UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

April 29, 2011

Erika Conkling, Senior Planner
City of Renton
Department of Community and Economic Development
1055 S. Grady Way
Renton, Washington 98057

Re: U.S. Environmental Protection Agency (EPA) Region 10 Comments on the Sunset Area Community Planned Action (Planned Action) Final Environmental Impact Statement (FEIS) (EPA Project Number: 10-051-HUD)

Dear Ms. Conkling:

The EPA has reviewed the Sunset Area Community Planned Action FEIS and we are submitting comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

Our January 31, 2011 DEIS comments focused on "Sustainability Features and the Environmentally Preferred Alternative" and "Monitoring". With regard to sustainability features and the environmentally preferred alternative, we suggested that the environmentally preferable alternative under NEPA[1] – for this Planned Action - would likely be the alternative which incorporates the maximum extent of implementable features consistent with quality urban design, sustainable urban redevelopment, and livability principles.[2] EPA recommended the FEIS include an alternative which addresses 37 specific design elements and mitigation measures (e.g. "require future developers to pursue a specific energy conservation approach/ standard(s)").

We are very pleased to note that the FEIS's new preferred alternative addresses all of the design elements and mitigation measures recommended by EPA and is, therefore, fully responsive to our DEIS comments on sustainability features and the environmentally preferred alternative. The following mitigation measures from Planned Action Ordinance Exhibit B: Sunset Area Community Planned Action EIS Mitigation Measures (FEIS, Appendix E) are especially responsive to our recommendations:

- fugitive dust Best Management Practices (BMPs);
- indoor air quality and construction diesel emissions controls considerations;
- Greenhouse Gas Reduction Measures;
- reductions of existing pollution-generating impervious surfaces and development of a drainage master plan;

[1] http://ceq.hss.doe.gov/nepa/regs/40/1-10.HTM#6
[2] http://www.epa.gov/smartgrowth/partnership/#livabilityprinciples

- consideration of Northwest ENERGY STAR Homes strategies and Seattle Energy Code compliance for non-residential buildings;
- hazardous materials training for all grading and excavation crews;
- provide new opportunities for public open space and emphasize transitions in density;
- helping affected businesses maintain their customer base during construction;
- establishing a local preference for rental assistance;
- added pedestrian, bicycle or multi-use trails at Edmonds Ave NE and NE 12th Street;
- parks and recreation impact fees, joint-use agreement with the Renton School District, and, conversion of public and private property to open space based on availability and DEIS Figure 4.15-2.

To increase the likelihood of full implementation of the proposed mitigation measures we recommended that the Planned Action Ordinance serve as a stand-alone document, incorporate specific targets and facilitate adaptive management. Exhibit B's 17 subject areas[3], overall framework[4], as well as the mitigation measures themselves (see above), are responsive to our 'stand-alone document' and 'incorporate specific targets' recommendations.

Our FEIS review generated questions regarding the EIS's and Planned Action Ordinance's ability to guide the measurement of sustainability, a key aspect of facilitating adaptive management. We submitted our questions via email to the City of Renton on April 11, 2011 and appreciate the city consultant's April 13, 2011 written response. We believe the proposals - contained in Attachment 1-1 of the April 13, 2011 response - to add sub-parts C[5], D[6], and, E[7] to Section 4 of the Planned Action Ordinance would help guide the measurement of sustainability in the Sunset Area and would facilitate meaningful adaptive management. Incorporation of these proposed, or similar, sub-parts would be fully responsive to our overall scoping, DEIS and FEIS recommendations that the EIS and Planned Action Ordinance strive to measure performance of livability efforts and facilitate adaptive management.

Altogether, we believe the City of Renton has developed a Planned Action that should achieve the FEIS's predicted long-term benefits - neighborhood revitalization, increased opportunities for healthy active lifestyles and local employment, net stormwater treatment improvements, increased aesthetic appeal, and, reductions in regional energy use and GHG emissions. We support full implementation of this Planned Action and look forward learning from the City of Renton's efforts to redevelop the Sunset Area into a healthy, livable, affordable, viable and green community.

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[3] earth, air quality, water resources, plants and animals, energy, noise, environmental health, land use, socioeconomics, housing, environmental justice, aesthetics, historic/cultural, transportation, parks and recreation, public services, and, utilities.

[4] summary of significant environmental impacts, summary of unavoidable adverse impacts, mitigation measures, and, list of City policies/ regulations on which mitigation measures are based

[5] "...evaluate overall sustainability of the Sunset Area Planned Action..consistent with...review of Goals and Objectives and LEED-ND qualitative evaluation, or an equivalent approach"

[6] "...conduct a Greenroads evaluation or its equivalent at the time the NE Sunset Boulevard design is at 30% design level and 60% design level"

[7] review consistency with FEIS predictions for: (1) Vehicle Miles Travelled, (2) resulting greenhouse gas emissions, and, (3) changes in effective impervious area

Thank you for this opportunity to comment and if you have any questions you may contact me at (206) 553-1601, or you may contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at peterson.erik@epa.gov.

Sincerely,

Christine B. Reichgott

Christine B. Reichgott, Unit Manager
Environmental Review and Sediment Management Unit