.
- Avoids conflict with the concrete tie-back slab, thereby maintaining the bulkhead's structural integrity.
- Improves operational access by siting the station closer to the restrooms and control panel, making it easier for future maintenance and repairs.
- Meets current standards, including [MICC 15.06.070 – Engineering and design standards](#), and requirements established by the City's Sewer Utility team (as communicated at the 90% design stage in July 2025).

Is the proposed repair comparable to the original structure or development including but not limited to its size, shape, configuration, location and external appearance?

A definition for “comparable” repair is not provided in the RCW. For the purposes of this analysis, the Applicant defines comparable facility as a new or repaired structure that serves the same purpose, capacity, and function as the original facility but is built to current design, engineering, and safety standards.

Only Option 2 would maintain the existing size, shape, configuration and location of the existing lift station. However, doing so would result in a station that does not conform to current City standards for sanitary sewer systems. Option 3 was determined to be infeasible because a conforming lift station could not be sited in the existing location due to the constraints imposed by the concrete tie-back slab.

Option 4, the preferred alternative, is comparable to the original structure while incorporating necessary improvements. The proposed replacement lift station and valve vault have a combined surface area of approximately 35 square feet (lift station = 19 square feet, valve vault = 16 square feet); while this is an increase of approximately 19 square feet in surface area from the surface area of the existing vault, this is the minimum size necessary to meet current City standards for commercial sewer utilities as required by the Sewer Utility team. Because the minimum size requirements exceed the available area in the existing lift station location, the proposed replacement is relocated approximately 27 feet from the existing location, remaining within the waterfront plaza and well within the project limits, but moved farther from the shoreline. This configuration is necessary to meet current standards while maintaining comparability to the original station.

Does the proposed repair cause substantial adverse effects to shoreline resources or environment?

All three options would be developed within the ground disturbance limits of the overall project, and no additional disturbance would be required to complete any of the repairs. While none of the options are expected to cause substantial adverse effects to shoreline resources or environment, the existing lift station is more than 50 years old and has previously failed. Its age and location near the bulkhead increase the likelihood of future leaks. Moreover, the existing station does not include alarms or sensors to detect potential leaks or other issues, and the current damage was only discovered during construction.

The preferred alternative, Option 4, was selected not only to meet current City standards but also to reduce potential impacts to the shoreline and demonstrate responsible shoreline stewardship. The replacement station includes mechanisms to detect and prevent future leaks or failures, reducing risk to both the sewer system and the surrounding environment. By siting the station farther from the shoreline, the design provides additional protection for shoreline resources while maintaining functionality and accessibility.