

This 3rd EIS Addendum dated October 11, 2019 starting on the following page is in response to the project changes proposed by Inland Washington LLC, City File No SEP19-011.

NORTHEAST AUBURN / ROBERTSON PROPERTIES SPECIAL AREA PLAN

Environmental Impact Statement (EIS) Addendum

Addendum No. 3 Prepared for City of Auburn October 11, 2019

Final Environmental Impact Statement

July 2004



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Attachment A Development Phasing Plan
Attachment B Subject Property Parcel Numbers
Attachment C Amended and Restated Developing Agreement Attachment #6
Attachment D Traffic Impact Analysis

Acronyms and Abbreviations

ACC	Auburn City Code
ACOE	U.S. Army Corps of Engineers
APN	assessor parcel number
BMPs	best management practices
CWA	Clean Water Act
DFIRM	draft Federal Insurance Rate Map
DNR	Washington State Department of Natural Resources
Ecology	Washington Department of Ecology
EIS	Environmental Impact Statement
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
HPA	Hydraulic Project Approval
Inland	Inland Washington LLC
ITE	Institute of Transportation Engineers
LID	low impact development
LOS	level of service
MTCA	Model Toxics Control Act
NFIP	National Flood Insurance Program
NMFS	National Marine Fisheries Service
NPDES	National Pollutant Discharge Elimination System
Port	Port of Seattle
PUD	planned unit development
RCW	Revised Code of Washington
RPG	Robertson Properties Group
TIA	Traffic Impact Analysis
TMP	Transportation Management Program/Plan
TPH-G	total petroleum hydrocarbons
USFWS	U.S. Fish and Wildlife Service
WAC	Washington Administrative Code
WDFW	Washington Department of Fish and Wildlife

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PROJECT BACKGROUND

The City of Auburn (City) has prepared this report to analyze potential impacts associated with a proposed multi-family housing and mixed commercial development in the City of Auburn, King County, Washington. The proposed project, referred to as the Auburn Gateway project, is part of a larger, related project in the Northeast Auburn Special Plan Area. The Northeast Auburn Special Plan Area was originally analyzed in a 2004 Final Environmental Impact Statement (2004 Final EIS), as well as a 2011 Addendum to the Final EIS (2011 EIS Addendum).

This report, the 2019 EIS Addendum, addresses minor changes to the Northeast Auburn Special Area Plan proposed by the prospective buyer of the majority of the properties in the planning area, Inland Washington LLC (Inland). Inland is in the process of purchasing the properties within this area that are owned by Robertson Properties Group (RPG). As the project applicant, Inland proposes multi-family housing and mixed commercial development in a configuration that requires modifications to zoning regulations and to the Development Agreement established by RPG. Inland's proposal is referred to here as the *Inland Development Plan*, to distinguish it from the previous plans by RPG. The project history is summarized below.

In July 2004, the Final EIS was issued for the Northeast Auburn/Robertson Properties Special Area Plan (City of Auburn 2004). The Special Area Plan was developed to address a designated 'special planning area' as a subarea of the City's Comprehensive Plan and to establish policies governing the redevelopment and uses of the area in the Auburn Comprehensive Plan (City of Auburn 2005). The 2004 Final EIS also evaluated an application to redevelop the property located within the area designated as the "*Northeast Auburn Special Plan Area*." The Northeast Auburn Special Area Plan was adopted in June 2008 (Ordinance No. 6183) along with a Development Agreement (Resolution No. 4756, adopted 2011) and a "*planned action*" ordinance (Ordinance No. 6382) as authorized under Revised Code of Washington (RCW) 43.21C.031 (a more detailed description of the early planning history, including the rezone action that was part of previous land use approvals, can be found in the 2004 Final EIS).

The Northeast Auburn Special Area Plan covers approximately 90 acres of land (referred to in the 2004 Final EIS as the "*planning area*"). The planning area is bordered by Auburn Way N, S 277th Street, 45th Street NE, and the undeveloped right-of-way of I Street NE (Figure 1) as it existed within Parcel 0004200006 in 2004. A portion of the I Street NE right-of-way has been vacated as part of the implementation of the plan.

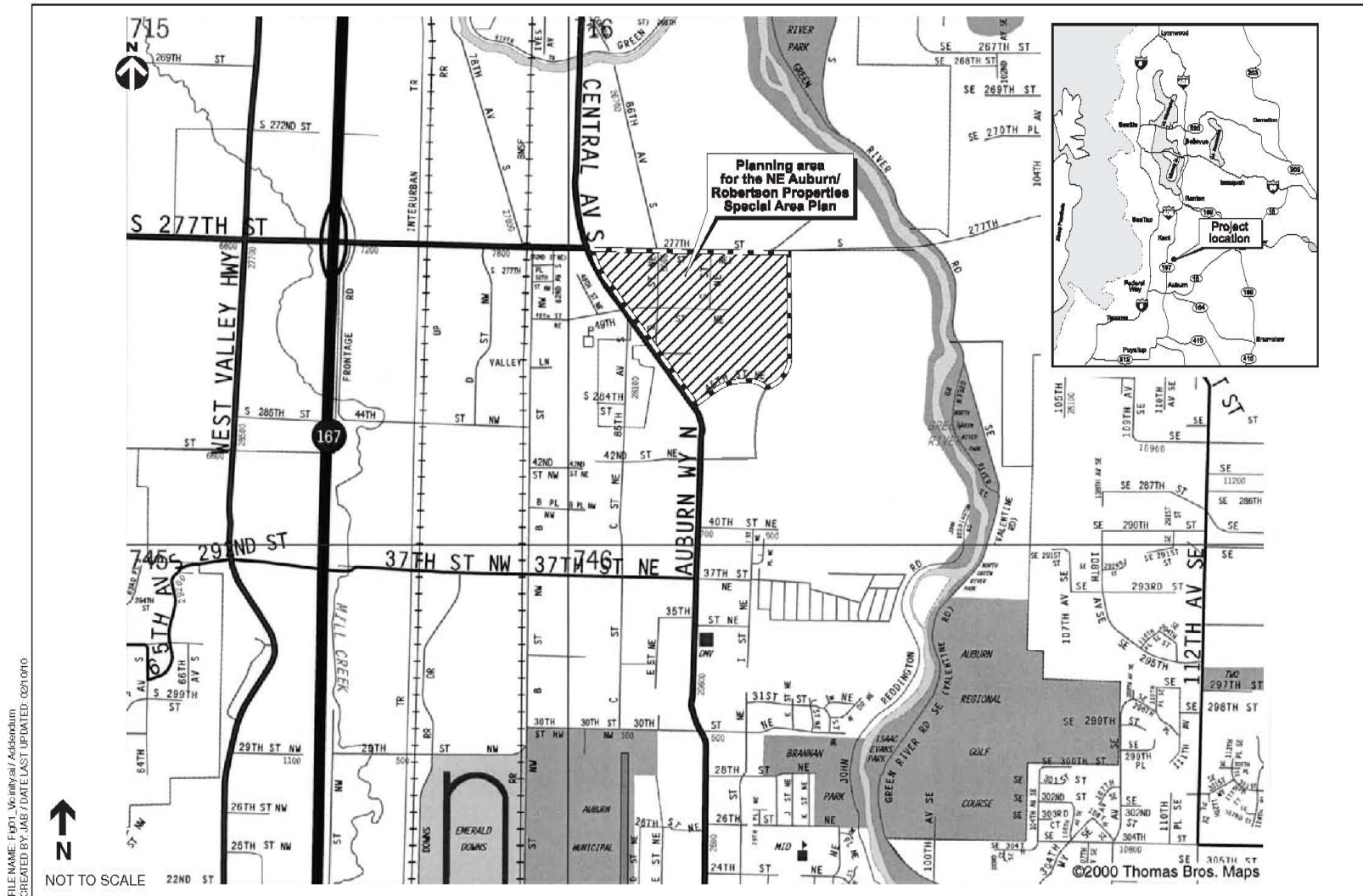


FIGURE 1. PLANNING AREA.

At the time of the 2004 Final EIS, RPG owned the Valley Six Drive-in Theater and several adjacent properties within the planning area. In addition to a “no action” scenario, the 2004 Final EIS evaluated three redevelopment alternatives for the RPG properties to retail, office, and multi-family residential uses. RPG named its redevelopment proposal “*Auburn Gateway*.” A core area of RPG’s holdings, together with other properties that RPG was considering acquiring or that could be cooperatively developed, was defined in the 2004 Final EIS as the *Auburn Gateway project area*. This area totaled approximately 60 acres, a subset of the 90-acre planning area for the Northeast Auburn/Robertson Properties Special Area Plan. An EIS Addendum in 2011 expanded the impacts of the study of the Auburn Gateway area to 71 acres (City of Auburn 2011). The boundaries of the planning area and the Auburn Gateway project area as evaluated in the 2004 Final EIS are shown in Figure 2. These boundaries are not changed by this 2019 EIS Addendum; however, the number of properties owned by RPG has grown since the 2004 Final EIS.

After the 2004 Final EIS was published, RPG purchased four additional parcels outside of the Auburn Gateway project area but within the boundaries of the planning area. These were the subject of the 2011 EIS Addendum, shown in Figure 2 as Auburn Gateway II. Since 2011, RPG has acquired other parcels within the Auburn Gateway planning area including:

- A parcel at the southeast corner of the Valley 6 Drive-in (Parcel 936060-0271).
- A parcel adjacent to the southeast corner of the intersection of NE 49th Street and D Street NE (Parcel 936060-0300, previously referred to as the McKee property).
- A parcel near the northeast corner of the Auburn Gateway Site (Parcel 936060-0325, previously referred to as the Stein property).

While the Northeast Auburn Special Area Plan covers approximately 90 acres of land, the total size of the Auburn Gateway project remains approximately 71 acres. A complete list of assessor parcel numbers (APNs) associated with the subject property is included in this 2019 EIS Addendum in Attachment B.

In addition, Inland has a separate contract to potentially purchase Parcel 936060-0269. However, that purchase is contingent on the completion of a cleanup plan and receipt of a No Further Action from the Washington State Department of Ecology (Ecology). If the purchase of the parcel is completed at some point in the future, additional environmental review will be completed, if necessary.



FIGURE 2. AUBURN GATEWAY PROJECT AREA.

The 2004 Final EIS evaluated the impacts associated with the implementation of the Northeast Auburn/Robertson Properties Special Area Plan and the Auburn Gateway project. In addition to the retail, office, and multi-family residential uses, development in this area would include new roads and utilities, surface parking, and stormwater detention and water quality facilities.

The former drive-in theater and other structures on the RPG properties have been demolished with permits issued by the City.

Alternatives evaluated in the 2004 Final EIS of the Auburn Gateway project involved building up to 720,000 square feet of retail development, 1,600,000 square feet of office, 500 multi-family residences, and 6,133 parking spaces. All alternatives evaluated the area outside the Auburn Gateway project area (the remaining portions of the planning area) as developing in accordance with existing zoning. This would include multi-family residential development to the south and east, and heavy commercial development to the west.

The focus of this 2019 EIS Addendum is on the proposed changes to the configuration of uses in the Auburn Gateway project area under the *Inland Development Plan*. The *Inland Development Plan* includes a multi-family residential area referred to in reports submitted by Inland as *Copper Gate*. Changes in phasing are also proposed. The previous phasing was just two phases: north and south. Now the “Heart” (central park) would be developed with the south portion. The infrastructure to support commercial development is also proposed and is closely associated with multi-family residential development. There are also road improvements, grading, and floodplains within other portions of the site.

This 2019 EIS Addendum was prepared pursuant to the State Environmental Policy Act (SEPA) Rules, contained in Chapter 197-11 of the Washington Administrative Code (WAC). In accordance with WAC 197-11-625 through -635, the analysis and results as presented in both the 2004 Final EIS and the 2011 EIS Addendum are incorporated by reference into this 2019 EIS Addendum.

PURPOSE OF THIS 2019 EIS ADDENDUM

The focus of this 2019 EIS Addendum is on the proposed changes to the configuration of uses and phasing in the Auburn Gateway project area under the *Inland Development Plan*. The *Inland Development Plan* includes the Copper Gate residential area. Other changes include a greater number and different phasing being proposed than before and a reduction in the amount of commercial development. Also, the prospective buyer and developer proposes to observe current stormwater management standards and anticipated floodplain standards with the development. The changes in phasing include revising the previous phasing that was just two phases; north and south to add the “Heart” (central park) that would be developed with the south portion. The first phase also includes compensatory floodplain storage as provided off-site within the previously constructed storage in the Port of Seattle Wetland Mitigation Site unless the timing for approvals for replacement storage does not coincide with the need for displacement, or is deemed insufficient. If this is the case, then temporary compensatory storage will occur within the north portion of the site (Stormwater Site Plan, Copper Gate Apartments [BCRA 2019]).

The purpose of this 2019 EIS Addendum is to compare the impacts of the *Inland Development Plan* with those for the Auburn Gateway project analyzed in the 2004 Final EIS and 2011 EIS Addendum, to ensure that all potentially significant impacts can be avoided or adequately mitigated.

Figure 3 provides an overall site plan for the *Inland Development Plan*. The Auburn Gateway project under the *Inland Development Plan* would include the same potential amount of multi-family residential development evaluated in the 2004 Final EIS and 2011 EIS Addendum, but the residential development would be separate from the commercial development. The amount of retail, office, and other allowed commercial uses (not vertically integrated mixed use) proposed by Inland is less than was evaluated in either the 2004 Final EIS or 2011 EIS Addendum.

Since the 2004 Final EIS was prepared, greater definition of phasing has been proposed for the Auburn Gateway project, which is a change from the original proposal. Although the project has always been planned to be built out over a period of approximately 15 years, the applicant had not previously identified any phasing of the project or infrastructure for the project evaluated in the 2004 Final EIS.

Under Inland’s proposal, depicted in Figure 3, the project would be developed in multiple phases. Inland has proposed to construct city utilities (water, sewer, and stormwater) during the earlier phase even though that infrastructure would serve the commercial development scheduled for the later phases. The phasing is proposed as follows and as shown in the figure in Attachment A of this 2019 EIS Addendum.

PHASE 1

Multi-family residential development would occur first in Phase 1 along with road and utility improvements serving the entire site, and some of the open space and trail elements (See Figure 3). Commercial development would follow in subsequent phases as market conditions permit. Phase 1 is generally located south of 49th Street NE.

- **Phase 1A (Multi-Family)** – Includes up to 500 multi-family residential units (referred to as *Copper Gate* Apartments), supporting buildings, and site work. Phase 1A also includes completion of public utility and transportation improvements specified in the Development Agreement.
- **Phase 1B (The Heart)** – The “Heart” is defined as work required for the centrally located open/green space serving the residential and commercial users. It also includes site work and the completion of public utility and transportation improvements as specified in the Development Agreement.
- **Phase 1C (I Street NE)** – Includes additional work located outside the Copper Gates Apartment needed for the multi-family units and supporting buildings.

Public roadway improvements would be constructed as a part of the first phase of development, which would include:

- I Street NE extended from 45th Street NE to S 277th Street, with traffic signal at I Street NE and S 277th Street.
- 49th Street NE from Auburn Way N to D Street NE improved to the maximum extent feasible within the right-of-way.
- D Street NE terminated at Auburn Way N and a cul-de-sac constructed.
- Auburn Way N improvements that include a U-turn.
- A traffic signal at the intersection at Auburn Way N and 49th Street NE.

Access to Phase 1 is proposed via a right-in/right-out driveway on Auburn Way N located south of the existing D Street NE intersection, and driveways on 49th Street NE, and 45th Street NE. Wetlands would be preserved as open space, and a pedestrian trail system would link to the common open space areas in Phase 1 and future phases.

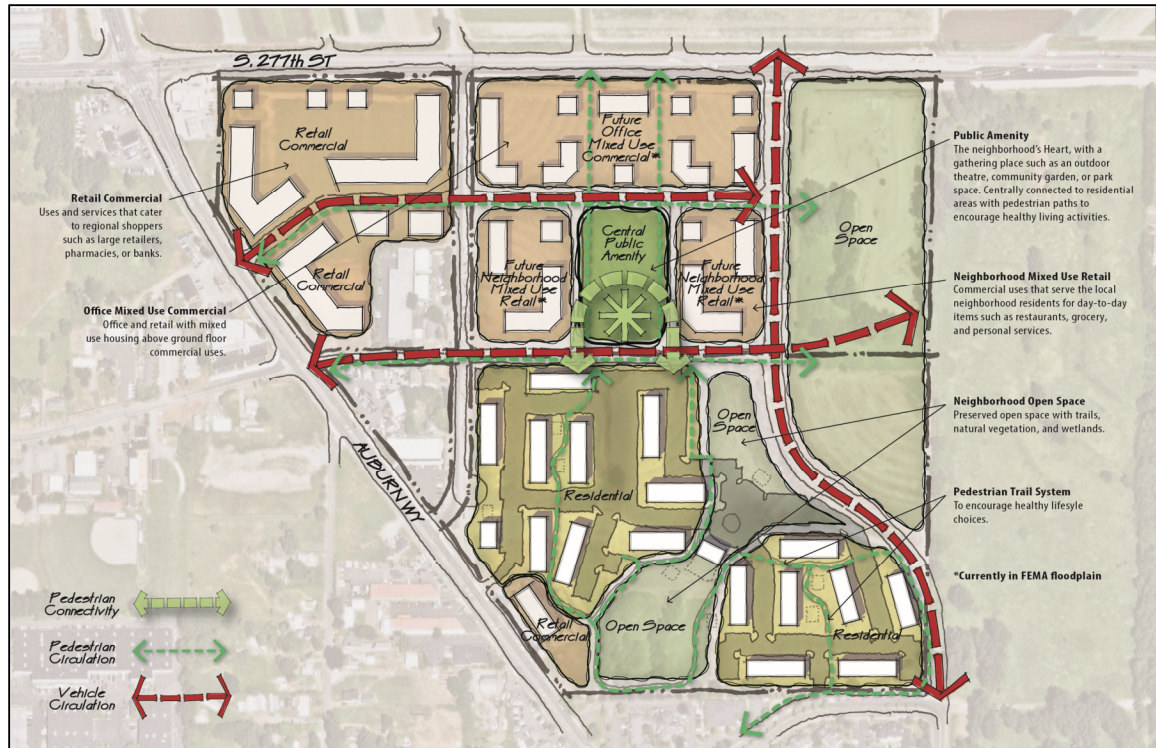


FIGURE 3. INLAND CONCEPTUAL DEVELOPMENT PLAN FOR AUBURN GATEWAY.

PHASE 2

Subsequent phases are anticipated to include commercial retail in the northwest portion of the Auburn Gateway project area, southeast of S 277th Street and west of D Street. Access would be provided from Auburn Way N, 49th Street NE, and D Street NE.

The remainder of the commercial development, north of 49th Street NE and between D Street NE and I Street NE, is less well defined at this time, due to anticipated Federal Emergency Management Agency (FEMA) floodplain map revisions and market conditions for commercial tenant space by the property owner.

Two scenarios for this final phase of commercial development are presented in the transportation analysis referenced in this addendum. The purpose of describing the scenarios in this document is to provide disclosure of floodplain criteria and mapping changes that may affect development decisions that need to consider potential impacts on floodplains.

- Phase 2A Commercial /North Phase Outside of Flood Zone
- Phase 2B Commercial/North Phase in Flood Zone

The first scenario includes a reduction in the total amount of commercial development that reflects anticipated FEMA floodplain map revisions with greater amount of

floodplain. The total amount of commercial retail assumed in this scenario is 150,000 square feet.

The second scenario assumes full development of the north areas, consistent with the previous approvals and assumes site filling and securing FEMA floodplain map amendments to develop outside the floodplain. The total amount of development for the second scenario assumes 168,000 square feet of commercial retail and 111,000 square feet of office use. Results for both development scenarios are presented in the traffic analysis in this Addendum.

Both scenarios have smaller commercial components than either Alternative 1 (evaluated in the 2004 Final EIS as having up to 1,800,000 square feet of office and retail development) or Alternative 2 (evaluated as having up to 720,000 square feet of office and retail development).

ADDITIONAL REVISIONS FROM 2004 FINAL EIS AND 2011 EIS ADDENDUM

Additional 2019 revisions proposed subsequent to the issuance of the 2004 Final EIS and 2011 EIS Addendum include:

- With the *Inland Development Plan*, D Street NE would remain connected to S 277th Street and restricted to right-in, right-out only vehicle movements. In the 2011 EIS Addendum, D Street NE north of 49th Street NE was proposed to be vacated and converted to an internal circulation aisle serving the project.
- In the 2011 EIS Addendum, RPG requested removing the eastward extension of 49th Street NE east of the proposed I Street NE, which was included in the 2004 Final EIS to serve development to the east of the RPG property. The 2011 EIS Addendum included an assessment of the traffic impacts of eliminating the northern portion of D Street NE and of not constructing the eastward extension of 49th Street NE. Similarly, the *Inland Development Plan* does not include constructing this extension of 49th Street NE, east of I Street NE.
- Also, since the 2004 Final EIS was prepared, development of nearby properties has proceeded and City of Auburn regulations and policies have changed. Notable regulatory changes affecting the Auburn Gateway Project since the 2011 EIS Addendum are described in the impacts analysis below.

Table 1 summarizes the total development proposed by Inland as part of the Auburn Gateway project.

TABLE 1. COMPARISON OF PREFERRED ALTERNATIVE FROM THE 2004 FINAL EIS WITH THE *INLAND DEVELOPMENT PLAN*.

Land Use	Preferred Alternative from Final EIS (2004)	Inland Development Plan (2019)
Office	Up to 1,600,000 gross square feet	Up to 111,000 gross square feet.
Retail	Up to 720,000 gross square feet	Up to 168,000 gross square feet.
Multi-family residential	Up to 500 units	Up to 500 units.
Parking	Up to 6,133 spaces	Up to 870 spaces for residential. Commercial would meet code requirements: Up to approximately 555 for office and 672 for retail, for a total of 1,227 spaces. Overall total – up to 2,097 spaces.
Roads	S 277 th Street would be widened. I Street NE would be constructed from S 277 th Street to 45 th Street NE. A new east-west street (49 th Street NE) would be constructed. The south end of D Street NE at Auburn Way N would be closed.	Same as preferred alternative, as indicated in the 2011 EIS Addendum, D Street NE could be vacated north of 49 th Street NE and be turned into an internal aisle and a right-in/right-out driveway at S 277 th Street. D Street NE would remain as a public road and terminate at Auburn Way North via a cul-de-sac. (S 277 th Street has already been widened since the 2011 EIS Addendum).
Pedestrian trails and open space	A pedestrian trail would be constructed along the south side of S 277 th Street. A pedestrian trail would be constructed to link the wetland areas within the project area and to public roads and trail connections.	Same as preferred alternative. (The trail along S 277 th Street has been constructed).
Signs	A coordinated signage system would be constructed throughout the project area, including pylon signs, monument signs, directional signage, and signs for individual stores and tenants.	Same as preferred alternative.
Wetlands and Streams	Wetlands would be preserved, with the exception of the ditches along S 277 th Street and the wetlands within the existing and proposed right-of-way of 49 th Street NE.	Wetlands and streams may require temporary grading, filling and mitigation in accordance with agency standards to provide for the development as shown in the Inland Development Plan and to provide for the road and infrastructure improvements associated with the development.
Other features	Approximately 400,000 cubic feet of landscaped stormwater detention ponds would be constructed. Approximately 250,000 cubic yards of soil would be excavated, and approximately 650,000 cubic yards of fill would be placed. (Increased to 750,000 cubic yards in the 2011 EIS Addendum.) Compensatory floodplain storage is proposed to be provided in the Port of Seattle Wetland Mitigation Site unless storage capacity is	Grading, stormwater management, and floodplain storage would conform to current (2019) regulations for Phase 1. Phase 2 may be governed by standards in effect at the time of construction as allowed by the development agreement. Phase 1 detention volumes total approximately 222,460 cubic feet. Future phases would be determined once a detailed site plan is established for the commercial phase of development.

TABLE 1. COMPARISON OF PREFERRED ALTERNATIVE FROM THE 2004 FINAL EIS WITH THE *INLAND DEVELOPMENT PLAN*. (CONT.)

Land Use	Preferred Alternative from Final EIS (2004)	<i>Inland Development Plan</i> (2019)
Other features (cont.)	unavailable or insufficient and the City would then allow temporary storage on-site.	<p>Estimated volumes for Phase 1 (residential) are: 150,000 cubic yards of excavation, and 150,000 cubic yards of fill.</p> <p>Maximum grading volumes for the entire site would not exceed those described in the 2004 Final EIS and 2011 EIS Addendum. Approximately 250,000 cubic yards of soil could be excavated, and approximately 750,000 cubic yards of fill could be placed.</p> <p>Permanent floodplain compensation will be provided within previously constructed advance storage on the Port of Seattle wetland mitigation site , per Resolution 4841 (City of Auburn 2012). If the timeframe for approvals for replacement storage does not coincide with the need for displacement, or is deemed insufficient, the City will allow temporary floodplain storage within the northern portion of the site during Phase 1.</p>

PROPOSED ANALYSIS FOR THE 2019 EIS ADDENDUM

The following environmental elements warrant evaluation of potential changes in the affected environment and a change in the intensity of impacts associated with the Auburn Gateway project under the *Inland Development Plan*:

- Water resources
- Plants and animals
- Transportation

These elements require a detailed analysis because the Auburn Gateway project involves development within a floodplain that is anticipated to be more restricted than was evaluated in the 2004 Final EIS and 2011 EIS Addendum, requiring greater compensatory flood storage; reduced impervious surfaces relative to the alternatives evaluated due to limitations on floodplain development; and reduced total trip generation relative to the impacts projected in the 2004 Final EIS. In each case, the *Inland Development Plan* would have less development or intensity than previously evaluated and may not require the same level of mitigation as previously required. In addition, this 2019 analysis summarizes changes found in the wetlands and streams on the site and examines potential impacts on threatened or endangered species.

Construction of the project in two phases was evaluated in the 2011 EIS Addendum, but the 2019 EIS Addendum updates the phasing plan as described in this section of the addendum. Street improvements described above would be provided in the first phase of the project under the *Inland Development Plan*. Transportation improvements needed to support the project are proposed to be completed during Phase 1 in advance of development of the Phase 2 commercial phases. Therefore, no additional analysis of phasing is warranted.

Impacts on the remaining environmental elements evaluated in the 2004 Final EIS (geology/soils, air quality, noise, hazardous materials, cultural and historic resources, land use, aesthetics, recreation, utilities and public services) are not expected to be substantially different from those evaluated in the 2004 Final EIS. These are described briefly at the end of this 2019 EIS Addendum.

The following sections assess the changes that have occurred in the affected environment, environmental impacts, and mitigation measures resulting from changes in the project plans and/or the environment since the 2004 Final EIS and 2011 EIS Addendum were issued. For all impacts other than those described in this 2019 EIS Addendum, the 2004 Final EIS analysis and conclusions have not changed, and the mitigation measures in the 2004 Final EIS continue to apply.

The analysis provided below does not find any significant impacts that were not disclosed in the 2004 Final EIS. The information contained in this 2019 EIS Addendum is provided to allow the revised project to be evaluated by the City and other regulators, in order to determine appropriate mitigation for development applications.

ADDENDUM TO AFFECTED ENVIRONMENT, IMPACTS, AND MITIGATION

WATER RESOURCES

Applicable Laws and Regulations

Laws and regulations regarding water resources have changed since the 2004 Final EIS and 2011 EIS Addendum were published. The 2011 EIS Addendum noted new critical area regulations in Auburn City Code (ACC) Chapter 16.10 Critical Areas. Chapter 16.10 has been amended twice since publication of the 2011 EIS Addendum, primarily to clarify processes for variances and exceptions, and to provide flexibility in siting wetland mitigation. In addition, effective January 1, 2017, Auburn adopted its *Surface Water Management Manual*. The City also adopted the Supplemental Manual to the Ecology Stormwater Management Manual for Western Washington on January 1, 2017. The drainage requirements that would apply to the project are based on equivalency to the Department of Ecology's 2014 *Stormwater Management Manual for Western Washington* (Ecology 2014).

As noted in the 2011 EIS Addendum, since the 2004 Final EIS, FEMA's National Flood Insurance Program (NFIP) released preliminary draft Federal Insurance Rate Maps (DFIRMs) on September 28, 2007 that, when adopted, will revise the extent and depth of the Green River floodplain in the planning area. Revised preliminary DFIRMs were published September 15, 2017. These draft maps indicate a larger and deeper 100-year floodplain area than the 1995 maps that are currently in effect. Since FEMA has not yet adopted the DFIRMs, the 1995 maps remain in effect from a regulatory standpoint, based on City code.

Also as noted in the 2011 EIS Addendum, on April 5, 2010, the City of Auburn approved interim floodplain regulations (Ordinance No. 6295; City of Auburn 2010), which replaced the City's previous floodplain regulations. The City received written notification from FEMA dated September 21, 2011, that FEMA reviewed the City's interim regulations and concur they are consistent with FEMA's model ordinance; the regulations are no longer interim. The regulations incorporated federal habitat protection requirements and created a new City floodplain development permit to replace the previous flood zone control permit. The changes include requiring new developments to prepare a habitat impact assessment that must include one of the following:

- A Biological Evaluation or Biological Assessment that has received concurrence from the U.S. Fish and Wildlife Service (USFWS) or National Marine Fisheries Service (NMFS); or
- Documentation that the activity fits within Section 7 or Section 10 of the Endangered Species Act (ESA); or
- An assessment prepared in accordance with Regional Guidance for Floodplain Habitat Assessment and Mitigation (FEMA 2010).

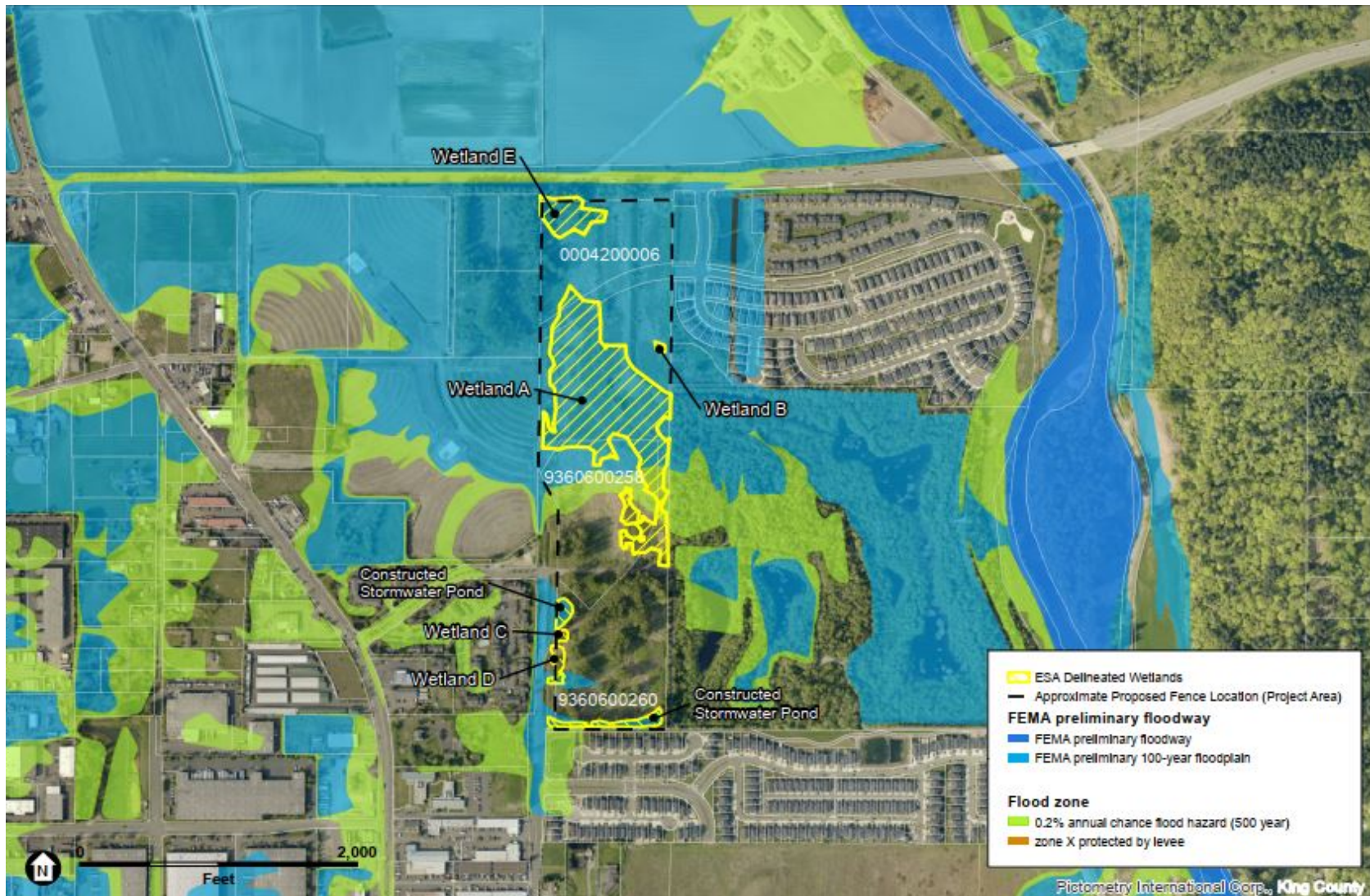
New development must be designed and located to minimize the impact on flood flows, flood storage, water quality, and aquatic habitat. Stormwater and drainage features must incorporate low impact development (LID) techniques that promote pre-development hydrologic conditions. If the project involves more than 10 percent impervious surfaces within the regulated floodplain, then the project applicant must demonstrate that there will be no net increase in the rate and volume of the stormwater surface runoff that leaves the site. Structures must be located as far from the water body as possible or on the highest land on the lot (City of Auburn 2010).

After completion of the Port of Seattle's approximately 70-acre compensatory flood storage and wetland mitigation project, located, southeast of the planning area, and in response to FEMA's release of the DFIRMs, King County and the valley cities of Auburn, Kent, Renton, and Tukwila (appellants) commissioned NW Hydraulic Consultants, Inc. to analyze and map the 100-year floodplain for the area. The resulting report (NW Hydraulic Consultants 2017) was submitted to FEMA for their consideration during the public appeal period on the draft floodplain maps. At the time of this writing, the appellants expect that the DFIRM maps for the planning area will be changed to closely reflect the DFIRM maps that FEMA reviewed in 2017 as the basis for the appeal. FEMA is expected to adopt the revised maps in early 2020 and restrict vesting opportunities. Because the DFIRM maps have not been adopted by FEMA, the 1995 maps remain in effect from a regulatory standpoint however, with the imminent floodplain map changes, the City and FEMA have been cautioning consideration of the anticipated preliminary 2017 DFIRMs maps, and Inland has been relying on them for planning its development.

Affected Environment - Surface Water

The Auburn Gateway project area is within the floodplain of the Green/Duwamish River watershed. The surface water conditions in the Auburn Gateway project area were described in the 2004 Final EIS and have not changed substantially, except for the increased likelihood of flooding, as reflected in the anticipated FEMA maps described above, and completing of some development projects in the area.

In May 2019, BCRA produced a Stormwater Site Plan for Phase 1 of the *Inland Development Plan* (BCRA 2019). The stormwater conditions described by BCRA are summarized in this section. Figure 4 of this 2019 EIS Addendum illustrates the floodplains project area.



SOURCE: ESA, 2019; King County, 2018

D180066 Port of Seattle Environmental Review

**FIGURE 4. KING COUNTY FEMA FLOODPLAIN
AUBURN, WASHINGTON.**

Green River Floodplain

As described in the 2011 EIS Addendum, the Port of Seattle (Port) completed its compensatory flood storage and wetland mitigation project described in the 2004 Final EIS. The City of Auburn and the Port entered into an Interlocal Agreement to allow the Port's wetland mitigation property to be used to compensate for filling nearby properties located in the floodplain, including the Auburn Gateway project site (Resolution 4841; City of Auburn 2012).

As described in the 2011 EIS Addendum, the Port constructed a flood conveyance channel from its wetland, southeast of the planning area, to the roadside ditch along the south side of S 277th Street. At the time of the 2004 Final EIS, the Port reported that the capacity of the roadside ditch on the south side of S 277th Street that connects to the Port's flood conveyance channel is not sufficient to convey the 100-year flood volume (Wessels 2003, personal communication). The roadside ditch was relocated as part of the roadway widening completed along S 277th Street.

Storm Drainage

Runoff from the planning area in general, and specifically from the Auburn Gateway I site, was described in the 2004 Final EIS. Runoff from the Auburn Gateway II site was described in further detail in the 2011 EIS Addendum. In general, surface water flows in sheetflow or via ditches toward the northeast. Most of the site is approximately 4 to 6 feet lower in elevation than the road level of Auburn Way N (BCRA 2007). No changes to drainage patterns have occurred in the Auburn Gateway project area since the 2011 EIS Addendum was issued.

As described in the 2011 EIS Addendum, since the 2004 Final EIS was published, a residential subdivision and planned unit development (PUD) was constructed on a 40.9-acre site east of the planning area. The Trail Run (previously called River Sands) development involved the construction of houses, townhouses, roadways, and stormwater facilities. As noted in the 2011 EIS Addendum, assuming the stormwater system is working as designed, the rate of stormwater runoff from the Trail Run property has decreased since the 2004 Final EIS was prepared.

The City has determined that the ditches along the south side of S 277th Street are not regulated as streams under the City's critical areas ordinance (ACC Chapter 16.10), but are regulated by the City's Flood Hazard Area regulations as typed waters using the Washington State Department of Natural Resources (DNR) water typing system (WAC 222-16-030). These water bodies are therefore referred to as drainage ditches in this EIS addendum, to distinguish them from water bodies that the City regulates as streams. However, other agencies with jurisdiction may make different determinations.

Surface Water Quality

The 2004 Final EIS refers to the 1998 Ecology 303(d) list when describing water quality conditions for the Green River. According to the 2012 Ecology 303(d) list, the Green River adjacent to the planning area is still listed as having elevated temperature and low

dissolved oxygen. The 303(d) list also indicates that fecal coliform bacteria and temperature do not meet standards in the Green River reaches located several miles downstream (Ecology 2012).

Impacts

Short-Term Construction Impacts

Project construction as two phases was evaluated in the 2011 EIS Addendum. The applicant is expected to develop the *Inland Development Plan* in more than two phases. Phase 1 (multi-family residential) south of 49th Street NE, and one or more commercial phases north of 49th Street NE. Short-term impacts associated with construction would be similar to what was described in the 2004 Final EIS.

The 2004 Final EIS estimated that approximately 650,000 cubic yards of fill and 250,000 cubic yards of excavation would be necessary to allow for proper drainage of stormwater using a combination of gravity and pump systems. With the addition of the Auburn Gateway II properties, the 2011 EIS Addendum indicated that up to 750,000 cubic yards of fill would be necessary, if the stormwater system were designed to function by gravity alone.

The Auburn Gateway project site would be graded to accommodate a gravity system with an outlet to the existing ditch along S 277th Street. Because the type of stormwater detention facilities have yet to be determined, this volume of earthwork is an estimate. Grading for the Auburn Gateway project would consist of importing and placing fill material sufficient to allow for proper drainage of stormwater and to raise the buildings above the 2017 100-year FEMA floodplain elevation whether structures are in the floodplain or not (BCRA 2019). The Preliminary DFIRM map is currently dated September 15, 2017. Any future phasing projects would be required to address floodplain regulations in effect for each phase.

Erosion impacts could affect water quality. Water quality impacts associated with grading would be similar to those described in the 2004 Final EIS and 2011 EIS Addendum. Potential erosion impacts would be avoided by implementing best management practices (BMPs) and complying with Ecology's requirements for temporary erosion control, grading, and drainage; the City of Auburn *Surface Water Management Manual* (City of Auburn 2014); and Ecology's *2014 Stormwater Management Manual for Western Washington* (Ecology 2014). The contractor will also be required to obtain a Construction Stormwater General Permit through Ecology and the National Pollutant Discharge Elimination System (NPDES) permit.

Long-Term Operational Impacts

Green River Floodplain

Volume of Floodplain Storage Affected

For Phase 1 of the *Inland Development Plan*, all floodplain compensatory storage would be provided off-site within previously constructed advance storage in the Port of Seattle Wetland Mitigation Site unless the timeframe for approvals for replacement storage does

not coincide with need for displacement. If off-site storage is unavailable due to timing, or capacity is deemed insufficient, then the City will allow temporary storage within the northern portion of the project site. Exact volumes to be used have not been calculated as of this writing, and any use of these compensatory storage volume would be subject to City approval. Any additional floodplain compensation beyond that provided by the Port site would be provided in compliance with applicable City regulations pursuant to a flood development permit and habitat impact assessment.

Connection of Wetland Flood Storage to Existing Floodplain

As noted above, the 2004 Final EIS indicated that the ditch along S 277th Street would not adequately carry floodwaters after the entire Auburn Gateway project was developed. RPG indicated that the relocated roadside ditch and culvert system would be designed to accommodate the 100-year, 24-hour peak flow rate and fish passage criteria (if required) per Chapter 3 of the City of Auburn *Surface Water Management Manual* (City of Auburn 2014). If necessary, the Inland project would do the same; therefore, the impact would not change with the *Inland Development Plan* and would not be significant.

Storm Drainage Systems

The conceptual stormwater system for Auburn Gateway I and II was described in the 2011 EIS Addendum. The conceptual plan for the *Inland Development Plan* remains the same as described in that analysis. As described in the 2011 EIS Addendum, storm drainage discharge would be directed to either S 277th Street (EIS Scenario 3a), or split evenly between S 277th Street and D Street NE (EIS Scenario 3b). To provide for adequate storm drainage and conveyance to the point of discharge at the northeast corner of the Auburn Gateway II site, the site at the south and southwest ends would need to be at an approximate elevation of 56 feet, requiring a substantial amount of fill to allow for draining the site to the northeast. The site would likely need to be raised approximately 5 to 7 feet in some areas to allow for gravity drainage to the culvert at S 277th Street and D Street NE (BCRA 2007).

The Stormwater Site Plan for Phase 1 of the *Inland Development Plan* provides further detail for the residential development proposed in the southern portion of the Auburn Gateway project area (BCRA 2019). It describes three basins within the site and the design approach taken for each to meet requirements of the *2014 Stormwater Management Manual for Western Washington* (Ecology 2014) and Auburn Supplemental Manual (Effective date of January 1, 2017).

The Auburn Gateway project is expected to meet the design requirements and stormwater management code as required by the City of Auburn. To ensure coordination of the future storm system for the project area in conformance with proposed phasing and City codes, a master storm drainage plan will be prepared prior to construction authorization. The master storm drainage plan shall also define which improvements are to be constructed concurrent with each phase of the project. If necessary, additional downstream drainage analysis shall be required as directed by the City Engineer prior to construction

authorizations. Development consistent with current stormwater regulations is not expected to result in significant impacts on water quality or quantity.

Stormwater facilities for both the Auburn Gateway project and the *Inland Development Plan* sites would be designed to comply with the City of Auburn *Surface Water Management Manual*. The City's *Surface Water Management Manual* is equivalent to Ecology's *2014 Stormwater Management Manual for Western Washington*. With the construction of on-site detention facilities, stormwater runoff from the *Inland Development Plan* is expected to be the same or less than the current rate of runoff.

Significant Unavoidable Adverse Impacts

As stated in the 2004 Final EIS, no significant unavoidable adverse impacts on water resources would occur if the mitigation requirements and recommendations provided in the 2004 Final EIS, and future mitigating measures required during permitting, are followed. Compliance regulations for stormwater management, and floodplain management adopted since the 2004 Final EIS also ensure that significant impacts will be avoided.

PLANTS AND ANIMALS

Applicable Laws and Regulations

When the 2004 Final EIS was issued, the City of Auburn relied on adopted SEPA policies and used the SEPA process to identify impacts and mitigation for environmentally critical areas. General guidance from the City of Auburn Comprehensive Plan regarding the protection of critical areas was also used as a guide for assessing impacts. Since that time, the City of Auburn has developed critical area regulations codified in ACC 16.10 Critical Areas. The 2011 EIS Addendum summarized the critical areas regulations, standards, and procedures. Changes to the critical areas regulations since 2011 clarify the processes for variances and exceptions, and provide additional flexibility in siting wetland mitigation.

Affected Environment

Wetlands

Wetlands in the Auburn Gateway project area were not delineated or categorized in the 2004 Final EIS. Since that time, J.S. Jones and Associates, Inc. conducted a delineation and prepared a *Wetland and Stream Impact Assessment* (J.S. Jones and Associates, Inc. 2010). Wetland information from that 2010 report was described in the 2011 EIS Addendum. The assessment categorized Wetlands A, B, C, and D, all of which are located at least partially within the Auburn Gateway I project area. The 2010 report also described Wetland E in the northwest corner of the project, which is in the Auburn Gateway II project area and was qualitatively described (i.e., not delineated or formally categorized) in the 2011 EIS Addendum.

This 2019 EIS Addendum updates information on the wetlands that would be affected by Phase 1 of the *Inland Development Plan* in addition to features located within ditches along S 277th Street. The updates are based on information provided by J.S. Jones and Associates, Inc. and EnCo (Environmental Corporation). In a delineation report prepared in 2014, the boundary of Wetland A was expanded to include a wetland to the north, Wetland B, as depicted in the 2004 Final EIS (J.S. Jones and Associates, Inc. 2014). In 2019, EnCo conducted a site visit to confirm existing conditions and prepared a *Combined Floodplain Habitat Impact Assessment with Critical Areas Report* (HIA/CAR), which compiles past studies, updates information on listed species, and summarizes ratings for wetlands (EnCo 2019a). EnCo subsequently described Wetland E in an amendment to the report (EnCo 2019b). The revised HIA/CAR dated September 27, 2019 included an additional site visit which determined that the former Wetland E area no longer meets criteria for wetland (EnCo, 2019d).

Current wetland conditions are similar to those described in the 2011 EIS Addendum. However, Wetland B has been consolidated with Wetland A and re-classified to Category III. The reclassification of Wetland A results in a 50-foot buffer requirement under current Auburn Code; in previous documents, it was listed as having a 35-foot buffer

requirement. In addition, former Wetland E has been removed from the project maps based upon the information found in the updated HIA/CAR prepared by EnCo (2019d).

EnCo conducted a site visit on September 26, 2019 to update information in the HIA/CAR and to confirm the location and boundaries of former Wetland E. The area in question was found to be a cultivated field dominated by pasture grasses, weeds and an unidentified root crop. Based upon data taken at three locations in the former wetland area, EnCo determined that this area no longer meets the federal definition of wetland based upon the lack of hydric soil indicators and wetland hydrology (EnCo, 2019d).

In addition to Wetlands A and C, the 2004 Final EIS described several roadside wetlands (Wetland Ditches H, I, and J) within a ditch on the south side of S 277th Street. The 2011 EIS Addendum indicated that these interconnected features may no longer be regulated and would be relocated as part of a road widening project. In June 2019, after completion of the road widening project, a field visit with the Washington Department of Fish and Wildlife (WDFW) and others resulted in a change in the jurisdictional status to some of these features, described in the *Streams and Watercourses* section below (EnCo 2019c).

Beyond the on-site wetlands, ESA delineated several off-site wetlands as part of a separate project on land located immediately east of the project area that is owned by the Port of Seattle (ESA 2019). The City wetlands inventory map depicts Wetland A on the Port property and Wetland A on the Auburn Gateway project site as connected. However, ESA's 2019 Port of Seattle delineation determined that these two wetlands are not connected (ESA 2019). The boundaries of Wetland A on the Port property were surveyed and do not intersect with the Auburn Gateway property; however, the buffer of Wetland A does overlap the project site. In addition, the boundaries of Wetland E on the Port property do not extend onto the Auburn Gateway project site; however the buffer does overlap the site in the vicinity of a newly created stormwater pond. It is important to note that wetland buffers from the off-site Port wetlands are fully encompassed within the 75-foot riparian buffers on Watercourses K and L, as described below.

Streams and Watercourses

The wetland ditches described in the 2004 Final EIS as Wetlands H, I, and J were determined by WDFW in 2009 to be intermittent fish-bearing waters as the agency defines them. Wetland Ditch G, which is also located along D 277th Street, was not considered a stream by WDFW and was not identified as a wetland in the 2004 Final EIS. Since then, the ditch was relocated south and is no longer assessed as part of this 2019 EIS Addendum.

In addition, six watercourses were identified and described in the HIA/CAR (EnCo, 2019a, 2019d). These are named Watercourses K, L, M, N, O and P. Watercourses N, O and P are located entirely off-site; whereas K, L and M are at least partially located on the development site. Watercourses K, L, N, O and P are considered fish-bearing and are recognized as Class II streams under the City's regulations, requiring a 75-foot standard buffer each side of the ordinary high water mark (EnCo, 2019d). Watercourse M is a mitigation watercourse constructed in 2017 as part the City's road widening project along S 277th Street.

With the completion in 2018 of the City project widening S 277th Street, the following physical changes were made along the road:

- The culvert under S 277th Street near the intersection with I Street NE has been replaced with a fish passable culvert.
- Watercourses H, I, and J were relocated south and are no longer considered intermittently fish-bearing. Watercourses H, I, and J are considered stormwater conveyance features and are no longer regulated based on a field visit with WDFW in June 2019 (EnCo 2019c). The City of Auburn installed a 36-inch pipe replacing the streams, which now conveys stormwater from a drainage area south and west of the Auburn Gateway site to the culvert at S 277th Street.
- On-site mitigation required for these watercourse relocations was completed on the northeast corner of the Auburn Gateway site (mostly on what was the former Stein property). Mitigation Watercourse M was constructed to offset project impacts.

Threatened and Endangered Species

Wildlife

Changes to the listing status for several wildlife species have occurred since the 2004 Final EIS was published. The 2011 EIS Addendum provided updated information on listed species. The CAR (EnCo 2019b) does not identify any changes to the listing status of any species previously identified on or near the site. As noted in previous environmental documents, the CAR (EnCo 2019b; 2019d) states that there are no known federally listed wildlife species or critical habitat present on the site. The EnCo report (2019b) also notes that there are no known state-listed wildlife species present. Consistent with the 2004 Final EIS and the 2011 EIS Addendum, state priority habitats present on the site include wetlands, riparian buffer zones, and snags.

Fish

The 2004 Final EIS identified the Puget Sound/Strait of Georgia coho salmon (*Oncorhynchus kisutch*) as a Candidate species; their current federal status continues to be Candidate, while at the state level they are listed as a species of concern. In June 2019, WDFW reported that threatened and endangered fish were not found or expected in Watercourse K or Watercourse L (EnCo 2019a); furthermore, these two watercourses do not contain designated critical habitat for any ESA-listed fish species. Coho salmon are the only state-listed fish species present on the site; these are reported for Watercourses K, L, M, N, O and P (EnCo, 2019d).

Other listing changes that have occurred since the 2004 Final EIS were described in the 2011 EIS Addendum and have not changed.

Impacts

Short-Term Construction Impacts

Impacts on plants and animals would be similar to the impacts described in the 2004 Final EIS and not considered significant.

Long-Term Operational Impacts

Habitat Loss and Fragmentation

Wetland Habitat

Wetland impacts under the *Inland Development Plan* are similar to those described in the 2004 Final EIS and the 2011 EIS Addendum. No wetlands would be permanently impacted; however, temporary impacts are anticipated. Temporary impacts from grading are anticipated in Wetland A (0.60 acre) to remove reed canarygrass as part of wetland restoration. Temporary grading impacts are also anticipated in Wetland D (0.05 acre) as part of Watercourse N expansion to address flood conveyance issues (EnCo, 2019d).

Wetland buffers would also be affected by project development. Wetland buffer impacts associated with the Auburn Gateway project under the *Inland Development Plan* were described in the August and September 2019 CAR (EnCo 2019c, 2019d).

The wetland buffers for Wetland A would be impacted due to the proposed alignment of I Street NE as described in the 2004 Final EIS. The buffer areas that would be impacted are currently a gravel road. The remaining on-site portion is a 50-foot buffer for Wetland A. In 2005, a 35-foot buffer for the north portion of this wetland was planted with native shrubs and trees (J.S. Jones and Associates, Inc. 2010).

Wetland C also has an enhanced 35-foot buffer that was planted in 2005 (J.S. Jones and Associates, Inc. 2010).

Wetland D would likely have a minimum 50-foot buffer as required by the city code.

Because delineations had not occurred at the time of the 2004 Final EIS, there were no estimates of buffer impacts. In the 2011 EIS Addendum, total buffer impacts were estimated at 0.22 acre. Phase 1 of the *Inland Development Plan* would affect 0.14 acre of buffer, not including impacts associated with constructing I Street NE.

All development would comply with the City's critical areas regulations, which were adopted after the 2004 Final EIS and are expected to adequately protect wetland resources and avoid significant impacts.

June 12, 2019 Site Visit Update

A site visit was conducted between WDFW and EnCo on June 12, 2019. EnCo's Combined Floodplain Habitat Impact Assessment with Critical Areas Report (EnCo 2019c) documents the June 12, 2019 meeting with WDFW staff and the results of the discussion. EnCo's report notes the following:

"In order to determine the status of the project site and nearby watercourses and manmade conveyance ditches, a site visit was initiated by EnCo (Jonathan Kemp)

with Brent Parrish (Inland Construction), Mr. Larry Fisher, Area Habitat Biologist (WDFW), Jeff Dixon and Ryan Vondrak (City of Auburn), and Ben Dort (BCRA). This event was used to determine if the current on-line WDFW Fish Passage Map and WDFW SalmonScape Fish Distribution Map accurately represents the current status of these two watercourses. Based on this event it was confirmed that these two WDFW maps do not accurately represent the current status of these two watercourses. It was confirmed by WDFW and concurred by EnCo that former Watercourse H and former Watercourse I are now classified as stormwater conveyance ditches and are no longer considered watercourses.

EnCo and WDFW representatives concur that the extent of the former location of Watercourse H and Watercourse I (south of South 277th Street) was mitigated for as a newly constructed fish-bearing watercourse that is located contiguous to the north, east, south, and west of a constructed stormwater detention pond that is located a few hundred feet east of the planned alignment of I Street NE. These two watercourses were officially relocated to the east under an agency-approved watercourse mitigation plan (As-Built Report – South 277th Street Corridor Capacity and Non-Motorized Trail Improvements – Parametrix May 2018) that was completed in 2017.

WDFW also confirmed and EnCo concurred that Watercourse K and Watercourse L (seasonal watercourses) support Coho salmon, thereby classifying these two watercourses as fish-bearing. This assessment changes the current status of Watercourse L from a non-fish bearing watercourse to a fish-bearing watercourse. The baseline condition of Watercourse L was much degraded in comparison to Watercourse K as evidenced by the thick growth of reed canary grass within the substrate (bed) of the eastern segment of Watercourse L. WDFW confirmed that threatened and endangered fish were not found or expected in Watercourse K and Watercourse L, thereby rendering that these two watercourses are not a federal listed critical habitat for fish.” (sic)

Fish Habitat

As described in the 2004 Final EIS, erosion of exposed soils during land clearing, grubbing, and grading could affect fish habitat. Compliance with City requirements for a floodplain permit and associated City of Auburn requirements would provide adequate protection for endangered fish species.

Stream Habitat

Watercourse K, which WDFW determined as fish-bearing, is located almost entirely outside of the project area, except at the most northern end. The southern 460 linear feet would be impacted by the extension of I Street NE. Permanent impacts to Watercourse K are anticipated to place an additional 250 linear feet of the watercourse into a culvert. Approximately 222 linear feet of Watercourse K near the southern property boundary is culverted. To accommodate the preferred alignment of I Street NE, a total of 472 linear feet of Watercourse K will be placed within a culvert at the south end of the

site, requiring 250 linear feet of new culvert. The proposed culvert will be slightly larger than the current culvert with fish-friendly substrate added within the new section of culvert.

Due to the right-of-way location of I Street NE, this southern portion of Watercourse K would require displacement and mitigation in accordance with applicable agency standards. Proposed stream mitigation includes improving and enhancing the remaining portions of Watercourse K. The planned mitigation would require permission from the Port of Seattle and negotiation to acquire temporary construction easements.

Temporary impacts from grading are anticipated to occur within Watercourse L (425 linear feet) and Watercourse N (520 linear feet). Grading would be required as part of stream restoration efforts and in conjunction of expansion of Watercourse N to address flood conveyance issues (EnCo, 2019d).

As noted in the 2004 Final EIS, the extension of 49th Street NE through the Stein and Port of Seattle properties would impact Watercourse L. The EnCo report (EnCo 2019c) indicated that WDFW determined this is a fish-bearing stream. In 2011, the extension of 49th Street NE east of I Street through the Stein and Port properties was removed from the proposed project development.

Mitigation

The 2004 Final EIS provided a list of measures to mitigate impacts both during construction and operation of the planning area. That list was updated with the 2011 EIS Addendum. Mitigation required by law was described in the 2011 EIS Addendum and is not repeated here.

Phase 1 is expected to require a federal Clean Water Act (CWA) Section 404 permit due to fill placed. The June 12, 2019 Site Visit Update section describes proposed mitigation measures to offset impacts on watercourses. Future phases could trigger this type of permit.

A Hydraulic Project Approval (HPA) will be required for construction of roadways where fish-bearing waters are affected. The June 12, 2019 Site Visit Update section describes proposed mitigation measures to offset impacts on watercourses.

As described in the *Water Resources* section of the 2004 Final EIS, impacts on water quality are regulated by the City of Auburn *Supplemental Manual to the Ecology Stormwater Management Manual for Western Washington* (City of Auburn 2018).

The proposed Auburn Gateway Design Guidelines indicate that native plantings would be used in wetland buffer areas and around detention facilities (BCRA 2003). No change to these guidelines is proposed and they will remain in effect.

Changes proposed to the mitigation measures for impacts on plants and animals as identified in the 2011 EIS Addendum are listed in the notes from the June 12, 2019 Site Visit, as described below.

A more detailed discussion on the proposed mitigation plan will be provided in a report currently in preparation by Talasaea Consultants and available in October 2019. The proposed mitigation plan will contain elements that will restore or enhance portions of Watercourse L, Watercourse K, Watercourse N, Wetland A, Wetland A (Port), and Wetland D and portions of their buffers. All elements of the mitigation plan will be consistent with the requirements outlined in ACC 16.10.090(E) for both wetlands and streams. Mitigation or enhancements proposed off site will require coordination and legal agreement with adjacent land owners, including the Port of Seattle. Should mitigation proposed not be acceptable to all parties, then alternative mitigation options will be developed to fully meet code requirements for either on or off-site mitigation.

June 12, 2019 Site Visit Update

EnCo's *Combined Floodplain Habitat Impact Assessment with Critical Areas Report* documents the June 12, 2019 meeting with WDFW staff and the results of the discussion. EnCo's (2019c) report notes the following:

“While in the field and after additional correspondence to clarify a proposed approach to re-align the southern segment of Watercourse K, an un-official agreement was made with WDFW that would allow compensatory mitigation for the permanent filling of about 460 linear feet of the southern extent of Watercourse K. This proposed action would provide a more feasible connection from 45th Street NE to the future alignment of I Street NE (after Phase 1). EnCo and WDFW representatives concur that this mitigation approach for Watercourse K is reasonable.

A discussion was held and it was agreed to compensate for the permanent loss of about 460 feet of the southern extent of Watercourse K via a mitigation plan that would be drafted and would include enhancing about 1,400 feet of Watercourse K, north of the area to be permanently impacted by I Street NE. This would be accomplished through mitigation by removing opportunistic aggressive species in and around this watercourse, to be replaced by implementing a native plant species enhancement program in concert with designing and installing habitat features (i.e. down wood, perches, snags, rock piles, and rip rap) along with re-configuring the watercourse with amphibian / fish beneficial sinuosity, a gently sloped prism, and added vegetation to provide shading and over hanging shrubs. Portions of the regulated 75-foot wide, fish-bearing watercourse buffer would be enhanced along the entire length of Watercourse K. EnCo and WDFW representatives concur that this mitigation approach for Watercourse K is reasonable. It is understood that this mitigation effort would also need the approval / support by all agencies with permitting authority such as the Muckleshoot Tribe, ECOLOGY, and the ACOE.

Watercourse L is currently mapped by several consultants as a seasonal, non-fish bearing watercourse with a regulated 25-foot-wide buffer. EnCo and WDFW concurred, while in the field, that Watercourse L is fish-bearing with very limited habitat function to support fish use. This would require establishing a regulated

75-foot-wide buffer. The entire length of Watercourse L would not be negatively impacted by the proposed project action. It was proposed to reduce the watercourse buffer from the regulated 75 feet.... This buffer reduction would allow for a more feasible alignment of I Street NE and its roundabout at the intersection of 49th Street NE. This would be accomplished through mitigation by removing opportunistic aggressive species in and around this watercourse, to be replaced by implementing a native plant species enhancement program in concert with designing and installing habitat features (i.e. down wood, perches, snags, rock piles, and rip rap) along with re-configuring the watercourse with amphibian / fish-beneficial sinuosity, a gently sloped prism, and added vegetation to provide shading and over-hanging shrubs. The reduced ...watercourse buffer would be enhanced along the entire length of Watercourse L. EnCo and WDFW representatives concur that this mitigation approach for Watercourse L is reasonable. It is understood that this mitigation effort would also need the approval / support by all agencies with permitting authority such as the Muckleshoot Tribe, ECOLOGY, and the ACOE.”

After consideration of City comments, Inland Construction has revised the previous buffer reduction proposal for the project. Stream buffers for Watercourses K, L, N, O and P are proposed to be reduced to 65 percent of the standard buffer as allowed administratively by code (ACC 16.10.090). Therefore, the 75-foot buffer for these Class II (fish-bearing) streams would be reduced to no less than 48.75 feet with enhancement. Watercourse M is a mitigated feature with buffers ranging from 25 to 48.75 feet. The buffer reduction proposal is summarized in the September 27, 2019 revised HIA/CAR (EnCo, 2019d).

Significant Unavoidable Adverse Impacts

As described in the 2004 Final EIS, the 2011 EIS Addendum, and this 2019 EIS Addendum, with mitigation in accordance with City regulations and those of other agencies with jurisdiction currently in development and required during project permitting, no significant impacts on watercourse and wetland functions are expected. All reductions to buffers are allowed administratively by code and will required enhancement within the remaining buffer area.

To avoid impacts on ESA-listed species and habitats, the development must meet City floodplain development permit standards as well as FEMA and NMFS requirements for providing adequate protection to endangered species.

TRANSPORTATION

Affected Environment

In the 2004 Final EIS, development-related traffic impacts were evaluated under year 2020 traffic conditions. The 2011 EIS Addendum considered a similar timeframe, but with updated baseline information. Inland now projects Phase 1 to be completed in year 2022, and the commercial phase(s) to be completed in year 2024. Therefore, the traffic forecasts without the development were revised to reflect actual traffic patterns in 2019, along with recent historical growth trends.

Information on existing conditions is provided below. The TIA (Transpo 2019) also provides information on existing conditions in the study area for 2019. Characteristics are provided for the roadway network, non-motorized facilities, transit service, existing traffic volumes, traffic operations, and traffic safety.

Roadway Network - Characteristics of the existing street system in the vicinity of the proposed project are shown in Table 2 below.

TABLE 2. SUMMARY OF EXISTING STREET SYSTEM IN THE STUDY AREA

Roadway	Arterial Classification ¹	Posted Speed Limit (mph)	Number of Travel Lanes	Parking	Sidewalks	Bicycle Facilities
Auburn Way N	Principal Arterial	35	5	No	Yes	No
S 277 th Street	Principal Arterial	35	4–6	No	Partial	Partial
45 th Street NE	Residential Collector	25	2	Yes	Yes	No
49 th Street NE	Non-Residential Collector	25	2	Yes	No	No
D Street NE	Non-Residential Collector/Local Street	25	2	Yes	No	No
I Street NE	Minor Arterial	35	2–3	Partial	Partial	Partial

Based on the 2015 City of Auburn Comprehensive Transportation Plan

Non-Motorized Facilities - In addition to the facilities provided on the roadways, there is a non-motorized trail on the south side of S 277th Street between Auburn Way and L Street NE. This trail connects to other non-motorized facilities on either side that extend to the Interurban Trail to the west and to the S 277th Corridor Recreational Trail to the east. About a quarter mile south of the project, off I Street NE, a trail connects to Brannan Park and Auburn Golf Course.

Transit Service - King County Metro provides transit service in the project study area. Route 180 operates along Auburn Way N from approximately 3:30 AM to 12:00 AM on both weekdays and weekends with a weekday PM peak hour headway of 30 minutes. The project site is served by three transit stops, one each near the intersections with 45th Street NE, 49th Street NE, and S 277th Street. Route 180 provides service to the north up

through Kent and to the Burien Transit Center, with a stop at SeaTac airport, and to the south toward southeast Auburn and White River Junction.

Traffic Volumes - This transportation analysis focuses on the weekday PM peak hour when traffic conditions would be the highest. Existing turning movement counts in the study area were counted in February 2019. Existing weekday PM peak hour traffic volumes are summarized in the TIA and were used to characterize existing traffic conditions.

Changes that have occurred in or near the study area since the 2004 Final EIS was issued include:

1. The Trail Run residential subdivision and PUD (referred to as River Sands in the 2004 Final EIS) east of the project area, has been completed, including opening of L Street NE to provide access to that site onto S 277th Street.

In the 2004 Final EIS, access to Trail Run was expected to be via a roadway that would have right-in/right-out only access to S 277th Street, and that 49th Street NE would be extended east of I Street NE to connect and serve the Trail Run development.

On an interim basis, a temporary signal was installed at L Street NE and S 277th Street and monies were collected by the City for the future extension of 49th Street NE east of I Street NE and for I Street NE to serve the Trail Run development and to facilitate the relocation of the temporary signal to the future intersection of I Street NE and S 277th Street. (The 2011 EIS Addendum included an assessment of conditions with and without the 49th Street NE extension east of I Street NE to Trail Run.)

2. S 277th Street was widened from three lanes to five lanes from Auburn Way N east to L Street NE. A multi-use trail was also constructed on the south side of S 277th Street.
3. At S 277th Street/Auburn Way N, lanes have been added:
 - Eastbound: one through lane and a right-turn lane.
 - Westbound: one through lane and a right-turn lane.
 - Northbound: a northbound to eastbound right-turn lane.

Methodology to Assess Project Impacts

The analysis below is summarized from the *Traffic Impact Analysis - Copper Gate* report prepared by Transpo Group, July 2019 (2019 TIA). The 2019 TIA is hereby incorporated into this analysis. In its approach, the traffic analysis focuses on the *Inland Development Plan*, with specific reference to Copper Gate, the name given to the South Phase (multi-family residential) of *Inland Development Plan*, also referred as Year 2022 South Phase Only (Phase 1) to evaluate impacts and mitigation associated with any development. The

2019 TIA also evaluates future commercial development for Phase 2 under two scenarios: Reduced Build and Full Build.

The 2019 TIA summarizes the following without-and with-project scenarios, as requested by the City:

- Year 2022 Without-Project
- Year 2022 With-Project – South Phase (Phase 1) Only, without I Street NE
- Year 2022 With-Project – South Phase (Phase 1) Only, with I Street NE
- Year 2024 Without-Project
- Year 2024 South (Phase 1) plus Reduced North Phase (**Phase 2 – Reduced Build**)
- Year 2024 South (Phase 1) plus Full Buildout of the North Phase (**Phase 2 -Full Build**)

Note that although the extension of I Street NE is proposed as part of Phase 1 of the project, a scenario that excludes this improvement has been identified. This scenario reflects the future conditions assuming a delay in permitting and construction of the I Street NE improvements.

More information on each scenario is included in the 2019 TIA.

The amount of development under the *Inland Development Plan* is most similar to Alternative 3 evaluated in the 2004 Final EIS (the Residential/Retail Option). Because the trip generation of Alternative 3 was not re-analyzed for the 2011 EIS Addendum, the analysis in this 2019 EIS Addendum compares the *Inland Development Plan* with the preferred alternative evaluated in the 2004 EIS.

Planned Transportation Improvements (Future Without-Project Conditions)

This section describes the future traffic conditions during the PM peak hour without the addition of project traffic. It focuses on 2022 conditions and describes planned transportation improvements, traffic volume forecasts, and traffic operations. A review of jurisdiction documents, including the City of Auburn's 2019-2024 Transportation Improvement Program (TIP) (City of Auburn 2018), the City's Comprehensive Transportation Plan (City of Auburn 2015), and King County Metro's Long Range Plan (King County Metro 2017), was conducted to determine potential improvements to facilities in the study area. Each is broken down into the sections below.

Roadway - The following projects, from the City's TIP, have been identified in the study area and would affect capacity or traffic patterns:

- I Street NE corridor (45th Street NE to S 277th Street) – TIP# R-2
- 49th Street NE extension (Auburn Way N to I Street NE) – TIP# R-8

The projects listed above have funding identified in 2022 but are not assumed in 2022 without-project conditions as they are associated with the development of the proposed project. Both projects are assumed under with-project conditions for each phase. Additionally, a signal was assumed at the future I Street NE/S 277th Street intersection as part of the corridor extension. Because these have been identified as conditions of the proposed development, the completion of these projects has not been assumed in the without-project conditions.

One additional project not in the City's TIP but associated with future development in the study area was assumed under 2022 without-project conditions. The west leg at the intersection of Auburn Way N/NE 49th Street will be widened to include a dedicated right-turn lane and a shared through-left turn lane.

Non-motorized - The City's Transportation Plan shows the future priority sidewalk corridors and future bicycle facilities in maps 3-1 and 3-2. No priority sidewalk corridors are shown in the project vicinity. A future trail facility is shown on S 277th Street, which already exists, and a future bicycle facility is shown on the planned I Street NE extension connecting the existing facilities near 40th Street NE and S 277th Street.

Transit - There are no planned transit improvements that would occur by 2024 in the study area. Service changes as part of the regular service updates could occur throughout the year. The King County Metro Long Range Plan does identify RapidRide service along Auburn Way; however, it is not anticipated until the year 2023.

Summary of Project Impacts

The detailed analysis for traffic impacts is provided in the 2019 TIA. Project impacts are summarized below.

- Phase 1 of the project is expected to generate 208 new PM peak hour project trips (127 inbound and 81 outbound). The Phase 2 Reduced Build scenario is expected to generate 540 new PM peak hour project trips (278 inbound and 262 outbound). The Phase 2 Full Build scenario is expected to generate 654 new PM peak hour project trips (291 inbound and 363 outbound).
- The I Street NE corridor project (including a signal at S 277th Street/I Street NE) and the 49th Street NE extension project would be constructed with the south phase of the development and thus was assumed as part of the with-project analysis.
- For the Phase 1 development, all intersections are expected to operate at the same or better level of service (LOS) than under 2022 without-project conditions.
- A signal warrant analysis was conducted at the intersection of Auburn Way N/ 49th Street NE. The eight-hour, four-hour, and peak hour vehicular volume warrants were met under 2022 without-project conditions. A signal is recommended at this location.

- A signal warrant analysis was conducted at the intersection of I Street NE/S 277th Street. The 8-hour, 4-hour, and peak hour vehicular volume warrants were met under 2022 with-project conditions, which is the first scenario where I Street NE has the potential to be completed. A signal is recommended at this location.
- The signalization of the Auburn Way N/49th Street NE intersection is recommended as mitigation with Phase 1 of the project to bring the intersection operations above the LOS standard.
- For the Reduced Build Phase 2 development, all intersections are expected to operate at or above the LOS standard.
- With the Full Build Phase 2 development scenario, the intersection of Auburn Way N/42nd Street NE is expected to operate at LOS F. While the intersection increases in delay between 2024 Baseline and Full Build, going from LOS E to LOS F, it operates at the same level as projected for the 2022 baseline conditions that don't reflect the I-street extension. This amount is negligible and could be reduced with a slight adjustment in signal timing.
- Due to the shifts in traffic from the completion of the I Street NE corridor and the closure of the Auburn Way N/D Street NE intersection, no other improvements are recommended as part of either scenario of Phase 2.

Mitigation

The 2019 TIA presents an assessment of the mitigation needs of the *Inland Development Plan* and compares them with mitigation proposed in the Development Agreement as proposed to be amended for the Auburn Gateway project. Traffic-related mitigation recommended for the project is substantially the same as that described in the 2004 Final EIS, with some refinements and minor changes.

Tables 3 and 4 compare the mitigation requirements, assuming that the development of Phase 1 (South Phase) is constructed first as is currently proposed. Table 3 identifies the requirements to be met prior to issuance of construction permits, and Table 4 identifies requirements to be met prior to issuance of occupancy permits.

TABLE 3. IMPROVEMENTS REQUIRED PRIOR TO ISSUANCE OF CONSTRUCTION PERMITS BY PHASE AS OUTLINED IN DEVELOPMENT AGREEMENT (UNDER REVIEW BY CITY OF AUBURN)

Improvement	Either Phase First	North Phase First	South Phase First	Assessment
Master Plan for Peds/Non-Motorized Circulation Plan	X			Plan completed and submitted to the City as a separate document.
Master Transit Plan	X			Plan completed and submitted to the City as a separate document.
Master Access and On-site Vehicular Circulation Plan	X			Plan completed and submitted to the City as a separate document.
Master Motorized Public Improvement Plan	X			Plan completed and submitted to the City as a separate document.
Widen S 277 th St to 5 lanes (L St NE to Auburn Wy N)		X		This project has already been completed by the city as a capital project.
Traffic Signal at S 277 th St/I St NE		X		This was assumed to be completed in Phase 1 to support future Phase 2 commercial development scenarios.
EBR turn pocket at S 277 th St/D St NE		X	X	Intersection operations do not indicate that an EB right-turn pocket is necessary. Therefore, no action is required of the applicant at this location.
WB right-turn pocket at Auburn Way N/S 277 th St		X		Project has already been completed by the city as a capital project.
Complete I St NE (49 th St NE to S 277 th St)		X	X	This was assumed to be completed in Phase 1 to support future Phase 2 commercial development scenarios.
Roundabout at I St NE/ 49 th St NE		X	X	Analysis assumed the construction of a single lane roundabout at the intersection. The intersection, with 3-lanes constructed on I Street NE, was forecast to operate at LOS A with the north phase Full Build scenario (see Attachment N in the 2019 TIA).
Traffic Signal at Auburn Way N/ 49 th St NE		X	X	Project may either install signalization or contribute either proportionate share towards installation of traffic signal pending discussions with City.
Traffic Signal at Auburn Way N/ 45 th St NE		X	X	Intersection operations do not indicate a signal is necessary as the westbound approach is projected to operate at LOS C during the weekday PM peak hour.
Dedicate and construct cul-de-sac on D St NE at Auburn Way N		X	X	Included in the <i>Inland Development Plan</i> and reflected in the analysis.
Complete I St NE (45 th St NE to 49 th St NE)			X	This was assumed to be completed in Phase 1 to support future Phase 2 commercial development scenarios.
Traffic Signal at I St NE/45 th St NE			X	Intersection operations do not indicate a signal is necessary and as such installation is not recommended.

As shown in Table 4, many improvements previously outlined in the Development Agreement were already completed, assumed as part of Phase 1, or became unnecessary by the results of the analysis.

Traffic volume forecasts developed for I Street NE between 45th Street NE and S 277th Street suggest that I Street NE could be constructed with three lanes instead of five, as described in the 2004 Final EIS and the 2011 EIS Addendum.

Depending on the scope of the north phase, auxiliary lanes could be needed, but this could be determined when the north phase is permitted and the extension of I Street NE between 49th Street NE and S 277th Street is finalized.

TABLE 4. IMPROVEMENTS REQUIRED PRIOR TO OCCUPANCY OUTLINED IN DEVELOPMENT AGREEMENT AND PRESENTED BY PHASE

Improvement	Either Phase First	North Phase First	South Phase First	Assessment
Built according to approved transportation construction plans.	X			Applicant will comply with the requirement as each phase of the project is approved.
City accepts ownership of all public transportation facilities	X			Applicant will comply with the requirement as each phase of the project is approved.
Conceptual design and construction estimate, & paying proportional share for EB right-turn lane at Auburn Way N/37 th St NE	X			Due to decreases between the 2004 Final EIS and the current proposed development, these intersections were not included in the current analysis.
Conceptual design and construction estimate, & paying proportional share for SBT lane at Harvey Rd NE/M St NE/8 th St NE	X			
Conceptual design and construction estimate, & paying proportional share for new traffic signal & widening at SE 304 th St/ 112 th Ave SE	X			
Mitigation agreement effort w/ Kent & King County	X			
NB right-turn lane at Central Ave/ S 259 th St	X			
Widening at S 277 th St/55 th St NE	X			
Reconfigure signal phasing at S 272 nd St/Military Rd	X			
Signal warrant analysis at Auburn Way N/45 th St NE and I St NE/ 45 th St NE	X			Intersection operations do not indicate that a signal is necessary at either intersection.
Transportation Demand Management program	X			The need for the TDMP would be removed as the north phase of the development proceeds through the approval process.

Significant Unavoidable Adverse Impacts

The revised road layout and the addition of Auburn Gateway under the *Inland Development Plan* would not result in significant unavoidable adverse impacts. Traffic impacts are expected to be generally equivalent to or less than what was described in the 2004 Final EIS and 2011 EIS Addendum.

As described in the 2004 Final EIS, all of the development alternatives would result in additional traffic at several intersections that would operate at LOS F in the future. The 2004 Final EIS and the 2011 EIS Addendum did not identify mitigation for three intersections where the project would cause an increase in delay: S 277th Street/West Valley Highway, Central Avenue/Willis Street, and 116th Avenue SE/Kent-Kangley Road. These intersections would operate at LOS F regardless of whether the proposed project is developed, and the additional delays were not considered significant.

For the 2019 EIS Addendum, the following traffic conditions are expected:

- The proposed project would be developed in two phases. Phase 1 (South Phase) would include 500 multi-family residential units. Phase 2 (North Phase) could be developed under two possible scenarios: A Reduced Build and a Full Build. The Reduced Build would include 150,000 square feet of commercial retail. The Full Build would add an additional 18,000 square feet of commercial retail (for a total of 168,000 square feet) and 111,000 square feet of office use.
- For the Phase 1 Development, all intersections are expected to operate at the same or better LOS than under 2022 without-project conditions.
- A signal warrant analysis was conducted at the intersection of Auburn Way N/49th Street NE. The 8-hour, 4-hour, and peak hour vehicular volume warrants were met under 2022 without-project conditions. A signal is recommended at this location.
- A signal warrant analysis was conducted at the intersection of I Street NE/S 277th Street. The 8-hour, 4-hour, and peak hour vehicular volume warrants were met under 2022 with-project conditions, which is the first scenario where I Street NE has the potential to be completed. A signal is recommended at this location.
- The signalization of the Auburn Way N/49th Street NE intersection is recommended as mitigation with Phase 1 of the project to bring the intersection operations above the LOS standard.
- For the Reduced Build Phase 2 development, all intersections are expected to operate at or above the LOS standard.
- With the Full Build Phase 2 development scenario, the intersection of Auburn Way N/42nd Street NE is expected to operate at LOS F. While the intersection increases in delay between 2024 Baseline and Full Build, going from LOS E to LOS F, it operates at the same level as projected for the 2022 baseline conditions that do not reflect the I-street extension. The increase in delay due to the project

would be negligible and could be reduced with a slight adjustment in signal timing.

- Due to the shifts in traffic from the completion of the I Street NE corridor and the closure of the Auburn Way N/D Street NE intersection, no other improvements are recommended as part of either scenario of Phase 2.

ENVIRONMENTAL ELEMENTS NOT ANALYZED

The following briefly describes the reasons that additional analysis was not performed for other elements of the environment analyzed in the 2004 Final EIS.

Geology/Soils

No change is expected for impacts related to geology and soils due to the development of Auburn Gateway under the *Inland Development Plan*. The project acreage remains approximately the same, grading volumes are expected to be similar to or less than those evaluated in the 2004 Final EIS, and the project will be required to meet future changes in FEMA floodplains.

Air Quality

No change is expected for impacts related to air quality due to the development of the Auburn Gateway project under the *Inland Development Plan*. The analysis in the 2004 Final EIS estimated maximum peak hour carbon monoxide concentrations by examining intersections that would be most affected by the project, and is still relevant. The development of Auburn Gateway under the *Inland Development Plan* would not result in an increase in project-related trips because a smaller amount of retail and office square footage is proposed for the project, compared to that evaluated in the 2004 Final EIS. There would be minor changes in traffic circulation related to D Street NE and 49th Street NE. The change in traffic generation is expected to reduce the project-related volume of traffic at S 277th Street and Auburn Way N during the PM peak hour under Alternative 2 of the 2004 Final EIS, an intersection studied in the 2004 Final EIS for carbon monoxide concentrations. Lower traffic volumes would result in less delay at the Auburn Way N and S 277th Street intersection, which in turn would result in less carbon monoxide concentrations during the PM peak hour than shown in the 2004 Final EIS under Alternative 2.

Noise

No increase is expected for impacts related to noise due to the development of the Auburn Gateway project under the *Inland Development Plan* as compared to that evaluated in the 2004 Final EIS. Temporary construction noise would likely be of shorter duration due to the lower overall density of development. Similarly, operational noise from project-related traffic is expected to be proportionally lower than that described in the 2004 Final EIS. Of the four noise study focus areas studied in the 2004 Final EIS, only residences along D Street NE would find project-related traffic to have noticeably increased noise levels compared to existing noise levels. The proposed change in traffic circulation would not increase traffic volume along D Street NE any further than what

was evaluated in the 2004 Final EIS. To ensure noise from the operations and land uses does not result in noise impacts, a noise mitigation master plan is required to be provided and approved prior to vertical construction authorization by the development agreement.

Hazardous Materials

No change is expected for impacts related to hazardous materials due to the development of the Auburn Gateway project under the *Inland Development Plan*. A Phase I Site Assessment was conducted by Landau Associates in 2014 to assess and document environmental conditions on a property acquired by RPG after the 2011 EIS Addendum (Landau Associates 2014a). The report indicates that the site had underground storage tanks that were removed in 1991. The analytical results for the soil samples taken after tank removal indicated the presence of benzene, xylene, and gasoline-range total petroleum hydrocarbons (TPH-G) at concentrations greater than the current Ecology Model Toxics Control Act (MTCA) Method A soil cleanup levels based on unrestricted land uses. Landau conducted groundwater and soil sampling in 2014 and concluded that soil and groundwater were below cleanup levels and requested a No Further Action determination from Ecology (Landau Associates 2014b). The No Further Action determination from Ecology is still pending. There is a soil remediation plan on parcel # 936060-0269 under City grading permit GRA19- 0017, which may become part of the project in the future and is included for that purpose. Further environmental review may be required as part of the grading permit process if Inland moves forward with purchase of the property.

Cultural and Historic Resources

No change is expected for impacts related to cultural and historic resources due to the development of the Auburn Gateway project under the *Inland Development Plan*. The 2004 Final EIS evaluated the entire planning area for the potential of discovering cultural and historic resources. The 2004 Final EIS indicated that there is a high probability of hunter-fisher-gatherer, ethnographic period and historic Indian, and historic period archaeological resources within the planning area. The probability estimates for the Auburn Gateway project area and the planning area were based on the availability of the Duwamish River – Green River floodplain for hunter-fisher-gatherer use, soils data that indicate old channels and low terrace deposits, prehistoric and historic period land use in similar environmental settings, and documented ethnographic and historic period land use in these two areas.

Land Use

No change is expected for impacts related to land uses due to the development of the Auburn Gateway project under the *Inland Development Plan*. The same Comprehensive Plan and C4, Mixed Use Commercial zoning designations would apply. The Auburn Gateway project would be developed with retail, office, and/or multi-family residential units, parking lots, and stormwater facilities, similar to the alternatives described in the 2004 Final EIS, with minor changes that would not introduce any new potential for incompatible uses. The same amount of multi-family residential development is proposed, but it would be separated from the commercial development on the site, rather than being vertically integrated within the same building. A smaller amount of

commercial, retail, and/or office use would be developed compared to that evaluated in the 2004 Final EIS. The private residences south of the Auburn Gateway project site would be less affected under the *Inland Development Plan* because the proposed development would be residential rather than commercial mixed-use, as evaluated in the 2004 Final EIS.

Recreation

No change is expected for impacts related to recreation due to the development of the Auburn Gateway project under the *Inland Development Plan*. The development of the *Inland Development Plan* would tie into the trail that has been developed along the south side of S 277th Street. Internal trail connections are proposed as part of the Auburn Gateway project and identified in the proposed Auburn Gateway Design Guidelines. The recreational demand as a result of retail, office, and/or residential development would likely be lower than what was evaluated in the 2004 Final EIS since the *Inland Development Plan* proposes a lower amount of total development than evaluated in the 2004 Final EIS.

Aesthetics

No change is expected for impacts related to aesthetics due to the development of the Auburn Gateway project under the *Inland Development Plan* because the Auburn Gateway Design Guidelines apply to the similar mix of retail, office, residential or mixed-use structures, surface parking lots, and stormwater facilities.

The amount of fill required to ensure that buildings are above the flood elevation would not substantially change the appearance of the project. In addition, the Auburn Gateway Design Guidelines proposed in the 2004 Final EIS, together with the landscaping and other measures required by the Auburn City Code, include measures to mitigate the aesthetic impacts of the project that would be effective in addressing this additional impact.

Utilities and Public Services

No change is expected for impacts related to utilities (except storm drainage systems) and public services due to the development of the Auburn Gateway project under the *Inland Development Plan*. The residential development would be similar to alternatives evaluated in the 2004 Final EIS, and the retail and office component would be lower. Therefore, the estimate for domestic water consumption and wastewater production associated with development in the 2004 Final EIS likely overstates demand that would be expected under the *Inland Development Plan*. To ensure orderly and efficient extensions of public utilities consistent with the proposed phasing and City regulations, a master plan will be provided prior to construction authorization.

The fiscal impact analysis in the 2004 Final EIS associated with fire, emergency medical, and police service is also still applicable.

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