

- Mitigating for fill in lower-quality wetlands by using credits from Springbrook Creek Wetland and Habitat Mitigation Bank, a higher-quality wetland complex.

Where Can I View the EA and FONSI?

Copies of the I-405 Renton Nickel Improvement Project EA and the FONSI are available for a cost of \$21 and \$12, respectively, which does not exceed the cost of printing. Both documents are available for review online at: <http://www.wsdot.wa.gov/projects/I405/Corridor/Library/Rentea>. The EA and the FONSI may also be reviewed at the WSDOT I-405 Project Office at 600 108th Avenue NE, Suite 405, Bellevue, and the U.S. Department of Transportation, Federal Highway Administration at 711 South Capitol Way, Suite 501, Olympia. The EA and FONSI will also be available at the following public libraries:

- Bellevue Community College
- Bellevue Regional Library
- Renton Public Library
- University of Washington Libraries (Suzzallo and Bothell)
- Highlands Public Library
- Skyway Library
- Tukwila Regional Library
- Foster Library

Who Can I Contact with Questions?

Please contact Allison Ray, WSDOT I-405 Project Office, 600 108th Avenue NE, Suite 405, Bellevue, WA 98004; telephone (425) 456-8610 if you have any questions.

Individuals requiring reasonable accommodations may request written materials in alternative formats, sign language interpreters, and physical accessibility accommodations by calling (360) 705-7097. Persons who are deaf or hard of hearing, please call Washington State Telecommunications Relay Service, or Tele-Braille at 7-1-1, Voice 1 (800) 833-6384, and ask to be connected to (360) 705-7097.

FHWA and WSDOT ensure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes by prohibiting discrimination based on race, color, national origin, and sex in the provision of benefits and services. For more information about Title VI, please call Jose Rivera, the WSDOT Title VI Coordinator, at (360) 705-7098.

Usted puede pedir estos materiales escritos en español o solicitar un intérprete llamando a Jose Rivera en (360) 705-7098.

***The preceding legal notice was advertised in the following newspaper on the date noted:
King County Journal, February 1, 2007.***

DETERMINATION OF NONSIGNIFICANCE (DNS) I-405 Renton Nickel Improvement Project, I-5 to SR 169

Description of proposal: WSDOT intends to improve Interstate 405 (I-405) from I-5 to SR 169. These improvements are part of the I-405 Corridor Program. The Proposed Action includes these improvements to support construction and operation of the facility:

- Constructing one new northbound general-purpose lane and one new southbound general-purpose lane on I-405 from I-5 to SR 167 and from SR 167 to SR 169;
- Constructing one new southbound general-purpose lane on SR 167 from I-405 to the SW 41st Street off-ramp;
- Extending the SR 167 southbound HOV lane north to begin at I-405;
- Replacing the Benson Road Bridge on a new alignment that will include bike and pedestrian facilities; and
- Replacing the I-405 bridges over Springbrook Side Channel and Oakesdale Avenue with new southbound and northbound bridges.

Other features of the project include:

- Replacing the bridge rails on the I-405 bridges over the Burlington Northern/Santa Fe (BNSF) and Union Pacific (UP) railroad tracks, and over SR 515 (Talbot Road);
- Improving stormwater treatment, detention, and conveyance;

- Using design principles and adding architectural treatments to improve the highway's appearance; and
- Incorporating numerous measures to avoid or minimize effects to the environment.

The Renton Nickel Improvement Project will provide many short- and long-term benefits. Some of these benefits are:

- Reducing travel times and improving operations in the project area;
- Improving response time for emergency service vehicles along I-405 and SR 167;
- Improving safety;
- Building a noise wall along the north side of the Talbot Hill neighborhood to reduce highway noise;
- Removing the existing box culvert at Springbrook Creek and improving the streambed; and
- Mitigating for fill in lower-quality wetlands by using credits from Springbrook Creek Mitigation Bank, a higher-quality wetland complex.

Location of proposal, including street address, if any: The Renton Nickel Improvement Project extends for approximately 3.6 miles along I-405 from I-5 to SR 169 and along SR 167 from I-405 to the SW 41st Street ramp off-connection.

Proponent/Lead Agency: Washington State Department of Transportation

Determination: The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030 (2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request. Please note that our checklist document is titled *I-405 Renton Nickel Improvement Project, I-5 to SR 169, Environmental Assessment*, published October 2006. The document is available to view during normal business hours at: I-405 Project Office, 600 – 108th Avenue NE, Suite 405, Bellevue; Bellevue Regional Library; Bellevue Community College; Foster Library; Highlands Public Library; Renton Public Library; Skyway Library; Tukwila Regional Library; and the University of Washington Library (Suzzalo and Bothell).

The document is also available electronically at: www.wsdot.wa.gov/projects/i405/corridor/library/rentea

There is no comment period for this DNS.

This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 14 days from the date below. Comments must be submitted by October 29, 2006.

Responsible Official: Allison Ray
Position/Title: WSDOT I-405 Project Environmental Manager
Address: I-405 Project Office
 600 – 108th Avenue NE, Suite 405
 Bellevue, WA 98004
Phone: 425-456-8610
Date: October 16, 2006

The preceding legal notice was advertised in the following newspaper on the date noted:
King County Journal, October 2, 2006

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Attachment 3: FONSI Distribution List

To promote good communication and enhance interagency coordination, we acknowledge that this FONSI is a public document and has involved the public, agencies, and tribes in implementing NEPA procedures. The FONSI was sent to the following government agencies, tribes, organizations, and elected officials:

Federal Agencies

U.S. Army Corps of Engineers

U.S. Department of the Interior

U.S. Department of Transportation, Federal Transit Administration

U.S. Environmental Protection Agency, Region 10

U.S. National Marine Fisheries Service

Tribal Governments

Confederated Tribes and Bands of the Yakama Nation

Duwamish Tribe

Muckleshoot Tribe

Snoqualmie Tribe

State Agencies

Washington State Department of Archaeological and Historic Preservation

Washington State Department of Ecology

Washington State Department of Fish and Wildlife

Washington State Department of Natural Resources

Washington State Transportation Commission

Local Agencies

City of Renton

Gregg Zimmerman

Peter Hahn

Keith Woolley

Alex Pietsch

Terry Higashiyama

Leslie Betlach

Ron Straka

Abdoul Gafour

Ray Sled

James Gray

Suzanne Dale Estey

City of Tukwila

Cyndy Knighton

Bob Giberson

Jim Morrow

Multi-Agency Permitting Team

Jim Fraser, Washington State Department of Fish & Wildlife
Terry Drochak, Washington State Department of Transportation
John Maas, Washington State Department of Transportation
Rebecca McAndrew, U.S. Army Corps of Engineers
Rebecca Ponzio, Washington State Department of Ecology
Robert Nolan, Washington State Department of Ecology
Don Ponder, Washington State Department of Fish & Wildlife

Libraries

Bellevue Community College
Bellevue Regional Library
Renton Public Library
University of Washington Libraries (Suzzalo and Bothell)
Highlands Public Library
Skyway Library
Tukwila Library
Foster Library

Elected Officials

U.S. Senators

Senator Maria Cantwell, U.S. Senate
Senator Patty Murray, U.S. Senate

U.S. House of Representatives

U.S. Representative Jay Inslee, 1st Congressional District
U.S. Representative David Reichert, 8th Congressional District
U.S. Representative Adam Smith, 9th congressional District

Washington State Senators

Rosemary McAuliffe, 1st District
Margarita Prentice, 11th District
Adam Kline, 37th District
Brian Weinstein, 41st District
Eric Oemig, 45th District
Rodney Tom, 48th District

Washington State Representatives

Al O'Brien, 1st District
Mark Ericks, 1st District
Zack Hudgins, 11th District
Bob Hasegawa, 11th District
Sharon Santos, 37th District
Eric Pettigrew, 37th District
Fred Jarrett, 41st District
Judy Clibborn, 41st District
Roger Goodman, 45th District
Larry Springer, 45th District
Ross Hunter, 48th District
Deborah Eddy, 48th District

Attachment 4: Mitigation Commitment List

This attachment describes project mitigation commitments. The mitigation measures are organized by element of the environment, as presented in the EA. These commitments were included in the EA as Appendix B, "Avoidance, Minimization, and Mitigation Measures," issued on October 2, 2006.

Since the issuance of the EA, corrections have been made to these commitments. These corrections serve to clarify or enhance readability. Changes are identified using strikethrough and underlining. Each deletion of original text is shown with a line striking through it; new text is indicated by an underline. These minor revisions are incorporated into the EA by reference.

These commitments have been adopted as part of FHWA's final decision on the proposed project. They are listed to "assist with agency planning and decision-making" and to "aid an agency's compliance with NEPA when no Environmental Impact Statement is necessary" [40 CFR 1501.3(b) and 1508.9(a)(2)].

List of Commitments Identified in the EA

WSDOT has well-established design and construction practices for avoiding or minimizing impacts resulting from environmental conditions anticipated along the project alignment. The following sections describe the established design and construction practices that WSDOT will include to avoid or minimize impact to the various environmental resources during both the construction and operation phases of the project.

What measures are proposed to minimize effects during construction?

WSDOT will use the measures below to minimize effects on elements of the natural and built environments. In addition, WSDOT expects to meet the commitments in their *I-405 Corridor Program NEPA/SEPA Final Environmental Impact Statement (EIS) Record of Decision*.

Air Quality

The following measures will be used to control PM₁₀, deposition of particulate matter, and emissions of CO and NO_x during construction:

- Exposed soil will be sprayed with water to reduce emissions of PM₁₀ and deposition of particulate matter.
- To reduce PM₁₀ and deposition of particulates during transportation, all truck loads of fill material will be covered, materials in trucks will be wetted, or adequate freeboard (space from the top of the material to the top of the truck) will be provided.
- Wheel washers will be provided to remove particulate matter that would otherwise be carried off site by vehicles to decrease deposition of mud on area roadways.
- Particulate matter deposited on paved, public roads will be removed to reduce mud on area roadways.
- Dirt, gravel, and debris piles will be covered as needed.
- Construction trucks will be routed and scheduled in a manner that will reduce delays and the indirect air quality effects associated with traffic slowing to accommodate construction vehicles.

Cultural Resources

Although WSDOT does not anticipate any construction-related effects to historic properties and resources, it is always possible that archaeological resources could be found during construction. Because of this, WSDOT will follow their Unanticipated Discovery Plan to ensure that archaeological resources are not inadvertently disturbed during construction.

Cumulative Effects

No measures, beyond those incorporated in the project design and listed in the air quality, surface water, wetlands, and fish and aquatic resources discipline reports, will be necessary.

Economic Elements

WSDOT will follow these construction planning procedures to minimize construction effects on access to local businesses:

- Daytime street closures will be kept to a minimum to provide access for businesses during regular business hours.
- Access to businesses will be maintained throughout construction by carefully planning construction activities and being aware of the need to provide adjacent properties with reasonable access during business hours.

- WSDOT will post appropriate signs that communicate revised access information to potential customers.
- As part of construction management, access measures will be prepared and included in the contract specifications will be maintained to businesses and residences.

Environmental Justice

To minimize effects on local service centers, WSDOT will inform local agencies, the public, school districts, emergency service providers, and transit agencies of traffic changes ahead of time in the following ways:

- Send information to service provider contacts so that they can include the information in newsletters and relay the information face to face. WSDOT can accomplish this in part by sending service providers the project's monthly electronic newsletter.
- Send flyers and handouts to service providers for posting and distributing in key locations at their facilities. Flyers will be printed in Spanish, Chinese, Russian, and Vietnamese.
- Post flyers at key stores and religious institutions.
- Set up a project table and talk with people at locations such as food banks.
- Translate written materials accurately.
- Ensure understanding by writing public materials at a 4th grade reading level.



Project Fact Sheet in Spanish

Fish and Aquatic Resources

WSDOT will take the following actions to minimize the effects of project construction on fish:

- All in-water work will be restricted to authorized construction periods when juvenile salmon are not likely to be present in substantial numbers. Adherence to designated in-water work windows or approved work periods, as defined by appropriate permitting agencies (Washington State Department of Fish and Wildlife, National Marine Fisheries Service, and the U.S. Fish and Wildlife Service), will also eliminate or reduce in-water interference during periods when returning adult salmon are likely to be present.
- All permanent pile driving within the ordinary high water mark will be performed in dewatered conditions. ~~No in-water pile driving will be required to isolate surface water from work areas.~~
- WSDOT will restore temporarily cleared areas to preconstruction grades conditions and replant the areas with appropriate native vegetation.

In addition, WSDOT will follow these BMPs during construction to avoid discharging sediment from bridge, culvert, and roadway construction:

- Develop and implement a temporary erosion and sediment control plan for clearing, vegetation removal, grading, ditching, filling, embankment compaction, or excavation. The BMPs in the plan will be used to control sediment input from all vegetation or ground-disturbance activities.
- Use effective erosion control measures, such as filter-fabric fence, straw mulch, straw bales, and plastic sheeting to prevent silt and soil from entering surface waters (including wetlands).
- Hydroseed bare soil areas following grading per environmental regulations.
- Clearly label streams and stream buffers on the construction plans and in the field.

- Mark clearing limits with orange barrier fencing wherever clearing is proposed in or near critical areas.
- Locate staging areas and equipment storage areas away from sensitive areas (e.g., streams and wetlands).
- Refrain from vehicle refueling and maintenance activities within 100 feet of streams, rivers, and wetlands, or as allowed per permit requirements.
- Minimize the duration of in-water work (below the OHWM) and strictly adhere to the appropriate in-water work windows, as dictated by applicable permits.
- Prohibit waste and excess materials from being disposed of or allowed to remain below the OHWM.
- Prepare and adhere to ~~an approved~~ a Spill Prevention, Control, and Countermeasures Plan for the project prior to beginning any construction and maintain a copy of the plan with any updates at the work site.
- Identify and develop staging areas for equipment repair and maintenance away from all drainage courses. WSDOT will require that washout from concrete trucks not be dumped into storm drains or onto soil or pavement that carries stormwater runoff. Thinners and solvents will not be used to wash oil, grease, or similar substances from heavy machinery or machine parts. WSDOT will designate a washdown area for equipment and concrete trucks.
- Contain excavated sediment in tanks, or other appropriate containers, to avoid discharge to surface water, and transport the contained sediments to an approved disposal site.
- Check items regularly such as fuel hoses, oil drums, and oil and fuel transfer valves and fittings for drips or leaks to prevent spills into surface water.
- Keep the illuminated area and intensity of nighttime lighting to the minimum that is necessary for the intended purpose. Lights will be directed onto the work areas and away from the water.
- Remove the Springbrook Creek box culvert and restore the streambed in that area to provide stream mitigation.
- ~~For unavoidable stream and buffer effects, WSDOT will mitigate at a site or sites within the same watershed.~~

Floodplains

Adding fill to the floodplain of Springbrook Creek is an unavoidable negative effect. Compensation for this fill comes from removing the Springbrook Creek box culvert and from the Springbrook Creek Wetland and Habitat Mitigation Bank, an Early Environmental Investments (EEI) Project where large volumes of material will be removed to construct that project. The excavation at the EEI site, which is required to construct the wetlands, will provide sufficient floodplain storage to compensate for the fill placed within the floodplain during construction of the new I-405 northbound and southbound bridges over Springbrook Creek and Oakesdale Avenue, along the south side of I-405 between Oakesdale Avenue and Lind Avenue, and on the west side of SR 167 near SW 23rd Street.

WSDOT will ~~hydraulically~~ analyze the effectiveness of the fill mitigation in order to confirm that the 100-year floodplain elevation will have no rise due to the project. If the proposed mitigation is demonstrated to be inadequate, then ~~an additional site will be found for compensatory storage~~ will be found. ~~In addition, WSDOT will evaluate headloss at stream crossings prior to construction.~~

Hazardous Materials

WSDOT will conduct the following activities to avoid or minimize effects to human health or the environment:

- WSDOT may be responsible for remediating and monitoring contamination found on properties that will be acquired for this project. WSDOT will further evaluate the identified properties before acquisition or construction occurs. Contamination in soils will be evaluated relative to Model Toxic Control Act cleanup levels.

What is remediation?

Remediation is an action to identify, eliminate, or minimize hazardous substances that pose a threat to human health or the environment.

What is the Model Toxics Control Act (MTCA)?

MTCA is Washington Administrative Code that describes a process to identify, investigate and clean up properties that may threaten human health or the environment.

- If WSDOT encounters an unknown underground storage tank within the existing right-of-way (ROW), WSDOT will assume cleanup liability for the appropriate decommissioning and removal of the underground storage tank. If this occurs, WSDOT will follow all applicable rules and regulations associated with underground storage tank removal activities.
 - WSDOT will ensure that the surrounding properties and population are not exposed to the contaminants on the site. For example, WSDOT will ensure that the site is properly contained after construction is completed so contaminants do not migrate off site and the health and safety of all on-site personnel are protected during work at the site.
- WSDOT will consider entering into pre-purchaser agreements for the purpose of indemnifying WSDOT against acquiring the responsibility for any long-term cleanup and monitoring costs.
 - Construction mitigation measures will be implemented to reduce the use, transfer, and storage of hazardous materials in sensitive areas.
 - WSDOT will be required to meet all appropriate discharge approvals if water affected with hazardous materials is encountered during construction and water needs to be managed.
 - Contaminated groundwater originating from properties located upgradient of the ROW could migrate to the study area. In general, WSDOT will not incur liability for groundwater contamination that has migrated into the project footprint as long as it does not acquire the source of the contamination. However, WSDOT will manage the contaminated media within the project footprint in accordance with all applicable rules and regulations.

Land Use Patterns

In addition to the actions listed for Environmental Justice, WSDOT will do the following:

- Prepare and implement a traffic management plan (TMP).
- Provide detour routes and clearly mark with signs, if local streets must be temporarily closed during construction.
- Maintain access to businesses and residences throughout construction.

Land Use Plans and Policies

None identified.

Noise and Vibration

To reduce construction noise at nearby receptors, the following activities will be incorporated by WSDOT where practicable:

- As construction takes place in the area where the noise barrier is to be built, if possible, construct the proposed noise barrier before other construction activities. Require early construction of permanent noise barriers to provide noise shielding.
- Limit noisiest construction activities, such as pile driving, to between 7 a.m. and 10 p.m. to reduce construction noise levels during sensitive nighttime hours.
- Equip construction equipment engines with adequate mufflers, intake silencers, and engine enclosures to reduce their noise.
- Turn off construction equipment during prolonged periods of nonuse to eliminate noise.
- Locate stationary equipment away from residences, where possible, to decrease noise.
- Construct temporary noise barriers or curtains around stationary equipment that must be located close to residences to decrease noise levels at nearby sensitive receptors.
- ~~Require resilient bed liners in trucks being loaded on site.~~
- ~~Prohibit banging of dump truck tailgates.~~
- Require WSDOT to use OSHA-approved ambient sound sensing backup alarms to reduce disturbances from backup alarms during quieter periods.

Parks and Recreation, Section 4(f)

~~Mitigation for effects on Section 4(f) resources is not required because no Section 4(f) resources are affected by this project.~~ During construction of the new southbound and northbound bridges over Springbrook Creek and Oakesdale Avenue, the Springbrook Creek Trail under I-405 will be closed for public safety reasons. A signed detour will be provided during the closure and notices will be provided to the Cascade Bicycle Club and posted to keep the public informed about the construction. The detour will extend from SW Grady Way to a point just south of SW 16th Street on the sidewalk and road edge of Oakesdale Avenue SW. The trail will be fully restored following construction.

Public Services and Utilities

Effects to existing utilities will be avoided through project design where it is feasible. Where avoidance is not feasible, utilities will be relocated or protected in place. Coordination with utility service providers will identify conflicts and resolve them prior to or during construction where possible.

In addition, if temporary disruptions in public service are unavoidable, emergency and school transportation service providers will be contacted and kept informed. Contingency plans for unforeseen interruptions of access or public services will be developed before construction begins.

Social

In addition to the measures listed for Land Use Patterns, WSDOT will implement the following to minimize construction effects for the general public:

- Post current information on construction and travel options on the project website.
- Increase access to travel options and incentives to use them.
- Build Benson Road Bridge over I-405 on a new alignment west of the existing bridge to avoid long-term closure.
- Meet with City of Renton staff during final design to coordinate temporary closures and detours related to replacing the Springbrook Creek and Oakesdale bridges and widening the Talbot

Road bridge. If it is not possible to maintain trail traffic during construction, then ~~the team~~ WSDOT will identify appropriate, safe detours for use by cyclists and/or pedestrians.

Soils, Geology, and Groundwater

~~Contractors and consultants associated with this project~~ WSDOT will follow these procedures:

- WSDOT will reduce degradation of moisture-sensitive soils. This may be accomplished by maintaining proper surface drainage to avoid ponding of surface water or groundwater; by minimizing ground disturbance through limiting the use of heavy equipment, limiting turns,

What is an admix?

An admix is a product, such as cement or kiln dust, that is mixed into soil to improve the characteristics of the soil, such as workability and compactability.

and/or not tracking directly on the subgrade; and/or by covering the final subgrade elevation with a working mat of crushed rock and/or geotextile for protection. A soil admix such as cement may also be mixed into the subgrade to add strength and stabilize the ground.

- If WSDOT identifies areas where dewatering will be necessary for ~~utility~~ work, then WSDOT will take steps to minimize the potential settlement effects. ~~These steps may include recharge wells and/or cut-off shoring walls, as well as surveying adjacent properties to monitor for settlement.~~
- WSDOT ~~identified~~ confirmed the presence of an abandoned coal mine tunnel near Benson Road. WSDOT will design the project to avoid adverse settlement or subsidence effects from the tunnel. If necessary, avoiding settlement or subsidence may be accomplished by bridging over the tunnel with a structural slab or by adding fill to the tunnel.
- ~~Large construction projects will cause ground vibrations as a result of heavy equipment use. WSDOT will determine acceptable limits for off-site construction-related vibration before beginning construction. WSDOT will demonstrate that off-site ground vibrations are within the limits set for the project through the use of vibration monitoring equipment.~~

What is compaction grouting?

Compaction grouting is a method of improving the soil by injecting a thick grout into the soil, causing the soil to become denser. The higher density of the soil causes it to be less susceptible to liquefaction and shaking during an earthquake.

- New bridges underlain by liquefaction prone soils will be designed to current seismic standards. The bridges ~~will~~ may be founded on deep piles and/or the soil under the bridges will be improved. Soil improvement measures, if needed, ~~will likely~~ may consist of compaction grouting.
- Retaining walls may be constructed in locations underlain by liquefaction-prone soils. In accordance with the *WSDOT Geotechnical Design Manual*

~~(GDM),~~ if a retaining wall is greater than ten feet in height and within ten feet of the roadway, then the wall will be founded on deep piles or the soils under the wall will be improved using measures such as compaction grouting. WSDOT will select measures that will minimize the effect on adjacent properties.

- ~~A large earthquake can damage existing roads, utilities, and structures near new embankment fills. WSDOT will identify these areas and mitigate risks using ground modifications or other procedures identified in the *WSDOT GDM*.~~
- WSDOT will only import and place clean fill for the project. Contaminated fill brought from outside sources can contaminate shallow aquifers. WSDOT will require documentation for fill brought onto the site from the supplier that the fill does not exceed Washington State soil cleanup standards. If documentation is not available, then WSDOT will require testing of imported fill soils prior to placement. WSDOT will test suspect soils encountered during project construction. Where necessary, WSDOT will require their removal from the site and proper disposal in accordance with Washington State regulations.
- WSDOT may need to install underdrains to control seepage for retaining walls and fill embankments. These underdrains may lower the groundwater table in the immediate vicinity

of the project. In the unlikely scenario that the effects from this drawdown could be adverse, WSDOT will include special provisions in the design, such as discharging drain flow back into affected wetlands.

- All construction within and/or over the City of Renton Aquifer Protection Area Zones 1 and 2 shall comply with the Washington State Wellhead Protection Requirements outlined in WAC 246-290-135(4) and the City of Renton Municipal Code 4-3-050C, 4-4-030H, and 4-9-015.

Surface Water and Water Quality

The *I-405 Corridor Program NEPA/SEPA Final EIS* makes the following commitments to protect water quality during construction of I-405 projects. These commitments will be followed for the Renton Nickel Improvement Project.

- ~~For construction within 300 feet of a lake or stream, or where concentrated construction site discharge may flow directly to surface waters, all site grading and initial stabilization could be scheduled to occur only during the dry season, May 1 through September 30. Where construction must occur within stream channels, such construction will occur "in the dry" whereby stream flow is temporarily diverted around the work site where practicable to prevent turbidity.~~
- ~~If other construction activities occur during the wet season, such as subgrade or pavement installation, utilities placement, or curbs and sidewalks, a plan will be developed that:~~
 - ~~1) Limits disturbed area activities to a maximum of 48 hours at any single location, and includes provisions for temporarily ceasing construction and quickly stabilizing the site when rainfall greater than one-half inch in a 12-hour period is measured at the site.~~
 - ~~2) Uses alternative means to treat construction site runoff such as overland flow across a vegetated surface, uses coagulants in the sediment ponds or other stormwater chemical treatment measures, or uses polymer soil stabilizers to reduce erosion. If coagulants are used, then a nontoxic compound will be used as approved by WSDOT.~~
- Construction disturbances will be limited to the minimum area needed, the shortest duration, and an appropriate distance away from waterbodies as practical. Seasonal work windows will be identified and implemented.
- BMPs such as fencing, landscaping, erosion matting, hydro mulching, soil imprinting, straw bales, detention/sediment trap basins, and vegetated fringes as described in the HRM will be used.
- ~~Clearing activities will be staged such that construction areas are cleared no earlier than one week ahead of starting construction where practicable. If this is impractical, then cleared areas will be immediately mulched, covered with plastic, or otherwise stabilized.~~
- WSDOT will be required to obtain a NPDES (National Pollutant Discharge Elimination System) permit. WSDOT will ensure that water encountered during construction meets the standards specified in the NPDES permit prior to the discharge of the encountered water to a surface ~~waterbody from the project site~~. If necessary, water quality will be improved, such as by using sediment ponds to allow sediment to settle out prior to discharge.
- A scour analysis of any bridge piers that are below the OHWM will be conducted~~submitted~~ before bridge construction begins.

Transportation

Transportation demand management (TDM) strategies will form an important part of the construction management program. TDM strategies for the Renton Nickel Improvement Project will be implemented both before and during construction to increase public awareness and participation in HOV travel. The major focus for specific TDM efforts will be to implement programs that:

- Provide bus service, carpool, vanpool, vanshare and/or incident response;
- Divert trips from construction areas by encouraging the use of Park and Rides;
- Engage and inform the public through enhanced real-time information and resources; and
- Are targeted to specific geographic and trip markets.

Specific traffic control strategies have been listed under Environmental Justice, Land Use Patterns, and Social.

Upland Vegetation and Wildlife

Mitigation measures listed for Surface Water and Water Quality also apply to upland vegetation and wildlife. In addition, BMPs will be used to help protect wildlife resources. The BMPs will include revegetating construction zones and roadside areas with native plants to offset habitat loss due to construction.

Visual Quality

~~Measures used to minimize effects on transportation and social resources will also serve to minimize effects on visual quality during construction.~~ These measures will be followed to minimize construction effects:

- Where possible, restore environmental and visual functions to temporary impact areas, and work with agencies and landowners to preserve and establish buffer zones.
- Adjust grading limits to protect desirable vegetation, natural habitat, wetlands and sensitive areas, and heritage resources where possible.

Wetlands

As appropriate, measures described for Surface Water and Water Quality as well as Fisheries and Aquatic Resources will also apply to wetlands.

~~In addition,~~ WSDOT will compensate for unavoidable wetland fills using credits from the Springbrook Creek Wetland and Habitat Mitigation Bank.

Temporarily disturbed wetland areas will be restored and replanted with appropriate wetland vegetation ~~after the project is complete.~~ WSDOT will develop a project specific plan ~~before construction begins~~ to identify how restoration will occur.

What measures are proposed to minimize effects during operation?

WSDOT will use the measures below to minimize effects on elements of the natural and built environments. Several discipline report topics did not need minimization measures because these topics will not be affected by the project. Disciplines with no minimization measures are as follows:

- Air Quality
- Cultural Resources

What is transportation demand management (TDM)?

Institutional and operational methods to reduce travel demand on the transportation system. TDM strategies are usually implemented to support the use of HOVs, which typically include carpools, vanpools, and public transit programs.

- Cumulative Effects
- Economic Elements
- Environmental Justice
- Fisheries and Aquatic Resources
- Land Use Patterns
- Land Use Plans and Policies
- Parks and Recreation, Section 4(f)
- Public Services and Utilities
- Social
- Soils, Geology, and Groundwater
- Transportation

Floodplains

Bridge piers placed within the floodplain will be designed to minimize hydraulic disturbance to flow. This ~~can~~ may be achieved by designing piers that are all the same size and placed in lines parallel to the flow path.

Hazardous Materials

WSDOT will notify Ecology and Washington State Patrol in the event of an accidental spill along I-405 and SR 167. Ecology is the state's Incident Command for emergency spills and as such, responds to spills in highway ROW.

Noise and Vibration

WSDOT will construct a noise wall to reduce noise levels from the freeway for residences along the southern ROW of I-405, adjacent to South 14th Street at the north side of the Talbot Hill neighborhood. This wall will extend east from the South 14th Street/South 15th Street intersection to Talbot Road South. The 18-foot-tall barrier will have an area of approximately 36,800 square feet and a length of approximately 2,200 feet.

Surface Water and Water Quality

~~WSDOT has designed~~ Stormwater facilities for this project ~~that~~ will both maintain the rate of stormwater runoff at existing conditions and remove pollutants from runoff generated by the project. With these facilities, the runoff is expected to meet Washington State water quality standards listed in WAC173-201(A). WSDOT will provide routine maintenance for these facilities.

The area of the project that is within 10,000 feet of the Renton Municipal Airport will ~~also~~ require measures to minimize hazards associated with wildlife attraction to stormwater detention ponds ~~because of the project's proximity to the Renton Municipal Airfield~~. The following are guidelines that may be used for stormwater management facilities sited near the airport:

- Cover or net all permanent open water surfaces.
- To minimize the frequency and duration of open water to acceptable levels, water that is detained by the 2-year design storm should completely drain or fall to a level that is covered by a net or solid cover within 24 hours after the end of the storm event. ~~That is, the pond should drain from the 2-year design storm depth to the bottom or covered depth within 24 hours or less.~~
- Site ponds away from aircraft movement areas to minimize aircraft-wildlife interactions.
- Use steep side slopes and deep pond depths to minimize shallow water areas and minimize the total water surface area.
- Slope the pond bottom to allow quick drainage and reduce the potential for standing water.

- Eliminate the potential for wetland vegetation growth on the pond bottom and side slopes by lining the pond with riprap or quarry spalls. Alternatively, plants that provide minimal habitat to wildlife can be used. Dense brush and small trees that will be perceived by waterfowl as hiding places for predators are a good choice. Avoid closely mowed grass, which is preferred by waterfowl.
- Break up possible flight lines by planting trees, setting up poles and or fences which do not allow most water fowl clear landing or takeoff room on the pond surface.
- Introduce islands within open water areas as needed to support scrub-shrub vegetation cover within wetpools with emergent aquatic planting areas.

Design of open stormwater facilities shall be reviewed and approved by ~~USDA Wildlife Services and the Port of Seattle's Wildlife Manager~~ to ensure that these objectives are met.

Upland Vegetation and Wildlife

Structures are being added or modified to help protect wildlife resources in the study area. ~~One new noise wall will be built along I-405 that may help reduce noise effects to wildlife in this area.~~ The I-405 bridges over Springbrook Creek and Oakesdale Avenue will be replaced with a single northbound structure and a single southbound structure. These new structures will have longer spans ~~to~~ which may provide additional wildlife passage underneath.

Visual Quality

Guidelines from the RCP and CSS process for the I-405 corridor will be applied to compensate for the minor negative visual effects caused by the project. For improvement projects such as this, the RCP requires roadside restoration ~~from ROW to~~ within the ROW throughout the project limits. For this project, ~~the roadsides~~ disturbed areas will be restored to a treatment level 2, which ~~will~~ may include the following guidelines:

- ~~Restore environmental and visual functions, and where possible, work with agencies and landowners to preserve and establish buffer zones.~~
- ~~Adjust grading limits to protect desirable vegetation, natural habitat, wetlands and sensitive areas, and heritage resources.~~
- ~~Adjust grading limits to preserve and protect vegetation for screening purposes.~~
- ~~Grade slopes to provide corridor continuity.~~
- Minimize site disturbances to protect native plant communities and specimen trees.
- Restore roadside character with trees (conifers up to 4 feet in height and deciduous trees up to 1 inch in diameter) and shrub seedlings; ~~plant trees up to 2 inches in diameter in pedestrian areas.~~
- Select and locate plant material to facilitate driver guidance ~~and to screen visual distractions and undesirable views.~~
- Locate plantings to enhance views of natural features.
- Select vegetation and design planting density to achieve blending with adjacent land use ~~and/or to meet screening objectives by the tenth year after construction.~~

How is the RCP used for this project?

The Roadside Classification Plan (RCP) provides guidance for restoring the roadside and providing needed/desirable functions such as permanent erosion control, buffering/screening, driver guidance, etc. In practice, this means that disturbed areas of the roadside are always revegetated to provide site-specific functions/needs. In some situations, as described in the RCP, revegetation and other treatments may be required beyond the disturbed areas to provide the needed/desirable functions that are identified.

How do permanent and temporary project elements differ?

Permanent project elements are part of the I-405 Corridor Master Plan. Temporary project elements are not part of the Master Plan and will therefore be reconstructed during future Master Plan phases.

How are Context Sensitive Solutions Used for this project?

CSS guidelines incorporate community design preferences into a project's design. Throughout development of the Renton Nickel Improvement Project, local input has been encouraged to ensure that community concerns for how the project fits into the landscape are addressed.

WSDOT met with affected communities to review each jurisdiction's "view to" issues such as interchange locations/designs, noise wall locations/treatments, traffic, safety, structures, lighting, and landscaping. As part of this process, a corridor-wide CSS Aesthetics Committee was formed. This committee focused on the "view from the corridor" issues. The combined efforts of these groups determined an I-405 theme of "Culture Nature, and Progress," with nature being the dominant theme for corridor-wide and local I-405 designs.

The CSS guidelines incorporate the communities design preferences. These guidelines will be applied fully to permanent elements, which are limited on the Renton Nickel Improvement Project.

Temporary project elements will have roadside restoration applied in accordance with these RCP guidelines. However, for this project, the expected life of the roadside restoration will be affected by future reconstruction in the master plan phases. In locations where this reconstruction will disturb the roadside after this project, fast-growing vegetation (such as poplars and maples) shall may be used to quickly achieve the needed/desired functions within the expected life of the planting.

CSS for the I-405 corridor complements the RCP to provide another layer of compensation for unavoidable minor negative effects caused by this project. In some instances, guidelines from CSS are redundant with those found in the RCP. The permanent project elements will have the "full" CSS guidelines applied where appropriate and practicable:

- Adhere to the I-405 Urban Design Guidelines Manual to ensure visual unity and consistency throughout the I-405 corridor. This includes defining the appearance and style of built elements, such as lighting, paving, railings, signs, bridges, structures (and associated elements) and walls around bridges. The guidelines address the use of aesthetic treatments in the corridor, including the process for selecting and locating architectural treatments.
- Enhance the architectural design of project features such as retaining walls including stepping and battering walls terracing to reduce apparent height, using a consistent design vocabulary throughout the corridor, using lighter weight materials for spans to produce reduced structural silhouettes, applying texture to the concrete surfaces to reduce apparent scale, and applying concrete sealants pigmented sealer for uniform color, to limit the effects of graffiti, and to aid in reducing reflective sunlight glare.

- Shield roadway light fixtures to minimize glare and ambient light spillover into adjacent residential areas.
- Where possible, minimize clearing for construction, preserving existing stands of mature trees.
- Screen views of the roadway, elevated structures, retaining walls, noise walls, and other project features from areas with high viewer sensitivity.
- Grade slopes to blend with the natural topography by softening slope transitions.
- ~~Darken concrete surfaces to aid in reducing reflective sunlight glare.~~
- Follow the guidelines of the RCP to blend the project into the adjacent land uses, while creating a unified experience for the freeway user.

The new Benson Road Bridge over I-405 and the new Springbrook/Oakesdale bridges on I-405 are is the main project features that will receive the "full" CSS treatments described above because it is a they are permanent project elements. Temporary project elements will also receive "limited" CSS architectural treatments ~~as described below.~~

■ ~~Apply texture to concrete surfaces to reduce apparent scale and to blend with other elements within the corridor.~~

■ ~~Darken concrete surfaces to lessen reflective sunlight glare and apparent reduction of scale.~~

~~The full CSS treatments will be applied during future Master Plan phases for the overall I-405 corridor.~~

Wetlands

No additional effects on wetlands are expected during operation of the Renton Nickel Improvement Project. Some wetlands that occur within the ROW are currently affected by the lack of forested upland buffer and the lack of stormwater control and management facilities. Some wetlands within WSDOT's ROW must be kept clear of forested vegetation to meet safety requirements. These wetlands and those that receive untreated or undertreated stormwater runoff will likely continue to be affected by these conditions.

WSDOT, in partnership with the City of Renton, is developing a mitigation bank called the *Springbrook Creek Wetland and Habitat Mitigation Bank (Bank)*. Mitigation banking is one early-action approach identified in the I-405 Corridor Program NEPA/SEPA Final Environmental Impact Statement and the ~~project Bank~~ is part of WSDOT's watershed approach to wetland mitigation. By consolidating the mitigation at one large site, the opportunity exists to work with a panel of resource agency representatives to create mitigation that specifically contributes aquatic ecosystem functions that are lacking in the local watershed while providing safe, high-quality wildlife habitat away from the dangers of a roadside location. This approach will be used as the wetland mitigation for unavoidable effects to wetlands within the Bank service area.

~~Therefore,~~ The 1.66 acres of permanent effects to wetlands for the Renton Nickel Improvement Project will be compensated for with credits from the Bank.

The mitigation ratios that will be used to compensate for effects to wetlands at the Springbrook Creek Wetland and Habitat Mitigation Bank have been designed to meet the "no net loss" guidance.

What is a mitigation bank?

A mitigation bank site is a property purchased and developed by a public agency or utility to earn credits to compensate for adverse effects to wetlands due to development activities of other agencies, utilities, or in specific instances, private sector developers. Credits are generated through the restoration, creation, and/or enhancement of wetlands.

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Attachment 5: Comments and Responses

In this attachment, we present written comments (via email, EA public hearing forms, and letters), and oral comments (recorded during the October 26, 2006 public hearing). Comments have been copied in their entirety and presented according to the index below. Our corresponding responses follow each email, public hearing form, testimony, and letter.

Index to Written Comments and Responses

Email Comments

Jan Hickling

Steve Passantino

Kathleen Weisberg

Public Hearing Comment Forms

Jeff Lykken

Arland "Buzz" Johnson

Calvin Hoggard

Recorded Testimony at Public Hearing

Jeff Lykken

Agency and Tribal Comments

City of Renton

King County Department of Transportation

King County Wastewater Treatment Division

U.S. Fish and Wildlife Service

Snoqualmie Tribe

Comments Received Via Email

Comment EC-1: Email to Allison Ray from Jan Hickling

-----Original Message-----

From: jan hickling [mailto:jzhickling@yahoo.com]

Sent: Friday, October 20, 2006 9:45 AM

To: Allison Ray

Subject: Renton I-405 project

Please include lots of tree's perhaps Poplars, to adsorb the polution and noise from the cars.

This would fall in line with the Mayors commitment to the Kyoto (spelling?) Agreement.

Thanks for the consideration

Jan Hickling

Talbot Hill

Response to Comment EC-1

The I-405 Corridor Program includes context sensitive solutions (CSS) as part of design for projects. These CSS treatments include planting trees and shrubs along the corridor with the dominant tree being native species of each city's selected tree (Renton is cedar and Tukwila is hazelnut). The Renton Nickel Improvement Project will replant vegetation equal to the amount affected by the project.

Comment EC-2: Email to Allison Ray from Steve Passantino

-----Original Message-----

From: Steve Passantino [<mailto:sjp@critterioncellular.com>]

Sent: Sunday, October 22, 2006 2:56 PM

To: Allison Ray

Subject: Renton Nickel Improvement Project

I am impressed by the thoroughness of the consideration of the project.

It's a lot to digest. Let me simplify my comment, which may already be included in your plan. There appears to be a misunderstanding as to what is required for 2 freeways to meet in many of the interchanges. I know you're adding a lane to I-405 near 167. My hope would be that this lane would be dedicated as the 167 merge lane. The best example of how this works extremely well is the on-ramp from 900 West onto I-90. The oncoming traffic from 900 has its own lane and does not have to compete with the I-90 traffic in motion. The lack of a dedicated lane for merging on to the freeway from another freeway, as you know, is also a problem for the other on and off ramps pertaining to I-405 and 167.

Thanks for the opportunity to give feedback. I'm looking forward to the improvements.

Steve Passantino

Response to Comment EC-2

The dedicated merge lanes described in this comment are what will be built with the Renton Nickel Improvement Project. These auxiliary lanes will be built in both the northbound and southbound directions on I-405 for traffic that is both getting on and coming off SR 167.

Comment EC-3: Email to Allison Ray from Kathleen Weisberg

-----Original Message-----

From: Weisberg, Kathleen [mailto:weisberg.k@ghc.org]

Sent: Monday, October 23, 2006 3:53 PM

To: Allison Ray

Subject: I-405 - WSDOT Takes Next Step to Widen I-405 in Tukwila and Renton

Regarding:

WSDOT Takes Next Step to Widen I-405 in Tukwila and Renton; Public Invited to Comment on Environmental Assessment

Date: Tuesday, October 10, 2006

Contact: Allison Ray, Environmental Manager, I-405 Project (425) 456-8610

RENTON – WSDOT invites the community to attend the Renton Nickel Improvement Project Environmental Assessment (EA) Public Hearing on October 26 from 4-7 p.m. at the Renton High School Cafeteria (400 South Second Street, Renton). WSDOT will present results of the EA and receive comments from the public.

I have some feedback and get frustrated that the resolution to everything is always add more lanes as opposed to looking at what's actually causing the problem.

I've lived in the Renton area my whole life and was in fact, learning how to drive the last time this area was widened. I've always wondered why you can't just eliminate the carpool lane from Tukwila to I-167 (northbound). It's the source of TONS of accidents, just check out all the skidmarks on the road. Part of that problem is the number of people who use the carpool lane traveling at 45+ MPH and then suddenly cut off cars to get over the two lanes to get off at I-167. Seems like adding another lane wouldn't have any impact on this problem aside from now the carpoolers would have THREE lanes to move over in.

As for the SR 169, that area doesn't need another lane, they need a better way to control the off ramp of exit four so it's not just a stop sign. This creates tremendous traffic and often it can take 10-15 minutes just to get off the freeway once you "land" in the shoulder. Very dangerous as well since this can back up into the freeway as well as the number of cars who "cheat" by taking exit 4B and then doing a U-turn. This U-turn prevents the cars from exit 4A from being able to turn onto the road because normally cars wouldn't be coming but now you have cars always approaching because of the U-turn. It's a bit out of control.

I couldn't find an address for you other than e-mail. Hope it's okay.

Kathy Weisberg

Group Health Cooperative, ISD

Application Services

QA & Testing

206-448-4320

Response to Comment EC-3

The I-405 Master Plan will add at least two lanes in each direction along the length of the I-405 corridor. The Renton Nickel Improvement Project is one of the first steps toward building the Master Plan. The I-405 Record of Decision recommended a balanced multimodal approach, including HOV facilities. HOV lanes benefit traffic in that they move more people than general-purpose lanes and provide alternatives for people willing to ride in carpools or vanpools or to use mass transit. By encouraging these alternatives, fewer vehicles use the road and more traffic travels at higher speeds. Because WSDOT recognizes the problems weaving causes, the Master Plan includes HOV direct-access ramps from I-405 to SR 167 in both directions. Once these ramps are in place, HOV vehicles will no longer have to weave across traffic and cause congestion at the I-405/SR 167 interchange.

The City of Renton has a funded project to address the traffic congestion that occurs at the northbound off-ramp intersection with SR 169. This project will add an exclusive lane for northbound to eastbound right-turning vehicles accessing SR 169. This change will reduce the queuing and stops that currently occur at this location. The project is planned for construction in 2007.

Written Comments (WC) Received at the Public Hearing on the EA.

Comment WC-1: Jeff Lykken

 **405 Corridor Program**
Congestion Relief & Bus Rapid Transit Projects

Name: Jeff Lykken
Mailing Address: 1116 N 31st Benton
Phone: (206) 234-3122 Email: _____

Comments (please print clearly): Please, hurry and get funding to widen the freeway from I-5 to I-90 & new lanes in each direction! Also HWY 167/405 interchange needs to be rebuilt AGAIN to a Freeway to Freeway Interchange. Put funds on Ballot for Benton to Bellevue Project

 Washington State Department of Transportation

Response to WC-1

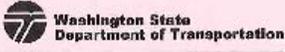
Thank you for your comment and support of these currently unfunded WSDOT projects.

Comment WC2: Arland "Buzz" Johnson

INTERSTATE 405 Corridor Program
Congestion Relief & Bus Rapid Transit Projects

Name: ARLAND "BUZZ" JOHNSON
Mailing Address: 734 WILSON AVE S #304
Phone: 425 917-9907 Email: arlandj@yahoo.com

Comments (please print clearly): Noise level especially at night along 405 is sometimes unbearable. You had the sound some up with the solution.

 Washington State Department of Transportation

Response to WC-2

It is WSDOT and FHWA policy to model noise during hours when noise is highest. Peak noise levels generally occur during daytime hours when traffic levels are high but free flowing. When noise levels exceed the Noise Abatement Criteria (set by FHWA) noise walls will be built provided they are both reasonable and feasible.

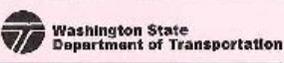
Comment WC: Calvin Hoggard

 **405 Corridor Program**
Congestion Relief & Bus Rapid Transit Projects

Name: CALVIN HOGGARD
Mailing Address: 18654 110th PL SE, Renton, WA 98055
Phone: 425-226-6635 Email: calvinhoggard@yahoo.com

Comments (please print clearly): I Am concerned that the bridges stacked atop one another at the SR167 and I 405 interchange in upcoming phases of the I405 project are too large in scale and ugly and will totally consume the appearance of the south end of downtown Renton with roads & bridges filling the views (like up by Bothell and at the I-90 and I-5 interchange in Seattle). Please look for design solutions that won't have these affects on the appearance of things looking around in this area. Thank You.

RECEIVED
OCT 31 2006
URBAN CORRIDORS OFFICE

 Washington State
Department of Transportation

Response to WC-3

The Renton Nickel Improvement Project does not construct flyover ramps at the I-405/SR 167 interchange. Future phases that do construct these ramps will analyze visual quality in the area. Context sensitive designs and architectural treatments will be used to minimize the visual effects of future construction.

Public Hearing Testimony

WASHINGTON STATE DEPARTMENT OF TRANSPORTATION
INTERSTATE 405 CORRIDOR PROGRAM

I-405, RENTON NICKEL IMPROVEMENT PEA HEARING

OCTOBER 26, 2006
4:00 through 7:00 p.m.

Renton High School
400 South Second Street
Renton, Washington

Carl T. Beck, Court Reporter
CCR 2952

Van Pelt, Corbett & Bellows
100 South King Street * Suite 360
Seattle, WA * 206 682-9339

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INDEX OF SPEAKERS

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JEFF LYKKEN
1116 North 31st
Renton, Washington 98051

Van Pelt, Corbett & Bellows
100 South King Street, Suite 360
Seattle, WA * 206 682-9339

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APPEARANCES

KIM HENRY

I-405 Corridor Program Director

STACY TRUSSLER

I-405 Corridor Program Project Manager

ALLISON RAY

I-405 Corridor Program Environmental Manager

Court Reporter:

CARL T. BECK
Van Pelt, Corbett & Bellows
100 South King Street, Suite 360
Seattle, WA 98104

Van Pelt, Corbett & Bellows
100 South King Street, Suite 360
Seattle, WA * 206 682-9339

STATEMENT OF JEFF LYKKEN

1
2
3 Hello. My name is Jeff Likken. I live up in the
4 Kennydale area. I just wanted to make a comment about the
5 project that I hope they expedite the funding so that they
6 can get the freeway widened for two lanes. That area is
7 really bad, and all my neighbors -- everyone I know --
8 wonders why it wasn't done 20 years ago. But they're
9 working on it, which is great. So if you get the funding
10 and expedite the process so we can have the freeway widened
11 to two lanes all the way from I-5 all the way to I-90.
12 That's my major comment. Thank you.

13 [Hearing ended 7:00 p.m.]
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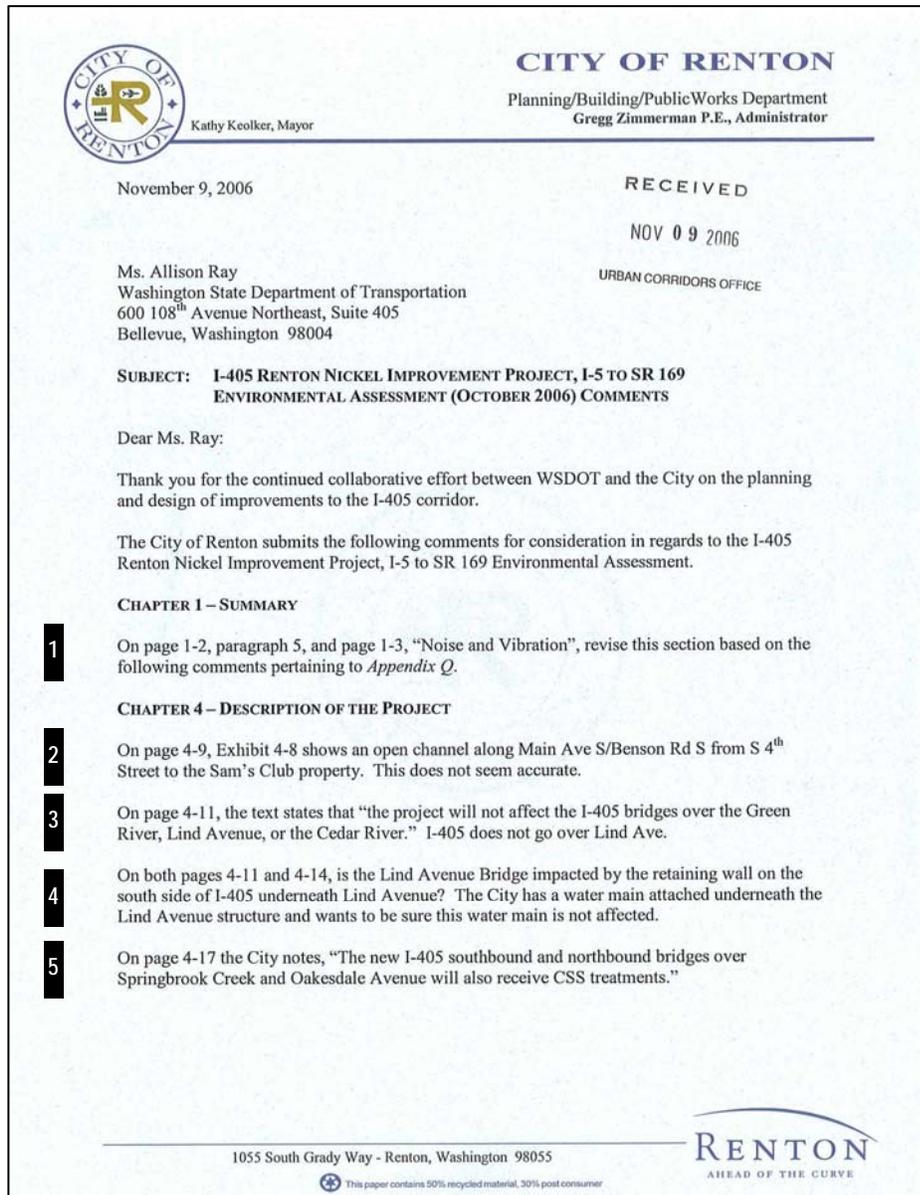
Van Pelt, Corbett & Bellows
100 South King Street, Suite 360
Seattle, WA * 206 682-9339

Response to Public Hearing Testimony by Jeff Lykken

Thank you for your comment and support of these currently unfunded WSDOT projects. We expect that voters will have an opportunity to provide funding to these projects in the November 2007 election when the Regional Transportation Investment District is anticipated to have a funding package on the ballot.

Agency and Tribal Letters

Comment AT-1: City of Renton



Response to AT-1:

1. Please refer to the response to comments on Appendix Q found on page A5-14.

2. The open channel described on page 4-9 existed at the time this document was prepared. Since that time, the location of the open channel has been slightly relocated by a private developer. The channel is still in roughly the same location.

3. Comment noted. Lind Avenue goes over I-405. This bridge will not be affected as I-405 will be restriped to provide the new lanes versus physically widened in this area. Please refer to Attachment 1: Errata to EA and DRs for the updated text.

4. The Lind Avenue Bridge will not be affected by the retaining wall on the south side of I-405 underneath Lind Avenue. Working with the I-405 team, the City of Renton has confirmed that the waterline is suspended

from the under side of the Lind Avenue Bridge, and that this waterline is not in conflict with the current project design.

5. Yes, we confirm that CSS treatments will be used on the new I-405 southbound and northbound bridges over Springbrook Creek and Oakesdale Avenue.

Comment AT-1: City of Renton (continued)

I-405 Renton Nickel Improvement Project, I-5 to SR 169 Environmental Assessment
November 9, 2006
Page 2 of 8

CHAPTER 5.1 – NOISE AND VIBRATION

6 On page 5-19, the City disagrees with the determination that only one noise wall is both reasonable and feasible. Please see the following comments pertaining to Appendix Q.

Appendix Q – Noise and Vibration Discipline Report

7 The City disagrees with the determination that Noise Barrier West 2 is not feasible or reasonable. This conceptual noise wall runs along the west side of I-405 between the Cedar Avenue overpass and Renton City Hall.

8 Exhibit 12 states that a near source barrier for an elevated roadway is “very effective”. The text on page 23 indicates even a short wall can be effective with a near source barrier and an elevated roadway. Such would be the case with Noise Barrier West 2.

9 On page 31, first paragraph, the text states that the effectiveness of noise barriers was evaluated at the outermost boundary of the right-of-way. Certainly for Noise Barrier West 2, evaluating the noise barrier at the outermost boundary of the right-of-way would be erroneous, as the right-of-way line appears to be located at the base of the slope immediately adjacent to Main Ave S.

10 On page 32, the DR states that the study area for the noise analysis extends approximately 1,000 feet from the project. The modeled noise receptors for Noise Barrier West 2 should have included the Spencer Court Apartments (334 Wells Ave S), a 72-unit, affordable housing apartment complex located less than 400 feet from the I-405 Renton Nickel project.

11 The City agrees that Main Ave S contributes to noise. However, Main Ave S noise is not constant 24 hours a day like the I-405 corridor, and therefore the noise analysis should factor the I-405 noise when Main Ave S is quiet.

12 On page 56, Noise Barrier West 2 is certainly feasible when Main Ave S has reduced traffic, such as during the late-night hours (12 a.m. – 5 a.m.). WSDOT policy elsewhere, such as the I-5 express lanes, is to reduce noise in these hours.

13 The planning level costs used to evaluate noise barriers (Exhibits 30-33, 35) all use \$32.31 per square foot of barrier, regardless of the location or situation. The exception is that the planning level cost for Noise Barrier East 3 was then almost doubled to account for existing conditions.

14 No planning level cost was provided for Noise Barrier West 2, however the planning level cost should be significantly less than \$32.31 per square foot because a retaining wall is already being constructed in this area, essentially already completing the substructure foundations/footings. To add an additional 8 feet in height above the jersey-type safety barrier above the retaining wall for approximately 1,300 linear feet would likely be less than \$200,000.

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Response to AT-1 (cont.):

6. The noise analysis does not support a second noise wall. See responses to comments 7 to 14 for details.

7-12. Noise Barrier West 2 was evaluated for placement along the I-405 southbound edge of pavement as a part of the original noise analysis, not at the bottom of the slope. WSDOT’s determination that this barrier is **not feasible** is based on modeled data and the inability of even a 24-foot-high wall to reduce noise by at least 7 dBA for any of the residences behind the barrier. The highest noise reduction this barrier could provide was 2 dBA at seven residences located along Well Avenue South.

No planning-level cost was presented in the discipline report to evaluate Noise Barrier West 2 because this barrier did not meet WSDOT criteria for feasibility. If the 24-foot-tall barrier was able to provide at least a 7 dBA noise reduction, the barrier would

still **not be reasonable** as at a height of 24 feet, the barrier would exceed 42,000 square feet, which is more than the allowable area of 8,428 square feet for the number of households it would serve.

Spencer Court Apartment residences were not included in the original noise analysis because no outdoor uses were identified on site. Upon further review, the Spencer Court Apartments have an outdoor courtyard located in the interior of the building that may be considered an outdoor use for its residents. Modeling shows that I-405 does not contribute to noise levels above the NAC at the outdoor courtyard. Much of the I-405 traffic noise is shielded at this outdoor location by the U-shaped apartment building. The courtyard at the Spencer Court Apartments was the only identified outdoor use on site. For residential properties, WSDOT Noise Abatement guidance targets noise mitigation efforts at outdoor use areas that experience noise levels approaching or exceeding the NAC.

Traffic noise from Main Avenue S contributes to noise levels at receptors in this area. Noise mitigation to shield traffic noise from Main Avenue S was not evaluated as a part of this project because the area is outside of WSDOT ROW. Noise barriers located along Main Avenue S would also prohibit access to adjacent properties.

WSDOT guidance was followed in using peak-hour traffic volumes for noise modeling, regardless of the time of day. Nighttime measurements were not taken as field noise measurements are used only to validate the noise model and are not used for mitigation purposes. Once the noise model is validated to calculate the traffic noise at the time of the field measurement (within 2 dBA), traffic volumes counted during the field measurement to validate the noise model are replaced with peak-hour traffic calculated for the project traffic analysis.

Future (2030) peak-hour traffic volumes are used to predict the future peak-hour noise levels. These future peak-hour noise levels are used to determine whether noise barriers meet WSDOT criteria for feasibility and reasonableness as described in Appendix B of the Noise and Vibration Discipline Report.

13. Regarding the comment on Noise Barrier East 3, additional planning-level costs were included in the barrier evaluation for this barrier because Noise Barrier East 3 would have to be constructed atop an existing retaining wall of significant height.

14. While a proposed retaining wall is included in the same location, 850 linear feet of this proposed wall is less than five feet tall and would not provide adequate support for, nor would it reduce the cost of the new noise barrier. The planning-level cost of the 850-foot-long, 8-foot-tall segment would be \$220,000.

The proposed retaining wall averages 12 feet in height under the remaining 450 linear feet of the noise barrier. The below grade portions of the proposed retaining wall would need to be strengthened to support the wind loads on the noise barrier and the weight of the barrier. The planning-level cost of the above grade portion of the remaining 450 feet of noise barrier is \$25 per square foot of exposed noise barrier or \$90,000. The planning-level cost for strengthening the retaining wall to support the noise barrier is \$110 per linear foot of wall, or \$50,000. The total planning-level cost of this 450-foot-long section of noise barrier would be \$90,000 plus \$50,000, which equals \$140,000.

The total planning-level cost for Noise Barrier West 2 is \$220,000 plus \$140,000, which equals \$360,000.

Also note that these costs are based on the planning-level cost estimates used when the EA process was initiated. Recent increases in construction costs would increase these planning-level costs to over \$500,000.

Comment AT-1: City of Renton (continued)

I-405 Renton Nickel Improvement Project, I-5 to SR 169 Environmental Assessment
November 9, 2006
Page 3 of 8

15 Therefore, the City's opinion is that the EA should be amended such that Noise Barrier West 2 is determined to be feasible and reasonable. The EA should then include additional analysis to determine that Noise Barrier West 2 will not, by way of deflection, introduce additional noise to the Renton Hill neighborhood. Also, note comments regarding retaining walls and noise walls made under *Chapter 5.6 – Visual Quality*.

16 Barring any detrimental noise impacts to the Renton Hill neighborhood, Noise Barrier West 2 will provide great benefit to downtown Renton and the South Renton neighborhood. The pending construction of a retaining wall in the Renton Nickel project is a clear and present opportunity to include a rather short Noise Barrier West 2 at a very reasonable cost.

CHAPTER 5.3 – WATER AND AQUATIC RESOURCES

17 On page 5-28, Exhibit 5-11 shows an open channel along Main Ave S and Benson Rd S adjacent to Renton City Hall.

Appendix M – Floodplains Discipline Report and Appendix V – Surface Water and Water Quality Discipline Report

18 1. The Floodplains Discipline Report states that any filling within the floodplain will be mitigated for by excavation of equivalent volumes and elevation at the Springbrook Early Environmental Investment Site which is now the City of Renton/WSDOT Springbrook Creek Wetland and Habitat Mitigation Bank (Bank). The City will allow the use of the Bank for floodplain fill that occurs in areas that are off the main channel of Springbrook Creek. Any fill that occurs within the main channel of Springbrook Creek must be mitigated at the same location in the channel. For project fills that are mitigated at the Bank, WSDOT must demonstrate (through hydraulic analysis) that there will be no drainage impacts upstream or downstream of the area to be filled. WSDOT can use their share of the surplus compensatory storage created by the Bank that is in excess of the flood storage needed to meet the City's flood hazard reduction requirements as defined in the approved Eastside Green River Watershed Project EIS hydraulic model.

19 2. As previously stated in the City's EA Scoping Comments Letter, WSDOT must identify all existing culvert crossings (culverts that convey upstream flows through WSDOT right-of-way) impacted by the project, and perform the necessary hydrologic and hydraulic analysis to verify the culverts have adequate capacity and material condition to convey the 100-year storm for the total tributary basin assuming existing land use conditions. Any improvements to cross culverts necessary to meet the above conditions will be at WSDOT's expense. New culverts and storm systems must be designed to meet the 2005 KCSWDM and the DOT Highway Runoff Manual. If culvert improvements are needed under existing land use conditions, WSDOT shall determine tributary flows under future land use conditions. The City will then decide whether to pay the cost to increase culvert size to convey the 100-year future conditions flow.

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Response to AT-1 (cont.):

15. Please refer to responses to comments 7–14 for details on why Noise Barrier West 2 is neither feasible nor reasonable.

16. Please refer to responses to comments 6–14.

17. Comment noted. Please refer to Attachment 1: Errata to EA and DRs, for the updated exhibit.

18. We concur that fills outside of the main channel of Springbrook Creek will be mitigated at the Springbrook Creek Wetland and Habitat Mitigation Bank. Fills within the main channel of Springbrook Creek will be mitigated by removing the existing Springbrook Creek box culvert and regrading the streambed. For project fills that are mitigated at the bank, WSDOT will perform analyses to ensure that there will be no changes to floodplain elevations upstream or downstream of the areas to be filled.

19. WSDOT has identified culverts that will be affected by the project. Verifying that the culverts are not blocked or damaged and have adequate capacity to convey the 100-year storm for the total tributary basin, assuming existing land use conditions, is beyond the scope of this project. Similarly, analysis of existing and new culverts for tributary flows (outside of I-405 right-of-way) under future land use conditions is also beyond the scope of the project.

Comment AT-1: City of Renton (continued)

20

Culverts that appear to be impacted by the project and may require improvements include:

- Culvert crossing of I-405 that conveys runoff from the ditch that runs along the north side of I-405 to the ditch on the south side of I-405 (MP 1.95).
- Culvert crossing of I-405 that conveys runoff from the west side of Lind Avenue north of I-405 to the ditch that runs along the south side of I-405 (MP 2.25).
- Culvert crossing of I-405 that conveys runoff from the north side of Talbot Hill to Rolling Hills Creek at the Renton Village Shopping Center (MP 2.65).
- Culvert crossing of I-405 that conveys Rolling Hills Creek to the pipe system along Talbot Road and east of Renton Village (MP 2.76).
- Culvert crossing of I-405 that conveys Thunder Hills Creek to concrete flume behind Sam's Club (MP 3.05).

21

3. At the time the Scoping Report was completed, WSDOT had not yet identified what water quality retrofitting of existing pavement would be required under future projects. Does WSDOT now have a better understanding of what retrofitting is required, and if so, what will be the approach? If retrofitting is required for future improvements, will the facilities constructed as part of the Nickel Project be designed for future expansion?

22

4. What water quality facility is proposed for I-405 between Tukwila and SR-167? Exhibit 4 of the Surface Water and Water Quality Discipline Report does not show a treatment facility nor is one identified in the conceptual design plans. At one time, a facility using ecology embankments was proposed for the area southwest of the I-405 crossing of Springbrook Creek.

23

5. Based on previous meetings with WSDOT storm water design staff, improvements were proposed for the existing ditch that runs along the south side I-405. However, the draft conceptual plans show no improvements to this ditch. This ditch currently conveys runoff from I-405 and the areas upstream of I-405 on the north side of the freeway. WSDOT also proposed to use the ditch to convey discharge from the proposed detention facility located between I-405 and SW 16th Street.

CHAPTER 5.4 – PUBLIC SERVICES AND UTILITIES

On page 5-40, "How will project construction affect public services and utilities?"

24

The last major construction project related to the S-curves was in the mid 90's. Emergency crews responded to a variety of motor vehicle accidents (MVA) related to this construction project. Pavement transitions resulted in single unit motorcycle accidents. A lack of lighting at night combined with little or no pavement striping resulted in a number of improper lane change MVAs. A lack of emergency parking in the construction zone was also characteristic of this project and placed emergency response crews at risk after arrival at emergency scenes.

Response to AT-1 (cont.):

20. The following addresses each culvert.

Culvert at MP 1.95 – has adequate capacity, contributing area is reduced by the I-405 widening, and the contributing area is fully developed. This culvert may be repaired or replaced.

Culvert at MP 2.25 – has adequate capacity, contributing area is reduced by the I-405 widening, and the contributing area is fully developed. This culvert will be repaired.

Culvert at MP 2.65 – This is the historic Rolling Hills Creek Culvert. It is oversized since creek was diverted to a closed conveyance system under Talbot Road. Future flows will likely decrease with future development in this area as I-405 will divert flows as it is widened. This project will not modify this culvert.

Culvert at MP 2.76 – I-405 spans this Talbot Road storm drainage system. The project will not impact it.

Culvert at MP 3.05 – The culvert ends extend beyond

the limits of this project. This project will not modify this culvert.

21. For this project, WSDOT will treat 11.84 acres of new pollutant generating surfaces and will retrofit 3.8 acres of the existing road within the project area. Total retrofit amounts for future projects in this area have not yet been determined. WSDOT will follow the HRM requirements and will seek additional opportunities to retrofit existing pavement as practicable and as additional I-405 improvement projects are funded. The stormwater facilities for the Renton Nickel Improvement Project are not designed for future expansion. Additional facilities would be required to meet the needs of future improvements.

22. This project will construct ecology embankments for treatment at the interchanges with I-5, SR 181, and SR 167, and in the area southwest of the I-405 crossing of Springbrook Creek.

23. Portions of the ditch will be covered by the new roadway. This portion will be lined with a new pipe and flows will remain in their current locations.

24. WSDOT will coordinate construction scheduling, phasing, and impacts with the City of Renton.

Comment AT-1: City of Renton (continued)

I-405 Renton Nickel Improvement Project, I-5 to SR 169 Environmental Assessment
November 9, 2006
Page 5 of 8

24 For the duration of the construction of the Renton Nickel project, the Renton Fire Department makes the following recommendations:

- Proper signage is needed to warn motorcyclists of pavement transitions.
- Adequate lighting needs to be maintained at night in the construction corridor.
- Adequate line striping to identify all lanes of travel needs to be maintained in the construction corridor.
- Maintain emergency parking lanes during construction.

Appendix T – Social Discipline Report

25 On page 39, the Narco property is listed as a 15-acre site. This parcel is a total of 57 acres, 15 of which can be developed into active recreational use. Parking is listed as 100 to 150 vehicles and should be revised to 358 as adopted in the City's Tri-Park Master Plan.

26 On page 39, the text should be revised to reflect that the Cedar River Trail extends from Lake Washington southeast to Maple Valley for a total of 12 miles of paved trail.

27 On page 42, the City concurs that local comprehensive plans and policies call for the proposed Oakesdale Trail, which "would extend the existing sidewalk/bike lane in the middle section of the proposed route."

28 On page 43, the Burnett Trail, Phase I trail construction was completed in 2006 in Burnett Linear Park; Phase II is expected to be constructed in 2007.

29 On page 43, under "Narco and Panther Creek Sites", please note the adoption of the Tri-Park Master Plan by the City of Renton on September 25, 2006.

30 On page 51, line 2-3, regarding the statement "The improvements will not prevent the city from completing this (Oakesdale) proposed trail." The statement is only accurate if the new I-405 Oakesdale/Springbrook Bridge provides a wider clearance over Oakesdale Ave than currently exists.

31 On page 52, paragraph 1, the discipline report identifies that the City plans to extend the Thunder Hills Creek Trail north to intersect with the Benson Trail along Benson Road, on the west side of I-405. The report does not identify that such an extension will require crossing underneath I-405. The discipline report should address how the additional widening of I-405 will affect this future trail extension and I-405 undercrossing, including possible recommendations and accommodations to ensure the future extension.

Appendix W – Transportation Discipline Report

32 On page 24, it appears that the title for this page should be Exhibit 11, not 10.

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Response to AT-1 (cont.):

25 – 29. Comments noted. Please see Attachment 1: Errata to EA and DRs of this FONSI for updates.

30. The new bridge will provide a wider clearance over Oakesdale Avenue than currently exists. The bridge will be constructed to permit the future roadway width of 79 feet, including bicycle lanes, as shown in the City's Comprehensive Plan.

31. According to the City's draft trail plans, Thunder Hills Creek Trail is east of I-405 and the Benson Trail is west of I-405. To connect these trails, the City will need to construct a crossing either over or under I-405. Project improvements are limited to minor, if any, widening of I-405 at the north end of the Thunder Hills Creek trail, where the connection to the Benson Trail would occur and will not affect the future trail extension.

32. Comment noted. Please see Attachment 1: Errata to EA and DRs of this FONSI for updates.

Comment AT-1: City of Renton (continued)

I-405 Renton Nickel Improvement Project, I-5 to SR 169 Environmental Assessment
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**CHAPTER 5.5 – HISTORIC, CULTURAL, AND ARCHAEOLOGICAL, AND SECTION 4(F)
EVALUATION**

Appendix S – Section 4(f) Discipline Report

33 On page 24, the Narco community park property is identified as “not significant as a park.” The City disagrees with this designation. Although not currently developed, this property is of significant size and is identified in the City’s Tri-Park Master Plan as a significant park property with active and passive recreation features, including the regional Cedar River Trail.

34 On page 41, clarification is needed regarding noise walls in the vicinity of Cedar River and Liberty parks.

35 The Noise and Vibration DR indicates that a noise wall along Liberty Park is not feasible or reasonable. The City questions the “not feasible” determination, but acknowledges that this wall may not be reasonable in the context of this project because the extent of work in this area will be restriping only.

36 The Noise and Vibration DR indicates that a noise wall along Cedar River Park is feasible but not reasonable. The City acknowledges that this wall may not be reasonable in the context of this project because the extent of work in this area will be restriping only.

37 On page 41, the Section 4(f) DR states, “WSDOT determined that users of these parks represent a small number and that mitigation would not be feasible.” The Liberty Park/Cedar River Park complex is second to Gene Coulon Park in the City of Renton in terms of annual usage. These two parks include a stadium, picnic shelter, community center with an outdoor event patio/lawn, community theater, and aquatic center. With the above statement, it would seem WSDOT would never build a noise wall for a park because parks do not have sufficient users. The City questions this reasoning.

CHAPTER 5.6 – VISUAL QUALITY

38 On page 5-53 in the margin text “How are Context Sensitive Solutions (CSS) used for this project?” the City notes that the CSS guidelines will be applied fully to permanent elements.

39 On page 5-55 within the fifth paragraph, the Oakesdale/Springbrook I-405 Bridge should also be identified as a permanent project element that will receive the “full” CSS treatments.

40 City officials have expressed their desire that visible elements of this project be aesthetically pleasant, even project elements that are not permanent master plan elements receiving the full CSS treatment. The more visible temporary project elements include noise walls and retaining walls.

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Response to AT-1 (cont.):

33. The designation of “not significant as a park” was given because the park is not currently developed. A plan to develop the park is not sufficient to make the park significant under Section 4(f). Only after the plan is implemented and the park is developed will the status change and the park qualify for Section 4(f) protection. The Cedar River Trail is covered under Section 4(f) as a developed resource and has been given its own designation within the document for this reason.

34. Noise barriers were evaluated on either side of I-405 where these two parks are located. The proposed barrier to the west was determined to be not reasonable because the barrier would not reduce noise levels enough to meet the state requirements. The proposed barrier to the east was determined to be not reasonable because it exceeded the allowable area for the benefited residential equivalency.

35 & 36. Comments noted.

37. Noise barriers for this project were analyzed in accordance with WSDOT and FHWA policy.

38. Comment noted.

39. We concur, Page 4-17 of the EA states “The new I-405 southbound and northbound bridges over Springbrook Creek and Oakesdale Avenue will also receive CSS treatments.”

40. The project is committed to providing CSS treatments on project elements which are compatible with the Master Plan. This is consistent with the guidelines for treatments provided in the I-405 Context Sensitive Solutions Master Plan. In addition, the project will provide CSS treatments on Noise Barrier East 5. The project team would consider City funding of CSS compatible aesthetic treatments for additional elements.

Comment AT-1: City of Renton (continued)

I-405 Renton Nickel Improvement Project, I-5 to SR 169 Environmental Assessment
November 9, 2006
Page 7 of 8

41

On page 5-55, the DR indicates that temporary project elements will receive “limited” architectural treatment consisting of textured concrete surfaces and darkened concrete surfaces. The City would appreciate some level of involvement or coordination with WSDOT regarding this “limited” architectural treatment, prior to design and construction.

Appendix Y – Visual Quality Discipline Report

42

On page 50, the DR states, “... the permanent project elements will have the “full” CSS guidelines applied where appropriate and practicable...”

43

On page 52, the I-405 Oakesdale/Springbrook Bridge should also be identified as “a main project feature that will receive the “full” CSS treatments ... because it is a permanent project element.”

CHAPTER 5.7 – SOILS, GEOLOGY, AND GROUNDWATER

44

On page 5-62 under *Groundwater*, because the additional lanes will begin/end at the SR 169 ramps, construction activities, even if only restriping, will occur over the City’s sole-source aquifer recharge area and these activities will be subject to the Renton Municipal Code requirements for construction activities in the City’s Aquifer Protection Areas.

Appendix B – Avoidance, Minimization, and Mitigation Measures

45

On page B-6 second paragraph, the City anticipates coordinating with WSDOT regarding temporary closures and detours for all affected City streets and for the I-405 and SR 167 mainlines. Partial or full closures of I-405 and SR 167 mainlines will cause rerouting of traffic onto City streets.

46

On page B-9, it should be noted under *Social* that the I-405 Oakesdale/Springbrook Bridge will be constructed in order to allow for the completion of the Oakesdale Trail bicycle lanes, as identified in the “Social Discipline Report.”

47

On page B-9, under *Noise and Vibration*, as a result of previous comments made on the “Noise and Vibration Discipline Report”, a second noise wall should be noted in this section.

48

On page B-12, the second paragraph should also identify the I-405 Oakesdale/Springbrook Bridge as a project feature that will receive the “full” CSS treatments because it also is a permanent project element.

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Response to AT-1 (cont.):

41. Comment applies to Page 51.

Temporary project elements will also receive “limited” CSS architectural treatments as described below.

Texture will be applied to reduce apparent scale and to blend features with other elements within the corridor.

Darken concrete surfaces to aid in reducing reflective sunlight glare and apparent scale.

The textures mentioned above will be standard WSDOT finishes. The colors will be consistent with the corridor paint standards.

The City was involved in developing the CSS guidelines. WSDOT will continue to work with the City in the future.

42. Comment noted.

43. We concur, also refer to response to comment No. 39 on the previous page.

44. WSDOT will comply with all applicable City codes. All construction within and/or over the City of Renton Aquifer Protection Area Zones 1 and 2 shall comply with the Washington State Wellhead Protection Requirements outlined in WAC 246-290-135(4) and the City of Renton Municipal Code 4-3-050C, 4-4-030H, and 4-9-015 as stated in the list of commitments for this project (see Attachment 4).

45. WSDOT will coordinate construction scheduling, phasing, and impacts with the City of Renton.

46. The bridge will be constructed to permit the future roadway width of 79 feet including bicycle lanes, as is shown in the City Comprehensive Plan.

47. Please see responses to comments 6 through 16.

48. Comment noted. Also refer to response to comment No. 39 on the previous page.

Comment AT-1: City of Renton (continued)

I-405 Renton Nickel Improvement Project, I-5 to SR 169 Environmental Assessment
November 9, 2006
Page 8 of 8

Again, thank you for the opportunity to submit comments on this environmental assessment.
Should you have any questions or concerns, please contact Peter Hahn, Deputy PBPW
Administrator – Transportation, at (425) 430-7242.

Sincerely,



Gregg Zimmerman, P.E., Administrator
Planning/Building/Public Works Department

cc: Jay Covington, Chief Administrative Officer
Alex Pietsch, EDNSP Administrator
Terry Higashiyama, Community Services Administrator
Peter Hahn, Deputy PBPW Administrator – Transportation
Stan Engler, Fire Marshal
Lys Hornsby, Utility Systems Director
Leslie Betlach, Parks Department Director
Ron Straka, Surface Water Utility Supervisor
Jim Seitz, Transportation Planning & Programming Supervisor
Keith Woolley, Transportation Planning & Programming
File

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Renton Nickel EA Comments.doc

Comment AT-2: King County



King County Department of Transportation
Metro Transit Division, Design & Construction Section
Environmental Planning and Real Estate, MS KSC-TR-0431
201 South Jackson Street
Seattle, Washington 98104-3856
(206) 684-1418 FAX: (206) 684-1900

November 7, 2006

Ms. Allison Ray, I-405 Environmental Manager
Washington State Department of Transportation
600 108th Ave. NE, Suite 405
Bellevue, WA 98004

Subject: I-405, I-5 to SR 169 Renton Nickel Project, NEPA EA

Dear Ms. Ray:

Below are comments from King County Metro Transit staff on the I-405 Renton Nickel Project NEPA EA.

1 Lane Width: The minimum lane width needed to operate a bus on a freeway is 11 feet. As the lanes are narrowed for bridges as part of this project, please maintain at least an 11-foot lane width.

Construction Impacts to Transit Facilities and Service: Although Metro has no facilities on I-405 or SR-167, we do have some bus stops nearby that may be impacted directly by construction or indirectly by re-routes (the level of information is not detailed enough to know exactly which transit facilities will be impacted). A few bus stops are located within 150 ft of the construction corridor or I-405 ramps. There is a pair of stops on Talbot Rd. S, approximately 65 ft. and 100 ft. north of the I-405 overpass, and a single stop on Longacres Dr. SW and SW 16th St., approximately 150 ft. south of the I-405 overpass. Another pair that could be impacted depending on the scope of the project is located on SR-169 (Maple Valley Hwy.), 350 ft. east of I-405 (northern project limit at SR-169) and 100 ft. east of the northbound on-ramp and off-ramp.

2 There are only a few bus routes operating along this section of I-405 and SR-167: ST 560 on I-405 between I-5 and Rainier Ave./SR-167 and Metro Route 952 and ST Routes 564/565 on SR-167 to/from I-405 and Rainier Ave. On adjacent arterials, Metro operates service on Lind Ave. SW, SW Grady Way, SW 16th St., Oakesdale Ave. SW, Southcenter Blvd., and Tukwila Parkway. We are concerned about potential construction-related impacts including detours, lane/turn modifications, and any bus zone/sidewalk restrictions that could impact rider access to transit in this area.

Prior to construction, WSDOT and/or the contractors should work closely with Metro to help mitigate any potential impacts. Please contact Metro's construction information office at (206) 684-2785 or construction.coord@metrokc.gov.

3 Staging Areas: At the completion of this project, Robin Anderson, Transit Planner, would like to discuss the possibility of using some of the staging areas as commuter parking lots. Please have the appropriate person contact Robin at (206) 684-2094, robin.anderson@metrokc.gov.

Thank you for the opportunity to comment on this environmental assessment.

Sincerely,

Gary Kriedt
Senior Environmental Planner

MOBILITY FOR THE REGION

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URBAN CORRIDORS OFFICE

Response to AT-2:

1. The project will decrease the lane width from 12 feet to 11 feet, this provides the width to meet the King County Department of Transportation (KCDOT) requirement for buses.

2. Construction may temporarily impact the bus stop north of the existing I-405 bridge over Talbot Road. WSDOT will coordinate with KCDOT.

The construction would not directly affect the KCDOT facilities along SR 169.

During construction, the contractor may decrease the lane width along I-405 and southbound SR 167, from 12 to 11 feet, maintaining the highway capacity. Also, we anticipate that there may be temporary lane closures. WSDOT will notify KCDOT ahead of time so that any impacts to routes 560, 952, and 564/565 would be minimized. This project will not include any construction along northbound SR 167.

We do not anticipate that project construction will have any impact on Lind Avenue. We do anticipate temporary lane closures along Grady Way between the BNSF railroad tracks and Oakesdale Avenue. We also do not anticipate that project construction will have any impact on SW 16th Street.

A new bridge will be constructed over Oakesdale Avenue. This may result in some short-term closures of Oakesdale Avenue. WSDOT will coordinate with KCDOT.

We do not anticipate any impact to Southcenter Boulevard due to construction of the project. However, a short-term closure may be necessary along the sidewalk south of I-405, between the on-ramp to northbound I-405 and Andover Park East. The bus layover along Tukwila Parkway may need to be relocated. Also, we anticipate temporary closure of the on-ramp from Tukwila Parkway to northbound I-405 for reconstruction. WSDOT will coordinate with KCDOT.

3. WSDOT will contact, Robin Anderson, Transit Planner, when the project is completed to discuss this matter. At this time, we do not think the project will include staging areas which could be converted to commuter parking.

Comment AT-3: King County Wastewater Treatment Division



King County
Wastewater Treatment Division
Department of Natural Resources and Parks
King Street Center
201 South Jackson Street
Seattle, WA 98104-3855

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OCT 30 2006

URBAN CORRIDORS OFFICE

October 26, 2006

Allison Ray, I-405 Environmental Planner
Washington State Department of Transportation
600 108th Avenue SE, Suite 405
Bellevue, WA 98004

RE: **I-405, I-5 to SR 169, Renton Nickel Improvement Project**

Dear Ms. Ray:

The King County Wastewater Treatment Division has reviewed the NEPA; EA dated October 2, 2006. King County's **South Interceptor, Boeing Chiller Lines and Boeing Renton Trunk** are located within the project site. In order to protect these wastewater facilities, King County is requesting that the Washington State Department of Transportation do the following:

- Submit construction drawings for the project to the Design, Construction and Asset Management Program, Civil/Architectural Section. Drawings should be submitted for review during design development so that King County staff can assess the project's impacts. Please send the drawings to:

Eric Davison, DCAM, Civil/Architectural Section
King County Wastewater Treatment Division
201 South Jackson Street, KSC-NR-0508
Seattle, WA 98104-3855
Tel.: (206) 684-1707
Eric.Davison@metrokc.gov
- Please contact Eric Davison a minimum of 72 hours prior to commencing any construction in order to allow staff time to arrange for a King County inspector to be on the site during construction.
- King County has a permanent easement for a sewer line on the proposed development site, and we must be assured the right to maintain and repair the sewer line. In the event that the line must be relocated, a new permanent easement must be provided.

1

2

3



CLEAN WATER - A SOUND INVESTMENT

Response to AT-3:

1. The project team has met with King County Wastewater Treatment Division to review the conceptual project plans. Additional review meetings will be scheduled during the design phase of the project.
2. WSDOT will comply with your request.
3. The project has been configured to avoid impacting the sewer line and the King County Easement. We do not anticipate that the line will be impacted or relocated. The construction contract will include language requiring the Contractor to coordinate construction issues with King County Wastewater Treatment Division. In the unlikely event that the sewer line needs to be relocated, WSDOT will notify Eric Davidson and provide to him the name, address, and telephone number of the property owner of the proposed site.

Comment AT-3: King County Wastewater Treatment Division (continued)

*Allison Ray, I405 Environmental Manager
Washington State Dept. of Transportation*

*October 26, 2006
Page 2*

Please send the name, address, and telephone number of the property owner of the proposed development site to Eric Davison so that he can contact the property owner regarding the easement.

Thank you for the opportunity to review and comment on this proposal.

Sincerely,



Sandy Redick, Administrative Staff Assistant
Environmental Planning & Community Relations

cc: Eric Davison, DCAM, Civil/Architectural Section

Comment AT-4: U.S. Fish and Wildlife Service



United States Department of the Interior
FISH AND WILDLIFE SERVICE
Western Washington Fish and Wildlife Office
510 Desmond Dr. SE, Suite 102
Lacey, Washington 98503

Ms. Allison Ray
Interstate-405 Corridor Program
Washington State Department of Transportation
600 108th Avenue NE, Suite 405
Bellevue, Washington 98004

Dear Ms. Ray:

This letter is in response to the request for comments on the Environmental Assessment (EA) and discipline reports prepared by the Washington State Department of Transportation (WSDOT) and Federal Highway Administration for the Interstate-405, Interstate-5 to State Route 169 Renton Nickel Improvement Project (Project) in King County, Washington. A copy of the EA, dated October 2006, was received in our office on October 3, 2006, with notice that WSDOT would accept comments through November 10, 2006. This office appreciates the opportunity to review and offer comments on the EA and supporting documentation.

As part of reviewing and drafting comments for the EA, we reviewed the following accompanying discipline reports: *Cumulative Effect* (Appendix H); *Fisheries & Aquatic Resources* (Appendix L); and *Upland Vegetation & Wildlife* (Appendix X).

The project's unavoidable impacts to in-stream, wetland, riparian and upland habitats, and the project's potential direct and indirect effects to watershed functions and surface water quality (especially as they relate to increased amounts of impervious surface within the project limits), were given emphasis during Endangered Species Act (ESA) consultation. During the course of consultation, the WSDOT committed to measures on which we based our concurrence with a "not likely to adversely affect" determination for listed bull trout. We offer the following comments as they relate to this Project's section 7 ESA consultation:

- 1. WSDOT previously committed to restoring 1.7 acres within the project limits to a forested condition. This measure, intended to compensate for the Project's direct effects to urban forest (i.e., removal), was understood to mean restoration with plantings to create in perpetuity a forested condition in areas where currently the cover type is not already "forested" (i.e., not under-planting of existing forested cover). The EA and supporting documentation do not clearly describe where and how the WSDOT intends to fulfill this commitment.



Response to AT-4:

1. Yes, this is true. WSDOT has committed to restoring 1.7 acres within the project limits to a forested condition, but has not yet developed a planting plan or selected the specific restoration sites within the project area. These elements will be developed by WSDOT at a later stage in the project's design.

Comment AT-4: U.S. Fish and Wildlife Service (continued)

Allison Ray

2

2

- WSDOT anticipates the project will result in direct, permanent impacts to approximately 1.66 acres of wetland, more than 3.5 acres of wetland buffer, and 1.51 acres of stream or riparian buffer. The project will result in temporary impacts to an additional 0.64 acre of wetland and 0.88 acre of stream or riparian buffer. The EA and supporting documentation provide little information to describe how (and at what approved ratios) the WSDOT will mitigate to replace lost or impaired wetland and riparian functions. The EA should include more information from the pending Section 404 permit(s), the Springbrook Creek Wetland Mitigation Bank Instrument, and any pending local permits (e.g., permits issued under the Critical Area Ordinance) to explain in broad, but specific terms, the Project's proposals for compensatory mitigation. The present documentation does not provide adequate information to explain how the Project will ensure "no net loss" of wetland and riparian functions.

3

- WSDOT previously committed to providing enhanced stormwater run-off treatment and flow control for an area equivalent to the total amount of new impervious surface resulting from the Project. The Service is satisfied the EA and supporting documentation do provide sufficient information to explain how WSDOT intends to fulfill this commitment. However, when planning future improvements to these same portions of I-405 and State Route 167 (i.e., the *I-405 Tukwila to Renton Improvement Project*), we recommend that WSDOT avoid and minimize effects to watershed functions and surface water quality by seeking opportunities to design and construct stormwater retrofits for a significant portion of the existing impervious surface within the project limits.

In addition to the comments offered above, which address consistency with this Project's section 7 ESA consultation, the Service offers the following additional comments on the EA and supporting documentation:

4

- WSDOT has not provided sufficient information to address the issue of impaired fish passage as it relates to the existing highway infrastructure and the current Project. The *Fisheries & Aquatic Resources Discipline Report* (Appendix L; dated October 2005) states that under the No-Build Alternative, "existing fish passage barriers throughout the study area would remain" (p. 46), and "culverts deemed to be fish passage barriers will be assessed further to determine if they will be replaced or retrofitted" (p. 52). The EA states that WSDOT will remove and replace the existing Springbrook Creek box culvert, but otherwise states "all culverts affected by the project were assessed... [and] no fish passage culvert replacements are planned" (p. 5-35). The EA and supporting documentation should include more information to explain which structures were assessed, the status of fish passage and reason(s) for deficiency at each structure, and what criteria were used to examine the costs, benefits and feasibility of retrofit for improved passage. Where the Project will modify but not correct existing deficient structures, the decision and supporting rationale should be explained in clear and transparent terms.

5

- WSDOT has not provided sufficient information to explain where and how the Project intends to mitigate for impacts to in-stream habitat. The EA and supporting documentation identify replacement of the Springbrook Creek box culvert under I-405 as

Response to AT-4 (cont.):

2. The DRs for the EA were written prior to completing the JARPA and the supporting information that is provided per the permitting process. The Renton Nickel EA was to be published originally on April 2006, but publication was delayed due to ESA consultation. To meet the April 2006 deadline, the DR was written and finalized prior to completing the Springbrook Creek Wetland and Habitat Mitigation Bank Instrument (MBI) and the design of the stream mitigation site.

The EA describes the effects that the project will cause, and how WSDOT intends to mitigate wetland effects by using roughly 1.5 wetland mitigation credits from the Springbrook Creek Wetland and Habitat Mitigation Bank and will create appropriate stream mitigation per local, state, and federal regulations.

3. WSDOT will continue to look for additional retrofit opportunities as practicable when designing projects along the I-405 corridor.

4. Per the Memorandum of Agreement that WSDOT has with the Washington State Department of Fish and Wildlife, only those stream culverts affected by a project and requiring a Hydraulic Project Approval (HPA) need to be assessed for fish passage. Only one stream culvert will be affected by this project. This culvert carries the west fork of Panther Creek across SR 167 north of the SW 41st Street interchange. The Renton Nickel Improvement Project is not improving the fish passability of this overflow culvert from the existing conditions today. Preliminary calculations indicate that the culvert exceeds velocity criteria for fish passage design at high flows. Please see pages A1-18 and A1-19 for more information on WSDOT owned culverts within the project area.

The stream effects caused by extending the culvert will be mitigated at the Springbrook Creek stream mitigation site. At this mitigation site, WSDOT will remove the existing box culvert and restore the streambed. This culvert can be removed because the Renton Nickel Improvement Project will construct new southbound and northbound bridges that span the box culvert making it obsolete. Although this box culvert is not currently a barrier and could remain in place under the new bridges, WSDOT will remove it as part of the project's stream mitigation.

5. See next page for response.

Comment AT-4: U.S. Fish and Wildlife Service (continued)

Allison Ray 3

5 mitigation for the Project's direct impacts to in-stream habitat. However, the EA also acknowledges the existing Springbrook Creek box culvert is not a barrier to fish passage (p. 1-5) and includes other statements to imply replacement of the structure is necessary in order to construct the Project's highway improvements. WSDOT should clarify with supporting rationale where and how the Project intends to mitigate for impacts to in-stream habitat.

If you or your staff would like to discuss these comments, or if this office can be of any further assistance, please contact Ryan McReynolds at (360) 753-6047 or John Grettenberger at (360) 753-6044, of my staff.

Sincerely,

/s/11/09/06/J Grettenberger/

Ken S. Berg, Manager
Western Washington Fish and Wildlife Office

cc:
FHWA, Olympia (S. Boch)
WSDOT – ESO, Olympia (P. Wagner)
USCOE, Seattle (R. McAndrew)
NMFS, Sand Point (S. Callahan)

Response to AT-4 (cont.):

5, cont. The project has the following defined impacts to streams:

- Fill of 629 square feet of Springbrook Creek that is primarily low-quality coho and cutthroat trout migratory channel habitat.
- Fill of 2,049 square feet of West Fork Panther Creek that is primarily low-quality resident cutthroat trout habitat.
- Temporary loss of low-quality fish habitat during dewatering.
- Shading of riparian vegetation adjacent to migratory channel.

To mitigate unavoidable impacts on Springbrook Creek and Panther Creek, the project will plan, design, construct, and monitor a stream mitigation site to compensate for the permanent and indirect stream impacts identified above.

Potential stream mitigation sites were evaluated based on the following site selection criteria:

- Mitigation should occur in the same basin as the impact (WRIA 9); should achieve no net loss of overall habitat functions by offsetting habitat losses through increased habitat quality at the mitigation site; and should occur at a location with a high likelihood of success.
- The selected site and design should meet King County and FEMA flood hazard requirements.
- Upland and riparian buffer zones around the sites should be enhanced and maintained.

The following is the mitigation to offset the project impacts to streams:

- Remove box culvert to create 160 linear feet and 9,000 square feet of more natural stream bed.
- Create 290 linear feet and 5,600 square feet of side channel, with cover and pools provided by bank logs to provide off-channel and refugia habitat for juvenile coho, cutthroat, and other fish in Springbrook Creek.

Enhance adult salmon resting habitat and cover in Springbrook Creek by adding rock in the side channel to diversify in-stream habitat.

Comment AT-5: Snoqualmie Tribe



SNOQUALMIE TRIBE

8130 Railroad Ave. Ste. 103
PO Box 969
Snoqualmie, WA 98065
Phone: 425-888-6551
Fax: 425-888-6727
E-Mail: Snoqualmie1855@snoqualmientation.com

October 31, 2006

Allison Ray, I-405 Environmental Manager
WSDOT
600 108th Avenue NE, Suite 405
Bellevue, WA 98004

Re: Renton Nickel Improvement Project Environmental Assessment

Dear Ms. Ray,

We recently received a copy of the Environmental Assessment for the Renton Nickel Improvement Project. Based upon the information that you have provided us concerning the project, we do not have any comments on the project at this time and we do not anticipate the need for further consultation on this matter. Please let me know if you have any questions.

In addition, I would appreciate if you could direct all future correspondence regarding transportation projects to the following address:

Snoqualmie Indian Tribe
Bill Sweet, Tribal Chairman
Andrea Rodgers, Transportation
P.O. Box 969
Snoqualmie, WA 98065
T: (425) 888-6551 ex) 112
F: (425) 888-6727
andrea@snoqualmientation.com

Sincerely,

Andrea Rodgers

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Response to AT-5:

Thank you for your response. We have updated our contact information for the Snoqualmie Tribe as you requested.