

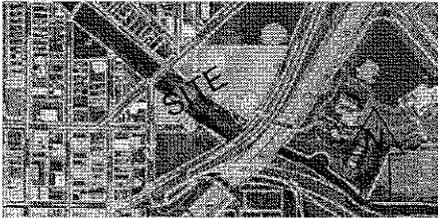
ENVIRONMENTAL REVIEW COMMITTEE REPORT

ERC MEETING DATE:	June 17, 2013
Project Name:	Renton Library at Liberty Park
Project Number:	LUA13-000255, ECF, SM, SA-H
Project Manager:	Vanessa Dolbee, Senior Planner
Owner:	City of Renton, 1055 South Grady Way, Renton, WA 98057
Applicant:	Greg Smith, King County Library System, 960 Newport Way NW, Issaquah, WA 98027
Contact:	Maaike Post, Miller Hull Partnership, 71 Columbia St. - Sixth floor, Seattle, WA 98104
Project Location:	100 Mill Avenue S

Project Summary: The applicant is requesting SEPA Environmental Review, Hearing Examiner Site Plan Review, and a Shoreline Substantial Development Permit for the remodel of the existing Renton Main Library located at 100 Mill Ave. S. The 22,400 SF library is currently constructed over the Cedar River and is located across three different parcels including Liberty Park and the parking lot on the south side of the Cedar River. Overall, the area of work would impact 37,630 SF and the remodeled library would be 19,680 SF following renovations. The site's zoning is primarily Center Downtown (CD). The proposed improvements to the building would include seismic upgrades, demolition of existing building envelope, and installation of new envelope and associated site improvements. The existing vehicular access and parking is not proposed to be changed. All but one tree is proposed to be retained. The applicant submitted the following studies with the application: a Stream Study and Habitat Data Report, Regulated Material Survey, Geotechnical Engineering Study, Technical Information Report. The site is located in the Aquifer Protection Zone 1, flood hazard area, Shoreline of the state and a habitat conservation area.

Exist. Bldg. Area SF:	22,400 SF	Proposed New Bldg. Area (footprint):	19,680 SF
		Proposed New Bldg. Area (gross):	19,680 SF
Site Area:	37,630 SF	Total Building Area GSF:	19,680 SF

STAFF RECOMMENDATION: Staff Recommends that the Environmental Review Committee issue a Determination of Non-Significance - Mitigated (DNS-M).



Project Location Map

PART ONE: PROJECT DESCRIPTION / BACKGROUND

The applicant is requesting SEPA Environmental Review, Hearing Examiner Site Plan Review, and a Shoreline Substantial Development Permit for the remodel of the existing Renton Main Library located at 100 Mill Ave. S. The 22,400 SF library is currently constructed over the Cedar River and is located across three different parcels including Liberty Park and the parking lot on the south side of the Cedar River. Overall, the area of work would impact 37,630 SF and the remodeled library would be 19,680 SF following renovations.

The subject site is located over the Cedar River; the river itself does not have zoning. However, zoning is applied on both the north and south banks of the river. The north shoreline is zoned Commercial Arterial (CA) and the south shoreline is zoned Center Downtown (CD). The site's main entrance, parking lot, and access is along the south shoreline. Due to the Library's primary access and the majority of the development along the south shoreline, City staff has determined that the CD zone would be applicable to the subject development. Because the subject property is located within the Center Downtown (CD) zoning designation, the proposal would be subject to the Design District "A" standards and guidelines.

King County Library System (KCLS) has proposed to remodel or rehabilitate the existing library which was constructed across the Cedar River between 1956 and 1966. The existing library is partially located in Liberty Park but fronts on Mill Ave. S. The site is surrounded with civic uses such as the City of Renton Fire Station and old City Hall on the south side of the river and Liberty Park on the north side of the river. The applicant has indicated that all work would occur within the area of existing development on the site and public access would be maintained off of Mill Ave. S.

The proposed library renovations include the following:

- Demolition of existing masonry and glass building envelope.
- Retention of existing concrete structure, roof framing, and site work.
- Installation of new building envelope: aluminum window system with glazed panels and a metal panel wall assembly.
- Demolition of portions of existing roof framing and replacement in specific areas at a lower height.
- Removal of the existing rooftop mechanical unit near the west end of the building.
- New rooftop mechanical unit (similar in scale to existing unit) with screening near the east end of the building where it would be less visible from the parking lot and main entry.
- New mechanical, electrical, and lighting systems within the building.
- Addition of insulation, sheathing, and roofing to existing roof assembly.
- Relocation of building entry to the west to face the existing parking lot.
- Seismic upgrade required by code including below-grade concrete abutments on either side of the building and steel brace frames in both directions. Approximately 900 cubic yards of excavation materials and 360 cubic yards of fill would be required for the installation.
- New hardscape, utility routing, and vegetation to address new entry location as well as repair associated with concrete abutments.
- Sandblasting of existing structural concrete to remove painted finish.
- Re-routing of existing under-slab mounted utility piping to address new utility penetrations.
- New exterior enclosure for refuse/recycling area and mechanical equipment.

The majority of the renovations includes upgrades to the existing building and structure to bring the building into compliance with today's building codes and regulations. The applicant has proposed minimal modifications to the existing site, with the exception of required utility upgrades and rehabilitation following necessary structural upgrades. For example, the proposed concrete abutments would require below-grade work along both the north and south edges of the building. As such, these disturbed areas would be re-landscaped and hard scraped following construction. Offsite improvements include the replacement of the sanitary side sewer pipe from the library to the manhole at the intersection of Mill Ave. S and S 2nd St. The public sidewalk along Mill Ave. S would be updated as a part of a 2014 city of Renton sidewalk improvement project and would not be included in the remodel to the library. The existing vehicular access and parking is not proposed to be changed. All but one tree is proposed to be retained.

The existing building spans the Cedar River, a shoreline of the State. As such, the project is subject to the Shoreline Master Program regulations. The site is located in the Shoreline High Intensity overlay along Cedar River Reach B. Overall, the existing building is considered to be a non-conforming structure. However, the proposal would be reducing the size of the building bringing it more into conformance than the existing situation. In addition to being located over the Cedar River, the site is located in a seismic hazards area and the Aquifer Protection Zone 1. There is also a 100 year flood plain and a floodway associated with the Cedar River and the banks of the river have been identified sensitive and protected slopes. Based on the project application material, no work is proposed below the ordinary high water mark of the Cedar River and therefore no work would occur in the flood plain or floodway.

The applicant submitted the following studies with the application: a Stream Study and Habitat Data Report, Regulated Material Survey, Geotechnical Engineering Report, Technical Information Report.

PART TWO: ENVIRONMENTAL REVIEW

In compliance with RCW 43.21C.240, the following environmental (SEPA) review addresses only those project impacts that are not adequately addressed under existing development standards and environmental regulations.

A. Environmental Threshold Recommendation

Based on analysis of probable impacts from the proposal, staff recommends that the Responsible Officials:

Issue a DNS-M with a 14-day Appeal Period.

B. Mitigation Measures

1. The applicant shall comply with the recommendations included in the Stream Study and Habitat Data Report, prepared by Talasaea Consultants, Inc., dated February 28, 2013 and revised May 10, 2013.
2. The applicant shall comply with the recommendations included in the Geotechnical Engineering Study prepared by GeoEngineers, dated December 20, 2012.
3. The applicant shall design and place lighting so that it is shielded from impacting the Cedar River and at the same time balances necessary lighting for site safety standards.

C. Exhibits

Exhibit 1	Vicinity Map
Exhibit 2	Title Sheet
Exhibit 3	Architecture Site Plan
Exhibit 4	Demolition Plan
Exhibit 5	T.E.S.C. Plan
Exhibit 6	Civil Site Plan
Exhibit 7	Landscape Site Plan
Exhibit 8	Conceptual Landscape Plan
Exhibit 9	Tree Inventory Plan
Exhibit 10	Building Elevations, Sheets A-201 and A-202
Exhibit 11	Muckleshoot Tribe Comments

D. Environmental Impacts

The Proposal was circulated and reviewed by various City Departments and Divisions to determine whether the applicant has adequately identified and addressed environmental impacts anticipated to occur in conjunction with the proposed development. Staff reviewers have identified that the proposal is likely to have the following probable impacts:

1. Earth

Impacts: The existing site topography consists of steep slopes along the north and south edges of the river channel. The grades of the river banks range from elevation 45 at the top of the slope to elevation 26 at the river bottom. Beyond the river banks the site grades to the north and south of the buildings is relatively flat. Based on the City's critical areas maps, the river banks are considered to be either a sensitive slope or a protected slope dependent upon the grade at the specific location. In addition, the library is located in a seismic hazard area.

The applicant submitted a Geotechnical Engineering Study ("Geo-tech") prepared for the Liberty Park Library by GeoEngineers, dated December 20, 2012. The primary purpose of the building upgrades is to bring the existing structure into compliance with current seismic code requirements. As such, the provided Geo-tech particularly focuses on the necessary structural upgrades needed to bring the existing building into compliance with the seismic standards. Pursuant to the provided study, the existing building is constructed similar to a three-span bridge structure with girders spanning between foundations located on the river banks and two interior piers that are located within the river.

To evaluate the subsurface conditions at the subject site, GeoEngineers completed two borings on October 22, 2012 to depths of 51.50 feet below the existing ground surface. The soil types encountered consisted of undocumented fill and recent alluvium deposits. More specifically the fill consisted of loose to medium dense/very soft to soft silty sand/silt with variable gravel and cobble content, and organics. The fill extended to depths of 15 feet below existing grades. The alluvium deposits consist of medium dense to very dense silty sand with varying amounts of gravel and medium dense to dense gravel with varying amounts of silt and sand. Occasional cobbles are anticipated to be present in the alluvium deposits.

The Geo-tech also addressed groundwater conditions and found groundwater in both the borings at approximately 20.50 feet below grades. The report concludes that groundwater levels are expected to fluctuate in response to water levels in the Cedar River and would vary as a function of season, precipitation, and other factors.

GeoEngineers concluded based on the soil analysis, that the site soils are moderately to highly susceptible to liquefaction under the design earthquake event. Given the slopes located along the banks of the Cedar River both settlement and lateral deformation of the foundations elements (towards the Cedar River) may occur potentially resulting in excessive foundation deformation. Furthermore the potentially liquefiable soils present a risk to the existing building through loss of foundation support, potential foundation settlement, and lateral deformation of soils towards the Cedar River. The Geo-tech recommends the use of ground improvements to meet seismic settlement and building performance tolerances. The preferred ground improvement option is a system comprised of closely spaced augercast piles to mitigate the liquefaction potential at the Cedar River banks on the north and south sides of the building. Approximately 900 cubic yards of soil would be excavated to install the below-grade concrete abutments or augercast piles and 360 cubic yards of fill would be used on site above the abutments. Pursuant to the provided report, the purpose of the ground improvement is to provide a 'block' of improved soil that would resist seismic lateral earth pressure acting towards the river and to provide improved bearing of the spread footings currently located on the river banks. GeoEngineers further conclude that the soil exploration indicated that the soils located below the river bottom elevation have a low risk of liquefaction, therefore, no additional improvements of the interior piers is considered to be necessary. The above ground improvement option is expected to mitigate potential liquefaction hazards in the immediate vicinity of the foundation elements located on the river bank and provide anchorage to the building to help resist seismic lateral forces.

In addition to the above ground improvement recommendations the provided Geo-tech includes recommendations for augercast piles, earthwork including clearing and site preparation, subgrade preparation, structural fill, materials, reuse of on-site soils, fill placement and compaction criteria, weather considerations, temporary slopes, utility trenches and additional geotechnical services recommendations. Based on the recommendations included in the provided report, staff recommends as a mitigation measure that the applicant comply with the recommendations included in the provided Geotechnical Report prepared by GeoEngineers.

Mitigation Measures: The applicant shall comply with the recommendations included in the Geotechnical Engineering Study prepared by GeoEngineers, dated December 20, 2012.

Nexus: SEPA Environmental Review, RMC 4-3-050 Critical Areas Regulations, RMC 4-4-060 Grading, Excavation and Mining Regulations.

2. Water

a. Wetland, Streams, Lakes

Impacts: The existing building spans the Cedar River, a shoreline of the State. As such, the project is subject to the Shoreline Master Program regulations. The site is located in the Shoreline High Intensity overlay along Cedar River Reach B. The ordinary high water mark (OHWM) for the Cedar River at the project location is general associated with the 34 foot above mean sea level (amsl) contour line and the 100-year FEMA floodplain is located at elevation 39.62 amsl. The proposed

rehabilitation work would be limited to the library structure above the river only, no work would occur within the regulatory floodplain or below the OHWM.

Due to the project's location, over the Cedar River, the applicant submitted a Stream Study and Habitat Data Report prepared by Talasaea Consultants, Inc., dated February 28, 2013. The study was prepared pursuant to the requirements of the Renton Municipal Code for both the Shoreline Master Program and the Critical Areas Regulations. The report identifies and describes the river, critical species and habitat on or adjacent to the project site, provides a regulatory review of local, State and Federal regulations and proposes mitigation for impacts to critical areas and habitat.

Pursuant to the provided Stream Study, the Cedar River is located in the Cedar-Sammamish watershed (WRIA – 8) and is approximately 100 feet wide. The water depth at the site was observed to be approximately 18 inches in the summer of 2012 and 3 feet in the fall of 2012. The in-stream substrate consists of clean gravel and cobble, however no natural pools, woody debris, or other fish habitat features were observed in the vicinity of the project by Talasaea. The stream study identifies the shoreline riparian habitat in the vicinity of the library building to be very narrow (30-50 feet max), and adjacent to urban impervious surface on the left bank and a baseball field/City park on the right bank. The riparian habitat downstream is dominated by invasive species including reed canarygrass, Japanese knotweed, and Himalayan blackberry. Tree species within the existing riparian habitat include: sycamore, black cottonwood, and horse chestnut. The upstream riparian habitat is similarly dominated by Himalayan blackberry, with slightly improved salmonberry habitat located on the left upstream bank.

The Stream Study concludes that there would be no direct impacts to the Cedar River, adjacent riparian habitat or State Shoreline area anticipated during or after construction, resulting in no net loss of ecological functions. This conclusion is based on the following reasons: 1) all work would occur within the footprint of the existing development for the library and would stay above the 100-year flood plain and above the OHWM; 2) the footprint of the existing disturbed/developed area within the shoreline zone would not be expanded as a result of the project; 3) all existing shoreline vegetation would remain intact; 4) portions of the existing library structure would be demolished which would result in a net reduction of approximately 1,700 square feet or 7 percent of the library structure's building itself and adjacent pedestrian bridge; 5) Best Management Practices (BMPs) would be implemented during construction to minimize temporary construction impacts to the aquatic environment; and 6) the project would comply with all applicable City ordinances including, but not limited to, stormwater management requirements, and those related to traffic, noise and aesthetics during and after construction.

The Stream Study provides a list of recommended BMP's which are intended to be employed during construction to ensure adequate protection of water quality and the aquatic and shoreline environment. The BMPs are divided into a set of general goals which have been defined to guide construction activities and ensure adequate protection of the aquatic and shoreline environment. Suggested specific BMPs are listed after each goal in the study, which is not intended to be an exhaustive list but instead a list of BMPs which shall be implemented as needed to meet the identified goals. The study has identified that implementation of BMPs would be the responsibility of the constructor to identify the appropriate BMPs for the different phases and types of work being conducted at the site. The following is a list of goals provided in the Stream Study:

Goal 1: Trash, construction/demolition debris, and other contaminants shall be kept out of the river and shoreline environment at all times during construction.

Goal 2: Dust Control, including minimizing, containment and collection of dust.

Goal 3: General worksite management including proper storage of materials and construction debris and worksite cleanup.

Goal 4: Work timing and scheduling in order to prevent debris from entering the aquatic environment.

Goal 5: Stormwater management BMPs shall be implemented in accordance with the 2009 King County Surface Water Design Manual (KCSWDM) and a Temporary erosion and sedimentation control plan.

In addition to the proposed BMPs, Talasaea has identified that the applicant would contribute \$22,700 to a vegetation conservation fund, which is administered by the City of Renton to meet the requirements of the Shoreline Master Program RMC 4-3-095F. This amount has been calculated based on the actual area of shoreline buffer contained within the project limits, which includes any area landward of the OHWM. The total shoreline buffer area contained within the project limits is approximately 18,130 SF. This area was multiplied by a dollar amount of \$1.25/SF to calculate an amount for what it would hypothetically cost to restore an area of shoreline buffer equal to the area within the project limits. Based on the recommendations included in the Stream Study, staff recommends the applicant comply with these recommendations as mitigation for the subject project.

On June 12, 2013, the City received comments from the Muckleshoot Indian Tribe Fisheries Division (Exhibit 11). These comments include a request for lighting review and specific light bulbs to be used at the new library to reduce the potential impacts of artificial lighting on the fish. In addition, they have requested a wood management plan and a copy of the stormwater report. Their comments expressed concerns about the gabion baskets located in the Cedar River below the existing building and construction noise impacts. Finally, their comments appeared to be supportive of the fee-in-lieu option for the shoreline master program required mitigation.

Mitigation Measures: The applicant shall comply with the recommendations included in the Stream Study and Habitat Data Report, prepared by Talasaea Consultants, Inc., dated February 28, 2013 and revised May 10, 2013

Nexus: SEPA Environmental Regulations, Critical Areas Regulations

b. Storm Water

Impacts: A Technical Information Report (TIR) was submitted with the application, prepared by Miller Hull Partnership, LLP dated May 10, 2013. The report complies with the 2009 King County Surface Water Manual and the 2009 City of Renton Amendments to the KCSWM, Chapters 1 and 2. The TIR indicates that the existing site consist of 0.793 acres of impervious area and 0.071 acres pervious area. Following the rehabilitation of the library, the site would consist of 0.788 acre impervious area and 0.076 acres pervious area.

The TIR identified three distinct areas with different drainage patterns. The existing library building roof runoff discharges directly to the Cedar River through piped outfalls. The parking lot to the south is collected in onsite catch basins and is routed to river outfalls in the near vicinity of the site. Finally, the park property within the site work limits to the north discharges to existing piped outfalls to the River. The proposed drainage system at the site has been identified to remain relatively unchanged, as the project is primarily a building rehabilitation project. Runoff from the site would be conveyed to existing storm systems in the parking lot and the park area to the north.

The roof drainage from the library would continue to utilize existing outfalls to the Cedar River. Portion of the existing drainage system onsite are proposed to be removed to make room for the new library entrance improvements. A small amount of new catch basins and conveyance piping would be installed in the parking lot to convey runoff to the existing system to the south. Pollution generating surface would be basically unchanged; therefore, no water quality mitigation is proposed to be installed as a part of the project.

The TIR included an upstream and downstream analysis, which concluded that there was no known drainage that enters the site from upstream and that there were no known drainage complaints within ¼ mile of the site. As such no mitigation was proposed for downstream drainage problems. The Library is located over the floodway of the Cedar River and any work within the floodplain or the floodway would have to comply with City adopted flood hazard regulations in the Critical Areas Ordinance and FEMA National Flood Insurance Program regulations. This also includes compliance with the National Marine Fisheries Biological Opinion Reasonable and Prudent Alternatives regarding the National Flood Insurance Program compliance with the Endangered Species Act, as they relate to development in the FEMA floodplain. FEMA regulations require that when a structure is located in the 100-year floodplain, any substantial improvements (i.e. when cost of improvements exceeds 50% of the appraised value of the structure) require the structure to be brought up to current floodplain development standards. Any improvements within the floodplain or floodway, such as placement of fill, piers or supports as part of the seismic retrofit work within the floodplain or floodway, will need to comply with FEMA floodplain requirements. Based on the provided TIR, no work is being proposed within the base flood elevation or within the FEMA floodway. Special consideration of design has been made to ensure that no alteration within these zones would occur.

In addition, the TIR indicated that a Temporary Erosion and Sediment Control (TESC) Plan would be provided including the following:

1. The project would provide sediment protection at the existing catch basins and maintain existing hardscape areas until areas would be re-paved.
2. For the period between November 1 through March 1, disturbed areas greater than 5,000 square feet left undisturbed for more than 12 hours must be covered with mulch, sodding, or plastic covering. A construction phasing plan would be provided to ensure that erosion control measures are installed prior to clearing and grading.
3. There shall be limits to tributary drainage to an area to be cleared and graded. Delineated dimension, stake and flag clearing limits.
4. Revegetate areas to be cleared as soon as practicable after grading.

Mitigation Measures: No further mitigation required.

Nexus: N/A

3. Vegetation

Impacts: The existing site is currently vegetated with ornamental landscaping and lawn areas in the vicinity of the existing structure. Scattered around the site are deciduous and coniferous trees/shrubs (see Wildlife and Stream sections for riparian vegetation information). The existing site contains 16 trees of which all will be retained with the exception of one 12-inch diameter cherry tree located in the southeast corner of the site. The removed cherry tree is proposed to be replaced with a 2-inch caliper river birch tree. In addition, to the 12-inch cherry tree, one street tree along Mill Ave. S is proposed to be removed. This is a result of the sanitary sewer line

improvements required for the project. This tree would be replaced in the same location with a 2-inch caliper Northern Red Oak.

In addition to the new trees, the applicant is proposing to revegetate all disturbed areas on the project site. In the SEPA checklist, the applicant has indicated that the planning palette would include native and non-native adapted/drought tolerant species including such plants as maidenhair fern, kinnickinick, deer fern, mock orange, salmonberry etc.

Mitigation Measures: No further mitigation required.

Nexus: N/A

4. Wildlife

Impacts: The applicant submitted a Stream Study and Habitat Data Report, prepared by Talasaea Consultants, Inc., dated February 28, 2013 with the application. The Habitat Report included a habitat assessment to determine the extent, functions, values, and existing conditions of the critical habitat on the site. The Habitat Report identified that the Cedar River is known to support Federally-listed (threatened) Chinook salmon and steelhead trout, along with coho salmon, a Federally-listed Candidate species, and sockeye salmon, a State Candidate species. Bull trout are listed in the Priority Habitat and Species (PHS) database as species of commercial and recreation interest.

Pursuant to Washington Department of Fish and Wildlife (WDFW) Salmonscape and StreamNet, the subject portion of the Cedar River is a documented spawning/rearing area for fall Chinook, coho, and sockeye, and is a documented rear area for winter steelhead. Bull trout are confirmed to be located in the area however cutthroat trout are not documented in the area by Salmonscape or StreamNet.

Talasaea conducted a field investigation on July 9 and November 2, 2012. During the field investigation, Talasaea completed a characterization of the habitat within the project site. Based on this characterization, the area directly beneath the library does not receive direct sunlight and is mostly devoid of vegetation. The left bank between the library and Bronson Way N (downstream) contains reed canarygrass within the streambed and floodplain. Japanese knotweed and Himalayan blackberry dominate the left and right bank slopes. Sycamore trees are located on top of the left bank adjacent to the parking lot. Black cottonwood and horse chestnut trees are growing on the right bank. The upstream riparian habitat is similarly dominated by Himalayan blackberry, with slightly improved salmonberry habitat located on the left upstream bank.

The Habitat Report identifies that the area's highly urbanized conditions results in wildlife species typically found in urban and residential areas, such as birds and small and medium-sized mammals. The Habitat Report concludes that the riparian vegetation in the project area provides only minimal buffer for the fish-bearing Cedar River and is of relatively low value to the watershed as a whole. Moreover, the assessment concludes that the project would not result in direct impacts to the riparian habitat during or after construction, resulting in no net loss of ecological functions and values. This is a result of a combination of limiting the renovation to the area of existing development and not expanding the existing disturbed/developed area within the shoreline zone. Finally, the study states that a portion of the library structure over the river would be demolished which would result in a net reduction of the library footprint over the river and BMPs would be implemented during construction to minimize temporary construction impacts to the aquatic environment.

Chapter 7 of the Stream Study and Habitat Data Report is a literature review evaluating the effects of light on salmonid predation to evaluate the possible pre-existing effect that the library may have on salmonid predation. Both studies evaluated found that predation is lowest under dark conditions, and increases as light and visibility increases. Furthermore Talasaea contacted Hans Berge, the King County expert on fish and the Cedar River watershed. Mr. Berge relayed that shade does not contribute to increased predation, but that excess light does contribute to increased predation. Talasaea concluded that the information indicated that the area under the library may provide a refuge for salmonids because predation would be higher upstream and downstream of the library where the river is always illuminated by sunlight and the lights of surrounding urban area. Moreover, Talasaea concludes that given the general lack of natural shade along this reach of the Cedar River, the shadow of the library across the river is likely to have beneficial effect, if any at all. Based on the recommendations included in the Habitat Data Report, staff recommends the applicant comply with these recommendations as mitigation for the subject project.

Mitigation Measures: The applicant shall comply with the recommendations included in the Stream Study and Habitat Data Report, prepared by Talasaea Consultants, Inc., dated February 28, 2013 and revised May 10, 2013

Nexus: SEPA Environmental Regulations, Critical Areas Regulations

5. Light and Glare

Impacts: The rehabilitated library structure would be designed with interior and exterior lighting. Based on the provided SEPA checklist, the applicant has indicated that the project would use downlights with excellent shielding and cutoffs. These types of lights would be incorporated into all spaces interior and exterior. The check list indicated that the placement of exterior fixtures in the plaza would contain the light to the plaza and would not impact the river or night sky. Light levels would meet but not exceed illuminating Engineering Society recommendations to provide the industry standard amount of light and minimize over lighting the space. Automatic controls would be implemented to turn off non-critical lighting after-hours to further reduce light impacts. The City received comments from the Muckleshoot Tribe on June 12, 2013 which included comments regarding lighting impacts on the Cedar River (Exhibit 11). The applicant has proposed lighting mitigation as identified above, however due to the concerns raised in the Muckleshoot's comment, staff recommends a mitigation measure that lighting be designed and placed in such a way that is shields spill over into the river at the same time balancing site safety standards.

Mitigation Measures: The applicant shall design and place lighting so that it is shielded from impacting the Cedar River and at the same time balances necessary lighting for site safety standards.

Nexus: SEPA Environmental Regulations, RMC 4-4-075 Lighting, Exterior On-site

6. Parks and Recreation

Impacts: The subject project is located within Liberty Park in downtown Renton. However, the project limits restrict the area of impact to primarily the library building and a small area on both the north and south sides of the building. The north side of the library is located in Liberty Park and construction impacts would extend approximately 30 feet north of the north edge of the existing building. This would result in temporary construction impact to a small plaza area and trail access to the walkway along the river in this location. There are other access locations to the river trail which would not be impacted by the subject project and no impacts are anticipated to any

recreational uses in the park. The construction impacts are temporary in nature and are not anticipated to have an adverse impact on Liberty Park.

Mitigation Measures: No further mitigation required.

Nexus: N/A

7. Transportation

Impacts: The site is surrounded by Mill Ave S, Bronson Way N, and S 2nd Street. Under current condition, the site is primarily access by vehicles from Mill Ave. S, to the existing surface parking lot. However, there is also a parking lot located in Liberty Park, which is accessed off of Bronson Way N, which may also be utilized by people using the library. The proposed site access and parking facilities are primarily proposed to stay the same. The existing surface parking lot along Mill Ave. S would lose four parking stalls following the project's construction. Trips associated with the project are not anticipated to change, as the existing use is not changing. The public sidewalk along Mill Ave. S would be updated as a part of a 2014 City of Renton sidewalk improvement project and would not be included in the rehabilitation of the library.

Mitigation Measures: No further mitigation required.

Nexus: N/A

E. Comments of Reviewing Departments

The proposal has been circulated to City Department and Division Reviewers. Where applicable, their comments have been incorporated into the text of this report and/or "Advisory Notes to Applicant."

- ✓ **Copies of all Review Comments are contained in the Official File and may be attached to this report.**

The Environmental Determination decision will become final if the decision is not appealed within the 14-day appeal period (RCW 43.21.C.075(3); WAC 197-11-680).

Environmental Determination Appeal Process: Appeals of the environmental determination must be filed in writing together with the required fee to: Hearing Examiner, City of Renton, 1055 South Grady Way, Renton, WA 98057, on or before 5:00 p.m. on July 5, 2013. RMC 4-8-110 governs appeals to the Hearing Examiner and additional information regarding the appeal process may be obtained from the City Clerk's Office, Renton City Hall – 7th Floor, (425) 430-6510.

ADVISORY NOTES TO APPLICANT

The following notes are supplemental information provided in conjunction with the administrative land use action. Because these notes are provided as information only, they are not subject to the appeal process for the land use actions.

Planning:

1. RMC section 4-4-030.C.2 limits haul hours between 8:30 am to 3:30 pm, Monday through Friday unless otherwise approved by the Development Services Division.
2. Commercial, multi-family, new single family and other nonresidential construction activities shall be restricted to the hours between seven o'clock (7:00) a.m. and eight o'clock (8:00) p.m., Monday through Friday. Work on Saturdays shall be restricted to the hours between nine o'clock (9:00)

a.m. and eight o'clock (8:00) p.m. No work shall be permitted on Sundays.

3. Within thirty (30) days of completion of grading work, the applicant shall hydroseed or plant an appropriate ground cover over any portion of the site that is graded or cleared of vegetation and where no further construction work will occur within ninety (90) days. Alternative measures such as mulch, sodding, or plastic covering as specified in the current King County Surface Water Management Design Manual as adopted by the City of Renton may be proposed between the dates of November 1st and March 31st of each year. The Development Services Division's approval of this work is required prior to final inspection and approval of the permit.
4. A National Permit Discharge Elimination System (NPDES) permit is required when more than one acre is being cleared.
5. The applicant may not fill, excavate, stack or store any equipment, dispose of any materials, supplies or fluids, operate any equipment, install impervious surfaces, or compact the earth in any way within the area defined by the drip line of any tree to be retained.
6. The applicant shall erect and maintain six foot (6') high chain link temporary construction fencing around the drip lines of all retained trees, or along the perimeter of a stand of retained trees. Placards shall be placed on fencing every fifty feet (50') indicating the words, "NO TRESPASSING – Protected Trees" or on each side of the fencing if less than fifty feet (50'). Site access to individually protected trees or groups of trees shall be fenced and signed. Individual trees shall be fenced on four (4) sides. In addition, the applicant shall provide supervision whenever equipment or trucks are moving near trees.

Plan Review – Sanitary Sewer:

1. Sewer service is provided by the City of Renton. There is an 8-inch sewer main in Mill Avenue South with a manhole at the intersection with South 2nd Street. The existing sewer service connection extends southerly to this main.
2. The project is required to cut and cap the existing side sewer at the property line as part of the demolition permit.
3. A new side sewer is shown on the preliminary drawings and shall be installed to the updated building as condition of the building permit.

Plan Review – Storm Drainage:

1. The FEMA approved 100-year base flood elevation at the Renton Library over the Cedar River is elevation 39.62 based upon the NAVD 88 Datum per the FEMA approved 2006 Cedar River Letter of Map Revision (LOMR) Case No. 06-10-B596P.
2. The Library is located over the floodway of the Cedar River and any work within the floodplain or the floodway would have to comply with City adopted flood hazard regulations in the Critical Areas Ordinance and FEMA National Flood Insurance Program regulations. This also includes compliance with the National Marine Fisheries Biological Opinion Reasonable and Prudent Alternatives regarding the National Flood Insurance Program compliance with the Endangered Species Act, as they relate to development in the FEMA floodplain.
3. FEMA regulations require that when a structure is located in the 100-year floodplain, any substantial improvements (i.e. when cost of improvements exceeds 50% of the appraised value of the structure) require the structure to be brought up to current floodplain development standards. Any improvements within the floodplain or floodway, such as placement of fill, piers or supports as part of the seismic retrofit work within the floodplain or floodway, will need to comply with FEMA floodplain requirements.
4. The applicant must show the 100-year base flood elevation (39.62 NAVD 88 Datum) on the construction

plans.

5. A drainage plan and drainage report was submitted with the site plan application. The report complies with the 2009 King County Surface Water Manual and the 2009 City of Renton Amendments to the KCSWM, Chapters 1 and 2. A final TIR is required with the building permit.

Plan Review – Transportation/Street:

1. A 12-foot sidewalk with cut-outs for street trees is not required to be constructed with the project.
2. A traffic study was not required for this project as the use is the same with a smaller building.

Plan Review – General Comments:

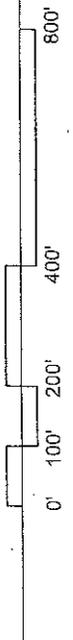
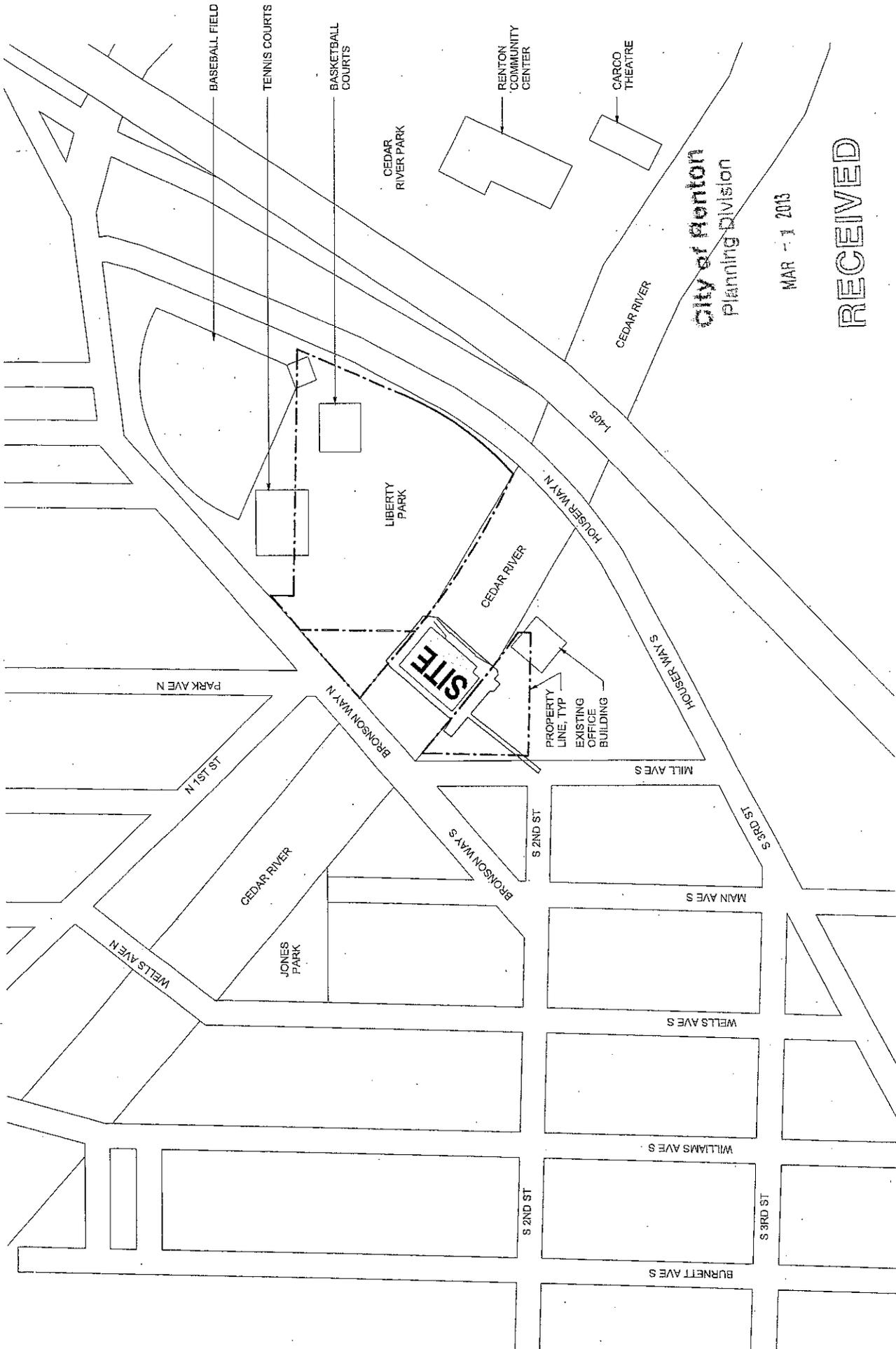
1. All construction utility permits for drainage and street improvements will require separate plan submittals. All utility plans shall conform to the Renton Drafting Standards. Plans shall be prepared by a licensed Civil Engineer.
2. Separate permits are required for the water meter installation, side sewer connection, and storm water connection.

Fire:

1. The fire hydrant and fire flow requirements for the proposed library are adequate as they exist.
2. The existing automatic fire sprinkler system will be required to be modified for any tenant improvement work.
3. The existing fire department apparatus access roads are adequate.
4. The existing automatic fire alarm system shall be replaced with an all new system as the existing system cannot meet current fire code requirements. System shall be fully addressable and full detection is required.
5. Exiting shall meet all current building and fire code requirements.

Police:

Recommendations: Due to the renovation vs. new construction, this review would be better served by a security survey following the completion of the improvement project. CFS would remain about the same since there will be no additional structural space added.



1 VICINITY MAP 1" = 200'

1" = 200'-0"

EXHIBIT 1

CONSTRUCTION
 10/1/2013

**RENTON LIBRARY
 AT LIBERTY PARK**
 SITE PLAN REVIEW
 100 MILL AVENUE SOUTH | RENTON, WA 98057
 5.10.2013



No.	Description	Date
31013		

Issue Date: 5.10.2013
 Checked: [Signature]
 CPL Project No.: 01000000

T.E.S.C.
 PLAN
C-200

Call before you dig. B-1-1
 800-4-A-DIG-4-1-1
 800-427-4441

SCALE 1"=20'

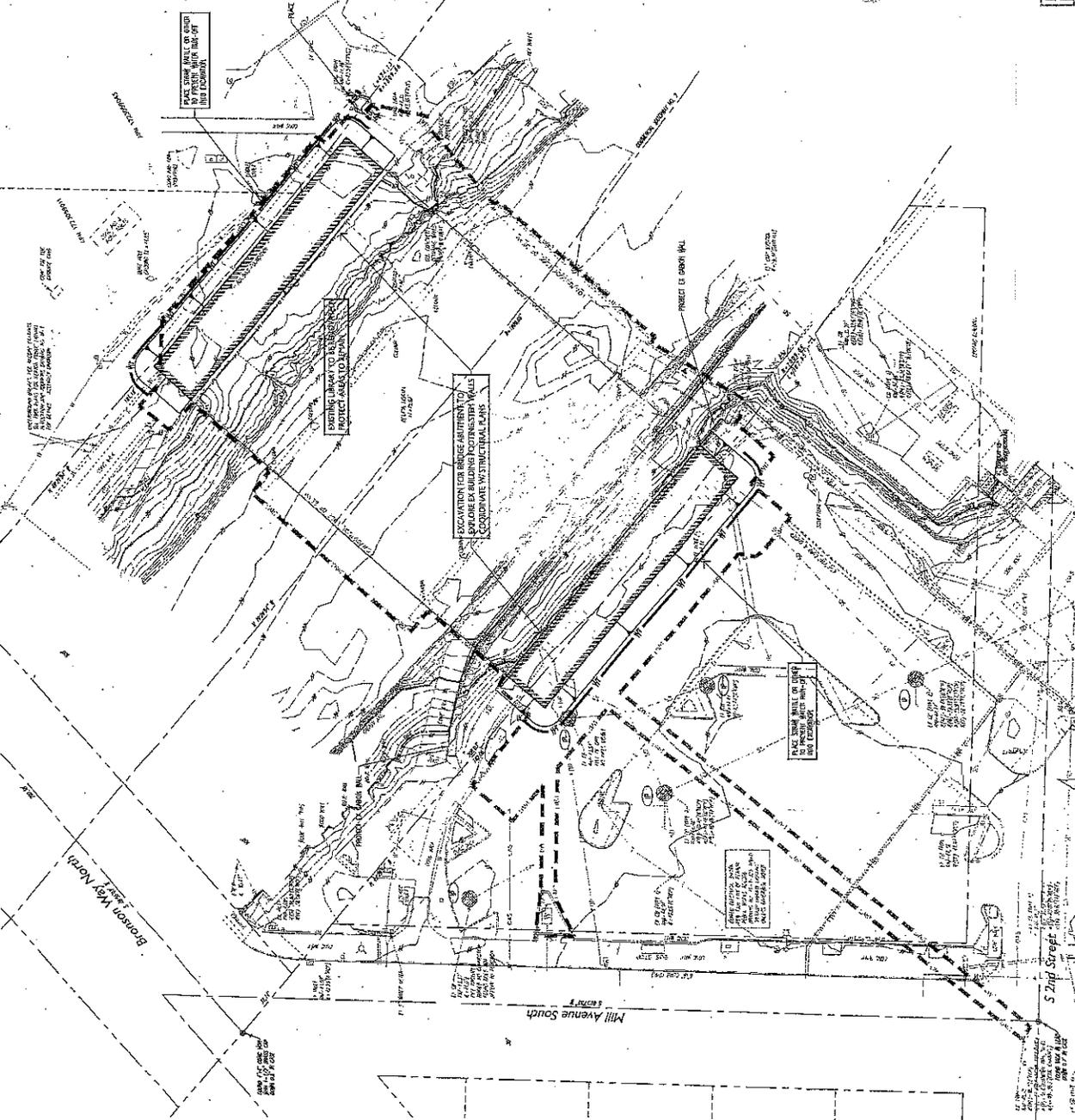
LEGEND

ASPHALT DRIVE	EXISTING DRIVE	PROPOSED DRIVE
CONCRETE CONC.	CONCRETE CONC.	CONCRETE CONC.
BRICKS	BRICKS	BRICKS
CONCRETE ANCHOR	CONCRETE ANCHOR	CONCRETE ANCHOR
CONSTRUCTION LOTS	CONSTRUCTION LOTS	CONSTRUCTION LOTS
OWNER'S SIGN MARK	OWNER'S SIGN MARK	OWNER'S SIGN MARK
NO. OF A HOUSE LOT	NO. OF A HOUSE LOT	NO. OF A HOUSE LOT
SUBJECT LOT	SUBJECT LOT	SUBJECT LOT
CONCRETE	CONCRETE	CONCRETE
ROCK	ROCK	ROCK
TREE REMOVAL	TREE REMOVAL	TREE REMOVAL
CONCRETE (HATCH)	CONCRETE (HATCH)	CONCRETE (HATCH)
CONCRETE	CONCRETE	CONCRETE
BRICK LITE	BRICK LITE	BRICK LITE
SOFT SWAMPY GROUND	SOFT SWAMPY GROUND	SOFT SWAMPY GROUND
SHOWER WATER LINE	SHOWER WATER LINE	SHOWER WATER LINE
POWERS	POWERS	POWERS
TELEPHONE LINE	TELEPHONE LINE	TELEPHONE LINE
GAS LINE	GAS LINE	GAS LINE
WATER MAIN/SEWER	WATER MAIN/SEWER	WATER MAIN/SEWER
SMALL CATCH	SMALL CATCH	SMALL CATCH
SEWER WATER LINE	SEWER WATER LINE	SEWER WATER LINE
GAS VALVE/VALVE	GAS VALVE/VALVE	GAS VALVE/VALVE
STREET LIGHT	STREET LIGHT	STREET LIGHT
UNDERGROUND	UNDERGROUND	UNDERGROUND

BMP LEGEND

WATERPROOF BANK
 CONTRACTOR ROCK
 STONE PAVEMENT
 CONCRETE/GRANITE
 BUILT PROTECTION
 PUBLIC COVERING
 STABILIZED SOIL
 SOIL OR HYPERMEDIATION

PAVE SHOW HATCH OR OTHER
 TO IDENTIFY THE TYPE OF BMP
 (SEE FIG. 10.1)



City of Renton
 Planning Division

MAR - 1 2013

RECEIVED

EXHIBIT 5

From: Karen Walter <KWalter@muckleshoot.nsn.us>
Sent: Wednesday, June 12, 2013 2:16 PM
To: Vanessa Dolbee
Cc: Fisher, Larry D (DFW)
Subject: Renton Library at Liberty Park, LUA13-000255, ECF, SM, SA-H, Notice of Application and Proposed Determination of Non-Significance, Mitigated

Follow Up Flag: Follow up
Flag Status: Flagged

Vanessa,

We have reviewed the Notice of Application materials for the Renton Library redevelopment project referenced above. This project will remodel the existing library located over the Cedar River. When we met with City staff and the consulting team in February 2013, we identified several issues for this project as noted below and offer recommendations where we can based on the information reviewed to date:

1. Artificial lighting- The checklist and the Critical Areas Report (CAR) discuss how the project will seek to reduce artificial lighting impacts in several ways. In addition to the measures proposed, we also recommend that the City use light bulbs which reduce artificial lighting opportunities to the Cedar River or nighttime sky. Previously, we provided information to City public Works staff about potential light bulb options that could be used. We also request a copy of the detailed site lighting plan for our review which is proposed to be part of the final construction plans.
2. Stormwater- We need additional information about the details as to how stormwater will be managed from redeveloped site, particularly for water quality. We request a copy of the Technical Information Report which likely contains the stormwater management details.
3. Wood management plan- At the February meeting, we indicated that the site should develop a wood management plan to deal with any wood that may approach or be entrained by the existing concrete piling in the Cedar River. This issue was not addressed in CAR. Wood management is needed to ensure that wood is not removed from the Cedar River or its banks unless it is absolutely necessary. Wood is shown being near the site from the photos the City provided in February. Wood may no longer be on or adjacent to the site with winter floods; however, the City should plan on wood transported to and through the site with time and future floods. It is timely to develop a wood management plan now as part of the redeveloped library. Please note that Boeing developed a wood management plan for its Cedar River bridges. We recommend that the City review it for applicability to the library site.
4. Gabion baskets- We understand that there is no bank work or modifications to the existing gabion baskets used to stabilize the river banks located on the site. Gabion baskets are subject to failure when exposed to streambed scour flows, requiring require repair or replacement with some regularity. When they fail, they can adversely affect fish habitat by adding angular rock to the stream channel that can create beneficial habitat spaces for sculpin and other salmon predators. In addition, the broken metal baskets can entrap adult salmon causing injury or mortality. In the course of a tagging study that included sonic tags, MITFD staff found dozens of live and dead adult salmon an arm's length from the bank inside several failed gabion baskets in the lower Cedar project reach. These fish presumably were seeking hiding cover or slow velocity resting places and were unable to complete their migration and spawning cycle in the Cedar River. The gabions also create poor salmon habitat conditions in the lower Cedar River by eliminating the complex natural stream bank habitats characterized by low-velocity areas, vegetation, pools, and undercut banks that are preferred by juvenile and adult salmon and reducing bank sources for spawning gravel. When the gabion baskets in the project area need repair, other alternatives that provide bank stability and improve habitat conditions for salmon should be pursued.
5. Construction Noise- The project should seek to minimize disturbance to spawning sockeye and Chinook in the vicinity from construction activity, particularly any piling driving activity that may be needed.
6. Shoreline mitigation- We recognize that the project needs to comply with the City's Vegetation Conservation provisions from the Shoreline Master Program and there are limited opportunities to meet the 100-foot vegetated

shoreline buffer requirement. Per the CAR, the applicant is proposing to pay an "in-lieu-fee" to the City's Vegetation Conservation Fund, which needs to be set up. Further, the CAR identifies several potential sites and actions on page 14 where the in-lieu fee could be spent. We are keenly interested in seeing the lower Cedar River's riparian areas enhanced and request the opportunity to work closely with City staff for this project, as well as, the overall framework approach to implement the in-lieu program. For this project's in-lieu proposal, we would like to work with the City to verify the extent of the impact area; the proposed fee amount; and the mitigation project area. For example, the \$1.25 per square foot rate may be too low and only cover the costs of acquiring and planting plants which may not be sufficient to actually plant areas if easements, acquisitions, and permits are needed. Once a rate is accepted by the City it is likely that others will seek to use the same rate, so it is important to ensure that the in-lieu rate is sufficient to cover all of the mitigation project costs.

We appreciate the opportunity to review this proposal and look forward to the City's responses and coordination. Please let me know if you have any questions.

Thank you,
Karen Walter
Watersheds and Land Use Team Leader

*Muckleshoot Indian Tribe Fisheries Division
Habitat Program
39015 172nd Ave SE
Auburn, WA 98092
253-876-3116*