



Kathy Keolker, Mayor

CITY OF RENTON

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

June 6, 2006

Allison Ray, I-405 Environmental Manager
Washington State Department of Transportation
I-405 Project Team Office
600 – 108th Avenue NE, Suite 405
Bellevue, WA 98004

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URBAN CORRIDORS OFFICE

Subject: I-405 Tukwila to Renton Improvement Project (Phase 2)
Environmental Assessment Scoping Comments

Dear Ms. Ray:

Previously, the City of Renton has provided environmental assessment scoping comments for the I-405 Renton to Bellevue project (comments dated October 29, 2003) and the I-405 Tukwila to Renton "Nickel" project (comments dated February 10, 2005). Portions of these two comment letters are also applicable to this subject project.

In addition, the City of Renton and WSDOT have signed several letters of concurrence regarding the I-405 Master Plan for the segment between I-5 and SR 169. The City would like the following letters of concurrence to be incorporated as part of this environmental assessment scoping:

- I-405 / SR 167 Interchange 5% Design (January 7, 2005)
- I-405 Mainline Alignment – Renton Western City Limit to SR 169 (January 7, 2005)
- SR 167 Mainline Alignment – Renton Southern City Limit to I-405 (August 17, 2005)
- Renton Hill Access (September 23, 2005)
- I-405 Wells & Parks Task Force (July 8, 2005)

The City of Renton submits the following comments for consideration with regards to the I-405 Tukwila to Renton Improvement Project (Phase 2).

GENERAL:

The City may request that WSDOT retain an independent Environmental Coordinator while constructing these projects.



TRANSPORTATION:

City Arterials and Local Streets

Impacts to traffic patterns and volumes on City arterials and local streets need to be identified and mitigated. These impacts potentially include, but are not limited to:

- The elimination of Houser Way South over the Cedar River;
- Revised access to Renton Hill;
- Revisions to the downtown street grid, such as Mill Avenue South;
- I-405 access from Lind Avenue South;
- Elimination of I-405 access from Rainier Avenue South.

The EA should address potential changed traffic patterns and mitigations on City streets due to I-405 construction, including potential short-term closures of both I-405 and local streets.

Pedestrian / Non-Motorized

The EA should address continuous safe and convenient pedestrian access through the I-405 work area, including Longacres Drive, Oakesdale, Lind, Talbot, and Benson. The Springbrook Trail also crosses under I-405 in the vicinity of Oakesdale. The EA should address trail impacts, closures, details, etc., including appropriate notification to the public.

Traffic Modeling and Simulation

Traffic modeling and simulation should be conducted using appropriate tools in order to fully identify and understand the impacts on local arterials, streets and intersections during construction.

Aesthetics / Landscaping

Aesthetics and landscaping should be addressed in the EA. Specifically, due to the proposed extensive use of retaining walls, wall face treatment must be addressed.

Motorized Freight Hazard Mitigation

The EA should address potential enhancements to the shoulder barriers atop retaining walls to reduce the potential for hazardous materials either running or tipping off the roadway. There are numerous locations within the City where such an incident would have detrimental impacts to the natural environment and to valuable City resources, such as its sole source aquifer.

Neighborhoods and Businesses

Impacts to traffic through neighborhoods need to be identified and mitigated. Impacts, such as access and traffic patterns, to local businesses need to be identified and mitigated.

WATER UTILITY:

The project will impact the City's existing drinking water wells and water treatment facilities.

1. The City requests a geo-technical investigation and analysis of impact to groundwater quality and quantity from the construction of support structures penetrating the City's drinking water well field and the Cedar Valley Aquifer. Provide basis for all analyses and conclusions made in the evaluation.
2. The City requests development of a detailed water quality monitoring plan for potential groundwater contamination from construction activities and from accidental spills of hazardous chemicals.
3. The City requests development of an emergency response and recovery plan in the event of a hazardous chemical spill.
4. Access and clearance for delivery vehicles, and for maintenance vehicles, trucks and cranes must be provided so that the wells, buildings and associated utilities can be maintained and/or redeveloped in the future.

The City requests the development of a conceptual plan for the relocation of existing City utilities, including a 16-inch water line under the existing Houser Way Bridge that will be impacted by the project.

5. No bridge supports are to be installed in the riverbed to prevent compromise of the silt seal in the river.
6. The City's Surface Water Management Standards, found in the Renton Municipal Code, must be adhered to.
7. The City's Construction Activity Standards, also found in the Renton Municipal Code, must be adhered to, including the requirement for a fill source statement for fill material imported to the project site.

STORMWATER:

General Comments

1. Water quantity control (detention) and water quality improvements will be required for all existing and proposed right-of-way improvements. The quantity and quality controls should be designed using a standard equivalent to the most recent edition of the

Washington State Department of Ecology Stormwater Management Manual for Western Washington (Ecology Manual).

2. If WSDOT storm systems currently discharge or are proposed to discharge to City storm systems, the downstream system capacities should be analyzed and off-site improvements made as part of the project, as needed. The hydrologic and hydraulic analyses would need to account for the total tributary area under the 100-year future land use conditions.
3. Water quality and quantity impacts should be mitigated for the same local drainage basin so there is no impact immediately downstream of the project. The mitigation will need to show that there are no temporary or long-term impacts due to increased peak rate and volume of runoff, along with changed water quality downstream of the project.
4. Separate stormwater facilities must be provided for each sub-basin or threshold discharge area as defined in the 2005 Ecology Manual.
5. Upstream flows that are currently being conveyed through WSDOT right-of-way will continue to be conveyed downstream after proposed improvements are constructed. A hydrologic and hydraulic analysis of all existing and proposed culverts and storm systems that cross I-405 should be performed to verify that the systems have adequate capacity to convey the 100-year, 24-hour storm event for the total tributary area under future land use conditions. If the analysis indicates that the system has insufficient capacity, then it should be replaced with a properly sized facility. This is needed to ensure that adequate stormwater conveyance can be provided across the I-405 corridor and that the project will not create upstream drainage problems.
6. Any City-owned structures that have to be relocated or are impacted by the project should be fully coordinated with the City as to sizing and location.
7. If WSDOT proposes an exemption from providing detention and water quality for existing impervious surface (retrofitting), then it must show that the proposed new impervious area does not exceed 50% of the existing impervious surface, within the project limits, which is defined by the project length and width of the right-of-way. Although the redevelopment threshold may not be exceeded for the Nickel Project, it could very well be exceeded for the I-405 Tukwila to Renton Phase 2 Project where an additional two lanes in some locations, new interchange and exterior ramps are proposed. How does WSDOT propose to address this issue? Thresholds for water quality treatment and detention are to be determined for each individual threshold basin and not based on the project as a whole.
8. If the project results in fill in the regulated floodplain, compensatory storage will be required to mitigate for the loss in flood storage. The compensatory storage shall be provided in equal volumes at equal elevations as required under Renton Municipal Code.

I-405 between SR 181 and SR 167

1. The split diamond interchange at Lind Avenue, new frontage roads and reconstruction of East Valley Road will require elevating Lind Avenue between I-405 and SW 16th Street. Additional fill to raise the road may make it difficult to access and maintain any existing utilities, particularly storm. These utilities may need to be relocated and/or reconstructed so as to be easily accessible for maintenance. This requirement may apply to other areas within the project limits where improvements result in significant elevation changes. Drainage impacts to surrounding properties due to elevation changes need to be mitigated.
2. Any properties adjacent to I-405 that will be impacted by the project may require relocation of existing on-site storm systems. These systems will need to be identified and incorporated into the design of the project.

I-405 between SR-167 and SR-169

1. Renton Village: Storm run-off generated from the additional two lanes is proposed to discharge into a stormwater facility which is tributary to Rolling Hills Creek. However, prior to discharging into Rolling Hills Creek, the facility will discharge into a flume behind Sam's Club, and then into a culvert across Talbot Road and into the storm system that serves the Renton Village Shopping Center. Portions of this storm system are undersized resulting in flooding of the parking area behind the shopping center and adjacent to Rolling Hills Creek. Additionally, Rolling Hills Creek is downstream of two large sub-basins that cross I-405 from the south, the Thunder Hills Creek sub-basin and the North Talbot Hills sub-basin. Consequently, any proposed project discharge upstream of Rolling Hills Creek must be analyzed for potential downstream impacts.
2. The existing storm pipe along Talbot Road that conveys Rolling Hills Creek under I-405 shall be analyzed to determine if it has sufficient capacity or will need to be upsized. One option would be to redirect Rolling Hills Creek to the west in a separate storm pipe that would combine with flows from the un-named tributary that discharges into a culvert under I-405 before entering Rolling Hills Creek.
3. How will the impacts to Rolling Hills Creek north of I-405 be mitigated as a result of the construction of the southbound frontage road and what is the extent of the impacts?
4. Downstream System: Flows from Rolling Hills Creek discharge into two culverts under the I-405 interchange before recombining and entering the Panther Creek Wetlands on the southeast corner of the interchange. Flows continue west in a culvert across SR-167 and enter into a pipe system on East Valley Road and SW 19th Street before outfalling to Springbrook Creek. This entire downstream system will require hydraulic analysis to determine any potential conveyance problems. These pipe systems/culverts may require

upgrades to eliminate potential flooding as a result of the I-405 Tukwila to Renton Phase 2 project.

5. Construction of the northbound frontage road will impact Thunder Hills Creek where it crosses I-405. Hydraulic and structural analysis will be required to evaluate the capacity and structural integrity of the culvert under I-405 and determine whether it needs to be upsized and/or replaced.

SR-167 between I-405 and SW 43rd Street

1. Capacity analysis will be required for the SW 23rd Street drainage channel due to the increase in run-off from the project. This channel receives run-off from a large tributary basin, which includes Panther Creek, on the east side of SR-167. The channel runs adjacent to a large wetland on the south side between East Valley Road and Lind Avenue SW.
2. The run-off from the reconstruction of East Valley Road will increase storm water discharging to the East Valley storm system as well as the SW 23rd Street drainage channel. The East Valley storm system from SW 23rd Street to SW 34th Street will need to be evaluated to determine if it has the capacity to convey the additional run-off from the project plus any tributary flow without causing flooding of the roadway. The analysis shall include a backwater model with revised tailwater elevations resulting from increase flows to the SW 23rd Street Drainage Channel.
3. The existing 48" culverts located at the crossing of the SW 23rd Street drainage channel and East Valley Road will need to be replaced as part of reconstruction of East Valley Road.
4. On the southern limit of the SR-167 improvements, flows from Panther Creek on the east side of the freeway become divided. Some of Panther Creek crosses SR-167 in a culvert which discharges into an open channel on the west side of the freeway and then into the storm system on East Valley Road which continues down SW 34th Street before outfalling to Springbrook Creek. The proposed northbound auxiliary lane will require that the culvert be extended to the east into the wetland. A hydraulic analysis will be required to determine the impacts of extending the culvert, as well as a capacity analysis to determine if the run-off from the project will require improvements to the channel and/or storm system in East Valley Road. To potentially minimize downstream impacts in this area, the City would like WSDOT to consider the possibility of redirecting Panther Creek flows into the Panther Creek Wetlands and allow it to flow to the north and into the SW 23rd Street channel. This concept was identified by the City as a way to reduce flooding in the East Valley Road storm system and to increase wetland function. The resulting increase in flow in the wetland would provide additional water recharge for migratory fish that use the wetlands for rearing and refuge.

WETLANDS:

General Comments

1. At a minimum, the project should be held to a “no net loss” of wetland area, function, and value. Replacement ratios for wetland mitigation should, at a minimum, satisfy Renton’s wetland replacement ratios for wetland impacts in Renton. The Department of Ecology’s or the Army Corps of Engineers’ replacement ratios should be acceptable if they are equal to or more stringent than Renton’s.
2. Wetland mitigation should be done in the same local drainage basin and as close as possible to where the impact occurs. The City of Renton is working with WSDOT to develop the Springbrook Creek Wetland and Habitat Mitigation Bank that, if approved and implemented, could be used as a mitigation site for this project.

I-405 between SR 181 and SR 167

There may be wetland impacts along Rolling Hills Creek between I-405 and Renton Village. No impacts are identified in the Environmental Overview Document.

I-405 between SR-167 and SR-169

None.

SR-167 between I-405 and SW 43rd Street

The Panther Creek Wetlands will be impacted as a result of the northbound auxiliary lane.

STREAM BUFFERS / FISH HABITAT:

General Comments

1. The project should provide mitigation to provide for “no net losses” of stream buffer area, function, and value. In addition, the impacts to fish habitat (spawning, rearing, and passage) should be held to the same standard. Replacement ratios (2:1) for impacts to stream buffers and fish habitat should be required.
2. Mitigation should be incorporated at the location of the impact to the maximum degree possible, but the additional mitigation could be done off-site within the same drainage basin within Renton. A mitigation fund could be established for acquisition, restoration,

or enhancement of stream buffer and/or prime fish habitat sites that have been determined to be beneficial to improving salmon habitat within Renton.

The project should not only mitigate for the action impacts but should have a restoration element to offset prior impacts and the fact that mitigation benefits are not immediately achieved, especially when it comes to stream buffers. Any existing culverts or other stream crossing structures that are barriers or restrictions to fish passage should be replaced with new structures that don't prevent or restrict fish passage.

3. WSDOT will need to comply with the City's proposed new stream buffer standards that are currently being adopted and the City's Shoreline Master Program regulations for the Cedar River and Springbrook Creek.

I-405 between SR 181 and SR 167

None.

I-405 between SR-167 and SR-169

Rolling Hills Creek will be impacted by the proposed connecting southbound frontage road.

SR-167 between I-405 and SW 34th Street

1. Any improvements to the SW 23rd Street channel will need to include mitigation for riparian wetland and habitat. Because of the direct connection of the channel with Springbrook Creek, salmonid species have the opportunity to use the channel to migrate from Springbrook Creek to the Panther Creek Wetlands.
2. The reconstruction of East Valley Road will impact wetlands on the west side of the road between SW 19th Street and the Shurgard Storage business. These wetlands have not been identified in the Environmental Overview Document.

FLOODPLAIN:

General Comments

1. The project should be required to provide compensatory storage for filling of any floodplain. A "zero rise" to the floodplain standard should be applied to the project.
2. The project is also required to comply with all FEMA and National Flood Insurance Program (NFIP) standards, since federal funding will be used. No encroachment into the floodway should be allowed unless a hydraulic analysis can demonstrate that the zero rise

standard can be achieved. The hydraulic analysis should be based upon future land use condition 100-year flood flows.

I-405 between SR-181 and SR-167

1. Adding the extra lane will also require the widening of the I-405 bridge over Springbrook Creek. WSDOT will need to show that any required structures such as bridge piers, columns or abutments will not result in an increase in the 100-year water surface elevation of the creek. Also, that adequate clearance between the 100-year water surface elevation and the lowest bridge cord is provided.
2. Any filling in the 100-year floodplain will require compensatory storage. This project must mitigate for the loss of floodplain storage due to filling of the floodplain by removing an equivalent volume of compensatory storage. Compensatory storage determination shall be based on filling up to the City's modeled 100-year flood elevation under future condition flows, which is 13.7 NGVD 29, revised future condition flows.

I-405 between SR-167 and SR-169

The area near the I-405 and SR-167 interchange on the Renton Village site is mapped as 100-year FEMA Floodplain. If improvements occur in this area, mitigation for floodplain impacts will be required.

SR-167 between I-405 and SW 43rd Street

1. The area near the SW 23rd Street channel where widening is proposed is mapped as 100-year FEMA Floodplain. Floodplain impacts at this location will need to be analyzed and mitigation provided.
2. The northbound auxiliary lane will impact the Panther Creek Wetland, which is mapped as floodplain. Compensatory storage will be required and shall be based on the filling up to the FEMA regulated floodplain elevation.

SHORELINES:

General Comments

The project should comply with the currently adopted Washington State Department of Ecology Shoreline Management Guidelines and City adopted Master Shoreline Program regulations for the Cedar River and Springbrook Creek.

I-405 Northbound

Springbrook Creek falls under shorelines of Washington State (State) and the City of Renton's Master Shoreline Program regulations.

FIRE AND EMERGENCY RESPONSE

General Comments

1. Renton Fire Department concerns regarding the planned improvements to I-405 are related to emergency vehicle response times. Emergency response times should not be negatively impacted by construction or the final improvements to I-405.

Intersection changes due to this project should result in emergency vehicles being able to travel in all directions when in emergency response mode and not be limited by physical barriers that may be present for normal traffic flow considerations.

Fire and aid emergency response vehicles need full access to both sides of I-405 across the normal response routes in the south Renton area during construction.

2. Access to Renton Hill from downtown Fire Station 11 should not be impacted by construction or the final improvements to I-405.

Liberty / Cedar River Park

Emergency vehicle access to all well facilities, including treatment facilities, must be maintained both during and after construction.

PARKS

General Comments

Pedestrian, bicycle, and vehicular access to Liberty Park, Cedar River Park, and Narco needs to be maintained.

Cedar River Park

1. Loss of usable park land and air space will need to be replaced in kind within the Cedar River trail corridor system located between Lake Washington and Ron Regis Park.
2. Two access points to the park must be maintained at all times and must be able to accommodate ladder trucks, fire engines, aid cars, maintenance vehicles, and park users

(including trestle area). Access from the Maple Valley Highway and one access from Houser Way needsto be maintained.

3. Trail access from Cedar River Park over the river to the Narco property must be maintained. Any impacts will need to be mitigated.
4. Shadow effects from I-405: Due to the existing active recreation uses and landscape amenities, encroachment of shade into the park area will need to be mitigated. Shade encroachment inhibits plant and turf growth and rejuvenation, thereby limiting the scheduled use of field time.
5. Damaged and/or removed landscaping and irrigation will need to be replaced in order to maintain the park setting.
6. Prior to construction, a certified arborist will be required to evaluate all trees with a tree canopy extending into any proposed construction limits. A certified arborist report will be required for each tree identifying recommendations for tree protection, special pruning practices, etc. to be utilized during the construction phase(s).
7. The City will require a certified arborist perform all tree root pruning, limb removal, limb pruning, tree spadework, etc.
8. The City will require a licensed landscape contractor to install all landscape elements including: plant materials, sod/seed, topsoil and irrigation.
9. There shall be no net loss of parking in Cedar River Park. Any loss will need to be replaced. Any loss of park land and loss of usable park land through the creation of replacement parking will need to be mitigated through in kind replacement within the Cedar River Trail corridor system located between Lake Washington and Ron Regis Park.
10. The proposed decorative noise wall along SR 169 (as part of the SR 169 project) will need to be preserved and protected. If the wall is removed and replaced, the replacement wall will require the same artwork incorporated into the forming process.
11. New noise walls constructed as part of this project and facing park property need to incorporate architectural elements consistent with existing park and recreational architectural features.

Narco Property

1. Primary vehicular access, emergency access (police and fire) and trail access to the Narco property from Mill Avenue South needs to be maintained at all times. Improvements including new clear span bridges need to ensure vehicular, emergency and trail access

from Mill Avenue to the Narco property. Access must meet City road and bicycle standards.

2. Loss of usable parkland and air space will need to be replaced in kind within the Cedar River trail corridor system located between Lake Washington and Ron Regis Park.
3. Trail access from Cedar River Park over the river to the Narco property must be maintained. Any impacts will need to be mitigated.

Liberty Park

1. Bicycle/pedestrian access from the Cedar River Trail to Cedar River Park and over to Liberty Park must be maintained, as this is part of a regional trail system.
2. Prior to construction, a certified arborist will be required to evaluate all trees with a tree canopy extending into any proposed construction limits, including but not limited to trees on Bronson Way and Houser Way. A certified arborist report will be required for each tree identifying recommendations for tree protection, special pruning practices, etc. to be utilized during the construction phase(s).
3. The oak trees on Bronson Way will need to be evaluated and appraised by a certified arborist if removal is required. The City will require monetary reimbursement for the appraised replacement value.
4. The City will require a certified arborist perform all tree root pruning, limb removal, limb pruning, tree spadework, etc.
5. The City will require a licensed landscape contractor to install all landscape elements including: plant materials, sod/seed, topsoil and irrigation.
6. There shall be no net loss of parking. Any loss will need to be replaced. Any loss of park land and loss of usable park land through the creation of replacement parking will need to be mitigated through in kind replacement within the Cedar River trail corridor system located between Lake Washington and Ron Regis Park.
7. New noise walls constructed as part of this project and facing park property need to incorporate architectural elements consistent with existing park and recreational architectural features.
8. Loss of usable park land and air space will need to be replaced in kind within the Cedar River trail corridor system.

Trails

1. The Thunder Creek Trail connection under I-405 to Benson Road needs to be evaluated with recommendations and accommodations made for trail connections and development.
2. Ensure the Burnett Trail has continued access under I-405 from the north to the south with a connection to the Cascade Trail.
3. The Cascade Trail follows Shattuck Avenue South to South 15th Street, crosses SR-515 and ties into and follows Puget Drive. This trail route needs to be maintained.
4. A connection for the Oakesdale Avenue SW trail under I-405 needs to be accommodated and maintained.
5. The existing Springbrook Trail under I-405 and along the entire Springbrook Creek needs to be maintained.
6. The SW 16th Trail with connections to the Oakesdale Trail, Springbrook Trail and the Christenson/Interurban Trail needs to be maintained.
7. The Christenson and Interurban trails need to be maintained.
8. The Monster Road Trail connection under I-405 needs to be maintained.
9. The Cedar River Trail needs to be maintained.

Should you have any questions or concerns, please contact Peter Hahn, at (425) 430-7242.

Sincerely,



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cc: Alex Pietsch, Administrator, EDNSP
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