

Record of Decision Sunset Area Community Planned Action EIS

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Introduction

The Council on Environmental Quality (CEQ) directs the implementation of the National Environmental Policy Act (NEPA). CEQ rules require agencies to prepare a Record of Decision (ROD) after preparing an environmental impact statement (EIS) (Title 40 of the Code of the Federal Register part 1505.2). The purpose of a ROD is to explain why the agency has taken a particular course of action. A ROD must include the following elements:

- An explanation of decision on a proposed action;
- Factors considered in making a decision;
- Alternatives considered and the environmentally preferred alternative;
- Adopted mitigation measures or reasons why mitigation measures were not adopted; and
- A monitoring and enforcement program for adopted mitigation measures.

This ROD addresses the redevelopment of the Sunset Terrace public housing community and its relationship to neighborhood growth and revitalization. Growth in the broader planning study area is not part of the proposal addressed in the ROD, and could occur independent of the Sunset Terrace proposal.

Background

The City of Renton (City) is the Responsible Entity and lead agency for NEPA purposes. In accordance with specific statutory authority and the U.S. Department of Housing and Urban Development’s (HUD’s) regulations at 24 Code of Federal Regulations (CFR) part 58, the City is authorized to assume responsibility for environmental review, decision-making, and action that would otherwise apply to HUD under NEPA. Additionally, the City is the proponent of the broader Planned Action for the Sunset area which has had environmental review under Washington State Environmental Policy Act (SEPA) (Revised Code of Washington [RCW] 43.21C).

The City has performed joint NEPA/SEPA environmental review in cooperation with the Recipient, the Renton Housing Authority (RHA). Accordingly, the City prepared a Draft and Final Environmental Impact Statement (EIS) to analyze potential impacts of redevelopment of the Sunset Terrace public housing community.

Constructed in 1959, Sunset Terrace is the oldest multifamily public housing complex directly managed by RHA. It contains 100 dwelling units. The units, facilities, and infrastructure are antiquated and the project is dilapidated. The units are contained within 27 buildings, which are 50-year-old, two-story structures, located at the intersection of NE Sunset Boulevard and Harrington Avenue NE. RHA owns additional vacant and residential land (approximately 3 acres with two dwelling units) along Edmonds Avenue NE, Glenwood Avenue NE, and Sunset Lane NE, and the authority proposes to purchase additional property adjacent to Sunset Terrace, along Harrington Avenue NE (which contains about eight dwellings). RHA plans to incorporate these additional properties into the Sunset Terrace redevelopment for housing and associated services.

The Sunset Terrace public housing community is generally bounded by Sunset Lane NE and Glenwood Avenue NE on the north, NE 10th Street on the east, NE Sunset Boulevard (State Route [SR] 900) on the south, and Edmonds Avenue NE on the west. There are three sites where land swaps or replacement housing for Sunset Terrace could occur located outside these boundaries, at the following locations:

- the Renton Highlands Library property at 2902 Northeast 12th Street (Assessor Parcel Number [APN]: 7227802040);
- vacant lots on Kirkland Avenue between NE 15th and NE 16th streets (APNs: 7227800200, 7227800185 and 7227800190.; and
- Sunset Court Park at 1104 Harrington Avenue NE (APN: 7227801781)

See Attachment A-1 for a study area map showing the Potential Sunset Terrace Redevelopment Subarea and land swap/replacement sites.

The Sunset Terrace public housing community and the three land swap/replacement sites are part of the Sunset Area Community neighborhood.; the neighborhood is generally bounded by NE 21st Street on the north, Monroe Avenue NE on the east, NE 7th Street on the south, and Edmonds Avenue NE. See Attachment A-2 for a neighborhood map.

Summary of Alternatives Considered in Reaching Decision

The proposal is to redevelop the Sunset Terrace public housing community and promote associated neighborhood growth and revitalization. RHA is the proponent of the proposal's primary development action, redevelopment of the existing Sunset Terrace public housing community; however, RHA would likely redevelop the property in partnership with other public and private non-profit and for-profit developers and agencies. The City is 1) responsible for public service and infrastructure improvements for Sunset Terrace and the broader Sunset Area Community neighborhood, 2) is the agency responsible for local permitting and environmental review, and 3) is the agency that would regulate public and private neighborhood redevelopment in accordance with its Comprehensive Plan and development regulations.

The City analyzed three alternatives (Alternatives 1, 2, and 3) as part of the Draft EIS to determine its Preferred Alternative. The Preferred Alternative is evaluated in the Final EIS. All four alternatives are described below.

Alternative 1 (No Action). RHA would develop affordable housing on two vacant properties, but it would not redevelop the Sunset Terrace public housing property. Very limited public investment would be implemented by the City, resulting in lesser redevelopment across the Planned Action Study Area. A Planned Action would not be designated. The No Action Alternative is required to be studied under NEPA and SEPA.

Alternative 2. This alternative represents a moderate level of growth in the Planned Action Study Area based on investment in mixed-income housing and mixed uses in the Potential Sunset Terrace Redevelopment Subarea, targeted infrastructure and public services throughout the Planned Action Study Area, and adoption of a Planned Action Ordinance.

Alternative 3. This alternative represents the highest level of growth in the Planned Action Study Area, based on investment in the Potential Sunset Terrace Redevelopment Subarea with a greater number of dwellings developed in a mixed-income, mixed-use style, major public investment in study area infrastructure and services, and adoption of a Planned Action Ordinance.

Preferred Alternative. This alternative provides a moderate number of dwellings in the Potential Sunset Terrace Redevelopment Subarea developed in a mixed-income, mixed-use style oriented around a larger park space and loop road, major public investment in study area infrastructure and services leading to similar, slightly less neighborhood growth as Alternative 3, and adoption of a Planned Action Ordinance.

To determine future growth scenarios for the next 20 years, a land capacity analysis was prepared. The alternatives produce different future growth estimates. Each would affect different amounts of property.

- Alternative 1 assumes that about 16% (35 acres) of the 213 net acres of Planned Action Study Area parcels would infill or redevelop, including two mostly vacant sites in the Potential Sunset Terrace Redevelopment Subarea.
- Alternative 2 assumes that about 32% (68 acres) of the Planned Action Study Area parcels would infill or redevelop, including all of the Potential Sunset Terrace Redevelopment Subarea.
- Alternative 3 assumes that approximately 40% (84 acres) of the Planned Action Study Area parcels would infill or redevelop, including all of the Potential Sunset Terrace Redevelopment Subarea.
- The Preferred Alternative assumes that approximately 40% (84 acres) of the Planned Action Study Area parcels would infill or redevelop, including all of the Potential Sunset Terrace Redevelopment Subarea and some nearby land swap/replacement sites.

The number of dwelling units and jobs under each alternative is compared in Table 1. Alternative 1 provides the least growth and Alternative 3 the most growth, with Alternative 2 and the Preferred Alternative in the middle.

Table 1. Summary of Land Capacity—Net Additional Growth above Existing—2030

Subarea	Dwelling Units/Jobs	Alternative 1 ¹	Alternative 2 ¹	Alternative 3 ¹	Preferred Alternative
Potential Sunset Terrace Redevelopment	Dwelling units	168–175 ²	310	479	266
	Jobs	49 ³	164	182	79–117 ⁸
Other Subareas in Neighborhood					
Sunset Mixed Use	Dwelling units	1,109	1,052	1,509	1,481
	Jobs	410–652	1,728	2,875	2,802
Central, North and South	Dwelling units	206	296	518	592
	Jobs	152–213	273	273	273
Total Study Area Net Growth	Dwelling units ⁴	1,483–1,490	1,658	2,506	2,339
	Population ⁵	3,430–3,442	3,830	5,789	5,403
	Employment SF	251,700	844,351	1,310,113	1,247,444–1,259,944 ⁸
	Jobs ⁶	611–914 ⁷	2,165	3,330	3,154–3,192 ⁸

¹ The EIS technical analysis for transportation, water, and sewer models studied two more net units in the Potential Sunset Terrace Redevelopment Subarea under Alternatives 1 and 3, and a slightly different mix of dwellings and jobs in the Potential Sunset Terrace Redevelopment Subarea under Alternative 2 (12 more dwellings and 38 fewer jobs). These differences are negligible and represent a less than 2% difference across the Planned Action Study Area.

² The lower range represents proposed concepts on RHA's two vacant sites based on funding applications. The upper range represents the results of a land capacity analysis.

³ The estimate is based on a 90%/10% housing/employment split between residential and service uses; the housing/employment share based on example proposed developments prepared for RHA's two vacant sites in the Sunset Terrace subarea.

⁴ Includes 217 dwellings and approximately 8 jobs associated with Harrington Square. The first building was constructed in Summer 2010, and the other is under construction to be completed in spring/summer 2011.

⁵ Applies an average household size of 2.31, an average of two census tracts 252 and 254.

⁶ Includes retail, service, and education jobs.

⁷ The lower figure shown is based on a commercial employment rate of 400 square feet per employee for retail and service jobs. If applying a commercial employment rate of 250 square feet per employee, the employment would equal the upper range. This latter figure is more similar to Renton Transportation Zone assumptions.

⁸ The lower figure assumes less commercial/service space; whereas, the higher includes more commercial/service space. The Final EIS studies the lower number of jobs (38 fewer) in the technical analysis for transportation, water, and sewer models though this is considered a negligible difference from the upper range (less than 2%) and is captured in the range of the EIS analysis for all alternatives.

Each alternative is qualitatively described in more detail below.

Alternative 1: No Action

Alternative 1 would continue the current City Comprehensive Plan land use designations and zoning classifications, with limited public investment in redevelopment of the Sunset Terrace public housing community and in civic and infrastructure improvements in the broader area.

In the Potential Sunset Terrace Redevelopment Subarea, RHA would develop affordable housing and senior housing with supporting elder day health services on two vacant properties, but it would not redevelop the Sunset Terrace public housing property.

With a low level of public investment, private investment in businesses and housing would be limited and would occur incrementally at scattered locations in the Planned Action Study Area. Land use form would largely continue to consist of single-use residential and single-use commercial developments with an occasional mix of uses. The development pattern would begin to transition incrementally from its current suburban pattern to a village center, but, this transition would occur slowly over time due to the relatively low level of investment in public housing redevelopment and improvements. A Planned Action would not be designated and each proposed development would be subject to individual environmental review. Some pedestrian- and transit-oriented development would occur, but it would be the exception rather than the rule, because new development would represent a small portion of the overall Planned Action Study Area. More piecemeal development could preclude opportunities for leveraging and combining strategies among individual projects.

The City would not make major infrastructure improvements. NE Sunset Boulevard would continue to emphasize vehicular mobility with less attention on pedestrian and transit facilities and limited aesthetic appeal (e.g., sparse landscaping). No changes to non-motorized facilities or transit are expected except for those non-motorized improvements identified in the Renton Trails and Bicycle Master Plan adopted in May 2009. Drainage systems would continue as presently configured; any improvements would be localized, incremental, and in compliance with the City's existing stormwater regulations.

The current Highlands Library would be relocated from the Central Subarea to another location in the Planned Action Study Area; since a new site had not been selected as of the Draft EIS in December 2010, this alternative assumes a new community services building in the study area of sufficient size to house a library or other social services. Parks and recreation services would largely continue as they exist today.

Alternative 2

Alternative 2 provides for a moderate level of mixed-income housing and mixed uses in the Planned Action Study Area, while continuing the current City Comprehensive Plan land use designations and zoning classifications.

RHA would redevelop the Sunset Terrace public housing community according to a master plan on properties it currently owns; the redevelopment would allow for new public, affordable and market-rate housing accommodating a mixed-income community. All 100 existing public housing units would be replaced at a 1-to-1 ratio; some would occur on the current Sunset Terrace public housing property and some elsewhere in the Planned Action Study Area; a duplex would be replaced with affordable townhouse units. An estimated 310 new dwellings would be developed in the Potential

Sunset Terrace Redevelopment Subarea, with more moderate-density flats and townhomes at a combined density of 40 units per acre, approximately. New public amenities would include civic and community facilities, which may include a single-use library building with a plaza and/or a community services center/office building, as well as ground-floor retail as required by zoning, and a proposed 0.89-acre park. Senior housing on RHA's Piha site would include supportive elder day health services.

Infrastructure and public services would be improved in a targeted manner in the Planned Action Study Area. Stand-alone residential uses and local-serving commercial development would continue but would be interspersed with mixed-use development at identified nodes throughout the Planned Action Study Area such as the Potential Sunset Terrace Redevelopment Subarea and portions of NE Sunset Boulevard. Densities of new development would occur at moderate urban levels that are pedestrian- and transit-oriented. The environmental review process for development would be streamlined under a Planned Action Ordinance.

NE Sunset Boulevard would be improved to meet the intent of the City Complete Streets standards (Renton Municipal Code [RMC] 4-6-060). Improvements would largely occur within the current right-of-way and would allow for signal improvements, expanded sidewalks, greater landscaping, new transit shelters and street furniture, pedestrian- and street-level lighting, a bike lane/multi-purpose trail in one direction, consolidated driveways, and a center median with left-turn vehicle storage. No on-street business parking would be available (consistent with current conditions).

Natural stormwater infrastructure would be integrated in design of streets, parks, and new development.

Active and passive recreation opportunities would be retained and enhanced through coordination between the Renton School District and the City such as through a joint-use agreement. Possible locations for enhancement include a reconfigured Hillcrest Early Childhood Center and North Highlands Park and repurposed public properties or acquired private properties in areas where demand for recreation is anticipated to be higher.

Alternative 3

Alternative 3 provides for a high level of growth in the broader area, and also maintains the current City Comprehensive Plan land use designations and zoning. RHA would redevelop the Sunset Terrace public housing community into a mixed-income, mixed-use development according to a master plan. It is expected that, with the Sunset Terrace property and associated properties owned or purchased by RHA, up to 479 additional new units could be created, some of which would be public, affordable, and/or market rate, resulting in a density of approximately 52 units per acre. The existing 100 public housing units would be replaced at a 1-to-1 ratio. Replacement of the public housing units would occur on the current public housing site and elsewhere in the Planned Action Study Area; the duplex units located adjacent to Sunset Terrace would be replaced with townhouse units, some affordable and some market-rate. Public amenities would be integrated with the residential development and could include the following: a community gathering space in a vacated Harrington Avenue NE (at Sunset Lane NE); a new recreation/community center and senior center; a new public library in a mixed-use building; a new park and open space; retail shopping and commercial space; and/or green infrastructure. The civic and recreation spaces could act as a "third place."

This alternative also includes major public investment in Planned Action Study Area transportation, drainage, sewer, water, cultural, educational, and parks and recreation facilities. This public investment in Sunset Terrace and neighborhood infrastructure and services would catalyze private property reinvestment at a greater scale, and realize the existing permitted zoning uses and density, which would create greater opportunities for market-rate and affordable homeownership and rental housing opportunities, and for local and regional shopping opportunities. Land use patterns would be of an urban intensity focused along NE Sunset Boulevard corridor and allow for vertical and horizontal mixed uses. Similar to Alternative 2, Alternative 2 would designate the study area as a Planned Action Ordinance.

A “family village” in the North Subarea would provide an opportunity for integrated reinvestment in housing, education, recreation, and supportive services designed to promote a healthy, walkable, and neighborhood-friendly community.

NE Sunset Boulevard would be transformed to improve all forms of mobility and to create an inviting corridor through urban design amenities. A wider right-of-way would allow for intersection improvements, bike lanes in both directions, and sidewalks. Improvements to traffic operations at intersections would prioritize transit vehicles; there would also be a planted median with left-turn storage, and u-turns. Improved sidewalks and crosswalks together with streetscape elements such as street trees, transit shelters, street furniture, public art, and lighting would promote walkability. Added bike lanes would promote non-motorized transportation.

Natural stormwater infrastructure would be integrated in design of streets, parks, and new development.

Active and passive recreation opportunities would be retained and enhanced. For example, the family village concept would allow for blending of education services outside the conventional K-12 spectrum such as early childhood education, the North Highlands Park, and RHA senior housing. Joint-use agreements could be forged between the City and the Renton School District to allow for public use of school grounds for parks and recreation purposes during non-school hours. When public properties are no longer needed for present uses, they could be repurposed for parks and recreation.

Preferred Alternative

An environmentally preferable alternative that best meets NEPA’s goals to reduce impacts on natural and cultural features is required to be identified, no later than in the Final EIS. Designation of a preferred alternative is optional under SEPA. The City and RHA have identified an environmentally preferred alternative within the range of the Draft EIS Alternatives 1 through 3. The Preferred Alternative provides for:

- mixed-use growth and transit and nonmotorized transportation improvements that result in regionally beneficial air quality and energy effects,
- a drainage master plan that promotes green infrastructure and improves water quality,
- expansion of parks and recreation facilities, and
- greater housing and job opportunities.

Key features are identified below.

Similar to Alternative 3, the Preferred Alternative includes redevelopment of Sunset Terrace, as well as major public investment in Planned Action Study Area transportation systems; drainage, sewer, and water systems; and cultural, educational, and parks and recreation facilities. This public investment in Sunset Terrace and neighborhood infrastructure and services would catalyze private property reinvestment at a greater scale, and realize the existing permitted zoning uses and density, which would create greater opportunities for market-rate and affordable homeownership and rental housing opportunities, and for local and regional shopping opportunities. Land use patterns would be of an urban intensity focused along the NE Sunset Boulevard corridor and would allow for vertical and horizontal mixed uses. Similar to Alternatives 2 and 3, environmental review of development would be streamlined with a Planned Action Ordinance.

RHA would redevelop the Sunset Terrace public housing community as part of redevelopment of the entire Potential Sunset Terrace Redevelopment Subarea. It would be redeveloped into a mixed-income, mixed-use development according to a master plan, featuring a “central” park of about 2.65 acres and a loop road. With a larger park space, the density of the Sunset Terrace development would be lower than Alternatives 2 and 3 at 33 units per acre, though some density would shift outside the subarea to other portions of the Planned Action Study Area.¹ Public amenities would be integrated with the mixed-use development and could contain the following: a new park space, including over a segment of Harrington Avenue NE (at Sunset Lane NE) to be vacated; a reconfigured Sunset Lane NE along the library that could be used as a plaza; an elder day health center; a new public library in a single-purpose building; retail shopping and commercial space; and green infrastructure. The civic and recreation spaces could act as a “third place.” See Attachment B for the Preferred Alternative in the Potential Sunset Terrace Redevelopment Subarea. See Attachment B for the Sunset Terrace conceptual plan as well as variations considered similar to the preferred conceptual plan.

The Preferred Alternative provides for growth in the Planned Action Study Area similar to but less than Alternative 3, while maintaining current City Comprehensive Plan land use designations and zoning classifications. New growth in the neighborhood would be about 7% less than under Alternative 3.

Similar to Alternative 3, a family village in the North Subarea would provide an opportunity for integrated reinvestment in housing, education, recreation, and supportive services designed to promote a healthy, walkable, and neighborhood-friendly community.

NE Sunset Boulevard would be transformed, similar to under Alternative 3, to improve all forms of mobility and to create an inviting corridor through urban design amenities. Improvements to traffic operations at intersections would prioritize transit vehicles; there would also be a planted median with left-turn lanes at intersections and two high-volume, mid-block driveway locations. Improved sidewalks and crosswalks, together with streetscape elements such as street trees, transit shelters, street furniture, public art, and lighting, would promote walkability. A multiuse trail along the west side of NE Sunset Boulevard would promote nonmotorized transportation. In addition to the multiuse trail on the west side of NE Sunset Boulevard, an eastbound bike lane would run from Edmonds Avenue NE up the hill to the City’s bike route on NE 10th Street.

¹ In particular, some potential sites for replacement housing include Sunset Court Park (as the park space would be relocated at Sunset Terrace), RHA-owned property along Kirkland Avenue NE, and the existing library site once it is relocated though another possible use for the library site would be for agency use (e.g., offices, maintenance).

Natural stormwater infrastructure would be integrated into the design of streets, parks, and new development, similar to Alternative 3. Several residential streets (designated as green connections) in the neighborhood would be transformed to improve pedestrian mobility, mitigate stormwater impacts (both for water quality and flow reduction), and create an inviting corridor to enhance the neighborhood. In addition to the green connections projects, the City would implement regional detention/retention improvements to provide advance mitigation for future increases in impervious area that could result from redevelopment.

Active and passive recreation opportunities would be retained and enhanced. This would include the 2.65-acre central park at Sunset Terrace. Due to the relocation and consolidation of Sunset Court Park at Sunset Terrace as well as the proposed vacation of a portion of Harrington Avenue NE, the central park space is enlarged compared to other alternatives to better meet the needs of the increased population of the neighborhood; with relocation, Sunset Court Park property would then redevelop with housing units. Additionally, the family village would allow for blending of education services outside the conventional K-12 spectrum such as early childhood education, the North Highlands Park, and RHA senior housing. Joint-use agreements could be forged between the City and the Renton School District to allow for public use of school grounds for parks and recreation purposes during non-school hours. When public properties are no longer needed for present uses, they could be repurposed for other public purposes, such as parks and recreation.

Selected Sunset Area Alternatives

The latter two alternatives – Alternative 3 and the similar Preferred Alternative – represent the higher growth levels studied in the EIS and differ by about 7%; these two alternatives are considered for the purposes of the ROD and associated mitigation document (Attachment C) to be the “Selected Sunset Area Alternatives.” The mitigation document in Attachment C is based on the range of growth considered in the Selected Sunset Area Alternatives.

Table 1. Summary of Land Capacity— Selected Sunset Area Alternatives

Dwelling Units/Jobs	Net New Growth			
	Alternative 3		Preferred Alternative	
	Neighbor- hood	Sunset Terrace	Neighbor- hood	Sunset Terrace
Dwelling units	2,506	479	2,339	266 ^a
Population	5,789	1,106	5,403	614 ^a
Employment SF	1,310,113	59,000	1,247,444– 1,259,944	38,100
Jobs	3,330	182	3,154–3,192	117

^a Does not include approximately 90-100 units to be developed on land swap/housing replacement sites.

The purpose of identifying two “Selected Sunset Area Alternatives” is to define a range of acceptable growth and design considering the conceptual nature of the Sunset Terrace redevelopment plans as well as the 20-year time horizon of the broader neighborhood planned action. The Preferred Alternative is similar to Alternative 3 with slightly lower growth and a reconfiguration of park space and road network; otherwise the two alternatives share greater public investment and associated beneficial impacts. The two alternatives are similar in terms of potential beneficial and adverse impacts and required mitigation measures.

Each is described in terms of their beneficial impacts below.

Preferred Alternative

The Preferred Alternative is considered the environmentally preferred alternative, best meeting NEPA's goals to reduce impacts on natural and cultural features.

The Preferred Alternative provides for:

- mixed-use growth and transit and nonmotorized transportation improvements that result in regionally beneficial air quality and energy effects,
- a drainage master plan that promotes green infrastructure and improves water quality,
- expansion of parks and recreation facilities, and
- greater housing and job opportunities.

Elements of the Preferred Alternative implement the Sunset Area Community Investment Strategy developed by neighbors and businesses. The Preferred Alternative would enhance the Sunset Area Planned Action Study Area as a destination by creating a multi-modal NE Sunset Boulevard with landscaping, transit, pedestrian, and bicycle amenities; enhancing neighborhood streets to serve as green connections for improved pedestrian environments as well as water quality; and redeveloping Sunset Terrace as a mixed use, mixed income development with attractive features for the broader Highlands community, including a relocated and larger library at Harrington Avenue NE and NE Sunset Boulevard, a "central park," and public plaza. Public investments described above are intended to spur private reinvestment in the neighborhood that is integrated and managed according to City standards for design and environmental quality.

The Preferred Alternative includes a range of housing styles – single family, townhomes, and flats – that would meet the needs of a range households. Housing would include a mix of public, affordable, and/or market rate units. Sunset Terrace redevelopment as well as the family village will be models and catalysts for private investment in housing at all income levels to serve a diverse population.

Alternative 3

Alternative 3 closely resembles the Preferred Alternative in most respects – mixed use growth, multi-modal transportation investments, green infrastructure, and greater housing and job opportunities. Alternative 3 also produces regionally beneficial air quality and energy effects. The primary difference lies with the configuration of open space and loop-road system that disperses density differently at Sunset Terrace and neighboring sites. In order to achieve the mitigation measures for parks and recreation, more park and recreation space would be required off-site whereas the park and recreation features of the Preferred Alternative are visually conceptualized and proposed on-site at Sunset Terrace.

Findings

Alternative 3 and the Preferred Alternative have similar adverse and beneficial impacts and equivalent mitigation measures identified in Attachment C.

The City of Renton finds by this environmental ROD, after considering the effects of the studied alternatives, and considering the written and oral comments offered by agencies and the public, that

the requirements of NEPA have been satisfied, as noted herein, for redevelopment, services, and roadway and utility infrastructure within Sunset Terrace, the Sunset Terrace Redevelopment Subarea, and the Planned Action Study Area.

Mitigation measures incorporated in Alternative 3 and the Preferred Alternative, and additional consultation and mitigation documented in this ROD, represent reasonable steps to reduce adverse environmental effects and would reduce effects to acceptable levels. Mitigation measures identified in the EIS are contained in Attachment C.

No development applications have been submitted for Sunset Terrace at this time; the Preferred Alternative for Sunset Terrace is still conceptual and is undergoing more detailed planning and engineering. The City of Renton, as the local land use authority, will incorporate the mitigation measures identified herein into any approvals for subsequent development applications.

As planning progresses from conceptual to more detailed building and construction plans, there may be minor variations from the initial concepts—including land uses, building footprints, circulation layouts, and other features. For example, Attachment B identifies minor variants of the Sunset Terrace redevelopment plans that are similar to the Preferred Alternative and within the range of Planned Action Alternatives. Future refined plans will be considered to be consistent with the Preferred Alternative and Alternative 3 provided the features are in the range of the two alternatives and associated environmental analysis.

The environmental decision is based on the conclusions of the EIS, and considerations of federal, state and City policies and RHA redevelopment goals.

Practicable Means to Avoid or Minimize Harm

The Preferred Alternative and Alternative 3 have been designed to be consistent with the Community Investment Strategy developed by neighbors and businesses, as well as to implement other goals and objectives of the proposal.

The Selected Sunset Area Alternatives will generate impacts to various elements of the built and natural environments. With the application of City-adopted development regulations and recommended mitigation measures, and application of other federal and state requirements, no significant unavoidable adverse impacts are anticipated. Pursuant to 40 CFR 1505.3, this decision to proceed with Sunset Terrace and actions in the broader area will be implemented and mitigation measures imposed through appropriate conditions in any land use or related permits or approvals issued by the City of Renton and through conditions of federal funding. Significant impacts and associated mitigation measures identified in the EIS are contained in Attachment C.

Monitoring: The City shall monitor mitigation measures in Attachment C through application of the measures to development permits and projects. This ROD shall be reviewed no later than five years from its effective date by the Environmental Review Committee to determine the continuing relevance of its assumptions and findings with respect to environmental conditions, the impacts of development, and required mitigation measures.

Public Involvement

This ROD completes the City's planning and environmental review process for NEPA purposes. This section describes the steps followed by the City to obtain public input and shape the environmental review process.

A public participation plan was developed in August 2010 during initiation of the EIS process, and guided public outreach efforts for this environmental review process, using proven techniques from past City and RHA outreach efforts.

As part of the EIS process, the proposed EIS alternatives including conceptual plans for Sunset Terrace, NE Sunset Boulevard, and other features were presented to the public at a scoping meeting held on September 1, 2010. This scoping meeting was advertised via distribution of 3,700 postcards, posters, and notices to RHA residents, and publication in the newspaper. Meeting materials were made available in English and Spanish, and Spanish translators were available at the public meeting. Approximately 17 members of the public participated in the scoping meeting. The results of the scoping meeting are included in Draft EIS Appendix A.

Additional public comment opportunities occurred within a 45-day Draft EIS comment period extending from December 17, 2010, to January 31, 2011. Following direct mail and posting of notices, RHA held a meeting for Sunset Terrace residents on January 4, 2011, at which more than 25 participants attended. After mailing postcards in English and Spanish, posting notices, and publishing notice in the City's local newspaper, a public hearing was held before the Planning Commission at Renton City Hall on January 5, 2011, at which eight persons spoke. During the 45-day comment period 12 pieces of correspondence were received as documented in the Final EIS.

The City held a Planning Commission public hearing on the SEPA Planned Action Ordinance on April 6, 2011 and three citizens spoke. The City will hold additional public meetings with the City Council as the SEPA Planned Action Ordinance is completed. The City's action on the Planned Action Ordinance is expected to be completed in early June 2011 prior to the release of funds by HUD; however, the NEPA and SEPA decisions are independent.

In mid-May 2011, the City issued a Notice of Intent to Request Release of Funds and published the notice in the newspaper and sent written notice to parties sent EIS notices.

The EIS public outreach process was built on long-term community outreach efforts. Recent City efforts that contributed to the proposal and alternatives studied in the EIS are described below.

- Highlands Task Force on Land Use and Zoning, 2006-2007
- Highlands Phase II Task Force, 2007-2008
- Sunset Area Community Investment Strategy, 2009

Additionally, to conceptually plan the redevelopment of Sunset Terrace, RHA selected a development consultant, Shelter Resources, Inc. (SRI), in 2007, and SRI retained an architect to help plan the property. Conceptual redevelopment designs were first prepared in December 2007 by Bumgardner Architects, and have been the subject of RHA board meetings, throughout 2008 to the present, and of RHA resident meetings on June 19, 2009, and July 12, 2010 as well as January 4, 2011.

Coordination with Other Agencies

The City initiated consultation with agencies and tribes regarding permit requirements and to identify any areas of concerns regarding the Sunset Terrace public housing redevelopment as well as the overall Planned Action.

Federal and state agencies were notified of comment opportunities through the scoping process and were offered comment opportunity on the Draft EIS. Two agencies were particularly consulted consistent with NEPA, the National Historic Preservation Act (Section 106), and the Endangered Species Act (Section 7) as described below. In addition, consistent with the federal Coastal Zone Management Act, the City received a letter of consistency from the State of Washington Department of Ecology (16 U.S.C. 1451-1464).

National Historic Preservation Act

Section 106 of the NHPA requires federal agencies to consider the effects of funded or approved undertakings that have the potential to impact any district, site, building, structure, or object that is listed in or eligible for listing in the National Register of Historic Places (NRHP), and the State Historic Preservation Officer, affected tribes, and other stakeholders an opportunity to comment. Although compliance with Section 106 is the responsibility of the lead federal agency, others can undertake the work necessary to comply. Pursuant to the HUD's regulations at 24 CFR 58, the City is authorized to assume responsibility for environmental review, decision-making, and action that would otherwise to apply HUD under NEPA, which includes NEPA lead agency responsibility. The Section 106 process is codified in 36 CFR 800 and consists of five basic steps:

1. Initiate process by coordinating with other environmental reviews, consulting with the State Historic Preservation Officer (SHPO), identifying and consulting with interested parties, and identifying points in the process to seek input from the public and to notify the public of proposed actions.
2. Identify cultural resources and evaluate them for NRHP eligibility (the process for which is explained below), resulting in the identification of historic properties.
3. Assess effects of the project on historic properties.
4. Consult with the SHPO and interested parties regarding any adverse effects on historic properties; and, if necessary, develop an agreement that addresses the treatment of these properties (e.g., a Memorandum of Agreement [MOA]).
5. Proceed in accordance with the project MOA, if an MOA is developed.

The City completed Section 106 consultation for Sunset Terrace redevelopment and all properties fronting NE Sunset Boulevard in the study area as follows:

- The City sent a letter regarding potential Area of Potential Effects to the SHPO, i.e. Washington State Department of Archaeology and Historic Preservation (DAHP), and to the Muckleshoot Indian Tribe on September 1, 2010;
- The City provided a copy of a Cultural Resources Survey Report and sent it to DAHP and the tribe. The City received an email and letter from DAHP, dated November 18, 2010, concurring with Cultural Resources Survey Report conclusions on eligibility; and

- The City received a letter from DAHP concurring with conclusions of no adverse impacts, dated November 30, 2010.

In addition, the City initiated the following consultation with agencies and tribes on three particular sites within the study area that may be locations for replacement housing for Sunset Terrace or other RHA activities as part of the Preferred Alternative:

- The City sent a letter requesting consultation along with technical report, February 18, 2011 to DAHP and the tribe; and
- The City received correspondence from DAHP, dated February 24, 2011, concurring with Cultural Resources Survey Report conclusions on eligibility and no adverse impacts.

The cultural resources surveys are included in the Draft and Final EIS and the Environmental Review Record. Letters of correspondence are included in Attachment D of this ROD.

Endangered Species Act

Consistent with the requirements of Section 7 of the Endangered Species Act (ESA), the proposal has been evaluated with respect to its potential effects on species listed or proposed for listing under the ESA. A biological assessment was prepared and submitted to the National Marine Fisheries Service (NMFS) in December 2010 for its concurrence with a finding that the proposal may affect, and is not likely to adversely affect, anadromous fish protected under the ESA, and would have no effect on any ESA-protected species under U.S. Fish and Wildlife Service jurisdiction. The City and NMFS corresponded in January, February, and April 2011 on NMFS questions. The City received a letter of concurrence in May 2011. The Biological Assessment and NMFS memoranda are included in the Environmental Review Record. The NMFS letter of concurrence is included in Attachment E.

Coastal Zone Management Act

Since the Sunset Area lies within Washington State's coastal zone lying in King County, the City completed a form titled "Certification of Consistency with Washington's Coastal Zone Management Program for Federally Funded Activities" and received a letter confirming the project's consistency in December 2010. The letter is included in Attachment F.

Final EIS Comments

In response to the Final EIS notice of availability, the federal Environmental Protection Agency prepared a letter affirming that its Draft EIS comments were satisfactorily addressed, and together with some monitoring language proposed in the Planned Action Ordinance believed that the Draft and Final EIS and Planned Action Ordinance were well done and would serve to monitor the Sunset Area's sustainability. The letter is included in Attachment G together with consultant documents references in the letter.

Clarifications and Corrections

As a result of preparing a formal drainage master plan for the planning area, some refinements in water resources data are warranted in the EIS and BA. The resulting clarifications and corrections

are included in Attachment H. There are no changes in overall conclusions regarding the alternatives, impacts or mitigation measures.

Attachments

Attachment A: Sunset Area Community Planned Action Study Area

Attachment B: Sunset Terrace Preferred Alternative and Concept Variations

Attachment C: Selected Sunset Area Alternatives Mitigation Measures

Attachment D: DAHP Section 106 Consultation Correspondence

Attachment E: Endangered Species Act Consultation, NMFS

Attachment F: Coastal Zone Certification

Attachment G: EPA Letter on Final EIS

Attachment H: Clarifications and Corrections

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