

Attachment 1-1.

Discussion Questions for EPA and City of Renton Meeting Regarding the Sunset Area Terrace FEIS

EPA Discussion Topic	Consultant Responses, April 13, 2011
<ul style="list-style-type: none"> • Livability principles and measures 	
<ul style="list-style-type: none"> ○ Principles 	
<ul style="list-style-type: none"> <ul style="list-style-type: none"> ▪ Are there direct connections in the FEIS to livability principles? – besides Appendix A and Greenroads analysis? 	<p>The project goals and objectives (Chapter 2, Section 2.6, also evaluated in Appendix A) are similar to EPA’s livability principles and principles of LEED-ND but translated to a more specific level to the study area. Please see the comparison chart to Livability Principles under separate cover.</p>
<ul style="list-style-type: none"> ○ Measures 	
<ul style="list-style-type: none"> <ul style="list-style-type: none"> ▪ “The proposed Planned Action Ordinance also includes guidance about measuring sustainability” <ul style="list-style-type: none"> • Where? Appendix A, Greenroads and Exhibit B? 	<p>Appendix E Planned Action Ordinance Exhibit B references Greenroads. To be more explicit, we recommend adding the following to the Planned Action Ordinance in Appendix E – Section 4:</p> <p style="text-align: center;"><u>SECTION 4. - <i>Monitoring and Review.</i></u></p> <p>A. The City shall monitor the progress of development in the designated Planned Action area to ensure that it is consistent with the assumptions of this ordinance and the Planned Action EIS regarding the type and amount of development and associated impacts, and with the mitigation measures and improvements planned for the Sunset Area.</p> <p>B. This Planned Action Ordinance shall be reviewed no later than five years from its effective date by the Environmental Review Committee to determine the continuing relevance of its assumptions and findings with respect to environmental conditions in the Planned Action area, the impacts of</p>

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	<p>development, and required mitigation measures. Based upon this review, the City may propose amendments to this ordinance and/or may supplement or revise the Planned Action EIS.</p> <p><u>C. At the following time periods, the City shall evaluate the overall sustainability of the Sunset Area Planned Action area defined in Exhibit A consistent with Final EIS Appendix A review of Goals and Objectives and LEED-ND qualitative evaluation, or an equivalent approach:</u></p> <p><u>(1) At the time of the 5 year review in Section 4.B above.</u></p> <p><u>(2) At the time of a NEPA re-evaluation pursuant to 24 CFR Part 58.53.</u></p> <p><u>D. The City shall conduct a Greenroads evaluation or its equivalent at the time the NE Sunset Boulevard design is at 30% design level and at the 60% design level.</u></p> <p>To get at monitoring topics below, we are also planning to add “E” as follows:</p> <p><u>E. The City shall review the Potential Sunset Terrace Redevelopment Subarea at the time of the five year review in Section 4B in relation to the following evaluation criteria:</u></p> <p><u>(1) Contribution of final conceptual designs to 2030 Regional Vehicle Miles Travelled (VMT) consistent with Final EIS Table 3.2-4, Sunset Terrace Redevelopment Subarea Contribution to Forecast 2030 Regional VMT.</u></p> <p><u>(2) Changes in land use and population growth and resulting greenhouse gas emissions of final conceptual designs compared to Tables 3.2-5 and 3.2-6 of the Final EIS, titled respectively Assumed Land Use and Population Growth for Greenhouse Gas Emission Calculations—Potential Sunset Terrace Redevelopment Subarea and Comparison of Greenhouse Gas</u></p>

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	<p><u>Emissions—Potential Sunset Terrace Redevelopment Subarea. (3) Change in effective impervious area for Sunset Terrace Redevelopment Subarea compared with Final EIS Preferred Alternative and Alternative 3 which resulted in a decrease of approximately 0.51 acre (11%) to 1.07 acres (23%) compared to existing conditions per Table 7 of Planned Action Ordinance Exhibit B.</u></p>
<ul style="list-style-type: none"> ▪ What role did Appendix A and Greenroads play in planning? Did the qualitative LEED analysis or Greenroads or some other sustainability measurement exercise influence the design of the preferred alternative? How? 	<p>The goals and objectives in Chapter 2, Section 2.6 that were evaluated in Appendix A guided the formulation of the action alternatives and ultimately the preferred alternative.</p> <p>The project goals and objectives are similar to EPA’s livability principles and principles of LEED-ND but translated to a more specific level to the study area.</p> <p>The LEED-ND and Greenroads analysis allowed us to “test” the action alternatives and preferred alternative against an objective set of principles that were not created specifically for the study area and will give a more specific path as designs progress to the next stage of planning.</p>
<ul style="list-style-type: none"> ▪ Differentiation between implementation and effectiveness monitoring. <ul style="list-style-type: none"> • No specific response to effectiveness monitoring suggestions (net reduction of x number tons GHG per year, and/or, overall reductions in pollution-generating surfaces...). What do Erika and Lisa think about the potential for effectiveness monitoring? 	<p>Generally speaking, we suggest that setting greenhouse gas policies is best determined at the Comprehensive Plan level as part of a citywide review.</p> <p>However, for the planned action purposes we can set some thresholds for monitoring – in particular, we suggest amending the Planned Action Ordinance monitoring section to address Sunset Terrace redevelopment in particular (see new Section 4E on page 2 of this document). In the broader planned action area, project-by-project review would be less effective since the increments are so small.</p>

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<ul style="list-style-type: none"> • Implementation 	
<ul style="list-style-type: none"> ○ EPA’s DEIS comments focused on Exhibit B as an appropriate area of focus to increase the likelihood of implementation? Was this helpful? How? 	<p>The focus on Planned Action Ordinance Exhibit B to increase the likelihood of implementation is the best place to focus given Renton is a local government that will be reviewing land use permits and tracking compliance with EIS mitigation measures.</p>
<ul style="list-style-type: none"> ○ How different from other recent Exhibit Bs elsewhere in Washington is the Sunset Area Exhibit B? 	<p>The Sunset Area Exhibit B is more detailed in that it covers 17 subjects, more than most other Planned Action Ordinances.</p>
<ul style="list-style-type: none"> • GHGs 	
<ul style="list-style-type: none"> ○ “The City shall require development applicants to consider the reduction measures shown in Table 6 for their projects, and as part of their application explain what reduction measures are included and why other measures found in the table are not included or are not applicable. The City may condition Planned Action applications to incorporate feasible GHG reduction measures.” (Exhibit B Table 6) <ul style="list-style-type: none"> ▪ Is this a good example of the value of Exhibit B for increasing implementation likelihood? How do developers view this type of requirement? 	<p>Yes, this is a good example of the value of Exhibit B. With the requirement that applicants evaluate feasible options and say why others are not feasible we believe they will be mindful of the mitigation as they design their projects. We have sites with different future land uses and conditions – the requirement is clear but there are many options for implementation which will be more appealing to developers who tend to want adaptability not a one-size-fits-all approach.</p>
<ul style="list-style-type: none"> • Air quality construction diesel mitigation measures, northeast diesel collaborative. 	
<ul style="list-style-type: none"> ○ The analysis on FEIS p. 5-12, “estimate of diesel cancer impacts” is interesting. Not sure how it comes from DEIS section 3.2.1. Did not know it was possible to estimate the impact of construction mitigation measures in terms of cancer risk. How was this done? 	<p>The air quality analysis for the Renton Sunset Area Community Planned Action EIS included a discussion of EPA’s ongoing Mobile Source Air Toxics regulations (see Sections 3.2 and 4.2 of the Draft EIS). Those regulations apply directly to off-road equipment such as construction equipment and haul trucks that would be used for the Renton project. Therefore, the discussion of the benefits of EPA’s regulations apply to the temporary construction phase as well as the permanent operational phase of</p>

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	<p>the project.</p> <p>Quantitative modeling of cancer impacts from temporary construction projects is seldom done for SEPA and NEPA projects in the Pacific Northwest. However, this modeling is often done in California for CEQA projects, and the Bay Area Air Quality Management District's recent guidance makes it a requirement for most CEQA projects in that jurisdiction. The steps in the analysis are: 1) develop an inventory of equipment used for the construction project; 2) estimate diesel particulate matter (DPM) emissions during the various construction phases using a variety of available data sources; 3) use either SCREEN3 or AERMOD to calculate the ambient DPM concentrations at sensitive receptors; 4) Apply unit risk factors to convert the ambient DPM concentration to an inhalation cancer risk. There are several methods available to estimate the percent reduction in DPM emissions and DPM cancer risk provided by various mitigation strategies. For example you can assume that any construction equipment using Diesel Particulate Filters will achieve a reduction of roughly 90% for that equipment item.</p> <p>For our response to EPA's comment in the Renton Sunset Area Community Final EIS, we did not do a quantitative estimate of DPM cancer risks for the construction phase of the Renton project. Instead, we relied on ICF's experience with other CEQA projects in California to derive the assumption that a medium-sized construction project typically results in a modeled DPM impact of between 1-per-million to 5-per-million. For the Renton project we assumed the uncontrolled DPM impact would be roughly in the middle of that range, or roughly 2-per-million.</p>

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<ul style="list-style-type: none"> • Urban Design <ul style="list-style-type: none"> ○ Whether and how to add standards from District B to District D, <ul style="list-style-type: none"> ▪ “Architectural elements that incorporate plants-particularly at building entrances in publically accessible spaces and at facades along the streets.” ▪ “Where possible and practical, provide for private useable outdoor space per units – porches, balconies, yards, decks.” ○ “To ensure that future redevelopment exhibits quality urban design, the City should consider either including this area in Design District D or creating a new design district for this purpose. Prior to the enactment of new design standards, the City may condition development north of NE 16th Street to meet appropriate standards of Design District D in RMC 4-3-100.” 	<p>The provisions to apply more strict design standards were intended to address the “family village” area since the design standards applicable to the southern more dense area may be appropriate as that block redevelops. The City could make development regulation amendments, or because there is only one block could choose instead to condition development to meet the standards rather than go through another legislative process to amend regulations. The Planned Action Ordinance Exhibit B would give the City the authority to do this.</p>
<ul style="list-style-type: none"> • Parks and Recreation: 	
<ul style="list-style-type: none"> ○ Apparently parks with stormwater functionality do not count toward open space LOS? 	<p>City policies promote areas that are usable by the public for passive or active recreation as counting towards the LOS, but not things like bioswales that have one function to treat stormwater.</p>
<ul style="list-style-type: none"> ○ We recommended that the City “develop and commit to a plan to address recreation facility level of service deficiencies”. Mitigation measures provided in Planned Action Ordinance, Exhibit B, Table 30 are creative and responsive to our recommendation. 	<p>We appreciate the support of the mitigation measures. The City is in the process of updating its parks/recreation/open space plan to address levels of service and ways in which the City will meet any identified deficiencies.</p>