

**Final Environmental Impact Statement**

# **Hyla Crossing and Rowley Center Project**

**Prepared by the  
City of Issaquah**



**November 2011**



PLANNING DEPARTMENT  
P.O. BOX 1307 - 1775 12TH AVENUE NW  
ISSAQUAH, WA 98027-1307  
(425) 837-3080 FAX (425) 837-3089

November 28, 2011

**Re: Hyla Crossing and Rowley Center Project  
Final Environmental Impact Statement (FEIS)**

Dear EIS Recipient:

The City of Issaquah is issuing the Final Environmental Impact Statement (FEIS) for the Hyla Crossing and Rowley Center Project. This FEIS responds to written comments received during the comment period on the DEIS; makes factual corrections to the DEIS; and updates the information, analysis of environmental impacts, and mitigation measures contained in the DEIS. As such, the FEIS should be used in conjunction with the DEIS. The FEIS also includes the applicant's preferred development alternative, which reflects the medium density Alternative 2 evaluated in the DEIS.

The FEIS is intended to provide decision-makers with environmental information about the proposal and to assist them with mitigation measures or conditions to address the environmental impacts of the project. It is the City's record of the environmental analysis conducted for the proposal.

Together, the DEIS and FEIS fulfill the State Environmental Policy Act (SEPA) requirements for Planned Action environmental review for future redevelopment of the Rowley Properties site, per RCW 43.21C.031. The City of Issaquah and Rowley Properties are preparing a Development Agreement that will guide the long-term redevelopment of the site. Concurrent with adoption of a Development Agreement, it is contemplated the City will adopt implementing land use regulations and a Planned Action Ordinance for the site, consistent with SEPA (WAC 197-11-168(C)).

FEIS Organization

This FEIS has been prepared pursuant to SEPA, Chapter 43.21C RCW and the SEPA Rules (including WAC 197-11-440 and 197-11-620). The FEIS together with the DEIS provide a detailed examination of the probable significant environmental impacts of the proposed project, as required by SEPA. The FEIS is organized as follows:

- Chapter 1: A summary of the FEIS, a brief description of the DEIS alternatives and the applicant's Preferred Alternative, an updated comprehensive overview of the significant environmental impacts of the project, and an updated table of mitigation measures.
- Chapter 2: A more complete description of the applicant's Preferred Alternative.

- Chapter 3: Updated information and analysis completed since issuance of the DEIS.  
Chapter 4: Public/agency comment letters on the DEIS and responses to the comments in these letters.  
Chapter 5: An Errata identifying corrections to the DEIS.

Applicant's Preferred Alternative

Subsequent to issuance of the DEIS, the applicant identified Alternative 2, 60 percent commercial/light industrial uses and 40 percent residential uses, as their Preferred Alternative. Approximately 3.8 million square feet of occupiable building space (building space, less the space in structured parking) is assumed under this Alternative. Additional occupiable building space may be developed (up to approximately 4.4 million square feet) if it is confirmed that the number of PM peak hour vehicle trips generated by the additional development would not exceed the number of PM peak hour vehicle trips analyzed for Alternative 2

Next Steps

There is no comment period for a FEIS. Final City Council action on the Development Agreement and Planned Action Ordinance is anticipated in December.

The FEIS is also available online at [www.ci.issaquah.wa.us](http://www.ci.issaquah.wa.us) or at the City of Issaquah Permit Center, located at 1775 12<sup>th</sup> Avenue NW.

Thank you for your interest and participation in this environmental review.

Sincerely,



Mark Hinthorne  
Planning Director - SEPA Responsible Official

MH/PR/nb

Enclosure

***FINAL***

**ENVIRONMENTAL IMPACT STATEMENT**

for the

**HYLA CROSSING AND  
ROWLEY CENTER PROJECT**

City of Issaquah

The Final EIS (FEIS) for the *Hyla Crossing and Rowley Center Project* has been prepared in compliance with the State Environmental Policy Act of 1971 (Chapter 43.21C, Revised Code of Washington) and the SEPA Rules, effective April 4, 1984, as amended (Chapter 197-11, Washington Administrative Code). Preparation of this FEIS is the responsibility of the City of Issaquah. The City of Issaquah has determined that this document has been prepared in a responsible manner using appropriate methodology and they have directed the areas of research and analysis that were undertaken in preparation of this FEIS. This document is not an authorization for an action, nor does it constitute a decision or a recommendation for an action; in its final form, it will accompany the *Proposed Actions* and will be considered in making the final decisions on the proposal.

**Date of Final EIS Issuance .....November 28, 2011**

## **FACT SHEET**

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<b>PROJECT TITLE</b>	<b>Hyla Crossing and Rowley Center Project</b>
<b>PROPONENT/APPLICANT</b>	<b>Rowley Properties, Inc.</b>
<b>LOCATION</b>	<p>The Rowley Properties site is located in the Central Issaquah area and is comprised of the Hyla Crossing Area and Rowley Center Area. The Hyla Crossing Area is generally bounded by I-90 to the north, SR-900 to the east, NW Maple Street to the south, and Tibbetts Creek to the west. The Rowley Center Area is generally bounded by NW Gilman Boulevard to the north, 12<sup>th</sup> Avenue NW to the east, NW Maple Street to the south, and SR-900 to the west.</p>
<b>DRAFT EIS</b>	<p>A Draft Environmental Impact Statement (DEIS) was issued on August 31, 2011, that addresses the probable significant adverse impacts that could occur as a result of redevelopment of the site.</p> <p>For purposes of environmental review, the DEIS analyzes two redevelopment alternatives (Alternative 1 – the higher density alternative and Alternative 2 – the medium density alternative), as well as the No Action Alternative. These alternatives are described further below.</p> <p>Proposed redevelopment of the site under Alternatives 1 and 2 is based, in part, on the past and ongoing public planning process for the Central Issaquah area. The overall vision for the Central Issaquah Planning Area is to transform an area typified by suburban-scale strip malls and office complexes into a vibrant, pedestrian-oriented mixed-use neighborhood.</p>
<b>DEIS ALTERNATIVES</b>	<p><b>Alternative 1 – Higher Density Alternative</b></p> <p>Alternative 1 would provide the highest level of density of the EIS alternatives, and would include a total of approximately 6.5 million square feet of new mixed-use redevelopment over the assumed 20-year buildout period. Redevelopment would include retention of the existing Hilton Garden Inn Hotel and John L Scott Building (approximately 132,000 square feet). Two land use mix scenarios are analyzed under Alternative 1.</p>

Under the 60/40 land use mix scenario, redevelopment would include approximately 2.8 million square feet of commercial space (office, retail, restaurant, and entertainment) and approximately 1.7 million square feet of residential space providing 1,800 housing units. Parking for approximately 6,600 vehicles would be primarily provided within structured areas.

Under the 80/20 land use mix scenario, redevelopment would include approximately 3.5 million square feet of commercial space and 756,000 square feet of residential space providing approximately 800 housing units. Parking for approximately 7,000 vehicles would primarily be provided within structured areas.

Two building height scenarios are analyzed under Alternative 1; building heights in the Hyla Crossing and Rowley Center Areas could be up to a maximum of 200 feet or 150 feet.

In general, the proposed circulation system is intended to provide walkable blocks and encourage pedestrian activity. Existing roadways would continue to be utilized for vehicular access in the Hyla Crossing and Rowley Center Areas and new internal circulation roadways would be provided as redevelopment occurs in the areas. Pedestrian circulation would be provided through new and enhanced trails and sidewalks. Community space, comprised of green space and shared space, would be provided throughout the Hyla Crossing and Rowley Center Areas. Green space in the Hyla Crossing Area is intended to preserve and enhance the Tibbett's Creek Greenway. The Rowley Center Area community space would be more urban in nature.

### **Alternative 2 – Medium Density Alternative**

Alternative 2 is the medium density redevelopment alternative and would provide a total of approximately 5.5 million square feet of mixed-use redevelopment over the assumed 20-year buildout period. Redevelopment would include retention of the existing Hilton Garden Inn Hotel and John L Scott Building. As under Alternative 1, two land use mix scenarios are analyzed under Alternative 2.

Under the 60/40 land use mix scenario, redevelopment would include approximately 2.4 million square feet of commercial space (office, retail, restaurant, and entertainment) and approximately 1.4 million square feet of residential space that would provide 1,450 housing units. Parking for approximately 5,700 vehicles would primarily be provided within structured areas.

Under the 80/20 land use mix scenario, redevelopment would include approximately 3.0 million square feet of commercial space and 628,000 square feet of residential space that would provide approximately 660 housing units. Parking would primarily be provided within structured areas and would include approximately 6,000 parking stalls.

Similar to Alternative 1, two building height scenarios are analyzed under Alternative 2; building heights in the Hyla Crossing and Rowley Center Areas could be up to a maximum of 200 feet or 150 feet.

The proposed circulation system and proposed community space under Alternative 2 would be similar to those described for Alternative 1.

### **No Action Alternative**

The No Action Alternative includes two sub-alternatives: 1) redevelopment of the site under existing zoning together with buildout of the previously approved Hyla Crossing Master Site Plan (MSP); and, 2) continuation of existing conditions together with buildout of the previously approved Hyla Crossing MSP.

No Action Alternative – Existing Zoning - Under this sub-alternative, redevelopment is assumed to occur on the Rowley Properties site consistent with the existing zoning and the previously approved Hyla Crossing MSP. The majority of the existing structures on the site would be demolished, with the exception of the Hilton Garden Inn Hotel and John L Scott Building in the Hyla Crossing Area (approximately 132,000 square feet). Redevelopment would include commercial uses consistent with a suburban office campus environment and could include limited retail uses within the commercial buildings; shared parking

structures could also be provided on the site with approximately 5,500 parking stalls. Approximately 3.4 million square feet of building development would be provided on the site, including 1.7 million square feet of commercial development and 1.7 million square feet of parking area (structured parking and/or surface parking). Vehicular and pedestrian circulation would be provided by existing streets and sidewalks, as well as three new streets and alleys in the Rowley Center Area. Community space would be provided for Hyla Crossing in accordance with the Hyla Crossing MSP and consistent with existing zoning requirements in Rowley Center.

No Action Alternative – Existing Conditions - under this sub-alternative, approximately 620,000 square feet of office and intensive commercial uses and approximately 604,000 square feet of parking (structured and/or surface parking for 1,800 vehicles) would be provided in the Hyla Crossing Area as part of the previously approved Hyla Crossing MSP; approximately 64,000 square feet of existing buildings would also be retained in this area. Approximately 174,600 square feet of existing building space would be retained in the Rowley Center Area. Vehicular and pedestrian circulation would be provided by the existing roadway system. A trail and community space area would be included as part of the Hyla Crossing MSP.

## **APPLICANT'S PREFERRED ALTERNATIVE**

Subsequent to issuance of the DEIS, the applicant identified Alternative 2, 60 percent commercial/light industrial uses and 40 percent residential uses as their Preferred Alternative. Approximately 3.76 million square feet of occupiable building space (overall building space, less the space in structured parking) is assumed under Alternative 2 - 60/40 mix scenario. Additional occupiable building space could be developed on site if it is confirmed through vehicle trip monitoring that the number of PM peak hour vehicle trips generated by the project would at no point exceed the level of PM peak hour vehicle trips analyzed in the DEIS and in this FEIS for Alternative 2 – 60/40 mix scenario. If traffic monitoring indicates that the level of PM peak hour vehicle trips are lower than assumed and analyzed for Alternative 2, additional building density could be developed on the site. Total occupiable building

density on the site would not exceed that analyzed in the DEIS for Alternative 1, 60/40 mix with the 200-foot building height scenario (approximately 4.4 million square feet) under the Preferred Alternative.

**LEAD AGENCY (SEPA)**

City of Issaquah

**SEPA RESPONSIBLE OFFICIAL**

Mark Hinthorne, Planning Director  
City of Issaquah Planning Department  
PO Box 1307  
Issaquah, WA 98027  
(425) 837-3080

**EIS CONTACT PERSON**

Peter Rosen, Environmental Planner  
City of Issaquah Planning Department  
PO Box 1307  
Issaquah, WA 98027  
(425) 837-3080

**FINAL ACTION**

Approvals/permits by the City of Issaquah to authorize development, construction, and operation of the Hyla Crossing and Rowley Center mixed-use development, as well as infrastructure improvements to serve the development.

**PERMITS AND APPROVALS**

Preliminary investigation indicates that the following permits and/or approvals could be required or requested for the Proposed Actions. Additional permits/approvals may be identified during the review process associated with specific development projects.

City of Issaquah

- Adoption of a Development Agreement between the City of Issaquah and Rowley Properties, Inc.
- Adoption of an amendment to the City of Issaquah Comprehensive Plan.
- Adoption of a zoning reclassification to Urban Village (developed by the City through the Central Issaquah Planning Process and the Development Agreement).
- Adoption of Development Regulations for the Hyla Crossing and Rowley Center Areas.
- Adoption of the Hyla Crossing and Rowley Center Planned Action Ordinance.

Future permits for infrastructure improvements, construction projects and redevelopment activities within the Hyla Crossing and Rowley Center Areas over the build-out period potentially include, but are not limited to:

- Site Development Permit(s) and/or Administrative Site Development Permit(s)
- Master Drainage Plan Approval
- Right-of-Way Permit(s) for Infrastructure (Streets and Utilities) Construction
- Clearing & Grading Permit(s)
- Flood Hazard Permit
- Building Permit(s) and related Construction Permits
- Mechanical Permit Approval
- Plumbing Permit Approval
- Fire System Permit Approval
- Shoreline Substantial Development Approval
- Shoreline Conditional Use Permit Approval
- Transportation Concurrency Approval
- Water Rights Certificate Approval
- Land Use Certification Approval

#### State of Washington

##### *Department of Ecology*

- Section 401 Water Quality Certification Approval
- Construction Stormwater General Permit
- NPDES Stormwater Discharge Permit
- General Permit

##### *Department of Fish and Wildlife*

- Hydraulic Project Approval

##### *Department of Natural Resources*

- Aquatic Use Approval

##### *Department of Labor and Industries*

- Electrical Permit Approval

#### United States Army Corps of Engineers

- Section 402 NPDES Permit Approval

**FINAL EIS AUTHORS AND  
PRINCIPAL CONTRIBUTORS**

The *Hyla Crossing and Rowley Center Project Final Environmental Impact Statement* has been prepared under the direction of the City of Issaquah and analyses were provided by the following consulting firms:

**EIS Project Manager, Primary Author, Land Use/  
Relationship to Plans and Policies,  
Aesthetics/Light and Glare, and Construction  
Impacts**

EA|Blumen  
720 Sixth Street S, Suite 100  
Kirkland, WA 98033

**Water Resources**

RH2 Engineering  
12100 NE 195<sup>th</sup> Street, Suite 100  
Bothell, WA 98011

**Critical Areas/Plants and Animals**

The Watershed Company  
750 Sixth Street S  
Kirkland, WA 98033

**Lake Studies**

Herrera Environmental Consultants, Inc.  
2200 6<sup>th</sup> Avenue, Suite 1100  
Seattle, WA 98121

**Transportation**

Heffron Transportation  
65544 NE 61<sup>st</sup> Street  
Seattle, WA 98115

**Site Planning and Visual Analysis (Simulations)**

VIA Architecture  
1809 Seventh Avenue, Suite 800  
Seattle, WA 98101

**Construction Impacts – Earth**

Terra Associates, Inc.  
12525 Willows Road NE, Suite 101  
Kirkland, WA 98034

**PREVIOUS ENVIRONMENTAL DOCUMENTS**

Per WAC 197-11-635, this EIS builds upon and incorporates by reference the following environmental documents: City of Issaquah, *Hyla Crossing Master Site Plan Resolution No. 98-10*; City of Issaquah, *Tibbett's Creek Greenway Restoration Project Draft EIS*, 1995; City of Issaquah, *Tibbett's Creek Greenway Restoration Project Final EIS*, 1995; *Newport Way/Maple Street Road and Bridge Improvement Project Draft EIS*, 1992; and, *Newport Way/Maple Street Road and Bridge Improvement Project Final EIS*, 1993.

These documents are available for review at the City of Issaquah Planning Department, City Hall Northwest, 1775 12<sup>th</sup> Avenue NW, Issaquah, WA 98027.

**LOCATION OF BACKGROUND INFORMATION**

Background material and supporting documents are available at the City of Issaquah Planning Department, City Hall Northwest, 1775 12<sup>th</sup> Avenue NW, Issaquah, WA 98027.

**DATE OF FINAL EIS ISSUANCE**

November 28, 2011

**DATE OF DEIS PUBLIC MEETING**

A DEIS public meeting/open house was held on Wednesday, Sept. 21, 2011, at Issaquah City Hall, to provide orientation and answer questions about the DEIS and EIS process, including how to provide written comments on the DEIS. No verbal public comments were taken at the meeting.

**AVAILABILITY OF THE FEIS**

Copies of the FEIS have been distributed to agencies, organizations and individuals noted on the Distribution List. Copies of the FEIS are also available for review at the following locations:

- City of Issaquah Planning Department  
City Hall Northwest  
1775 12<sup>th</sup> Avenue NW  
Issaquah, WA 98027

- Issaquah Library  
10 West Sunset Way  
Issaquah, WA 98027

A limited number of printed copies of the FEIS may be purchased at the City of Issaquah. The purchase price is \$20 each to cover printing costs.

The FEIS can be reviewed and downloaded at the City of Issaquah's web site at:  
[www.ci.issaquah.wa.us](http://www.ci.issaquah.wa.us).

Persons interested in receiving a copy of the FEIS on CD (at no charge) should contact Peter Rosen at (425) 837-3094.

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# SUMMARY

# CHAPTER 1 SUMMARY

## 1.1 Introduction

This chapter provides a summary of the Final Environmental Impact Statement (FEIS) for the Hyla Crossing and Rowley Center Redevelopment Project. It briefly describes the Draft EIS (DEIS); the DEIS Alternatives: Higher Density (Alternative 1), Medium Density Alternative (Alternative 2) and No Action Alternative (Alternative 3), and the applicant's Preferred Alternative; and, contains an updated comprehensive overview of significant environmental impacts identified for the DEIS alternatives and an updated table of mitigation measures. Please see **Chapter 2** of this FEIS for a more complete description of the applicant's Preferred Alternative; **Chapter 3** for updated information and analysis completed since issuance of the DEIS; **Chapter 4** for public/agency comment letters on the DEIS and responses to the comments in these letters; and, **Chapter 5** for an Errata identifying corrections to the DEIS. It should be noted that new and/or updated information provided subsequent to the issuance of the DEIS is indicated with underlined and strike-through text in this chapter.

The Hyla Crossing and Rowley Center Project DEIS was issued on August 31, 2011. The DEIS addressed the probable significant adverse impacts that could occur as a result of approval/adoption of the Proposed Actions listed below. A public open house was held on September 21, 2011, to provide orientation and answer questions about the DEIS and EIS process.

## 1.2 Background

The following provides background on the EIS process to date for the Hyla Crossing and Rowley Center Project in a question and answer format. Included are details on the DEIS, planning activities since the issuance of the DEIS, and the applicant's Preferred Alternative.

### **Q1. What are the Proposed Actions analyzed in the DEIS and in this FEIS?**

**A1.** The Proposed Actions for the Hyla Crossing and Rowley Center Project, as identified by the applicant and City of Issaquah, that would be necessary to implement the vision for the site include:

- Adoption of a Development Agreement between the City of Issaquah and Rowley Properties, Inc;
- Adoption of an amendment to the City of Issaquah Comprehensive Plan;
- Adoption of a zoning reclassification to Urban Village;
- Adoption of development regulations for the Hyla Crossing and Rowley Center Areas;
- Adoption of the Hyla Crossing and Rowley Center Planned Action Ordinance; and,

- Future permits for infrastructure improvements, construction projects, and redevelopment activities within the Hyla Crossing and Rowley Center Areas.

**Q2. What were the EIS Alternatives analyzed in the DEIS?**

- A2.** When the Hyla Crossing and Rowley Center Project DEIS (August 2011) was prepared and issued, a preferred redevelopment plan for the site had not been determined.

For purposes of environmental review, two redevelopment alternatives (Alternatives 1 and 2) and the No Action Alternative (Alternative 3) we formulated for evaluation in the DEIS. These three alternatives are intended to represent a full range of land use intensities and densities that the site could accommodate over the long term.

The DEIS alternatives range from approximately 5.5 million square feet of building development (total building space, including structured parking), including approximately 3.7 million square feet of occupiable space (building space not including structured parking) under Alternative 2 to approximately 6.5 million square feet of build development (approximately 4.4 million square feet of occupiable space) under Alternative 1 over the approximately 20-year buildout period. The No Action Alternative assumes that the Proposed Actions would not be approved or implemented. The No Action Alternative includes two sub-alternatives: 1) redevelopment of the site under existing zoning together with buildout of the previously approved Hyla Crossing Master Site Plan (MSP) (approximately 1.7 million square feet of occupiable space); and 2) continuation of existing conditions together with buildout of the previously approved Hyla Crossing MSP (approximately 0.9 million square feet of occupiable space).

The Alternatives are intended to represent an overall envelope of potential redevelopment and a range of redevelopment scenarios for analysis in the DEIS, including various mix of uses and building heights. None should be considered a definitive plan for the Hyla Crossing and Rowley Center Areas; rather, they provide representative parameters and types of redevelopment that could be achieved over time. The DEIS recognizes that as part of the ongoing planning and decision-making process, a preferred alternative that contains a level of development and mix of uses within the range analyzed in the DEIS will likely be selected through the Development Agreement process.

**Q3. What planning activities occurred after the DEIS was issued?**

- A3.** Ongoing public planning efforts toward the identification of the Preferred Alternative for the Hyla Crossing and Rowley Center site occurred during the several months subsequent to the issuance of the DEIS on August 30, 2011. Highlights of the ongoing public planning efforts conducted subsequent to the issuance of the DEIS include:

- 30-day public comment period on the DEIS;
- DEIS public meeting/open house;
- Urban Village Development Commission (UVDC) meetings to discuss provisions of the Development Agreement;

- City Council committee public meetings on provisions of the Development Agreement, including meetings of the Land & Shoreline Committee and the Transportation, Human Services & Utilities Committee; and,
- Initiation of the Planned Action Ordinance in association with the Development Agreement process.

**Q4. What is the Preferred Alternative and how does it relate to the Alternatives analyzed in the DEIS?**

**A4.** As indicated above, based on the information provided in the DEIS, ongoing public input associated with the DEIS comment period (including public meeting/open house), public meetings associated with the UVDC and City Council to formulate the Development Agreement, and coordination between the applicant and the City of Issaquah, the applicant has identified a Preferred Alternative. The Preferred Alternative is intended to be a medium density, urban pedestrian-oriented, transit-oriented, sustainable development that features a diversity of uses. The Preferred Alternative would be consistent with the applicant's objectives, as defined in the DEIS (see Section 2.5 of the DEIS for details). The level of redevelopment under the Preferred Alternative assumed on the Hyla Crossing and Rowley Center site would be within the range of redevelopment assumed under the EIS Alternatives analyzed in the DEIS. Redevelopment under the Preferred Alternative would mix and match elements of the EIS Alternatives. As an example, the Preferred Alternative would reflect the redevelopment density and vehicle trip generation of medium density Alternative 2 (approximately 5.5 million square feet of building development (total building space, including structured parking), including approximately 3.8 million square feet of occupiable space (building space not including structured parking), 60/40 commercial/residential split with building height up to 200 feet scenario. However, additional occupiable building space could be developed on site if it is confirmed through vehicle trip monitoring that the number of PM peak hour vehicle trips generated on the site would at no point exceed the level of PM peak hour vehicle trips analyzed in the DEIS and in this FEIS for Alternative 2 – 60/40 mix scenario. If traffic monitoring indicates that the level of PM peak hour vehicle trips are lower than assumed and analyzed for Alternative 2 in the DEIS, additional building density could be developed on the site. Total occupiable building density on the site would not exceed that analyzed in the DEIS for Alternative 1, 60/40 mix with 200 feet building height scenario (approximately 4.4 million square feet). The additional building density could be achieved through several means of reducing vehicle trips from the site, including adjustments to the land use mix and/or successful implementation of transportation management measures.

See **Chapter 2** of this FEIS for further details on the Preferred Alternative.

**Q5. What is a Planned Action, and how does it relate to this EIS?**

**A5.** According to the State Environmental Policy Act (SEPA), a "Planned Action" is a designation for a project or elements of a project that shifts environmental review from the time a permit application is made to an earlier phase in the planning process. The intent of this designation is to provide a more streamlined environmental process by using an existing EIS prepared at the planning stage for SEPA compliance for long-term actions.

Under SEPA, the basic steps in designating Planned Action projects are to: 1) prepare an EIS; 2) designate the project a Planned Action by adoption of an ordinance; and, 3) review future applications for redevelopment permits for consistency with the designated Planned Action.

The DEIS indicates that it is intended that the majority of the features of proposed redevelopment of the Hyla Crossing and Rowley Center site be designated by the City of Issaquah as a Planned Action(s) (see DEIS Section 2.3 for details on the Planned Action review). These features include most elements of proposed Hyla Crossing and Rowley Center redevelopment (except as noted below). Similar features of redevelopment under the Preferred Alternative would be assumed to be designated as a Planned Action(s) by the City.

As indicated in the DEIS, the Planned Action Ordinance would pertain to SEPA environmental review for future redevelopment projects subject to City of Issaquah permits (i.e. individual redevelopment projects would require City of Issaquah permits related to construction, building, clearing, and grading, etc.). Certain features, such as stormwater improvements, would require permits from federal and/or state agencies as well. The applicable federal or state agency would determine if additional SEPA environmental review is required at the time permit applications are submitted to such agencies in the future.

Certain elements of the Hyla Crossing and Rowley Center redevelopment cannot reasonably be defined at this time and would not be subject to the Planned Action Ordinance. The elements, listed below may require additional environmental review at the time applications for permits are submitted to relevant agencies.

- Relocation of Tibbett's Creek on the Mull Property;
- Removal of the Boardwalk and construction of bicycle and pedestrian facilities along SR 900; and,
- Stormwater conveyance system in Sammamish Cove Park and outfall to Lake Sammamish.

After issuance of the FEIS, it is expected that the City of Issaquah would adopt the Hyla Crossing and Rowley Center Planned Action Ordinance. The City's Planned Action Ordinance, if adopted, would reflect a decision that adequate environmental review has been completed for the designated projects and that further environmental review under SEPA would not likely be necessary. When specific redevelopment projects are proposed in the future, the City would determine whether the potential impacts of each project are within the parameters analyzed and mitigation identified in the this EIS (inclusive of the DEIS and FEIS) and ultimately addressed in the Planned Action Ordinance. If not, additional environmental review may be required. However, if potential impacts are within the parameters analyzed in the EIS and adopted as part of the Planned Action Ordinance, and future projects are consistent with the adopted Development Agreement and applicable development regulations and standards of the City, further environmental analysis would not be required under SEPA.

### **1.3 Alternatives**

For purposes of environmental review, three alternatives are analyzed in the DEIS, including two redevelopment alternatives (Alternatives 1 and 2) and a no action alternative (Alternative 3). Both Alternative 1 and Alternative 2 include two land use mix scenarios: 1) 80 percent commercial/light industrial and 20 percent residential (80/20 mix), and 2) 60 percent commercial/light industrial and 40 percent residential (60/40 mix) that are analyzed in the DEIS. Two building height scenarios are also evaluated: 1) 200-foot maximum building height, and 2) 150-foot maximum building height.

The No Action Alternative includes two sub-alternatives: 1) development under existing zoning together with buildout of the previously approved Hyla Crossing Master Site Plan (MSP), and 2) existing conditions together with buildout of the previously approved Hyla Crossing MSP. The alternatives provide representative levels of development that could be achieved on the site.

The DEIS alternatives are described in more detail below.

#### **DEIS Alternative 1 – Higher Density Alternative**

Alternative 1 would provide the highest level of density on the Rowley Properties site of the alternatives and would include a total of approximately 6.5 million square feet of mixed-uses over full buildout of the site; redevelopment would include retention of the existing Hilton Garden Inn Hotel and John L. Scott Building (approximately 132,000 square feet).

Redevelopment under the 60/40 mix scenario would include approximately 2.8 million square feet of commercial space and 1.7 million square feet of residential space providing approximately 1,800 housing units. Commercial redevelopment on the site under the 60/40 mix scenario would generate approximately 7,600 new jobs. The remainder of the approximately 6.5 million square feet of development would be comprised of parking structures with approximately 6,600 parking stalls.

Redevelopment under the 80/20 mix scenario would include approximately 3.5 million square feet of commercial space and 756,000 square feet of residential space providing approximately 800 housing units. Commercial redevelopment under the 80/20 mix would provide approximately 9,800 new jobs. The remainder of the approximately 6.5 million square feet of development would be comprised of parking structures with approximately 7,000 parking stalls.

Proposed redevelopment under Alternative 1 would result in an overall increase in community space onsite (including green and shared space), relative to current conditions. With assumed redevelopment under Alternative 1, a total of approximately 16.8 acres of proposed community space would be provided on the Rowley Properties site. An additional approximately 5.7 to 13.0 acres of community space could be provided in the redevelopment areas and circulation areas/public realm onsite. The Hyla Crossing and Rowley Center Areas would include publically accessible community space.

In general, the proposed circulation system is intended to provide walkable blocks and encourage pedestrian activity. Existing roadways would continue to be utilized for vehicular access in the Hyla Crossing and Rowley Center Areas, and new internal circulation roadways would be provided as redevelopment occurs in these areas. Pedestrian circulation would be provided through new and enhanced trails and sidewalks.

## **DEIS Alternative 2 – Medium Density Alternative**

Alternative 2 is the medium-range redevelopment scenario and would provide less density, compared to Alternative 1. Approximately 5.5 million square feet of mixed uses would be provided under Alternative 2; redevelopment would include retention of the existing Hilton Garden Inn Hotel and John L Scott Building (approximately 132,000 square feet).

Redevelopment under the 60/40 mix scenario would include approximately 2.4 million square feet of commercial space and 1.4 million square feet of residential space that would provide approximately 1,450 housing units. Commercial redevelopment on the site under the 60/40 mix scenario would generate approximately 6,500 new jobs. The remainder of the approximately 4.5 million square feet of development would be comprised of parking structures with approximately 5,700 parking stalls.

Redevelopment under the 80/20 mix scenario would include approximately 3.0 million square feet of commercial space and 628,000 square feet of residential space that would provide approximately 660 housing units. Commercial redevelopment under the 80/20 mix would provide approximately 8,300 new jobs. The remainder of the approximately 5.5 million square feet of development would be comprised of parking structures with approximately 6,000 parking stalls.

The proposed community space and circulation system concepts under Alternative 2 would be similar to those described for Alternative 1.

## **DEIS Alternative 3 – No Action Alternative**

The No Action Alternative includes two sub-alternatives: 1) redevelopment on the site under existing zoning together with buildout of the previously approved Hyla Crossing MSP; and, 2) existing conditions together with buildout of the previously approved Hyla Crossing MSP.

### No Action Alternative – Existing Zoning

Redevelopment is assumed to occur on the Rowley Properties site consistent with the existing zoning and the previously approved Hyla Crossing MSP. The majority of the existing structures on the site would be demolished, with the exception of the Hilton Garden Inn Hotel and John L Scott Building in the Hyla Crossing Area (approximately 132,000 square feet). Redevelopment would include commercial uses consistent with a suburban office campus environment and could include limited retail uses within the commercial buildings; shared parking structures would also be provided on the site with approximately 5,500 parking stalls. Approximately 3.4 million square feet of development would be provided on the site, including 1.7 million square feet of commercial development and 1.7 million square feet of parking (structured parking and/or surface parking<sup>1</sup>). Vehicular and pedestrian circulation would be provided by existing streets and sidewalks, as well as three new streets and alleys in the Rowley Center Area. Approximately 31 acres of community space would be provided in accordance with the Hyla Crossing MSP and existing zoning requirements.

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<sup>1</sup> The previously approved Hyla Crossing MSP does not specify whether parking stalls would be provided in structured areas or surface lots.

## No Action Alternative – Existing Conditions

Approximately 620,000 square feet of office and intensive commercial uses and approximately 604,000 square feet of parking for approximately 1,800 vehicles would be developed on the site as part of the previously approved Hyla Crossing MSP<sup>1</sup>; approximately 64,000 square feet of existing buildings would also be retained in this area. Approximately 174,600 square feet of existing building space would be retained in the Rowley Center Area. Vehicular and pedestrian circulation would be provided by the existing roadway system. Approximately 18 acres of community space would be provided on the Rowley Properties site in accordance with the Hyla Crossing MSP.

## **Applicant's Preferred Alternative**

At the time the DEIS was prepared and issued, a Preferred Alternative had not been determined. Subsequent to issuance of the DEIS, the applicant identified Alternative 2, 60 percent commercial/light industrial uses and 40 percent residential uses (60/40 mix) as their Preferred Alternative. Additional occupiable building space could be developed on site if it is confirmed through vehicle trip monitoring that the number of PM peak hour vehicle trips generated on the site would at no point exceed the level of PM peak hour vehicle trips analyzed in the DEIS and in this FEIS for Alternative 2 – 60/40 mix scenario. If traffic monitoring indicates that the level of PM peak hour vehicle trips are lower than assumed and analyzed for Alternative 2 in the DEIS and this FEIS, additional building density could be developed on the site. Total occupiable building density on the site would not exceed that analyzed in the DEIS for Alternative 1, 60/40 mix with 200 feet building height scenario (approximately 4.4 million square feet). See **Chapter 2** for further details on the Preferred Alternative.

## **1.4            Impacts**

**Table 1-1** presents a summary of the impacts that would potentially result from the alternatives analyzed in the DEIS and this FEIS. New or updated impacts that have been added since issuance of the DEIS are shown in underline. Impacts that have been all or partially removed are shown in strike through. This summary table is not intended to be a substitute for the complete discussion of each element that is contained in Chapter 3 of the DEIS and of air quality/greenhouse gas emissions in **Chapter 3** of this FEIS.

**Table 1-1  
IMPACT SUMMARY TABLE**

<b>Alternative 1 Higher Density Alternative</b>	<b>Alternative 2 Medium Density Alternative</b>	<b>Alternative 3 No Action – Existing Zoning Sub-Alternative</b>	<b>Alternative 3 No Action – Existing Condition Sub-Alternative</b>
<b><u>Water Resources</u></b>			
<ul style="list-style-type: none"> <li>• During construction, the potential for erosion and sedimentation of water resources on and in the vicinity of the site would increase when soils would be temporarily exposed. Construction equipment would provide opportunities for spills of pollutants into stormwater runoff from the site. Temporary erosion and sedimentation control plans (TESCP) and Stormwater Pollution Prevention and Spill Plans (SWPPS) would be implemented, as required by the City and no significant impacts would be expected.</li> </ul>	<ul style="list-style-type: none"> <li>• Same as Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>• The types of potential construction impacts to water resources during construction would be similar to Alternatives 1 and 2; however, the level of potential impacts would be lower due to less redevelopment.</li> </ul>	<ul style="list-style-type: none"> <li>• The types of potential construction impacts to water resources during construction would be similar to Alternatives 1 and 2; however, the level of potential impacts would be much lower due to less redevelopment.</li> </ul>
<ul style="list-style-type: none"> <li>• A permanent stormwater management system would be installed that would comply with the City's <i>2009 Addendum to the 2009 King County Surface Water Design Manual (KCSWDM)</i> and the <i>Project Master Drainage Plan (MDP)</i>. Stormwater flow control and water quality treatment would improve substantially over existing conditions, as only six percent of the site presently contains stormwater management facilities that meet current stormwater standards</li> </ul>	<ul style="list-style-type: none"> <li>• Same as Alternative 1</li> </ul>	<ul style="list-style-type: none"> <li>• The permanent stormwater management facilities on the Hyla Crossing MSP portion of the site would comply with the City's 1998 stormwater code, which is less stringent than the current code. Stormwater management on the remainder of the site would comply with the City's <i>2009 Addendum to the 2009 KCSWDM</i>.</li> </ul>	<ul style="list-style-type: none"> <li>• The permanent stormwater management facilities on Hyla Crossing MSP portion of the site would comply with the City's 1998 stormwater code. The rest of the site would remain in its existing condition with minimal stormwater management facilities.</li> </ul>

Alternative 1 Higher Density Alternative	Alternative 2 Medium Density Alternative	Alternative 3 No Action – Existing Zoning Sub-Alternative	Alternative 3 No Action – Existing Condition Sub-Alternative
<ul style="list-style-type: none"> <li>With redevelopment, the primary source of pollutants that could enter stormwater runoff would be from traffic and transportation facilities.</li> </ul> <p>Under Stormwater Scenario 1, enhanced basic water quality treatment with Sensitive Lake Protection would be provided via a combined detention pond and wet pond, followed by a sand or media filter.</p> <p>Under Stormwater Scenario 2, basic water quality treatment with Sensitive Lake Protection would be provided via media filters.</p>	<ul style="list-style-type: none"> <li>Same as Alternative 1, although there would be less traffic that would generate pollutants.</li> </ul>	<ul style="list-style-type: none"> <li>Same as Alternatives 1 and 2, although there would be less traffic that would generate pollutants.</li> </ul>	<ul style="list-style-type: none"> <li>Same as Alternatives 1 and 2, although there would be much less traffic that would generate pollutants.</li> </ul>
<ul style="list-style-type: none"> <li>With redevelopment, peak flow rates and durations could increase, which could contribute to scour and sediment transport in nearby creeks (i.e. Tibbetts Creek) and deposition in receiving waters (i.e. Lake Sammamish).</li> </ul> <p>Under Stormwater Scenarios 1 and 2, peak flow rate durations would match pre-developed (forest) conditions. This reduction in flow rates from their existing conditions would help reduce the scour and sediment transport that presently occurs within Tibbetts Creek, and would also reduce the sediment deposition into Lake Sammamish.</p>	<ul style="list-style-type: none"> <li>Same as Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>Similar to Alternatives 1 and 2, although flow control in the Hyla Crossing MSP area would be less stringent.</li> </ul>	<ul style="list-style-type: none"> <li>Flow control in the Hyla Crossing MSP area would be less stringent than Alternatives 1 and 2, and no additional flow control would be provided in the portions of the site outside the Hyla Crossing MSP area.</li> </ul>

Alternative 1 Higher Density Alternative	Alternative 2 Medium Density Alternative	Alternative 3 No Action – Existing Zoning Sub-Alternative	Alternative 3 No Action – Existing Condition Sub-Alternative
<ul style="list-style-type: none"> <li>Under Stormwater Scenario 2, stormwater would be directly discharged to Lake Sammamish via a pump station. Two conveyance routes across the City's Sammamish Cove Park to the north of I-90 are being considered: 1) Tibbetts Creek Route, and 2) Tunnel Route. Three outfall options are being considered for discharge to the lake: Option 1) surface nearshore outfall at King County Pier; Option 2) bottom nearshore outfall near King County Pier; and, Option 3) deep offshore outfall. Further SEPA review would be required prior to issuance of any applicable permits and approvals for the off-site conveyance system and outfall.</li> </ul>	<ul style="list-style-type: none"> <li>Same as Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>No direct discharge to Lake Sammamish is assumed.</li> </ul>	<ul style="list-style-type: none"> <li>No direct discharge to Lake Sammamish is assumed.</li> </ul>
<p><b><u>Critical Areas, Plants and Animals</u></b></p>			
<p><i>Critical Areas</i></p> <ul style="list-style-type: none"> <li>Construction impacts to critical areas could include temporary turbidity and introduction of pollutants in wetlands, streams and ditches on and adjacent to the site as a result of clearing and grading activities. With implementation of temporary erosion and sedimentation control measures required by the City of Issaquah, no significant impacts to critical areas would be expected.</li> </ul>	<ul style="list-style-type: none"> <li>Construction impacts to critical areas would be similar to Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>Construction impacts to critical areas would be similar to Alternatives 1 and 2.</li> </ul>	<ul style="list-style-type: none"> <li>Construction impacts would be similar to Alternatives 1 and 2; however, the level of impacts would be less, because no development would occur outside of the Hyla Crossing MSP area.</li> </ul>

Alternative 1 Higher Density Alternative	Alternative 2 Medium Density Alternative	Alternative 3 No Action – Existing Zoning Sub-Alternative	Alternative 3 No Action – Existing Condition Sub-Alternative
<ul style="list-style-type: none"> <li>Under Stormwater Scenario 2, the construction of stormwater management conveyance pipes in Sammamish Cove Park and outfall to Lake Sammamish would result in temporary disturbance to critical areas, including wetlands, streams, and the lake.</li> </ul>	<ul style="list-style-type: none"> <li>Impacts of constructing stormwater conveyance pipes in Sammamish Cove Park and outfall to Lake Sammamish on critical areas would be similar to under Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>No stormwater conveyance in Sammamish Cove Park and outfall to Lake Sammamish would be included in the stormwater management system and no associated impacts to critical areas would result.</li> </ul>	<ul style="list-style-type: none"> <li>No stormwater conveyance in Sammamish Cove Park and outfall to Lake Sammamish would be included in the stormwater management system and no associated impacts to critical areas would result.</li> </ul>
<ul style="list-style-type: none"> <li>Redevelopment would not require any fill of wetlands or relocation of streams. Proposed stream and wetland buffers would be the same or greater than the current vegetated buffers onsite. However, these buffers would be less than those required by the City's CAO in areas adjacent to certain proposed roads and areas of redevelopment onsite. A stream buffer and building setback from Tibbetts Creek would be maintained as depicted in Exhibit 16 to the Hyla Crossing MSP. Floodplain widening and stream corridor enhancements would be provided at the north and south ends of the Tibbetts Greenway, per the Hyla Crossing MSP. <u>See FEIS Table 3.2-1 and Figure 3.2-1 for details on existing and proposed stream buffer widths.</u></li> </ul>	<ul style="list-style-type: none"> <li>Impacts to streams, wetlands, and their buffers would be similar to Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>Impacts to streams, wetlands, and their buffers would be similar to Alternatives 1 and 2.</li> </ul>	<ul style="list-style-type: none"> <li>Impacts to streams, wetlands, and their buffers would be similar to Alternative 1 and 2.</li> </ul>
<ul style="list-style-type: none"> <li>Proposed trails through the Tibbetts Creek Greenway and over Tibbetts Creek could result in impacts to wetland and stream buffer vegetation. However, the trails would not be expected to result in a loss of buffer functions and values, and enhancements are proposed within the buffer area.</li> </ul>	<ul style="list-style-type: none"> <li>Potential impacts on wetland and stream buffers from proposed trails would be similar to Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li><u>Similar to Alternatives 1 and 2, proposed trails through the Tibbetts Creek Greenway in accordance with the Hyla Crossing MSP Exhibit 16 could result in impacts to wetland and stream buffer vegetation; however, no trails over Tibbetts Creek would be provided.</u></li> </ul>	<ul style="list-style-type: none"> <li><u>Similar to Alternatives 1 and 2, proposed trails through the Tibbetts Creek Greenway in accordance with the Hyla Crossing MSP Exhibit 16 could result in impacts to wetland and stream buffer vegetation; however, no trails over Tibbetts Creek would be provided.</u></li> </ul>

Alternative 1 Higher Density Alternative	Alternative 2 Medium Density Alternative	Alternative 3 No Action – Existing Zoning Sub-Alternative	Alternative 3 No Action – Existing Condition Sub-Alternative
<p><i>Plants</i></p> <ul style="list-style-type: none"> <li>Existing on-site vegetation, primarily lawn grasses and ornamental plantings, would be removed with redevelopment.</li> </ul> <p>Approximately 12.6 acres of proposed green space would be provided in the Hyla Crossing Area and approximately 0.3 acre of proposed green space in the Rowley Center Area with redevelopment, for a total of approximately 12.9 acres, or 17 percent of the site. Additional green space could also be provided throughout the site.</p>	<ul style="list-style-type: none"> <li>Potential impacts to vegetation/green space would be similar to Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>Existing on-site vegetation would be removed, similar to Alternatives 1 and 2.</li> </ul> <p>Approximately 21.0 acres of green space would be provided in the Hyla Crossing Area and approximately 10.0 acres of green space would be provided in the Rowley Center Area, for a total of approximately 31.0 acres, or 39 percent of the site.</p>	<ul style="list-style-type: none"> <li>Less on-site vegetation would be removed than under Alternatives 1 and 2, as only the Hyla Crossing MSP area would be developed.</li> </ul> <p>Approximately 18.0 acres of green space would be provided in the Hyla Crossing Area and approximately 0.4 acres of green space would be provided in the Rowley Center Area, for a total of approximately 18.4 acres, or 23 percent of the site.</p>
<ul style="list-style-type: none"> <li>The existing vegetated areas in the Tibbetts Creek Greenway area would be expanded by approximately 1.4 acres.</li> </ul> <p>Other vegetated areas would be provided throughout the site with redevelopment, including in pocket parks, courtyards, landscaping, lawns, and green roofs. As possible, native vegetation would be incorporated into the landscaping.</p>	<ul style="list-style-type: none"> <li>Potential impacts to vegetated areas would be similar to Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>Enhancements to the Tibbetts Creek Greenway would be similar to Alternative 1. Other vegetated areas would be provided per the Hyla Crossing MSP and existing zoning requirements.</li> </ul>	<ul style="list-style-type: none"> <li>Enhancements to the Tibbetts Greenway would be similar to Alternative 1. Other vegetated areas would be provided in the Hyla MSP area only.</li> </ul>
<p><i>Animals</i></p> <ul style="list-style-type: none"> <li>Construction activities (including for Stormwater Scenario 1 or 2) could temporarily disturb wildlife in the area.</li> </ul>	<ul style="list-style-type: none"> <li>Potential disturbance to wildlife from construction activities would be similar to Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>Potential disturbance to wildlife from construction activities would be similar to Alternatives 1 and 2.</li> </ul>	<ul style="list-style-type: none"> <li>Potential disturbance to wildlife from construction activities would be less than Alternatives 1 and 2, as redevelopment would only occur in the Hyla Crossing MSP area.</li> </ul>

Alternative 1 Higher Density Alternative	Alternative 2 Medium Density Alternative	Alternative 3 No Action – Existing Zoning Sub-Alternative	Alternative 3 No Action – Existing Condition Sub-Alternative
<ul style="list-style-type: none"> <li>• During construction, there could be temporary turbidity and release of pollutants to wetlands, streams, and ditches on and adjacent to the site, which could impact fish and other aquatic species. With implementation of temporary erosion and sedimentation control and spill prevention measures required by the City of Issaquah, no significant water quality impacts would be expected.</li> </ul>	<ul style="list-style-type: none"> <li>• Potential construction-related water quality impacts on fish and wildlife would be similar to Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>• Potential construction-related water quality impacts on fish and wildlife would be similar to Alternatives 1 and 2.</li> </ul>	<ul style="list-style-type: none"> <li>• Potential construction-related water quality impacts on fish and wildlife would be less than Alternatives 1 and 2, as redevelopment would only occur in the Hyla Crossing MSP area.</li> </ul>
<ul style="list-style-type: none"> <li>• Following construction, there could be release of sediment and pollutants to wetlands, streams, ditches, and Lake Sammamish on and adjacent to the site, which could impact fish and other aquatic species. With implementation of a permanent stormwater control system per the City's 2009 Addendum to the 2009 KCSWDM, no significant water quality impacts on fish and other aquatic species would be expected.</li> </ul>	<ul style="list-style-type: none"> <li>• Potential water quality impacts on fish and other aquatic species following construction would be similar to Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>• Potential water quality impacts on fish and other aquatic species following construction would be similar to Alternatives 1 and 2. However, stormwater management on the Hyla Crossing MSP portion of the site would be per the City's 1998 stormwater standards, which are less stringent in terms of water quality treatment than the City's current (2009) stormwater standards. Stormwater facilities on the remainder of the site would be in accordance with the City's current (2009) standards.</li> </ul>	<ul style="list-style-type: none"> <li>• Potential water quality impacts on fish and other aquatic species following construction could be greater than Alternatives 1 and 2. Stormwater management on the Hyla Crossing MSP portion of the site would be per the City's 1998 stormwater standards. Stormwater control on the remainder of the site would remain unchanged, with limited water quality treatment.</li> </ul>
<ul style="list-style-type: none"> <li>• Under Stormwater Scenario 2, operation of Outfall Option 2 (bottom nearshore) or Option 3 (deep offshore) would be expected to be less disturbing to fish and other aquatic species in Lake Sammamish than Option 1 (surface nearshore), since the discharge would be near the bottom of the lake, resulting in little surface disturbance, if any.</li> </ul>	<ul style="list-style-type: none"> <li>• Impacts from stormwater outfall operation on fish and aquatic resources in Lake Sammamish would be similar to Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>• No stormwater outfall to Lake Sammamish would be included in the stormwater management system and no associated impacts to fish and other aquatic species in the lake would result.</li> </ul>	<ul style="list-style-type: none"> <li>• No stormwater outfall to Lake Sammamish would be included in the stormwater management system and no associated impacts to fish and other aquatic species in the lake would result.</li> </ul>

<b>Alternative 1 Higher Density Alternative</b>	<b>Alternative 2 Medium Density Alternative</b>	<b>Alternative 3 No Action – Existing Zoning Sub-Alternative</b>	<b>Alternative 3 No Action – Existing Condition Sub-Alternative</b>
<ul style="list-style-type: none"> <li>The proposed stormwater management system would decrease peak flow rates, as compared to existing conditions, which could help juvenile fish rearing, adult fish migration and fish egg incubation.</li> </ul>	<ul style="list-style-type: none"> <li>Impacts to fisheries resources from decreased stormwater peak flow rates would be similar to Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>Impacts to fisheries resources from stormwater peak flow rates would be greater than Alternatives 1 and 2, because less flow control would be provided on the Hyla Crossing portion of the site under the City's 1998 stormwater standards.</li> </ul>	<ul style="list-style-type: none"> <li>Impacts to fisheries resources from stormwater peak flow rates would be greater than Alternatives 1 and 2, because less flow control would be provided on the Hyla Crossing portion of the site under the City's 1998 stormwater standards. Also, peak flow rates from the remainder of the site would continue with minimal control.</li> </ul>
<ul style="list-style-type: none"> <li>Base and low flows in Tibbetts Creek that are important for fisheries resources and aquatic species could be reduced with the proposed stormwater management system. Base/low flows could be maintained with adjustments to the system and/or infiltration measures.</li> </ul>	<ul style="list-style-type: none"> <li>Potential impacts to fisheries resources and aquatic species due to reductions in base and low flows would be similar to Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>Potential impacts to fisheries resources and aquatic species due to reductions in base and low flows would be similar to Alternatives 1 and 2.</li> </ul>	<ul style="list-style-type: none"> <li>Potential impacts to fisheries resources and aquatic species due to reductions in base and low flows would be similar to Alternatives 1 and 2.</li> </ul>
<ul style="list-style-type: none"> <li>Enhancements to the Tibbetts Creek Greenway (floodplain widening and stream corridor enhancements), per the Hyla Crossing MSP, would result in positive impacts to fish, wildlife, and habitat.</li> </ul>	<ul style="list-style-type: none"> <li>Positive impacts to fish, wildlife, and habitat with Greenway enhancements would be similar to Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>Positive impacts to fish, wildlife, and habitat with Greenway enhancements would be similar to Alternatives 1 and 2.</li> </ul>	<ul style="list-style-type: none"> <li>Positive impacts to fish, wildlife, and habitat with Greenway enhancements would be similar to Alternatives 1 and 2.</li> </ul>
<ul style="list-style-type: none"> <li>The increased activity and outdoor lighting associated with more dense urban development could result in long-term disturbance to more sensitive wildlife species.</li> </ul>	<ul style="list-style-type: none"> <li>Impacts from increased activity and lighting would be lower than Alternative 1 due to lower development density.</li> </ul>	<ul style="list-style-type: none"> <li>Impacts from increased activity and lighting would be lower than Alternatives 1 and 2 due to lower development density.</li> </ul>	<ul style="list-style-type: none"> <li>Impacts from increased activity and lighting would be much lower than Alternatives 1 and 2 due to lower development density.</li> </ul>

Alternative 1 Higher Density Alternative	Alternative 2 Medium Density Alternative	Alternative 3 No Action – Existing Zoning Sub-Alternative	Alternative 3 No Action – Existing Condition Sub-Alternative
<ul style="list-style-type: none"> <li>The Tibbetts Creek Greenway, that provides opportunities for wildlife travel, would be maintained and enhanced with redevelopment. Increased traffic from redevelopment could affect wildlife that crosses roadways. Wildlife movement under the boardwalks adjacent to SR-900 and along the I-90 ditches would likely continue. <u>The I-90 bridge crossing to Lake Sammamish that was constructed in 2004 to improve stormwater flow and wildlife movement would also remain.</u></li> </ul>	<ul style="list-style-type: none"> <li>Opportunities for wildlife travel would be similar to Alternative 1, although there would be less <u>development and associated traffic that could affect wildlife.</u></li> </ul>	<ul style="list-style-type: none"> <li>Opportunities for wildlife travel would be similar to Alternatives 1 and 2, although there would be less <u>development and associated traffic that could affect wildlife.</u></li> </ul>	<ul style="list-style-type: none"> <li>Opportunities for wildlife travel would be similar to Alternatives 1 and 2, although there would be much less <u>development and associated traffic that could affect wildlife.</u></li> </ul>
<b><u>Land and Shoreline Use</u></b>			
<ul style="list-style-type: none"> <li>Construction activities would result in periodic temporary impacts to adjacent land uses during the redevelopment period. Temporary construction impacts could include increased dust and emissions; increased noise levels; vibration associated with vehicle movement and construction activity; and, increased traffic associated with construction vehicles and construction workers. These impacts would be temporary in nature, and with implementation of required/proposed mitigation, no significant impacts would be expected.</li> </ul>	<ul style="list-style-type: none"> <li>Construction impact sources would be similar to Alternative 1, but temporary construction impact levels would be less due to the lower density of redevelopment under Alternative 2.</li> </ul>	<ul style="list-style-type: none"> <li>Construction impact sources would be similar to Alternatives 1 and 2; however, temporary construction impact levels would be less due to the lower density of redevelopment.</li> </ul>	<ul style="list-style-type: none"> <li>Construction impact sources would be similar to Alternative 1 and 2, but temporary construction impact levels would be much less due to the lower density of redevelopment.</li> </ul>

Alternative 1 Higher Density Alternative	Alternative 2 Medium Density Alternative	Alternative 3 No Action – Existing Zoning Sub-Alternative	Alternative 3 No Action – Existing Condition Sub-Alternative
<ul style="list-style-type: none"> <li>Redevelopment would result in the removal of the majority of the existing buildings on the site and displacement of these existing uses, <u>or relocation of the uses within redeveloped building areas onsite.</u> The existing Hilton Garden Inn Hotel and John L. Scott building would be retained on the site.</li> </ul>	<ul style="list-style-type: none"> <li>Displacement impacts would be similar to Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>Displacement impacts would be similar to Alternatives 1 and 2.</li> </ul>	<ul style="list-style-type: none"> <li>Existing buildings located within the Hyla Crossing MSP area (except the Hilton Garden Inn Hotel and John L. Scott building) would be removed and their associated uses displaced. All other existing buildings and their associated uses on site would be retained.</li> </ul>
<ul style="list-style-type: none"> <li>The type, character, and pattern of land uses on the site would change from a suburban-scale office and storage area to a more dense urban development featuring a mix of uses, consistent with the Guiding Principles of the Central Issaquah Plan.</li> </ul> <p>Approximately 6.5 million square feet of new commercial, office, residential, and retail uses would be provided on the site. The types of new land uses would generally be similar to existing uses in the vicinity of the site.</p>	<ul style="list-style-type: none"> <li>The type, character, and pattern of land uses on site would change, similar to Alternative 1.</li> </ul> <p>Approximately 5.5 million square feet of new commercial, office, residential, and retail uses would be provided on the site.</p>	<ul style="list-style-type: none"> <li>The site would be converted to a suburban office campus environment, in accordance with the existing IC and R zoning of the site, and the approved Hyla Crossing MSP.</li> </ul> <p>Approximately 2.8 million square feet of new commercial uses would be provided on the site.</p>	<ul style="list-style-type: none"> <li>The Hyla Crossing MSP area would be converted to office and commercial uses. The existing suburban-scale office, storage, and retail development on the remainder of the site would continue.</li> </ul> <p>Approximately 620,000 square feet of office and commercial uses would be provided in the Hyla Crossing MSP area; approximately 238,600 square feet of existing uses would also be retained on the site.</p>
<ul style="list-style-type: none"> <li>Redevelopment on the site would result in increased building heights and density. Building heights could range from a maximum of 150 feet to a maximum of 200 feet. The maximum building heights would be taller than existing buildings in the vicinity of the site. At build-out, the approximately 6.5 million square feet of redevelopment would also represent a greater building density than in the existing surrounding areas.</li> </ul>	<ul style="list-style-type: none"> <li>Maximum building heights could be similar to Alternative 1 and would result in similar impacts. Building density would be less than Alternative 1 (approximately 5.5 million square feet), but would also represent a greater building density than in the existing surrounding areas.</li> </ul>	<ul style="list-style-type: none"> <li>Building heights (maximum of 40 feet) and building density (approximately 2.8 million square feet) would be lower than Alternatives 1 and 2, and similar to in existing surrounding uses.</li> </ul>	<ul style="list-style-type: none"> <li>Building heights (maximum of 40 feet) and building density (approximately 860,000 square feet of new and retained development) would be much lower than Alternatives 1 and 2, and similar to in existing surrounding uses.</li> </ul>

Alternative 1 Higher Density Alternative	Alternative 2 Medium Density Alternative	Alternative 3 No Action – Existing Zoning Sub-Alternative	Alternative 3 No Action – Existing Condition Sub-Alternative
<ul style="list-style-type: none"> <li>Activity levels (i.e. noise, traffic, etc. associated with new site population) would increase over the long-term as a result of redevelopment due to the increase in density and associated increase in on-site population. Activity levels would be greater than the existing surrounding uses located in the site vicinity. Potential land use incompatibilities could result from the increase in activity levels. The Development Agreement (and associated development regulations/ design guidelines) between the City and the applicant would seek to minimize impacts to on and off-site uses from increased activity.</li> </ul>	<ul style="list-style-type: none"> <li>Activity levels and potential land use incompatibilities would increase under Alternative 2; however, the overall activity levels would be less than Alternative 1 due to lower building density and fewer on-site residents and employees.</li> </ul>	<ul style="list-style-type: none"> <li>Activity levels on the site would increase and would be similar to or slightly greater than existing land uses in the site vicinity. However, the increase in activity levels and potential land use incompatibilities would be less than Alternatives 1 and 2 due to lower building density and on-site population.</li> </ul>	<ul style="list-style-type: none"> <li>Activity levels would increase due to redevelopment of the Hyla Crossing MSP; however, the increase in activity levels would be much lower than Alternatives 1 and 2.</li> </ul>
<ul style="list-style-type: none"> <li>Approximately 17.0 acres of proposed community space would be provided on the site, including approximately 13.0 acres of green space and approximately 4.0 acres of shared space. Additional community space could be provided within the redevelopment areas and circulation/public realm on the site (approximately 9.0 to 13.0 acres). Community space areas would provide opportunities for recreation and gathering, and would increase activity levels on the site.</li> </ul>	<ul style="list-style-type: none"> <li>The amount of proposed community space would be similar to Alternative 1 and potential impacts (increased activity levels) would be similar as well.</li> </ul>	<ul style="list-style-type: none"> <li>Approximately 31.0 acres of community space would be provided, which would be greater than the proposed community space under Alternatives 1 and 2.</li> </ul>	<ul style="list-style-type: none"> <li>Approximately 18.0 acres of community space would be provided as part of the Hyla Crossing MSP, which would be greater than the proposed community space under Alternatives 1 and 2.</li> </ul>

Alternative 1 Higher Density Alternative	Alternative 2 Medium Density Alternative	Alternative 3 No Action – Existing Zoning Sub-Alternative	Alternative 3 No Action – Existing Condition Sub-Alternative
<b><u>Aesthetics/Light and Glare</u></b>			
<ul style="list-style-type: none"> <li>The visual character of the site would substantially change from existing suburban low-rise, commercial and light industrial development to a compact, higher density, mixed-use urban development with substantially taller buildings in certain locations.</li> </ul>	<ul style="list-style-type: none"> <li>There would be similar changes in the site's visual character to Alternative 1; however, Alternative 2 would include lower redevelopment density than Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>The visual character of the site would change to an office campus environment with slightly taller buildings than under existing conditions.</li> </ul>	<ul style="list-style-type: none"> <li>The visual character of the site would generally remain as described under existing conditions, although redevelopment would occur in conjunction with the approved Hyla Crossing MSP.</li> </ul>
<ul style="list-style-type: none"> <li>Redevelopment on the site would result in increased building heights and building density. Building heights could range from a maximum of 150 feet to a maximum of 200 feet and would generally be taller than existing buildings in the vicinity of the site. The approximately 6.5 million square feet of redevelopment would represent a greater building density than the surrounding areas.</li> </ul>	<ul style="list-style-type: none"> <li>Maximum building heights would be the same as described for Alternative 1. Redevelopment under Alternative 2 would also represent a greater building density than the surrounding areas, but at 5.5 million square feet, would be less dense than Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>Building heights (maximum of 40 feet) and building density (approximately 2.8 million square feet) would be less than Alternatives 1 and 2, and similar to surrounding uses.</li> </ul>	<ul style="list-style-type: none"> <li>Building heights (maximum of 40 feet) and building density (approximately 860,000 square feet of new and retained development) would be much less than Alternatives 1 and 2, and similar to surrounding uses.</li> </ul>
<ul style="list-style-type: none"> <li>Views of the site and areas beyond the site would be altered from certain surrounding viewpoints. Portions of views of the Issaquah Alps would be obstructed by redevelopment, but views would remain available between potential buildings and along existing and proposed streets.</li> </ul>	<ul style="list-style-type: none"> <li>Similar to Alternative 1, views of the site and areas beyond the site from certain surrounding viewpoints would be altered.</li> </ul>	<ul style="list-style-type: none"> <li>Views of the site and of areas beyond the site would not substantially change.</li> </ul>	<ul style="list-style-type: none"> <li>Views of the site and of areas beyond the site would not substantially change.</li> </ul>

Alternative 1 Higher Density Alternative	Alternative 2 Medium Density Alternative	Alternative 3 No Action – Existing Zoning Sub-Alternative	Alternative 3 No Action – Existing Condition Sub-Alternative
<ul style="list-style-type: none"> <li>Redevelopment would result in new light sources on the site. Light sources would be similar to surrounding commercial uses; however, lighting levels would be greater due to the increased level of building density on the site.</li> </ul> <p>New sources of glare (i.e. from <u>automobiles, as well as potentially from windows and building materials</u>) would also be created on the site in association with redevelopment.</p>	<ul style="list-style-type: none"> <li>Potential light and glare impacts would be similar to Alternative 1; however light and glare levels would likely be lower due to the lower level of building density.</li> </ul>	<ul style="list-style-type: none"> <li>Lighting levels would be lower than under Alternatives 1 and 2 due to the lower amount of redevelopment.</li> </ul> <p>New sources of glare would be generally similar to Alternatives 1 and 2, but at lower levels.</p>	<ul style="list-style-type: none"> <li>Lighting levels would be much lower than under Alternatives 1 and 2 due to the considerably lower amount of redevelopment.</li> </ul> <p>New sources of glare would be generally similar to Alternatives 1 and 2, but at much lower levels.</p>
<b><u>Transportation</u></b>			
<ul style="list-style-type: none"> <li>Construction-related traffic impacts under Alternative 1 would be primarily associated with demolition activities and major earthwork activities.</li> </ul> <p><u>A total of approximately 331,500 cubic yards of material would be excavated from the site. If all of this material is required to be removed from the site, it would require approximately 13,800 truck trips over the at least 20-year build-out period of the project.</u></p>	<ul style="list-style-type: none"> <li>Construction-related traffic impacts would be similar to or less than Alternative 1 due to the lower amount of redevelopment.</li> </ul>	<ul style="list-style-type: none"> <li>Construction-related traffic impacts would be less than Alternative 1 and 2 due to the lower amount of redevelopment.</li> </ul>	<ul style="list-style-type: none"> <li>Construction-related traffic impacts would be less than Alternative 1 and 2 and the Existing Zoning Sub-Alternative due to the lower amount of redevelopment.</li> </ul>

Alternative 1 Higher Density Alternative	Alternative 2 Medium Density Alternative	Alternative 3 No Action – Existing Zoning Sub-Alternative	Alternative 3 No Action – Existing Condition Sub-Alternative
<ul style="list-style-type: none"> <li>Redevelopment under Alternative 1 would generate approximately 49,000 to 51,500 daily vehicle trips, including approximately 3,980 to 4,300 AM peak hour trips and approximately 5,290 to 5,950 PM peak hour trips</li> </ul>	<ul style="list-style-type: none"> <li>Alternative 2 would generate approximately 45,000 to 46,000 daily vehicle trips, including approximately 3,470 to 3,750 AM peak hour trips and approximately 4,710 to 5,150 PM peak hour trips</li> </ul>	<ul style="list-style-type: none"> <li>The Existing Zoning Sub-Alternative would generate approximately 15,300 daily vehicle trips, including approximately 2,160 AM peak hour trips and approximately 2,180 PM peak hour trips.</li> </ul>	<ul style="list-style-type: none"> <li>In 1993, the City and Rowley Properties entered into a mitigation agreement for previously approved development on the sites. Based on this agreement, previously approved development would generate approximately 25,410 daily vehicle trips, including 2,283 AM peak hour trips and 2,889 PM peak hour trips.</li> </ul>
<ul style="list-style-type: none"> <li>During the PM peak hour, intersection impacts would exceed the LOS criteria at 22 signalized intersections, four stop-controlled intersections, and two roundabouts. Mitigation measures have been indentified to minimize the potential impacts at affected intersections.</li> </ul>	<ul style="list-style-type: none"> <li>During the PM peak hour, intersection impacts would exceed the LOS criteria at 15 signalized intersections and three stop-controlled intersections.</li> </ul>	<ul style="list-style-type: none"> <li>With the No Action Existing Zoning Sub-Alternative, many intersections are anticipated to exceed the City's LOS criteria and operate at LOS E or F conditions. This includes 22 signalized intersections, 4 unsignalized intersections and 1 roundabout that would operate below LOS D during the PM peak hours.</li> </ul>	<ul style="list-style-type: none"> <li>Intersection level of service would be similar under both No Action Sub-Alternatives.</li> </ul>
<ul style="list-style-type: none"> <li>Arterial operations under Alternative 1 would be projected to add more delay and travel time, and result in larger reductions in travel speeds.</li> </ul>	<ul style="list-style-type: none"> <li>Alternative 2 would be projected to have less delay, lower travel times and lower reductions in travel speeds along arterials than Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>Arterial operations under this sub-alternative would be similar to Alternative 2.</li> </ul>	<ul style="list-style-type: none"> <li>Arterial operations under this sub-alternative would be similar to Alternative 2.</li> </ul>
<ul style="list-style-type: none"> <li>Site access driveways would be located at Maple Street, Gilman Boulevard, and Mall Street. The site's location proximate to SR-900 and I-90 would facilitate access. Under Alternative 1, these access driveways would operate at acceptable LOS levels, with the exception of the eastern access from Gilman Boulevard, which would operate at LOS E.</li> </ul>	<ul style="list-style-type: none"> <li>Under Alternative 2, site access driveways and operational impacts would be similar to Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>Under this sub-alternative, site access driveway operational impacts would be lower than Alternatives 1 and 2.</li> </ul>	<ul style="list-style-type: none"> <li>Under this sub-alternative, site access driveway operational impacts would be lower than Alternatives 1 and 2.</li> </ul>

Alternative 1 Higher Density Alternative	Alternative 2 Medium Density Alternative	Alternative 3 No Action – Existing Zoning Sub-Alternative	Alternative 3 No Action – Existing Condition Sub-Alternative
<ul style="list-style-type: none"> <li>The increase in traffic associated with Alternative 1 would likely increase the probability for collisions in the area. The SR-900/Gilman Boulevard intersection currently has the highest number of collisions per year and Alternative 1 could add approximately one additional collision per year. Other intersections would have a very low potential for an increase in collisions.</li> </ul>	<ul style="list-style-type: none"> <li>Traffic safety impacts under Alternative 2 would be similar to or less than Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>Traffic safety impacts usage under this sub-alternative would be less than Alternatives 1 and 2.</li> </ul>	<ul style="list-style-type: none"> <li>Traffic safety impacts under this sub-alternative would be less than Alternatives 1 and 2</li> </ul>
<ul style="list-style-type: none"> <li>Transit usage would increase with redevelopment under Alternative 1. It is estimated that approximately 2,080 to 2,620 daily transit trips would be generated under Alternative 1, including approximately 180 to 220 AM peak hour trips and approximately 230 to 260 PM peak hour trips.</li> </ul>	<ul style="list-style-type: none"> <li><u>Similar to Alternative 1, transit usage would increase.</u> It is anticipated that Alternative 2 would result in approximately 1,760 to 2,240 daily transit trips, including approximately 160 to 180 AM peak hour trips and approximately 190 to 220 PM peak hour trips.</li> </ul>	<ul style="list-style-type: none"> <li>The Existing Zoning Sub-Alternative would generate approximately 460 daily transit trips, including approximately 70 AM peak hour trips and approximately 70 PM peak hour trips.</li> </ul>	<ul style="list-style-type: none"> <li>Daily transit trips under this sub-alternative would be similar to or less than the Existing Zoning Sub-Alternative.</li> </ul>
<ul style="list-style-type: none"> <li>Pedestrian and bicycle trails/walkways would be provided on the site under Alternative 1, including limited vehicle access/pedestrian-only use along 19<sup>th</sup> Avenue and pedestrian circulation facilities along new internal streets and pedestrian connections/mews.</li> </ul> <p>Alternative 1 would generate approximately 430 to 540 daily bicycle trips and approximately 8,790 to 10,310 daily pedestrian trips.</p>	<ul style="list-style-type: none"> <li>Alternative 2 would provide similar pedestrian and bicycle facilities as Alternative 1.</li> </ul> <p>Alternative 2 would generate approximately 360 to 460 daily bicycle trips and approximately 8,990 to 9,460 daily pedestrian trips.</p>	<ul style="list-style-type: none"> <li>Under the Existing Zoning Sub-Alternative, a pedestrian and bicycle facilities would be provided via trail along the western edge of the site. Existing sidewalks would also be utilized for pedestrian circulation.</li> </ul> <p>This sub-alternative would generate approximately 80 daily bicycle trips and approximately 780 daily pedestrian trips.</p>	<ul style="list-style-type: none"> <li>Pedestrian and bicycle facilities under this sub-alternative would be similar to the Existing Zoning Sub-Alternative and daily bicycle and pedestrian trips would also likely be similar to or less than the Existing Zoning Sub-Alternative.</li> </ul>

Alternative 1 Higher Density Alternative	Alternative 2 Medium Density Alternative	Alternative 3 No Action – Existing Zoning Sub-Alternative	Alternative 3 No Action – Existing Condition Sub-Alternative
<ul style="list-style-type: none"> <li>Under Alternative 1, approximately 6,600 to 7,000 parking stalls would be provided on the Rowley Properties site.</li> </ul> <p>Peak parking demand under Alternative 1 would depend on whether parking for residential uses is shared with other uses or reserved at a rate of one stall per unit. Parking demand would range from approximately 6,700 to 8,720 stalls.</p>	<ul style="list-style-type: none"> <li>Under Alternative 2, approximately 5,700 to 6,000 parking stalls would be provided on the Rowley Properties site.</li> </ul> <p>Similar to Alternative 1, peak parking demand would be dependent on the distribution for residential uses and would range from approximately 5,700 to 7,300 stalls.</p>	<ul style="list-style-type: none"> <li>Under the Existing Zoning Sub-Alternative, approximately 5,500 parking stalls would be provided on the Rowley Properties site.</li> </ul> <p>Peak parking demand for the site would be approximately 4,270 stalls.</p>	<ul style="list-style-type: none"> <li>Parking supply for the Existing Conditions Sub-Alternative was not available. However, peak parking demand for the site was determined to be approximately 4,330 stalls.</li> </ul>
<b><u>Construction Impacts</u></b>			
<ul style="list-style-type: none"> <li>Construction activities on the site would require approximately 255,200 cubic yards of cut material and 270,700 cubic yards of fill material over the at least 20-year build-out period of the project.</li> </ul>	<ul style="list-style-type: none"> <li>Grading activities would be similar to Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>Grading activities would be required for redevelopment; however, the potential grading quantities would be less than Alternatives 1 and 2.</li> </ul>	<ul style="list-style-type: none"> <li>Grading activities/quantities would be much less than Alternatives 1 and 2, as only the approved Hyla Crossing MSP area would be developed.</li> </ul>
<ul style="list-style-type: none"> <li>Due to the existing soil conditions on the site, taller buildings (up to 150 feet or 200 feet) that could be built would require the use of deep building foundations, such as piles.</li> </ul>	<ul style="list-style-type: none"> <li>Similar to Alternative 1, taller buildings under Alternative 2 would also require the use of deep foundations (i.e. piles).</li> </ul>	<ul style="list-style-type: none"> <li>It is anticipated that deep foundations would not be required due to the lower building heights under this sub-alternative.</li> </ul>	<ul style="list-style-type: none"> <li>Deep foundations would not be required due to the lower building heights under this sub-alternative.</li> </ul>

Alternative 1 Higher Density Alternative	Alternative 2 Medium Density Alternative	Alternative 3 No Action – Existing Zoning Sub-Alternative	Alternative 3 No Action – Existing Condition Sub-Alternative
<ul style="list-style-type: none"> <li>Construction of potential stormwater conveyance pipes through Sammamish Cove Park and outfall to Lake Sammamish that would utilize horizontal directional drilling (HDD) could result in potential impacts, such as surface subsidence or settlement, or the development of sinkholes along the alignment. An increase in water turbidity levels and associated impacts could also occur. These impacts would be temporary in nature, and with implementation of required/proposed mitigation measures, no significant impacts would be expected.</li> </ul>	<ul style="list-style-type: none"> <li>Construction of potential stormwater conveyance pipes and outfall through HDD could result in impacts similar to Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>Redevelopment would not include the use of stormwater conveyance pipes in Sammamish Cove Park or an outfall to Lake Sammamish and no associated impacts would occur.</li> </ul>	<ul style="list-style-type: none"> <li>Redevelopment would not include the use of stormwater conveyance pipes in Sammamish Cove Park or an outfall to Lake Sammamish and no associated impacts would occur.</li> </ul>
<ul style="list-style-type: none"> <li>Construction activities on the site would generate <u>temporary</u> air pollutants in the form of fugitive dust from demolition activities and earthwork, and emissions associated with construction vehicles and equipment. Emissions would be temporary in nature and localized in the immediate vicinity of the construction activity, and with implementation of required/proposed mitigation measures, no significant impacts would be expected.</li> </ul>	<ul style="list-style-type: none"> <li><u>Temporary</u> construction-related air pollutants and emissions would be similar to under Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li><u>Temporary</u> construction-related air pollutants and emissions would likely be lower than Alternatives 1 and 2 due to the lower level of redevelopment density.</li> </ul>	<ul style="list-style-type: none"> <li><u>Temporary</u> construction-related air pollutants and emissions would be much lower than Alternatives 1 and 2, as only the approved Hyla Crossing MSP would be developed.</li> </ul>

Alternative 1 Higher Density Alternative	Alternative 2 Medium Density Alternative	Alternative 3 No Action – Existing Zoning Sub-Alternative	Alternative 3 No Action – Existing Condition Sub-Alternative
<ul style="list-style-type: none"> <li>• During construction, localized sound levels and localized vibration would temporarily increase in the site vicinity and streets used by construction vehicles that would access the construction site. Construction noise would result in temporary annoyance and possibly increased speech interference near the construction site. These impacts would be temporary in nature, and with implementation of required/proposed mitigation measures, no significant impacts would be expected.</li> </ul>	<ul style="list-style-type: none"> <li>• Construction-related noise and vibration impacts would be similar to Alternative 1.</li> </ul>	<ul style="list-style-type: none"> <li>• Construction-related noise and vibration impacts would be less than Alternatives 1 and 2 due to the lower level of redevelopment on the site.</li> </ul>	<ul style="list-style-type: none"> <li>• Construction-related noise and vibration would be much less than Alternatives 1 and 2, as only the approved Hyla Crossing MSP would be developed.</li> </ul>
<ul style="list-style-type: none"> <li>• Construction activities are anticipated to occur incrementally over the buildout period and would move around the site, resulting in temporary impacts to remaining land uses within the site and adjacent land uses when site construction is proximate to those areas.</li> </ul>	<ul style="list-style-type: none"> <li>• Construction-related impacts to existing retained land uses and surrounding land uses would be similar to Alternative 1, and temporary in nature.</li> </ul>	<ul style="list-style-type: none"> <li>• Construction-related impacts to existing retained land uses and surrounding land uses would be less than Alternatives 1 and 2.</li> </ul>	<ul style="list-style-type: none"> <li>• Construction-related impacts to existing retained land uses and surrounding land uses would be much less than Alternatives 1 and 2, as only the approved Hyla Crossing MSP would be developed.</li> </ul>
<b><u>Air Quality and GHG Emissions</u></b>			
<ul style="list-style-type: none"> <li>• <u>Construction-related air quality impacts would include temporary air pollutants in the form of fugitive dust from demolition activities and earthwork, and emissions associated with construction vehicles and equipment. The primary types of pollutants that would be anticipated during construction activities would be particulates and hydrocarbons.</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Temporary construction-related air quality sources would be similar to Alternative 1; however, air quality impacts would be lower due to the lower amount of redevelopment under Alternative 2.</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Temporary construction-related air quality sources would be similar to Alternatives 1 and 2; however, air quality impacts would likely be lower than Alternatives 1 and 2 due to the lower amount of redevelopment.</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Temporary construction-related air quality sources would be similar to Alternatives 1 and 2; however, air quality impacts would be much lower than Alternatives 1 and 2 due to the lower amount of redevelopment.</u></li> </ul>

Alternative 1 Higher Density Alternative	Alternative 2 Medium Density Alternative	Alternative 3 No Action – Existing Zoning Sub-Alternative	Alternative 3 No Action – Existing Condition Sub-Alternative
<ul style="list-style-type: none"> <li>Operational emissions and related potential air quality impacts could result from the primary air polluting sources in the area, including transportation-related emissions and building-related emissions. The increase in vehicle trips would result in an increase in vehicle emissions, including carbon monoxide (CO). Operation of new buildings would also result in exhaust that would represent an increase over existing conditions.</li> </ul>	<ul style="list-style-type: none"> <li>Operational emission sources would be similar to Alternative 1. However, transportation-related emissions and building-related emissions would be lower due to the lower amount of redevelopment.</li> </ul>	<ul style="list-style-type: none"> <li>Operational emission sources would be similar to Alternatives 1 and 2. However, transportation-related emissions and building-related emissions would be lower due to the lower amount of redevelopment.</li> </ul>	<ul style="list-style-type: none"> <li>Operational emission sources would be similar to Alternatives 1 and 2. However, transportation-related emissions and building-related emissions would be much lower due to the lower amount of redevelopment.</li> </ul>
<ul style="list-style-type: none"> <li>Under Alternative 1, redevelopment on the Rowley Properties site is estimated to generate approximately 83,400 MTCO<sub>2</sub>e in GHG emissions annually under the 80/20 mix and approximately 81,000 MTCO<sub>2</sub>e annually with the 60/40 mix. However, the proposed mixed-use development would include features that would reduce GHG emissions and climate change impacts. As a result, per person GHG emissions would be expected to be less than under existing conditions/suburban development.</li> </ul>	<ul style="list-style-type: none"> <li>Alternative 2 is estimated to generate approximately 70,500 MTCO<sub>2</sub>e in GHG emissions annually under the 80/20 mix and approximately 68,400 MTCO<sub>2</sub>e annually under the 60/40 mix. Similar to Alternative 1, proposed mixed-use development would include features to reduce GHG emissions and climate change impacts, and per person GHG emissions would be expected to be less than under existing conditions/suburban development.</li> </ul>	<ul style="list-style-type: none"> <li>The Existing Zoning sub-alternative is anticipated to generate approximately 36,700 MTCO<sub>2</sub>e in GHG emissions annually. Per person GHG emissions could be higher than Alternatives 1 and 2.</li> </ul>	<ul style="list-style-type: none"> <li>The Existing Condition sub-alternative is anticipated to generate approximately 18,500 MTCO<sub>2</sub>e in GHG emissions annually. Per person GHG emissions could be higher than Alternatives 1 and 2.</li> </ul>
<ul style="list-style-type: none"> <li>Alternative 1 would utilize energy in the form of electricity and natural gas. Development under Alternative 1 would result in an increase in energy usage levels when compared to the existing conditions. Over the lifetime of the project, alternative sources of energy could be utilized that could reduce the demand for electricity and natural gas.</li> </ul>	<ul style="list-style-type: none"> <li>Energy usage levels would increase compared to existing conditions; however, the usage levels would be less than Alternative 1 due to the lower level of redevelopment.</li> </ul>	<ul style="list-style-type: none"> <li>Energy usage levels would increase, but the usage levels would be less than Alternatives 1 and 2.</li> </ul>	<ul style="list-style-type: none"> <li>Energy usage levels would increase, but the usage levels would be less than Alternatives 1 and 2.</li> </ul>

## **1.5 Mitigation Measures and Significant Unavoidable Adverse Impacts**

**Table 1-2** presents the mitigation measures and significant unavoidable adverse impacts that were identified in the DEIS. New or updated mitigation measures that have been identified since issuance of the DEIS are indicated in underline. Mitigation measures that have been all or partially eliminated from the proposal since the issuance of the DEIS are indicated in strikethrough. It should be noted that the format of the mitigation measures has changed slightly since issuance of the DEIS so that the measures more closely align with the language that is anticipated to be included in the Development Agreement (i.e. passive language has been changed to active language where more prescriptive mitigation will be required and is proposed). These format changes are not highlighted in **Table 1-2**. Further modifications to and additional mitigation measures could be added to the Development Agreement adopted by the applicant and the City.

The mitigation measures listed in **Table 1-2** are categorized as “Required by Code, Laws, and Regulations”, “Proposed by the Applicant” and “Other Possible” mitigation measures. The applicant has agreed to implement all of the mitigation measures listed as “Proposed by the Applicant” (other mitigation measures that the applicant has volunteered to implement, including those anticipated to be defined in the Development Agreement, beyond the required mitigation). Implementation of the mitigation measures identified as “Required by Code, Laws, and Regulations” and “Proposed by the Applicant” is expected to reduce impacts to less than significant levels. The “Other Possible” measures are additional actions that could be undertaken to further mitigate environmental impacts or provide additional site amenities; at this point, the applicant has not agreed to implement these measures. Implementation of the “Other Possible” mitigation measures would not be required to reduce the impacts of the project to less than significant levels.

**Table 1-2** also includes a breakdown of the general timing of when the mitigation measures would likely occur: “Prior to Construction”, “During Construction”, and “During Operation”. These are considered general timeframes given the long-term, phased approach of this redevelopment. Also, the construction mitigation measures could be general or specific to a development project or site area, depending on the environmental element. The specific timing for mitigation measures will be specified in the adopted Development Agreement.

There is some duplication of mitigation measures under the various elements of the environment listed in **Table 1-2**. This is necessary in order to clearly indicate how specific impacts will be addressed (i.e. the required stormwater control system will address impacts on both water resources and critical areas, and as such is included under both elements).

**Table 1-2  
SUMMARY OF MITIGATION MEASURES  
AND SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS**

Mitigation Measures and Significant Unavoidable Adverse Impacts	Prior to Construction	During Construction	During Operation
<b>Water Resources</b>			
<u>Mitigation Measures Required by Code, Laws, and Regulations</u>			
<ul style="list-style-type: none"> <li>Prepare a Master Drainage Plan (MDP) consistent with the guidelines described in the <i>King County Master Drainage Planning for Large or Complex Site Development</i>. The approved MDP will be provided in Appendix I (Utilities) of the Development Agreement.  (Required by: the City of Issaquah's <i>2009 Addendum to the 2009 King County Surface Water Design Manual</i> (2009 KCSWDM))</li> </ul>	<b>X</b>		
<ul style="list-style-type: none"> <li>Use Best Management Practices (BMP's) during construction to control erosion and sedimentation.  (Required by the City of Issaquah's <i>2009 Addendum to the 2009 KCSWDM</i>; <u>if a Construction Stormwater General Permit is needed for the project, BMPs required by the Washington State Department of Ecology (Ecology) will be followed.</u>)</li> </ul>		<b>X</b>	
<ul style="list-style-type: none"> <li>Prepare and implement a temporary erosion and sedimentation control plan (TESCP). Sediment control measures will be implemented to meet the maximum turbidity discharge limits established by the City of Issaquah's <i>2009 Addendum to the 2009 KCSWDM</i> (see the Construction Impacts section of this table for details on TESCP).  (Required by the City's <i>2009 Addendum to the 2009 KCSWDM</i>, as well as the Ecology Construction Stormwater General Permit, if needed)</li> </ul>	<b>X</b>	<b>X</b>	
<ul style="list-style-type: none"> <li>Prepare and implement a Stormwater Pollution and Prevention Spill Plan in accordance with the City of Issaquah's <i>2009 Addendum to the 2009 KCSWDM</i> and the Ecology Construction Stormwater General Permit (if needed), to prevent and minimize chances of accidental release of chemicals from construction equipment/activity.  (Required by the City's <i>2009 Addendum to the 2009 KCSWDM</i> and the Ecology Construction Stormwater General Permit, if needed)</li> </ul>	<b>X</b>	<b>X</b>	
<ul style="list-style-type: none"> <li>Under Stormwater Management Scenario 2, impacts to water resources (i.e. wetlands, Tibbetts Creek, and Lake Sammamish) during construction and operation of the conveyance line and outfall in Sammamish Cove Park will be analyzed through a separate SEPA process for that portion of the project.  Further environmental review under SEPA will be required prior to issuance of any applicable permits and approvals for the conveyance system and outfall.</li> </ul>	<b>X</b>		
<ul style="list-style-type: none"> <li>Design and install the permanent stormwater management in accordance with the City's <i>2009 Addendum to the 2009 KCSWDM</i> and Appendix I (Utilities) of the Development Agreement.</li> </ul>	<b>X</b>	<b>X</b>	

Mitigation Measures and Significant Unavoidable Adverse Impacts	Prior to Construction	During Construction	During Operation
<u>Mitigation Measures Proposed by the Applicant</u>			
<ul style="list-style-type: none"> <li>• Even though the site is not located in a Critical Aquifer Recharge Area, apply Best Management Practices (BMPs) to protect groundwater quality, per the City of Issaquah Critical Aquifer Recharge Area regulations, including: appropriate storage and handling facilities for any hazardous materials that may be used at the site and <u>documentation of imported clean, fill material to prevent the introduction of contaminants into groundwater.</u></li> </ul> <p><u>(Per the City of Issaquah Critical Aquifer Recharge Area (CARA) regulations – IMC 18.10.796, even though the site is not located in a CARA )</u></p>	<b>X</b>	<b>X</b>	<b>X</b>
<ul style="list-style-type: none"> <li>• Expand the Tibbetts Creek floodplain from the existing condition and provide stream enhancement in the southernmost portion of the creek in the Hyla Crossing Area, consistent with the Tibbetts Creek Greenway Plan. <u>The southern major enhancements will be completed prior to occupancy of any redevelopment of parcels 7450900380, 7450900370, or 7450900360. See FEIS Table 3.2-1 and Figure 3.2-1 for details on existing and proposed stream buffer widths.</u></li> </ul>	<b>X</b>	<b>X</b>	
<ul style="list-style-type: none"> <li>• <del>Adhere to the buffer protection requirements of the Group B wellhead protection area in the Hyla Crossing Area. Land uses in the Hyla Crossing Area will be compatible with the Group B wellhead protection area and activities that could potentially contaminate the area will not be permitted.</del></li> </ul>			
<ul style="list-style-type: none"> <li>• Develop and implement a landscape management plan to minimize the impact of landscape chemicals on water quality. <u>The management plan will include education and outreach for the on-site grounds-keeping staff.</u></li> </ul>			<b>X</b>
<ul style="list-style-type: none"> <li>• <u>Leachable metals (i.e. copper and galvanized metals) will not be used in areas exposed to weather and a covenant will be recorded prohibiting future use of leachable metals onsite in order to preserve water quality. As a result, enhanced water quality treatment will not be required.</u></li> </ul>		<b>X</b>	
<ul style="list-style-type: none"> <li>• <u>The Development Agreement will include a provision indicating that future wells will be prohibited and existing wells abandoned onsite in order to protect groundwater resources.</u></li> </ul>	<b>X</b>		
<u>Other Possible Mitigation Measures</u>			
<ul style="list-style-type: none"> <li>• Base flow (the natural flow of the creek that typically results from groundwater and precipitation) rates in Tibbetts Creek could be maintained with a control valve and in Tributary 0170 with a flow splitter.</li> </ul>		<b>X</b>	<b>X</b>
<ul style="list-style-type: none"> <li>• Appropriate Low-Impact Development (LID) techniques could be included in the Master Drainage Plan in order to infiltrate stormwater and maintain stream base flows.</li> </ul>	<b>X</b>		
<ul style="list-style-type: none"> <li>• <u>Additional water quality treatment could be provided, including through the use of filter media, water quality swales or created wetlands, and/or stormwater infiltration, to further improve water quality.</u></li> </ul>		<b>X</b>	

Mitigation Measures and Significant Unavoidable Adverse Impacts	Prior to Construction	During Construction	During Operation
<u>Significant Unavoidable Adverse Impacts</u>			
<ul style="list-style-type: none"> <li>With implementation of the required/proposed mitigation measures, no significant impacts to water resources would be expected during construction and operation of the Hyla Crossing and Rowley Center Project. Under existing conditions, the Rowley Properties site is largely developed; however, existing stormwater management facilities (i.e. stormwater flow control and water quality treatment facilities) are very limited. Under Alternatives 1 and 2, redevelopment would include provision of temporary and permanent stormwater management systems per the City of Issaquah's 2009 Addendum to the 2009 KCSWDM. These systems would provide greater stormwater quantity and quality control than under existing conditions.</li> </ul>			
<b>Critical Areas/Plants and Animals</b>			
<u>Mitigation Measures Required by Code, Laws, and Regulations</u>			
<ul style="list-style-type: none"> <li>Avoid and minimize critical area impacts to the extent possible. No fill of wetlands or relocation of streams are proposed as part of the project on the Rowley Properties site as defined in this EIS. Temporary critical areas impacts, such as disturbance and possible erosion and sedimentation, will be addressed by restoring the affected areas to the same or an improved condition, in accordance with the Issaquah Critical Areas Ordinance and other applicable state and federal regulations.</li> </ul>		<b>X</b>	
<ul style="list-style-type: none"> <li>Maintain existing vegetated buffers adjacent to interior on-site Wetland A and existing vegetated buffers adjacent to the off-site ditch wetlands along I-90 (Wetlands B and E) and SR-900 (Wetlands F, G, H, ,I and J), as under existing conditions.</li> </ul>	<b>X</b>	<b>X</b>	<b>X</b>
<ul style="list-style-type: none"> <li>Implement a TESCP and SWPPS per the City of Issaquah's 2009 Addendum to the 2009 KCSWDM.  All clearing and grading will be in accordance with the City of Issaquah Clearing &amp; Grading Code (Chapter 16.26), as amended by the Development Agreement, and applicable permit conditions, codes, ordinances, and standards. These measures are intended to reduce impacts on critical areas on and in the vicinity of the site.</li> </ul>		<b>X</b>	
<ul style="list-style-type: none"> <li>Install a permanent stormwater management system per the City's 2009 Addendum to the 2009 KCSWDM and as outlined in the MDP. Water quality treatment and flow control will minimize potential impacts on critical areas and aquatic resources on and in the vicinity of the site. <u>The MDP will be provided in Appendix I (Utilities) of the Development Agreement.</u></li> </ul>		<b>X</b>	
<ul style="list-style-type: none"> <li><del>Tibbets Creek and/or associated buffer areas disturbed for construction of the stormwater conveyance route that crosses under I-90 (under Stormwater Scenario 2) would be restored after construction.</del></li> </ul>			
<ul style="list-style-type: none"> <li><del>Should Stormwater Scenario 2 be proposed for stormwater management for the project, further environmental review under SEPA, including wetland delineation, would be required prior to issuance of any applicable permits and approvals for the conveyance system and outfall to Sammamish Cove Park.</del></li> </ul>			

Mitigation Measures and Significant Unavoidable Adverse Impacts	Prior to Construction	During Construction	During Operation
<ul style="list-style-type: none"> <li>• <del>Vegetation that would be disturbed at Sammamish Cove Park for installation of the stormwater management system conveyance pipe to Lake Sammamish (under Stormwater Scenario 2) would be restored to the same or improved condition following construction.</del></li> </ul>			
<ul style="list-style-type: none"> <li>• Install outdoor lighting that will meet the intent of the Issaquah Municipal Code Section 18.07.107 that includes Critical Area Light Spillover Limits. <u>Outdoor lighting will be addressed in Appendix B (Design Guidelines) of the Development Agreement in order to ensure the mixed-use, urban nature of this development is appropriate and at the same time recognizes the sensitivity of the natural environment to light spillover.</u></li> </ul>			X
<ul style="list-style-type: none"> <li>• Preserve and enhance the Tibbetts Greenway (the existing approximately 10-acre Greenway will be expanded by approximately 1.4 acres with proposed redevelopment) as addressed in Appendix J (Critical Areas) of the Development Agreement.</li> </ul>	X	X	
<u>Mitigation Measures Proposed by the Applicant</u>			
<ul style="list-style-type: none"> <li>• At some point in the redevelopment process, complete improvements to the southern and northern ends of the Greenway, as shown on Exhibit 16 of the approved Hyla Crossing MSP (see DEIS Appendix B for Exhibit 16). At the southern end, floodplain capacity will be increased, two- to three buildings (on parcels 7450900380, 7450900370, or 7450900360) will be removed, impervious surface areas removed, non-native vegetation removed, and the stream corridor restored with native plants and in-stream log structures.</li> </ul> <p>At the northern end, non-native vegetation will be removed and native vegetation planted (these improvements will occur with or without the stream relocation on the adjacent Mull Property and will be addressed in Appendix J (Critical Areas) of the Development Agreement. Areas containing critical areas and their associated buffers will be protected during construction of these parcels. <u>See FEIS Table 3.2-1 and Figure 3.2-1 for details on existing and proposed stream buffer widths.</u></p>		X	
<ul style="list-style-type: none"> <li>• With redevelopment, the applicant proposes to provide a stream buffer and building setback adjacent to Tibbetts Creek consistent with Exhibit 16 to the approved Hyla Crossing MSP (see DEIS Appendix B for Exhibit 16). The stream buffer and building setback will be the same or greater width than what is currently being provided onsite. <u>The City and the applicant will consider including more restrictive stream buffer and building setback requirements in the Development Agreement, as appropriate.</u></li> </ul>	X	X	X
<ul style="list-style-type: none"> <li>• <u>Along with expansion, enhancement, and other improvements to the northernmost buffer section near Poplar Way, portions of the existing buffer adjacent to Tibbetts Creek that are currently less than 10 feet wide will be increased to an average of 10 feet wide and re-vegetated, and, portions of the existing buffer that are currently approximately 10 feet wide will be maintained at an average width of 10 feet as an interim measure until the creek is relocated onto the adjacent Mull property. See FEIS Table 3.2-1 and Figure 3.2-1 for details on existing and proposed stream buffer widths.</u></li> </ul>		X	
<ul style="list-style-type: none"> <li>• Configure the northern end of 19<sup>th</sup> Avenue NW between Tibbetts Creek and 19<sup>th</sup> Avenue NW to enable fire egress and to provide an adjacent multi-modal trail, thereby reducing traffic, pollutants and disturbance on</li> </ul>		X	

Mitigation Measures and Significant Unavoidable Adverse Impacts	Prior to Construction	During Construction	During Operation
the creek and associated wetlands.			
<ul style="list-style-type: none"> <li>Provide a total of approximately 12.9 acres of proposed green space onsite with redevelopment; additional green space could be provided throughout the site within the redevelopment areas and circulation areas/public realm. Overall, green space provided with redevelopment will be intended to meet or exceed existing conditions, <u>as addressed in Appendix D (Community Space) and Appendix J (Critical Areas) of the Development Agreement.</u></li> </ul>		X	
<ul style="list-style-type: none"> <li>Implementation of either Stormwater Scenario 1 or 2 will result in improvements to Tibbetts Creek over existing conditions, including addressing: flashy and erosive hydrologic conditions, increased erosion/sedimentation, higher nutrient loads, increased input of contaminants and habitat fragmentation.</li> </ul>		X	
<ul style="list-style-type: none"> <li><del>All three stormwater outfall locations will be subject to further environmental review under SEPA prior to issuance of any applicable permits and approvals (for the conveyance system and outfall).</del></li> </ul>			
<ul style="list-style-type: none"> <li>Plan construction activities in the Hyla Crossing Area to protect fish and wildlife by avoiding critical time periods (i.e. breeding, rearing, or migration periods) as much as possible and as prescribed by any applicable permit conditions.</li> </ul>	X	X	
<ul style="list-style-type: none"> <li>Locate trails through the Hyla Crossing Area and across Tibbetts Creek to avoid sensitive habitat areas as much as is possible. The majority of the trails through wetlands will be on elevated boardwalks or crossings to minimize impacts on critical areas. <u>Trails through buffers will be constructed with pervious materials, and the trail (boardwalk) through wetlands will be located at the narrowest crossing points.</u></li> </ul>	X	X	
<ul style="list-style-type: none"> <li>Provide landscaping throughout the Hyla Crossing and Rowley Center Areas, <u>as addressed in Appendix B (Design Guidelines) and Appendix G (Landscaping) of the Development Agreement.</u></li> </ul> <p>Landscaped areas and other green space provided with redevelopment will be planted <del>with native species, as possible</del> to support wildlife habitat and minimize maintenance.</p>		X	
<ul style="list-style-type: none"> <li><del>Under either Stormwater Scenario 1 or 2, stormwater will be infiltrated to the extend feasible and/or stored in scaled back detention facilities for release in a dispersed fashion over a more extended time period to support summertime low flows. Release stormwater runoff less than or equal to 1/2 of the 2-year historical flow rates to surface waters at the natural discharge locations to help maintain stream base flows important for aquatic resources.</del></li> </ul>			X
<u>Other Possible Mitigation Measures</u>			
<ul style="list-style-type: none"> <li>A long-term stewardship program for natural green spaces and critical areas could be created. This program could include stewardship goals and objectives for the care of the Tibbetts Creek Greenway, as well as overall, long-term goals for the ecological health and habitat value of Tibbetts Creek and associated Greenway areas. <u>It could also address the history of the site/City of Issaquah and the evolution of the creek from Drainage District #4 (associated with Issaquah's agriculture history).</u></li> </ul>			X

Mitigation Measures and Significant Unavoidable Adverse Impacts	Prior to Construction	During Construction	During Operation
<ul style="list-style-type: none"> <li>Stormwater infrastructure could be used to augment low flow in Tibbetts Creek to benefit fish and wildlife habitat.</li> </ul>			<b>X</b>
<ul style="list-style-type: none"> <li><del>Under either Stormwater Scenario 1 or 2, stormwater will be infiltrated to the extent feasible and/or store in scaled back detention facilities for release in a dispersed fashion over a more extended time period to support summertime low maintain base flows between storm events.</del></li> </ul>			
<u>Significant Unavoidable Adverse Impacts</u>			
<ul style="list-style-type: none"> <li>Redevelopment under Alternatives 1 and 2 would include some unavoidable impacts to critical areas and wildlife. Removal of vegetation, habitat fragmentation, and decreased vegetative screening of Tibbetts Creek and wetlands would result from construction of the proposed trails/boardwalk in the Tibbetts Greenway. Increased human activity and trail use associated with more dense urban development could also impact sensitive animal species living in or traveling through the Greenway. Overall, however, no significant impacts to critical areas, plants, animals or water quality in streams or Lake Sammamish would be expected with implementation of the required/proposed mitigation measures.</li> </ul>			
<b>Land and Shoreline Use</b>			
<u>Mitigation Measures Required by Code, Laws, and Regulations</u>			
<ul style="list-style-type: none"> <li>As part of the Proposed Actions, present a Development Agreement for approval between the City of Issaquah and Rowley Properties. The Development Agreement <u>and proposed Urban Village zoning</u> will identify implementing land use regulations for the site which will include regulations related to building height and design.</li> </ul>	<b>X</b>		
<ul style="list-style-type: none"> <li>Create specific development regulations and design guidelines as part of the Development Agreement; future development will be reviewed for conformance with these regulations/guidelines. Address the mixed-use, urban nature of this redevelopment with the design guidelines to ensure that new land uses are supportive and/or complementary to existing retained uses onsite and existing uses in the site vicinity.</li> </ul>	<b>X</b>		
<ul style="list-style-type: none"> <li>Establish land use regulations (zoning and design standards) to mitigate and plan for land use, height and scale impacts through the new <u>Urban Village</u> zoning for the Rowley Properties site and Development Agreement.</li> </ul>	<b>X</b>		
<ul style="list-style-type: none"> <li>Include a periodic review and update procedure in the Development Agreement to review the success of the Development Agreement.</li> </ul>	<b>X</b>		
<ul style="list-style-type: none"> <li>Additional mitigation measures related to views, transportation, and construction are identified in the Aesthetics/Light and Glare, Transportation and Parking, and Construction Impacts portions of this table to lessen overall impacts from redevelopment of the site.</li> </ul>	<b>X</b>		
<u>Mitigation Measures Proposed by the Applicant</u>			
<ul style="list-style-type: none"> <li>Phase redevelopment over time, consistent with market demands, and as addressed in the Development Agreement and applicable regulations and</li> </ul>		<b>X</b>	

Mitigation Measures and Significant Unavoidable Adverse Impacts	Prior to Construction	During Construction	During Operation
standards to reduce the intensity of land use impacts at a given time.			
<u>Other Possible Mitigation Measures</u>			
<ul style="list-style-type: none"> <li>• <u>The Development Agreement could include a provision to ensure that mixed-use development will be provided on the site. Specifically, development of the initial 2,500,000 square feet of commercial uses in the Hyla Crossing and Rowley Center Project could require the development of at least 500 residential units. Additional residential units could also be required to coincide with commercial development beyond 2,500,000 square feet.</u></li> </ul>	X	X	
<u>Significant Unavoidable Adverse Impacts</u>			
<ul style="list-style-type: none"> <li>• Redevelopment under Alternatives 1 and 2 would result in the intensification of development on the Rowley Properties site and increased site activity levels. At full build-out, the site would transition to a new mixed-use neighborhood with commercial, residential, and retail uses. Alternatives 1 and 2 could result in the displacement of some existing uses <u>and/or incorporation of these uses into the project</u>. Over the long-term, the land use character of the site would change from a historically commercial and light industrial site to a new mixed-use development.</li> </ul> <p>Significant adverse land use impacts would not be anticipated under Alternatives 1 and 2. It is assumed that redevelopment would occur consistent with the adopted standards, guidelines and regulations for the Rowley Properties site, including the Development Agreement between the City of Issaquah and Rowley Properties, Inc., as well as the Planned Action Ordinance.</p> <p><del>The No Action Alternative would not result in the transition of the site to a mixed use neighborhood, due to the fact that residential uses are not allowed under the existing zoning. The No Action Alternative would result in continued commercial uses on the site and no new housing units. However, the City of Issaquah's vision or Guiding Principles for the Central Issaquah Area anticipate future mixed-use development.</del></p>			
<b>Aesthetics/Light and Glare</b>			
<u>Mitigation Measures Required by Code, Laws, and Regulations</u>			
<ul style="list-style-type: none"> <li>• <del>As part of the Proposed Actions, a Development Agreement will be presented for approval between the City of Issaquah and Rowley Properties, Inc. in order for the project to qualify under the Planned Action Ordinance. Identify implementing land use regulations for the site, including regulations related to building height and design, in the Development Agreement.</del></li> </ul>	X		
<ul style="list-style-type: none"> <li>• Provide lighting associated with construction activities that will be in accordance with City of Issaquah regulations, which limit construction activities during nighttime hours, thus limiting construction lighting impacts.</li> </ul> <p>(Required by Issaquah Municipal Code 16.35.010)</p>		X	

Mitigation Measures and Significant Unavoidable Adverse Impacts	Prior to Construction	During Construction	During Operation
<ul style="list-style-type: none"> <li>Provide outdoor lighting that will meet the intent of the Issaquah Municipal Code that includes Critical Area Light Spillover Limits. Outdoor lighting <del>would be designed to be consistent with the applicable</del> <del>the applicable</del> provision of the City of Issaquah outdoor lighting requirements (IMC 18.07.107) will be addressed in Appendix B (Design Guidelines) of the <u>Development Agreement</u> in order to ensure that the mixed-use, urban nature of the redevelopment is appropriate and at the same time sensitive to the natural environment.</li> </ul>	X		
<u>Mitigation Measures Proposed by the Applicant</u>			
<ul style="list-style-type: none"> <li>Retain a portion of the site in community space (<u>approximately 16.8 acres of proposed community space</u>), including <u>two public parks</u>, riparian vegetation associated with the Tibbetts Greenway area and landscaping, to soften the aesthetic character of overall site redevelopment. <u>The specific timing that community space will be provided will be specified in the Development Agreement.</u></li> </ul>		X	
<ul style="list-style-type: none"> <li><u>Include lighting guidelines in the Development Agreement, such as:</u> <ul style="list-style-type: none"> <li><u>All streets could be well lit for safety and security purposes, meeting standards equal to or greater than those typically required by the City of Issaquah.</u></li> <li><u>Lighting for building exteriors and circulation routes at the perimeter of the site could be designed with sensitivity to surrounding areas. Fixtures could be sited in a manner to avoid glare into the surrounding areas.</u></li> <li><u>Informal path and trail lighting could be required to not exceed a certain maximum height. Use of bollard and ground lighting could be encouraged as an alternative to pole lighting.</u></li> <li><u>Exterior lighting features at the perimeter of the site could utilize appropriate shields to reduce light spillage and security lighting could be directed away from adjacent areas.</u></li> </ul> </li> </ul>	X		
<ul style="list-style-type: none"> <li><u>Include development standards and design guidelines in the Development Agreement specific to building heights, setbacks, modulation and materials, and provisions for implementation of design guidelines over the long-term redevelopment period.</u></li> </ul>	X		
<ul style="list-style-type: none"> <li><u>Include design guidelines regarding the distance between buildings (including tower structures) in the Development Agreement (Appendix B, Design Guidelines) to allow for view corridors through the Rowley Properties site.</u></li> </ul>	X		
<u>Other Possible Mitigation Measures</u>			
<ul style="list-style-type: none"> <li>Further provisions for the establishment of view corridors through the site could be made. For example, potential view corridors could be provided along existing street rights-of-way, such as NW Gilman Boulevard, SR-900, 12<sup>th</sup> Avenue NW and NW Maple Street. Potential redevelopment along these streets could frame views towards the surrounding hillsides, including portions of the Issaquah Alps (Tiger Mountain, Squak Mountain, and Cougar Mountain).</li> </ul>	X		
<u>Significant Unavoidable Adverse Impacts</u>			
<ul style="list-style-type: none"> <li>The site has historically been and continues to be a developed site (it is</li> </ul>			

Mitigation Measures and Significant Unavoidable Adverse Impacts	Prior to Construction	During Construction	During Operation
<p>not in an undeveloped, natural condition). Redevelopment under Alternatives 1 and 2 would substantially change the aesthetic character of the site from suburban low-rise commercial and light industrial development to a compact higher density, mixed-use urban development with a range of building heights, up to a maximum of 200- or 150-feet in certain locations. Changes in character would occur incrementally over the 20-year build-out period. <del>Under the No Action Alternative, redevelopment would reflect a change in visual character to a more densely developed suburban commercial area.</del></p> <p>Redevelopment under the EIS alternatives would alter certain existing views within the vicinity of the site. The aesthetic/visual changes that would result from redevelopment of the site over the build-out period could be perceived by some to be significant; however, perception regarding such changes would ultimately be based on the subjective opinion of the viewer.</p> <p>Redevelopment on the site under the EIS alternatives would result in an increase in light and glare on the site and in the surrounding community (i.e. from automobiles, as well as potentially from windows and building materials). With implementation of the required/proposed mitigation measures listed above, no significant light and glare impacts would be anticipated.</p>			
<b>Transportation</b>			
<u>Mitigation Measures Required by Code, Laws, and Regulations</u>			
<ul style="list-style-type: none"> <li>• Prepare a <i>Construction Management Plan</i> that documents the following construction practices: <ul style="list-style-type: none"> <li>- Truck haul routes to and from the site. To the extent possible trucks will be directed to access the site vicinity via SR-900.</li> <li>- Peak hour restrictions for construction truck traffic and how those restrictions will be communicated and enforced.</li> <li>- Truck staging areas (e.g., locations where empty or full dump trucks will wait or stage prior to loading or unloading).</li> <li>- Construction employee parking areas.</li> <li>- Road or lane closures needed during utility construction or relocation, roadway construction, or building construction. If any arterial street is affected by a partial or full closure, the contractor will also prepare a Maintenance of Traffic Plan detailing temporary traffic control, channelization, and signage measures.</li> <li>- Mechanism for notifying community if road or lane closures will be required.</li> <li>- Sidewalk and/or bus stop closures and relocations</li> </ul> </li> </ul>	<b>X</b>		
<ul style="list-style-type: none"> <li>• <u>Construct near-site improvements. The developer will construct the following improvements in accordance with the timing identified in the Development Agreement for each Mitigation project.</u> <ul style="list-style-type: none"> <li>- <u>NW Gilman Blvd / SR-900 (Intersection #21) – 1) Add eastbound left turn lane to provide dual eastbound lefts, one thru, &amp; one thru-right lane; 2) Add westbound right turn lane to provide dual right turn movement; 3) modify signal phasing to provide overlap phase for westbound right turn.</u></li> </ul> </li> </ul>		<b>Timing in accordance with the Development Agreement, based on each level of development (see FEIS Appendix A for details)</b>	

Mitigation Measures and Significant Unavoidable Adverse Impacts	Prior to Construction	During Construction	During Operation
<ul style="list-style-type: none"> <li>- <u>NW Maple Street / SR-900 (Intersection #65) – Widen eastbound approach to provide three lanes (left, left-thru &amp; right turn lane), convert westbound approach to left, left-thru &amp; right turn lane. Modify signal phasing to split the eastbound and westbound phases.</u></li> <li>- <u>NW Gilman Blvd/15<sup>th</sup> Avenue NW (Intersection #60) – Signalize when warranted. Convert existing two-way left-turn lane into left turn pockets at the intersection.</u></li> <li>- <u>NW Mall Street /12<sup>th</sup> Avenue NW (Intersection #194) – Signalize when warranted. Convert existing two-way left-turn lane into left turn pockets at the intersection.</u></li> </ul>			
<ul style="list-style-type: none"> <li>• <u>Pay for off-site intersection improvements. Make mitigation payments to be administered by the City in accordance with the timing identified in the Development Agreement for each of the following projects. Payment in lieu of construction will be considered full mitigation of the project’s impacts.</u> <ul style="list-style-type: none"> <li>- <u>NW Gilman Blvd /NW Juniper St (Intersection #170) – Contribute to City’s project to signalize intersection to improve the trail crossing (TIP Project Number T-26: Three Trails Crossing Intersection Improvements). Add southeast-bound right turn pocket on Gilman Boulevard. \$85,800</u></li> <li>- <u>SE 62<sup>nd</sup>St /E Lake Sammamish Pkwy (Intersection #10) – Add eastbound right-turn pocket.\$94,600</u></li> <li>- <u>SE Black Nugget Rd / Issaquah-Fall City Rd (Intersection #12) – Add southbound right turn pocket with overlap phase, and optimize cycle length (140 sec). \$75,100</u></li> <li>- <u>SE 58<sup>th</sup>St /Issaquah Fall City Rd (Intersection #34) – Add eastbound right turn pocket. \$23,300</u></li> <li>- <u>NW Gilman Blvd /Maple St NW (Intersection #51) – Modify signal phasing to add overlap phase for northbound right turn; and re-optimize splits. \$12,900</u></li> <li>- <u>Front St / NW Gilman Blvd (Intersection #26) – Add eastbound right turn pocket. \$101,700</u></li> <li>- <u>NW Gilman Blvd /12<sup>th</sup>Ave NW (Intersection #59) – Widen south leg to provide shared northbound left-thru plus right turn lane; optimize cycle length and splits. \$91,600</u></li> <li>- <u>Issaquah-Fall City Rd / E Lake Sammamish Pkwy (Intersection #11) – Restripe and/or shift and slightly widen west leg to provide three lanes on the eastbound approach (left, thru and right). \$9,600</u></li> <li>- <u>2<sup>nd</sup>Ave SE / Front St S (Intersection #16) – Restripe westbound approach as left AND left-thru-right to allow a dual-left turn movement (no widening proposed on this approach). Widen/modify south leg of intersection to provide 2 southbound lanes to accept dual left turn. Merge lanes back to one lane at a 35:1 taper. \$123,100</u></li> </ul> </li> </ul>			<p><b>Timing in accordance with the Development Agreement, based on each level of development (see FEIS Appendix A for details)</b></p>

Mitigation Measures and Significant Unavoidable Adverse Impacts	Prior to Construction	During Construction	During Operation
<ul style="list-style-type: none"> <li>- <u>SW Newport Wy / Front St (Intersection #17) – Add southbound right turn pocket by converting outside parking lane (remove curb bulb). Add parking on north side of Newport Way adjacent to residence. \$61,400</u></li> <li>- <u>Newport Wy NW / NW Maple St (Intersection #28) – Widen the southwest leg of Newport Way NW to provide three northeast-bound approach lanes: a short left turn pocket (50 feet long), a thru-only lane, and a right-turn-only lane. Change the signal phasing at the intersection from split phasing for Newport Way NW/10<sup>th</sup> Avenue NW to conventional phasing with concurrent protected left turn phases \$72,700</u></li> <li>- <u>Newport Wy NW / SR 900 (Intersection #61) – Modify signal phasing to provide eastbound right turn overlap phase and optimize corridor. Extend right turn pocket (by 100 additional feet) to make the overlap phase more effective. \$45,400</u></li> <li>- <u>SE 62<sup>nd</sup> St / 4<sup>th</sup> Ave NW (Intersection #62) – City should consider mitigation for No Action condition. Potential option is to add eastbound right turn pocket; or could reconfigure intersection as roundabout. \$33,800</u></li> <li>- <u>NW Gilman Blvd / 4<sup>th</sup> Ave W (Intersection #79) – Modify signal phasing to provide southwest-bound right turn overlap phase. \$12,900</u></li> </ul> <p><u>Total of all off-site mitigation = \$843,900</u></p>			
<ul style="list-style-type: none"> <li>• <u>Pay Transportation Impact Fee. Make development payments to the City of \$2,000,000 plus \$0.50 (fifty cents) per gross square foot of non-residential development for all new development in excess of 2.5 million gross square feet according to timing requirements outlined in the Development Agreement.</u></li> </ul>	<b>Timing in accordance with the Development Agreement, based on each level of development (see FEIS Appendix A for details)</b>		
<ul style="list-style-type: none"> <li>• <u>Implement a Transportation and Parking Management Plan. The developer will implement education and incentive programs to reduce vehicle trips and encourage use of alternative transportation modes. The program elements will be determined by monitoring trips at the site. The number of trips generated by the Preferred Alternative will be limited through an agreement with the City of Issaquah to the level previously evaluated in the DEIS as the Alternative 2 - 60/40 Mix Scenario. The Transportation and Parking Management Plan along with the trip limits and monitoring requirements will be addressed in the Development Agreement.</u></li> </ul>			<b>X</b>
<p><u>Mitigation Measures Proposed by the Applicant</u></p>			
<ul style="list-style-type: none"> <li>• <u>Include design features in the mixed-use redevelopment to enhance pedestrian connections through and adjacent to the site, particularly along walking routes that lead to the Issaquah Transit Center or a potential future transit station along I-90 (possibly at 12<sup>th</sup> Avenue NW). This would include sidewalks or walking paths, landscaping, and pedestrian-scale lighting.</u></li> </ul>	<b>Measures to be included as part of project design and implementation (see FEIS Appendix A for details)</b>		
<ul style="list-style-type: none"> <li>• <u>Provide truck access for all buildings. Where possible, service drives will be created to the side or back of buildings to provide access to loading docks. Truck access and loading requirements within the site will be</u></li> </ul>	<b>Measures to be included as part of project design and implementation (see FEIS Appendix A for details)</b>		

Mitigation Measures and Significant Unavoidable Adverse Impacts	Prior to Construction	During Construction	During Operation
<u>determined for individual building applications. On-street loading areas could also be provided along the internal private streets and signed for commercial vehicles only.</u>			
<u>Significant Unavoidable Adverse Impacts</u>			
<ul style="list-style-type: none"> <li>The proposed Hyla Crossing and Rowley Center Project would generate traffic and increase congestion at many intersections. Mitigation is required/proposed for all intersections that would meet the criteria for a "probable significant impact." However, some of these improvement options may improve the traffic operations of an intersection, but could adversely impact other elements, such as the pedestrian environment, landscaping opportunities, and/or the general character of the surrounding area. Some of the improvement options may also not be possible without other impacts to local access or sensitive environmental areas. As a result, the City could determine that some improvements are not desirable or feasible and may prefer an alternate approach to mitigation. This could result in some location-specific impacts not being fully mitigated at the point of congestion, which could be considered a significant unavoidable adverse impact.</li> </ul> <p>One of the suggested mitigation measures is to restripe the privately-owned approach (SE 64<sup>th</sup> Place) at the Issaquah-Fall City Road/East Lake Sammamish Parkway intersection (#11). Other alternative mitigation measures were tested, and no other reasonable options exist to return intersection operations to the No Action level. If the private owner does not agree to the restriping plan, then the Hyla Crossing and Rowley Center projects would have a Significant Unavoidable Adverse Impact at this location.</p>			
<b>Construction Impacts</b>			
<u>Mitigation Measures Required by Code, Laws, and Regulations - Earth</u>			
<ul style="list-style-type: none"> <li>Use Best Management Practices (BMPs), during construction to control erosion and sedimentation.</li> </ul> <p>(Required by the City of Issaquah's <i>2009 Addendum to the 2009 KCSWDM</i>; if a <u>Construction Stormwater General Permit</u> is needed for the project, BMPs required by the Washington State Department of Ecology will be followed).</p>		X	
<ul style="list-style-type: none"> <li>Prepare Stormwater Pollution Prevention and Spill Plans (SWPPS) and Temporary Erosion and Sedimentation Control Plans (TESCP) that outline BMPs that will be implemented during construction to prevent soil erosion and/or contain erosion onsite to prevent impacts to local streams and lakes. Examples of these BMPs could include: <ul style="list-style-type: none"> <li><i>Prevention</i> <ul style="list-style-type: none"> <li>Limit disturbance to areas where construction is imminent.</li> <li>Determine staging areas for temporary stockpiles of excavated soils.</li> <li>Provide temporary cover for cut slopes and soil stockpiles during periods of inactivity. Temporary cover could consist of durable plastic sheeting that is securely anchored to the ground surface or straw mulch.</li> </ul> </li> </ul> </li> </ul>	X	X	

Mitigation Measures and Significant Unavoidable Adverse Impacts	Prior to Construction	During Construction	During Operation
<ul style="list-style-type: none"> <li>- Establish permanent cover over exposed areas that would not be disturbed for a period of 30 days or more by seeding in conjunction with a mulch cover or appropriate hydroseeding.</li> </ul> <p><i>Containment</i></p> <ul style="list-style-type: none"> <li>- Install a silt fence along the downslope margin of areas that would be disturbed. The silt fence should be in place before clearing and grading is initiated.</li> <li>- Construct shallow drainage swales to intercept surface water flow and route the flow away from the construction area to a stabilized discharge point. Surface water would not be allowed to discharge at the top or onto the face of steep slopes.</li> <li>- Provide on-site sediment retention for collected runoff.</li> </ul> <p>(Required per the City of Issaquah's 2009 Addendum to the 2009 KCSWD)</p>			
<ul style="list-style-type: none"> <li>• Perform site-specific geotechnical studies to assess geotechnical hazards and associated risk during the design and permitting process. If analysis indicates settlement magnitudes that would structurally impair buildings, the hazard and associated risk will be mitigated by supporting the buildings on pile foundations or ground conditions that are improved to be more resistant to liquefaction using ground improvement technologies, such as vibrated stone columns.</li> </ul>	<b>X</b>		
<ul style="list-style-type: none"> <li>• Design structures in accordance with current local building codes or best practices to address the potential for structural impacts due to ground shaking during an earthquake.</li> </ul>	<b>X</b>		
<u>Proposed Mitigation Measures – Earth</u>			
<ul style="list-style-type: none"> <li><del>• Conduct a detailed geotechnical study to determine if HDD pipe installation techniques would be appropriate for the stormwater conveyance pipe to Lake Sammamish (under Stormwater Management Scenario 2) based on the existing soil and groundwater conditions. Recommendations could include:</del> <ul style="list-style-type: none"> <li><del>- If HDD techniques are determined to be suitable, careful planning, design and construction by individuals experienced in HDD techniques would be required.</del></li> <li><del>- Monitoring for surface displacements during HDD pipe installation, both subsidence and heave, would be implemented for settlement-sensitive areas below which the bore is advanced.</del></li> <li><del>- Monitoring of bentonite slurry pressures during HDD pipe installation would be performed to ensure that pressures do not exceed overburden stresses.</del></li> </ul> </li> </ul>			
<u>Mitigation Measures Required by Code, Laws, and Regulations – Air Quality</u>			
<ul style="list-style-type: none"> <li>• Ensure that site development and construction activities will comply with applicable Puget Sound Clean Air Agency (PSCAA) regulations regarding demolition activities and fugitive dust emissions, including: wetting of exposed soils, covering or wetting of transported earth materials, washing of truck tires and undercarriages prior to travel on public streets, and prompt cleanup of any materials tracked or spilled onto public streets.</li> </ul>		<b>X</b>	

Mitigation Measures and Significant Unavoidable Adverse Impacts	Prior to Construction	During Construction	During Operation
<ul style="list-style-type: none"> <li>If hazardous materials (i.e. asbestos, lead-containing paint, etc.) are encountered on the Rowley Properties site during redevelopment, all construction activities will comply with the applicable requirements and regulations regarding the removal and disposal of hazardous materials, including the approval of an asbestos/demolition notification permit and/or a notice of abatement from the PSCAA.</li> </ul>		X	
<u>Other Possible Mitigation Measures – Air Quality</u>			
<ul style="list-style-type: none"> <li>The applicant could work with adjacent property owners <u>and remaining on-site tenants</u> to devise a construction plan that minimizes construction-related impacts (including dust, air emissions, noise, and vibration).</li> </ul>	X		
<u>Mitigation Measures Required by Code, Laws, and Regulations – Noise</u>			
<ul style="list-style-type: none"> <li>Limit construction activities to standard construction hours, as identified in the <i>City of Issaquah Municipal Code</i> (7:00 AM to 6:00 PM). If construction is required outside of the standard construction hours, approval will be requested from the City of Issaquah prior to the commencement of work outside of these hours.</li> </ul> <p>(Required by Issaquah Municipal Code 16.35.010)</p>		X	
<u>Other Possible Mitigation Measures – Noise</u>			
<ul style="list-style-type: none"> <li>Building debris could be processed offsite during the demolition process.</li> </ul>		X	
<ul style="list-style-type: none"> <li>As possible, during the demolition process certain building materials could be recycled onsite or these materials could be transported to a proper facility for reuse offsite.</li> </ul>		X	
<ul style="list-style-type: none"> <li>As necessary, portable sound barriers could be used around generators, compressors, tieback drill rigs, etc.</li> </ul>		X	
<ul style="list-style-type: none"> <li>As needed, temporary sound barriers could be constructed and placed around construction site areas.</li> </ul>		X	
<ul style="list-style-type: none"> <li>If it is determined that pile foundations are required for redevelopment on the Rowley Properties site, drilled piles could be utilized and the use of driven piles could be limited in order to reduce the potential noise impacts associated with the construction of pile foundations.</li> </ul>		X	
<u>Significant Unavoidable Adverse Impacts</u>			
<ul style="list-style-type: none"> <li>Redevelopment under the EIS alternatives would result in some temporary construction-related earth, air quality, noise, and land use impacts that would be unavoidable. However, these impacts would be temporary in nature and with the implementation of the required/proposed mitigation measures, no significant construction-related impacts would be expected during redevelopment on the Rowley Properties site.</li> </ul>			
<b>Air Quality and GHG Emissions</b>			
<u>Mitigation Measures Required by Code, Laws, and Regulations</u>			

Mitigation Measures and Significant Unavoidable Adverse Impacts	Prior to Construction	During Construction	During Operation
<ul style="list-style-type: none"> <li>• <u>Meet all applicable standards related to building operations, including PSCAA regulations.</u></li> </ul>			X
<ul style="list-style-type: none"> <li>• <u>Implement a Transportation Management Plan for the Rowley Properties site to help reduce vehicle trips and associated vehicle emissions.</u></li> </ul>			X
<u>Mitigation Measures Proposed by the Applicant</u>			
<ul style="list-style-type: none"> <li>• <u>Create a pedestrian-oriented mixed-use neighborhood, which encourages non-motorized transportation and results in fewer vehicle trips to and from the site, thereby reducing GHG emissions</u></li> </ul>	X		
<ul style="list-style-type: none"> <li>• <u>Implement the following as part of the Development Agreement to demonstrate the commitment to sustainability:</u> <ul style="list-style-type: none"> <li>- <u>The Hyla Crossing and Rowley Center Project should look to address the three constituent parts of sustainability: environmental, economic, and sociopolitical;</u></li> <li>- <u>A voluntary approach to sustainability will be adopted, which will allow the flexibility to seize opportunities and grow its outreach over time; and,</u></li> <li>- <u>A continued dialogue will be maintained during the development process that will allow for the City and Rowley Properties to exchange information that will benefit the project and the community.</u></li> </ul> </li> </ul>	X		
<ul style="list-style-type: none"> <li>• <u>Incorporate the framework in “One Planet Living” as part of the Development Agreement to provide guidance for the project and a comprehensive approach towards sustainability.</u></li> </ul>	X		
<u>Other Possible Mitigation Measures</u>			
<ul style="list-style-type: none"> <li>• <u>Development could incorporate LEED or other low-impact/sustainable design features into the design of proposed buildings on the site to reduce the demand for energy and reduce the amount of GHG emissions. Such features have not been identified at this time, but could include architectural design features; sustainable building materials; use of energy efficient products; natural drainage/green roof features; use of native plants in landscaping; and/or, other design features.</u></li> </ul>	X	X	
<u>Significant Unavoidable Adverse Impacts</u>			
<ul style="list-style-type: none"> <li>• <u>With implementation of the required/proposed mitigation measures, significant impacts on air quality during operation of the project would not be expected.</u></li> </ul> <p><u>Redevelopment of the Rowley Properties site would result in an increase in GHG emissions and demand for energy relative to existing conditions, similar to any major development. Scientific research and analysis tools sufficient to determine a numerical threshold of significant impacts for GHG emissions and energy use are not available at this time. The proposed redevelopment would include features that would reduce GHG emissions and climate change (i.e. the pedestrian oriented, mixed-use nature of the proposed development would reduce vehicular trips). As a result, per person GHG emissions would be expected to be less than under existing conditions/suburban development.</u></p>			

# **DESCRIPTION of the APPLICANT'S PREFERRED ALTERNATIVE**

## **CHAPTER 2**

### **DESCRIPTION OF THE APPLICANT'S PREFERRED ALTERNATIVE**

This chapter of the Final Environmental Impact Statement (FEIS) identifies the applicant's Preferred Alternative for the Hyla Crossing and Rowley Center Project and provides a comparison between the Preferred Alternative and Draft EIS (DEIS) Alternatives 1 and 2. Any corrections to the descriptions of Alternatives 1 and 2 from DEIS Chapter 2 are contained in **Chapter 5**, Errata of this FEIS.

#### **2.1 APPLICANT'S PREFERRED ALTERNATIVE**

Based on the information provided in the DEIS, ongoing public input associated with the DEIS comment period (including public meeting/open house), public meetings associated with the Urban Village Development Commission (UVDC) and City Council in regards to formulation of the Development Agreement, and coordination between the applicant and the City of Issaquah, the applicant has identified a Preferred Alternative. The Preferred Alternative is intended to be a medium density, urban pedestrian-oriented, transit-oriented, sustainable development that features a diversity of uses. It is meant to be complete, compact, and connected, in keeping with the City of Issaquah's status as a Cascade Agenda Leadership City. The Preferred Alternative would be consistent with the applicant's objectives, as defined in the DEIS (see Section 2.5 of the DEIS for details). The level of redevelopment under the Preferred Alternative assumed on the Hyla Crossing and Rowley Center site would be within the range of redevelopment assumed under the EIS alternatives analyzed in the DEIS. Redevelopment under the Preferred Alternative would mix and match elements of the EIS alternatives. As an example, the Preferred Alternative would reflect the redevelopment density and vehicle trip generation of medium density Alternative 2 (approximately 5.5 million square feet of building and structured parking development, including approximately 3.8 million square feet of occupiable space), 60/40 commercial/residential split with building heights up to the 200 feet scenario.

Additional occupiable building space could be developed onsite under the Preferred Alternative if it is confirmed through vehicle trip monitoring that the number of PM peak hour vehicle trips generated on the site would at no point exceed the level of PM peak hour vehicle trips analyzed in the DEIS and in this FEIS for Alternative 2 – 60/40 mix scenario. If traffic monitoring indicates that the level of PM peak hour vehicle trips are lower than assumed and analyzed for Alternative 2 in the DEIS, additional building density could be developed on the site. Total occupiable building density on the site would not exceed that analyzed in the DEIS for Alternative 1, 60/40 mix with the 200 feet building height scenario (approximately 4.4 million square feet). The additional building density could be achieved through several means of reducing vehicle trips from the project, including adjustments to the land use mix and/or successful implementation of transportation management measures. See **Figure 2-1** for a vicinity map showing the Hyla Crossing and Rowley Center Areas; also see **Figures 2-2, 2-3** and **2-4** for the Conceptual Redevelopment Plan, Conceptual Vehicular Circulation Plan and Conceptual Pedestrian Circulation Plan for the Preferred Alternative, respectively. **Table 2-1** shows the relationship of the Preferred Alternative to the alternatives analyzed in the DEIS.

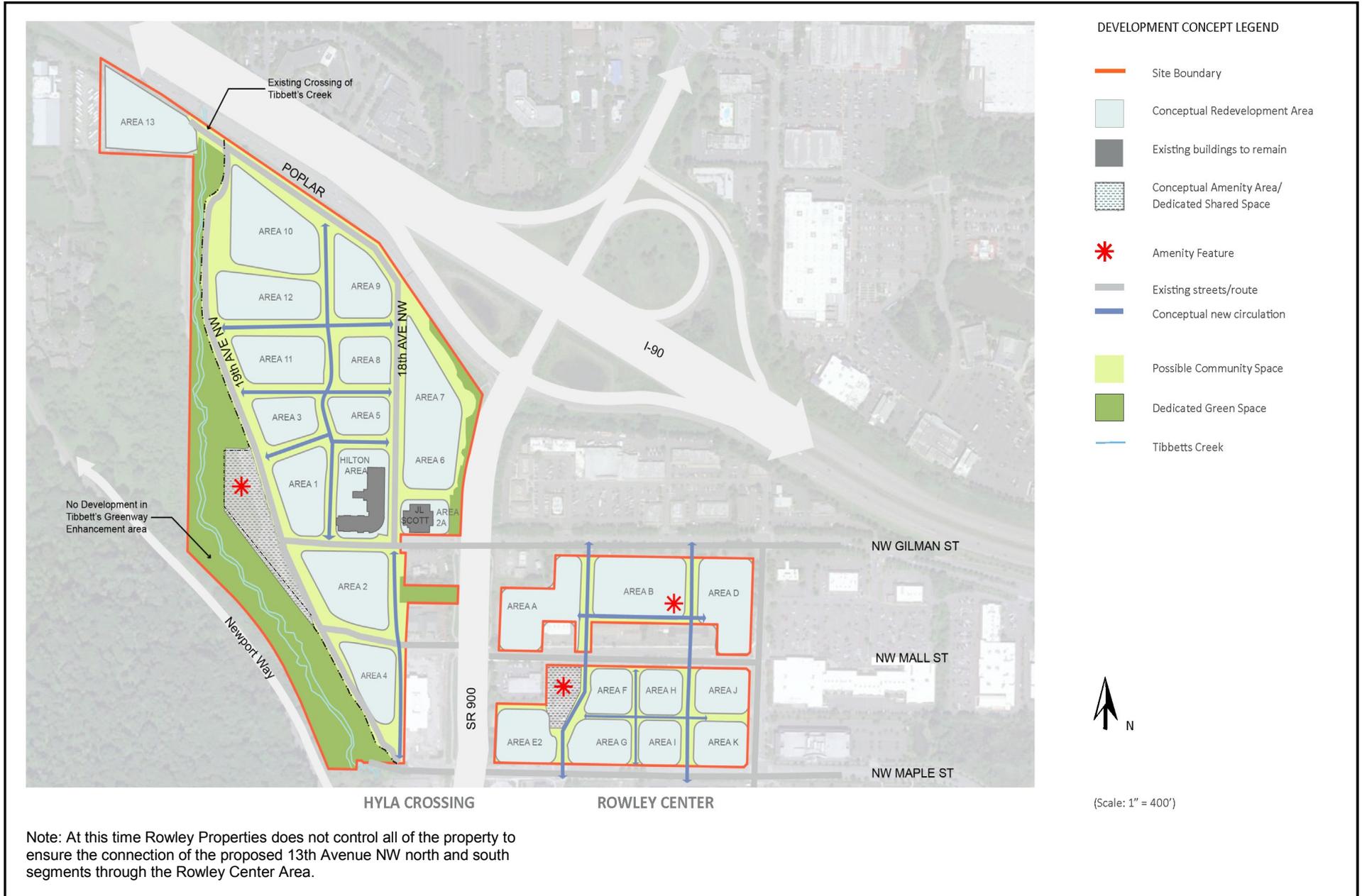
Hyla Crossing and Rowley Center Project  
Final EIS



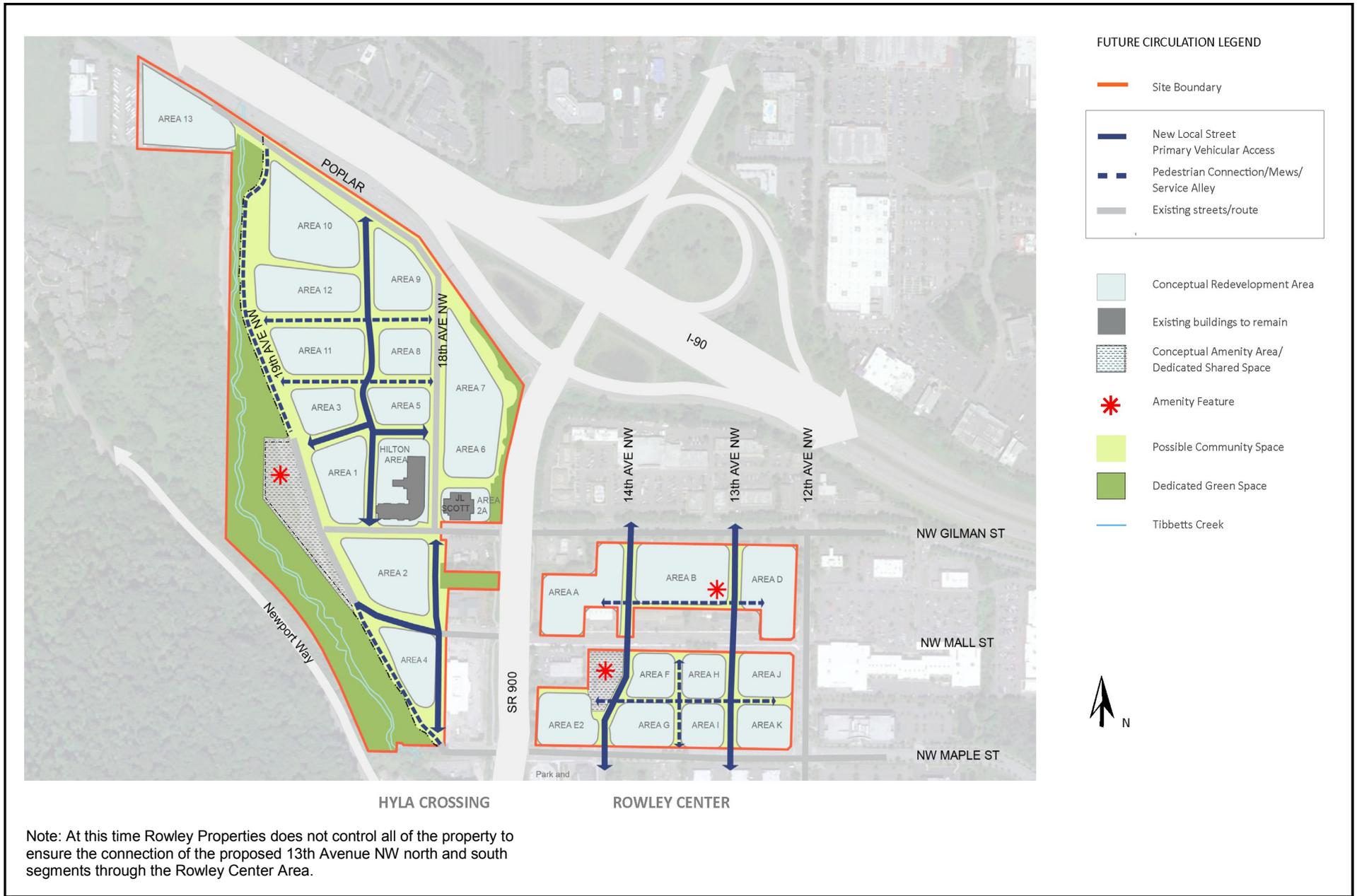
Source: EA|Blumen, 2011

**Figure 2-1**  
Vicinity Map

# Hyla Crossing and Rowley Center Project Final EIS



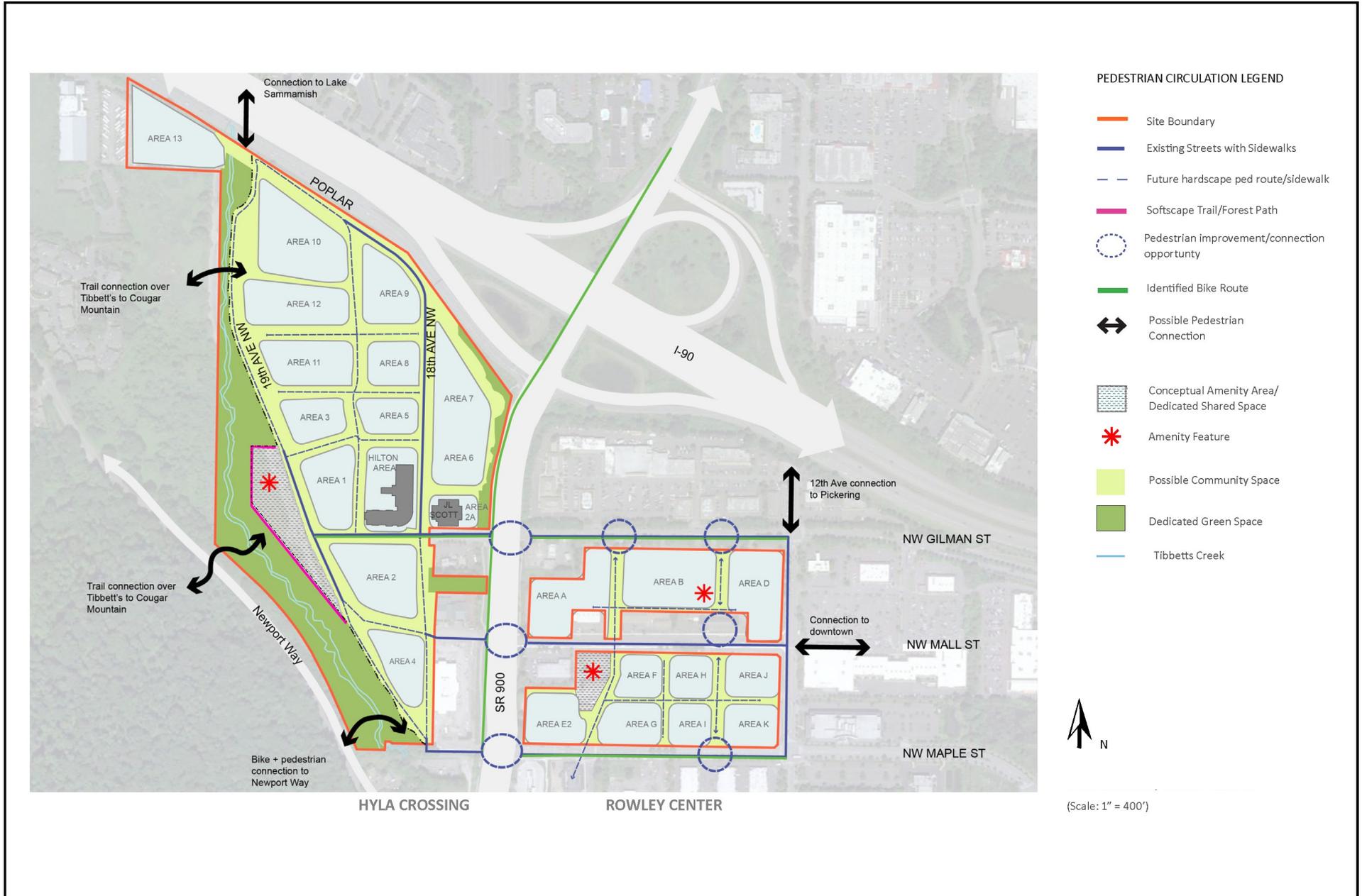
# Hyla Crossing and Rowley Center Project Final EIS



Source: VIA Architecture, 2011

**Figure 2-3**  
Preferred Alternative Conceptual Vehicular Circulation Plan

# Hyla Crossing and Rowley Center Project Final EIS



Source: VIA Architecture, 2011

**Figure 2-4**  
Preferred Alternative Conceptual Pedestrian Circulation Plan

**Table 2-1  
REDEVELOPMENT SUMMARY COMPARISON -  
DEIS ALTERNATIVES AND APPLICANT'S PREFERRED ALTERNATIVE**

<b>Assumed Uses</b>	<b>DEIS Alt 1 Higher Density 60/40 split</b>	<b>DEIS Alt 2 Medium Density 60/40 split</b>	<b>DEIS Alt 3 No Action Existing Zoning</b>	<b>DEIS Alt 3 No Action Existing Conditions</b>	<b>Applicant's Preferred Alternative</b>
PM Peak Hour Vehicle Trips	5,947	4,706	NA	NA	4,706
Maximum Occupiable Building Area Sq.Ft. (w/trip rates as in DEIS)	4,435,100	3,763,800	1,712,200	858,705	3,763,800
Maximum Occupiable Building Area Sq.Ft. (w/trip rates less than DEIS)	4,435,100	3,763,800	1,712,200	858,705	4,435,100
Maximum Residential Units (w/trip rates as in DEIS)	1,763	1,450	0	0	1,450
Maximum Residential Units (w/trip rates less than EIS)	1,763	1,450	0	0	1,763
Maximum Building Height	200'	200'	40'	40'	200'

Source: EA/Blumen, 2011.

### **Existing Structures to Remain**

To accommodate redevelopment under the Preferred Alternative, it is proposed that the majority of the existing buildings on the Rowley Properties site would be demolished, as assumed in the DEIS for Alternatives 1 and 2. Two existing buildings would be retained on the site; the Hilton Garden Inn Hotel and the John L. Scott Building, both of which are located in the Hyla Crossing Area.

Because redevelopment of the Hyla Crossing and Rowley Center Areas would occur in phases and proceed incrementally over an extended period of time, some existing uses would remain on the site during construction and likely transition with occupancy of the project.

### **Community Space**

As described for Alternatives 1 and 2 in the DEIS, the Preferred Alternative would include approximately 16.8 acres of proposed community space (15.8 acres in the Hyla Crossing Area and one acre in the Rowley Center Area) representing approximately 21 percent of the site. This proposed community space would consist of green space (including natural areas associated with Tibbetts Creek and other critical areas, and landscaped areas) and shared

space (including more urban character spaces, such as paved plazas and courtyards). The amount of proposed community space under the Preferred Alternative would be consistent with that described and analyzed under Alternatives 1 and 2 in the DEIS, and would result in an overall increase in community space compared to existing conditions. The community space would exceed the recommendations of the City's Land Use Task Force for the Central Issaquah Sub-area Plan.

## **Stormwater Management**

The permanent stormwater system under the Preferred Alternative would be as described in the DEIS for Alternatives 1 and 2, and would be designed and installed consistent with the City of Issaquah's *2009 Addendum to the 2009 King County Surface Water Design Manual* and the Master Drainage Plan (MDP) to be provided in the Development Agreement. The specific stormwater management system will be determined through the MDP process, and will reflect either conventional detention and water quality treatment in a pond system with discharge to Tibbetts Creek and Tributary 0170 via existing discharge locations (Scenario 1), or a system where runoff above pre-developed rates would be discharged to lake Sammamish via a direct discharge pipe (Scenario 2). Under Scenario 2, a stormwater pipe would pass along Tibbetts Creek and underneath I-90 (via one of two conveyance routes). The conveyance pipe would then pass through Sammamish Cove Park to the north of I-90 and to Lake Sammamish and outfall to the lake (via one of three outfall options).

Because the alignment of the Scenario 2 stormwater conveyance system in Sammamish Cove Park and the outfall to Lake Sammamish are not defined at this point, these stormwater conveyance system improvements are not subject to the Planned Action Ordinance. Should Scenario 2 be selected, additional SEPA environmental review would be required prior to the issuance of any applicable permits and approvals.

## **Roadway System**

As described in the DEIS for Alternatives 1 and 2, new public vehicular access to and through the site would be provided under the Preferred Alternative. New roadways in the Hyla Crossing Area would include a new north/south roadway, and extension of 18<sup>th</sup> Avenue NW (south of NW Gilman Boulevard) and two new east/west roadways.

Two new roadways would be provided in the Rowley Center Area under the Preferred Alternative, including new north/south roadways through the area to connect NW Gilman Boulevard to NW Maple Street and create walkable blocks through the Rowley Center Area. New east/west alleys would be included to provide increased access through the Rowley Center Area.

## **Utilities**

Public water, sewer, natural gas, electrical power, and communications utility service to the Preferred Alternative would be as described in the DEIS for Alternatives 1 and 2. Water and sewer service to the site would continue to be provided by the City of Issaquah. Water and sewer system upgrades would be as described in the DEIS, including sewer collection system upgrades and a new water reservoir. Natural gas, electrical power, and communications utility service to the Preferred Alternative would be provided by extensions of the existing systems.

## **Construction Phasing**

As assumed for Alternatives 1 and 2 in the DEIS, future redevelopment under the Preferred Alternative would consist of three primary activities: 1) demolition of existing buildings and paved areas and removal, replacement, or abandonment of existing utilities; 2) construction of new major site infrastructure, including roadways, utilities and parks/trails; 3) construction of new buildings and associated parking (structured or temporary surface); and, 4) the provision of community space, including landscaping.

The sequencing of these construction activities would depend on the specific extent and timing of infrastructure projects, including new roadways and utilities, and future market conditions. The majority of site infrastructure, including roadway and utility systems, would likely be phased over time to support phased construction of buildings and parking, subject to the stipulations of the approved Development Agreement and any subsequent third party developer funding agreements.

As specific areas are redeveloped, existing buildings not to be reused would be demolished and surrounding existing paved areas may also be removed, used as temporary parking, and/or planted with vegetation or hydroseeded and maintained until such a time as they are redeveloped. Temporary stormwater management systems would be installed and operated until establishment of the permanent stormwater management.

# **UPDATED INFORMATION and ANALYSIS**

## **CHAPTER 3**

### **UPDATED INFORMATION AND ANALYSIS**

This chapter updates and provides clarifications to the information and analysis of environmental impacts contained in Chapter 3 of the Draft EIS (DEIS).

#### **3.1 WATER RESOURCES**

This section of the Final EIS (FEIS) includes updated information regarding the DEIS groundwater information on the existing offsite Group B well located in the vicinity of the Hyla Crossing Area (DEIS page 3.1-6) and the stormwater management facilities discussion (DEIS page 3.1-9).

##### **3.1.1 Groundwater**

The DEIS identified an existing off-site Group B well that is located to the north of the Hyla Crossing Area, beyond I-90 (see DEIS Appendix D Figure 3.1.5). Group B wellhead protection areas do not have assigned time of travel distances, so an arbitrary 1,000-foot buffer was indicated around the source. As described on DEIS page 3.1-6, approximately 11.6 acres in the northern section of the Hyla Crossing Area are located within the Group B wellhead protection area. As a result, the following mitigation measure was identified in the DEIS:

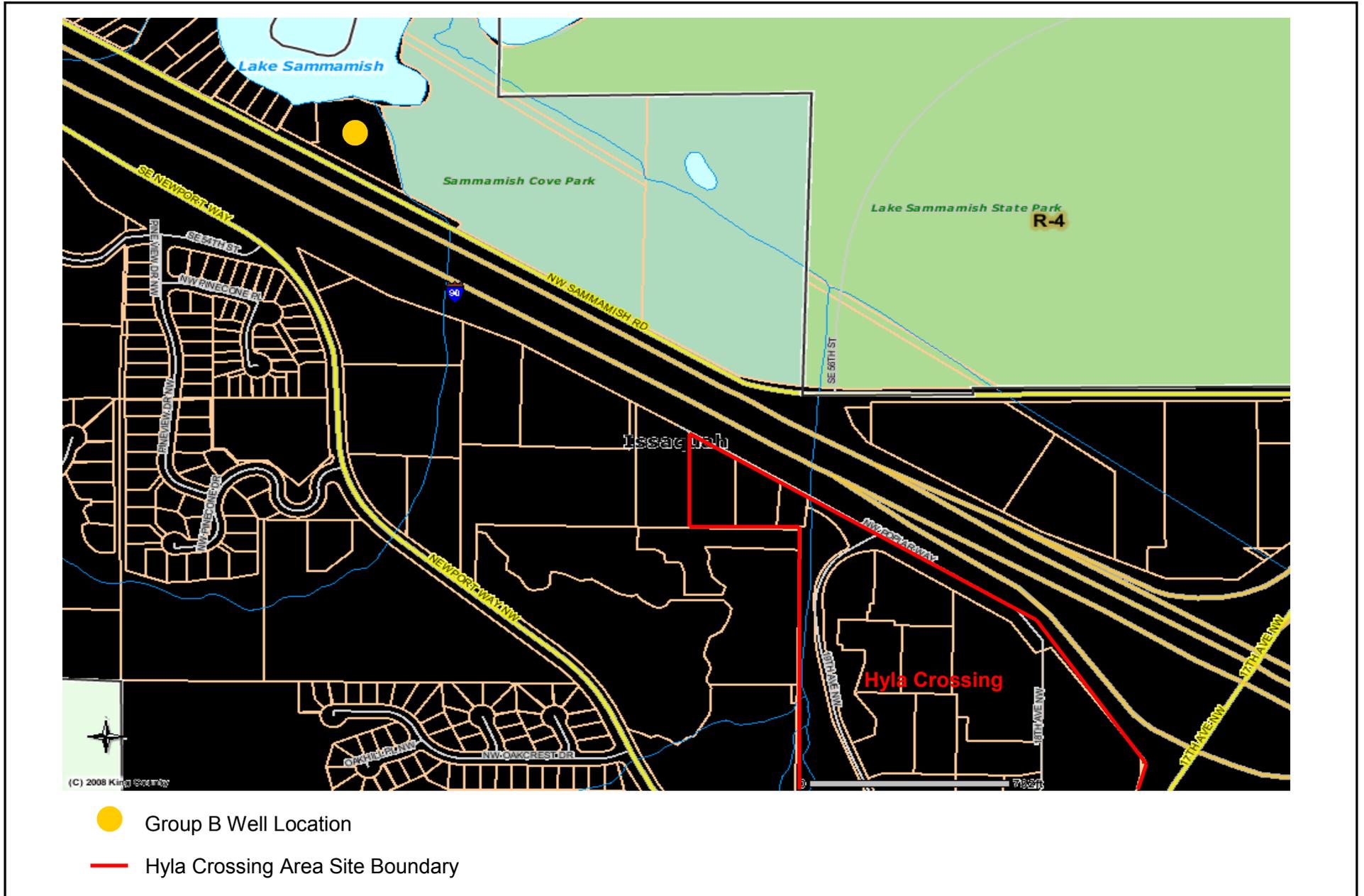
- The project would adhere to the buffer protection requirements of the Group B wellhead protection area in the Hyla Crossing Area; land uses in the Hyla Crossing Area would be compatible with the Group B wellhead protection area and activities that could potentially contaminate the area would not be permitted.

Subsequent to the issuance of the DEIS, further research was conducted regarding the location of the existing off-site Group B well. Based on information from the Washington State Department of Health, it was determined that the existing off-site Group B well is located on parcel number 2024069041, approximately 3,000 feet to the northwest of the original location that was depicted in the DEIS (see **Figure 3.1-1** for an updated map of the existing off-site Group B well). As a result of this updated information, the Hyla Crossing Area would be located approximately 1,700 feet to the southeast of the Group B well site and outside of the 1,000-foot Group B wellhead protection area. Therefore, the Group B wellhead protection area mitigation measure that was identified in the DEIS would not be necessary and has been removed from **Table 1-2** in this FEIS.

##### **3.1.2 Stormwater Management Facilities**

The DEIS described and analyzed two possible stormwater management facility scenarios under Alternatives 1 and 2: Scenario 1 – Conventional Detention and Scenario 2 - Direct Discharge (see DEIS page 3.1-9 through 3.1-15 and Appendices D and E to the DEIS).

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Source: Washington State Department of Health and RH2, 2011.

**Figure 3.1-1**  
Existing Offsite Group B Well Location

Under Scenario 2, two possible conveyance options through Sammamish Cove Park and three possible outfall options to Lake Sammamish are generally described and evaluated, and general mitigation measures are identified. The DEIS (page 2-46) and **Table 1-2** in this FEIS note that if Scenario 2 is selected as the preferred scenario for stormwater management, further SEPA review will be conducted prior to issuance of any applicable permits and approvals for the conveyance system and outfall. As such, the more specific mitigation measures related to Scenario 2 have been removed from **Table 1-2** in this FEIS. Appropriate mitigation measures will be identified during subsequent SEPA review for the conveyance system and outfall.

## **3.2 CRITICAL AREAS/PLANTS AND ANIMALS**

Several comments on the DEIS related to buffers adjacent to Tibbetts Creek. The following section is included in this FEIS to clarify information and analysis in the DEIS on existing stream buffers adjacent to the creek on the Rowley Properties site, stream buffers proposed with redevelopment of the site, and the relationship of these buffers to the City's current Critical Areas Ordinance (CAO) and the Hyla Crossing Master Site Plan (MSP). This section does not change any of the information or analysis in the DEIS. Rather, it presents the information/analysis in a different format to respond to the comments.

### **3.2.1 Existing Tibbetts Creek Stream Buffers**

The DEIS analyzes the existing and proposed buffers adjacent to Tibbetts Creek relative to the City's current CAO, which requires 100-foot wide buffers and 15-foot building setbacks. The DEIS also compares the stream buffers to Hyla Crossing MSP Exhibit 16 (see DEIS Appendix B for this exhibit), which depicts 100-foot wide buffers along the majority of the creek, and buffers of approximately 25 to 30 feet wide along an approximately 400-foot long section of the north-central portion of the creek.

DEIS pages 3.2-7 and 3.2-8 and DEIS Appendix F describe the existing stream buffer conditions adjacent to Tibbetts Creek on the Rowley Properties site. As indicated in the DEIS, stream buffers widths less than the 100-foot wide buffers required by the City's current CAO presently exist adjacent to areas of past development, including Rowley Properties buildings, parking lots, and 19<sup>th</sup> Avenue NW in the Hyla Crossing Area (see DEIS Figure 3.2-1).

The central portion of the Tibbetts Greenway project onsite was voluntarily built by Rowley Properties in 2001, and included relocation of the creek to a more natural configuration and other stream improvements (see DEIS Figure 3.2-1 and DEIS Appendix F for details). A stream buffer was established from the newly built channel per Exhibit 16 to the Hyla Crossing MSP. Since the northern proposed channel relocation (the off-site Mull section) and the southern floodplain expansion have not yet been built, only the relocated stream section in the central portion of the Tibbetts Creek Greenway currently provides a stream buffer vegetated with native trees and shrubs. **Table 3.2-1** presents the buffers adjacent to Tibbetts Creek under existing conditions, breaking the creek into five sections (Sections A through E); these stream sections are illustrated on **Figure 3.2-1**. As shown in **Table 3.2-1**, buffers along the majority of Tibbetts Creek (Stream Sections A, B, C, and E) are currently less than 100 feet wide. Stream buffers in the central portion of the Greenway (Section D) are presently 100 feet wide or greater as a result of the past stream relocation/restoration.

**Table 3.2-1  
TIBBETTS CREEK STREAM BUFFERS –  
EXISTING CONDITIONS AND WITH PROPOSED REDEVELOPMENT**

Tibbetts Creek Stream Section <sup>1</sup>	Existing Buffer Width	Proposed Buffer Width without Mull Stream Relocation	Proposed Buffer Width with Mull Stream Relocation
A	0 – 25 feet, 290 lineal feet of stream	10 – 95 feet, 290 lineal feet of stream	100 feet, 290 lineal feet of stream
B	10 – 25 feet, 250 lineal feet of stream	10 – 25 feet, 250 lineal feet of stream	100 feet or greater (up to 150 feet), 360 lineal feet of stream <sup>2</sup>
C	10 – 100 feet, 530 lineal feet of stream	10 – 100 feet, 530 lineal feet of stream (400 lineal feet ≤ 30')	25 – 100 feet, 530 lineal feet of stream (400 lineal feet ≤ 30')
D	100 feet or greater (up to 200 feet), 1,400 lineal feet of stream	Same as Existing Conditions	Same as Existing Conditions
E	0 – 100', 680 lineal feet of stream	100 feet or greater, 680 lineal feet of stream	Same as without Mull Stream Relocation

*Source: The Watershed Company, 2011.*

**Note:** Buffer widths shown are approximate, since the Section A, B, C, and E stream relocation/rehabilitation plans have not yet been fully designed.

<sup>1</sup> Corresponds to stream sections on **Figure 3.2-1**.

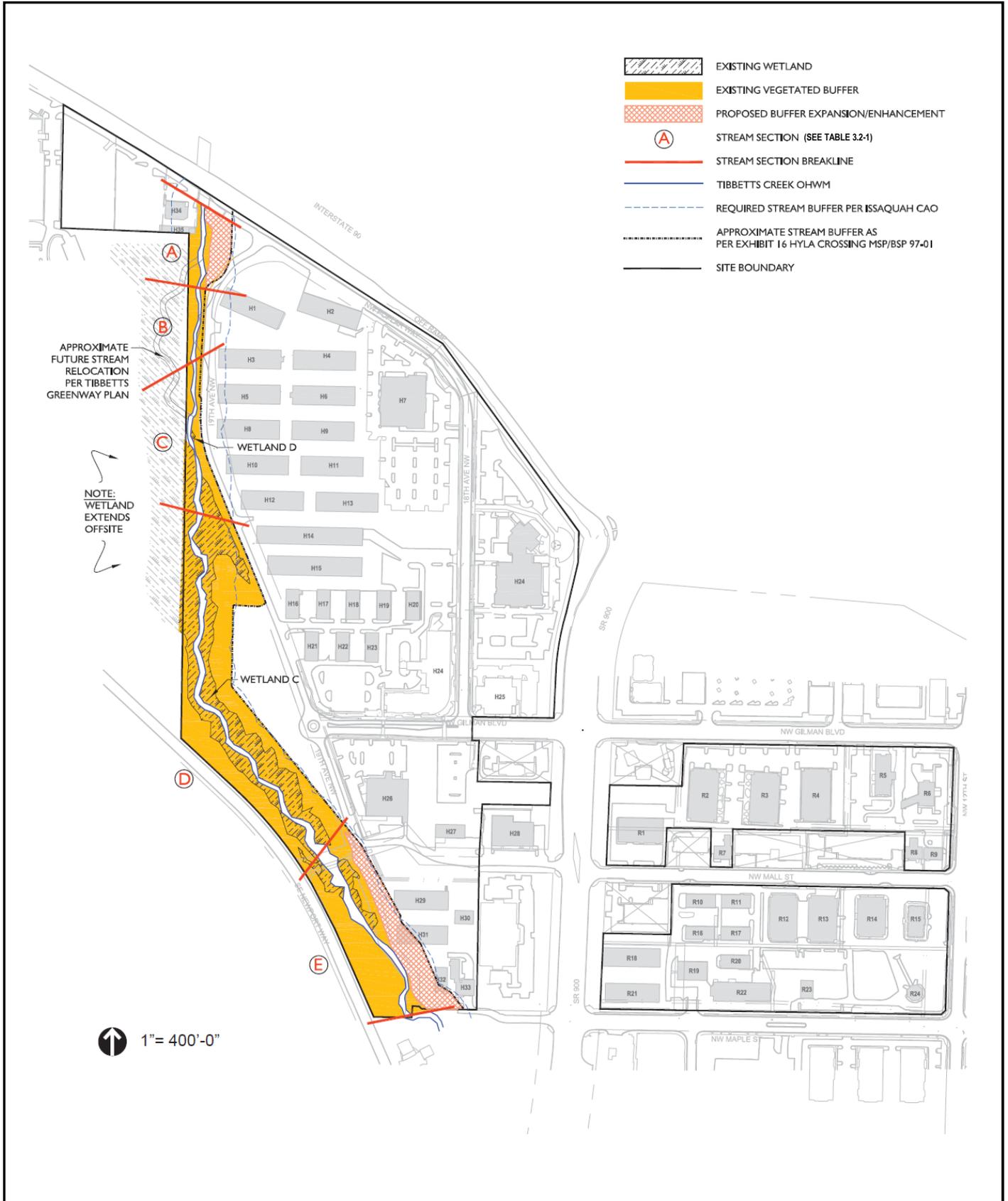
<sup>2</sup> The change in lineal feet of stream is due to increased stream length resulting from the future relocation and meandering configuration of Tibbetts Creek on the Mull property.

### **3.2.2 Proposed Tibbetts Creek Stream Buffers**

DEIS page 3.2-15 and DEIS Appendix F describe the stream buffers adjacent to Tibbetts Creek on the Rowley Properties site with proposed redevelopment of the Hyla Crossing and Rowley Center Project. Stream buffers were analyzed with and without relocation of Tibbetts Creek onto the Mull property to the west of the site (relocation of the creek onto the Mull property is not part of the proposed redevelopment, and may or may not occur during proposed redevelopment of the Rowley Properties site).

DEIS Figure 3.2-2 shows the stream buffers that would be provided onsite with proposed redevelopment under Alternatives 1 and 2, as well as the stream buffers required by the City's CAO. Stream buffer widths would be less than those required by the City's CAO in areas adjacent to proposed roads and areas of redevelopment on the Rowley Properties site with or without relocation of Tibbetts Creek onto the Mull property. However, proposed stream buffers would be the same or greater than the current vegetated buffers onsite.

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Source: The Watershed Company, 2011



**Figure 3.2-1**  
Tibbetts Creek Stream Buffers

Alternatives 1 and 2, and the applicant's Preferred Alternative described in this FEIS, would maintain the continuous stream buffer and 15-foot building setback from Tibbetts Creek onsite as depicted on Exhibit 16 to the approved Hyla Crossing MSP (see DEIS Figure 3.2-2). Floodplain widening and stream corridor enhancements are proposed at the southern end of the Greenway and stream corridor enhancements are proposed at the northern end of the Greenway, with or without relocation of the creek onto the Mull property. With these improvements, the stream buffer along the majority of the creek (Stream Sections A, B, D, and E) would be 100 feet wide or greater (see **Table 3.2-1**). From the south end of Section A to the north end of Section C, portions of the existing buffer adjacent to the creek that are currently less than 10 feet wide would be increased to an average of 10 feet wide and re-vegetated, and, portions of the existing buffer that are currently approximately 10 feet wide would be maintained at an average width of 10 feet as an interim measure until the creek is relocated onto the Mull property (approximately 80 lineal feet) (see **Table 3.2-1** and **Table 1-2**). With or without relocation of the creek onto the Mull property, the existing buffer would continue to be approximately 25 to 30 feet wide for a length of approximately 400 feet in Section C of the Greenway, consistent with Exhibit 16 to the Hyla Crossing MSP (see **Table 3.2-1**).

As indicated in **Table 1-2** in this FEIS, the City and the applicant will consider including more restrictive stream buffer and building setback requirements in the Development Agreement, as appropriate.

## **3.5 TRANSPORTATION**

This section of the FEIS includes additional transportation analysis related to the mitigation measures identified in the DEIS, including: a phasing analysis to determine the approximate trip thresholds when mitigation measures are expected to be triggered by the Preferred Alternative; a queuing analyses to determine the length of new auxiliary turn lanes suggested as mitigation, and to make sure that the Preferred Alternative would not create substantial queues that would require additional mitigation; and, a determination of the Preferred Alternative's traffic impact fee. This section is based on the *Transportation Technical Memorandum* (October 2011) prepared by Heffron Transportation, Inc. (see **Appendix A** to this FEIS).

### **3.5.1 Phasing Analysis and Mitigation Thresholds**

#### **Summary of Trip Generation for the Preferred Alternative**

The number of trips generated by the Preferred Alternative will be limited through an agreement with the City of Issaquah to the level previously evaluated in the DEIS as the Alternative 2 -60/40 Mix Scenario. Monitoring of the trips will be performed as part of the project's Transportation and Parking Management Plan, which was described in Section 3.5.3 of the DEIS.

Trip generation for the Preferred Alternative was derived for the DEIS, and was the basis for the mitigation program. **Table 3.5-1** summarizes the total number of vehicle trips expected to enter or exit the site at full build-out. It reflects trips generated by relatively new uses on the Hyla Crossing site that are expected to remain, such as the John L. Scott Building and the Hilton Garden Inn. However, it assumes that other existing uses would be demolished and removed to accommodate the new development. The trips reflect only the external site trips, and do not include trips that may be made among on-site uses (internal trips). As summarized below, the combined sites would generate about 45,000 trips per day (22,500 in and 22,500 out) with about 4,710 of those trips occurring in the PM peak hour. These totals reflect the full Preferred Alternative development, not the net change between the Preferred Alternative and the No Action Alternative (Previously-Approved Development). The values listed below provide the basis for any future trip monitoring. It is anticipated that early phases of the project would be monitored using the trip generation models developed for the EIS and later monitoring could be accomplished by performing traffic counts at the Hyla Crossing and Rowley Center Areas' external access points.

**Table 3.5-1  
HYLA CROSSING & ROWLEY CENTER –  
VEHICLE TRIP SUMMARY FOR PREFERRED ALTERNATIVE A**

Land Use	Daily Trips <sup>b</sup>	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Hyla Crossing <sup>c</sup>	22,930	1,313	496	1,809	828	1,528	2,356
Rowley Center	22,020	1,165	492	1,657	860	1,490	2,350
<b>Total Project</b>	<b>44,950</b>	<b>2,478</b>	<b>988</b>	<b>3,466</b>	<b>1,688</b>	<b>3,018</b>	<b>4,706</b>

**Source: Heffron Transportation, Inc., 2011.**

- a. The number of trips listed is for all trips that would enter and exit the site driveways at full build-out. Trips that would occur among on-site uses (or internal trips) are not included in these values.
- b. Daily trips represent the total for inbound plus outbound trips.
- c. Trips for recently developed uses, including the John L Scott Building and the Hilton Garden Inn Hotel, are included in the trip generation for Hyla Crossing.

### **Alternative Mitigation Measures**

Schematic engineering design was performed for intersections where mitigation was suggested as part of the DEIS. That design analysis determined that one of the suggested mitigation measures – at the Newport Way NW/NW Maple Street intersection (#28)—could adversely affect an existing wetland (see **Figure 3.5-1** for a map of the transportation study intersections). Therefore, an alternative remedy was evaluated. The analysis determined that the following measure would mitigate the full-build impacts associated with the Preferred Alternative:

*Widen the southwest leg of Newport Way NW to provide three northeast-bound approach lanes: a short left turn pocket (50 feet long), a thru-only lane, and a right-turn-only lane. Change the signal phasing at the intersection from split phasing for Newport Way NW/10<sup>th</sup> Avenue NW to conventional phasing with concurrent protected left turn phases.*

With the mitigation listed above, the intersection would operate at LOS E (68.0 seconds of delay per vehicle) with the Preferred Alternative. Compared to the No Action Alternative level of service reported for this intersection (LOS F, delay of 106.6 seconds), the suggested mitigation measure would fully mitigate the project impacts and would provide substantial improvement in operations over existing conditions.

Based on the subsequent schematic engineering review, alternative mitigation for the SE 56<sup>th</sup> Street/Issaquah-Fall City Road intersection (#34) is also recommended. Instead of adding a southbound right turn lane at this unsignalized intersection, the side street approach of SE 58<sup>th</sup> Street could be widened to separate the left- and right-turn movements. This mitigation option would result in a better level of service for side street movements than the mitigation that had previously been proposed in the DEIS.



## Phasing Analysis

Additional analysis was performed for each of the suggested mitigation measures to determine the approximate level of development that would trigger each mitigation need. Level of service analysis was performed for quartile growth increments of both background traffic associated with the No Action Alternative and increased traffic associated with the Preferred Alternative. Results for the 25% growth, 50% growth, 75% growth and 100% growth were then compared to determine the trigger for the mitigation. It is noted that this analysis assumes that growth for both the background traffic and project occur in steady increments between now and the year 2030. It is recognized that some spurts of development or background growth are likely; however, the analysis provides a reasonable tool to determine when mitigation could be needed. Full results of this level of service analysis are presented in **Appendix A** to this FEIS.

The need for mitigation at the intersection of SE 62<sup>nd</sup> Street/East Lake Sammamish Parkway (intersection #10) is estimated to occur with about 25% of the Preferred Alternative's trips, which would degrade the level of service from LOS D to LOS E. For the intersection of NW Gilman Boulevard and 12<sup>th</sup> Avenue NW (intersection #59), the level of service would remain at LOS D through about 75% growth in trips; however, the increase in project-related delay is estimated to exceed the 5.0 second increase when growth is at about 60%. The method of interpolation for LOS D intersection was used to approximate mitigation timing needs for several intersections. See Figure 1 and Figure 2 in **Appendix A** to his FEIS for an illustration of the analysis process for these two locations.

## Trigger Levels

The trip generation estimate and the phasing analysis were combined to establish "trigger levels" for each suggested mitigation measure. For intersections adjacent to the sites (or providing direct access to the site), the trigger for the mitigation could be trips generated by just one portion of the site that would add trips to the subject intersection. Further away from the site, the increase in trips could be related to development on either the Hyla Crossing or Rowley Center Areas. Again, it is acknowledged that the impact characteristics at a particular location could change depending on the type of land use developed in any particular phase of the project. For example, intersections on the Issaquah Plateau, such as SE Issaquah-Fall City Road/SE 58<sup>th</sup> Street (intersection #34), are more likely to be affected by office or retail land uses developed at the Hyla Crossing and Rowley Center Areas than residential land uses. However, over time, the development is expected to be balanced. The trigger level mechanism is intended to provide a reasonable basis for phasing the mitigation as development occurs without having to perform extensive analysis for each development phase.

**Table 3.5-2** summarizes the suggested mitigation measures. The measures are presented in groups according to the range of trigger levels. This analysis shows the mitigation that would be needed early in the development versus the measures that would be needed later. It also lists the mitigation that depends upon where site trips would access the roadway network. In these locations, some additional monitoring, such as signal warrant analysis, will likely be needed.

**Table 3.5-2  
PREFERRED ALTERNATIVE MITIGATION & TRIGGER LEVELS**

ID#	Intersection	Mitigation for Preferred Alternative
<b>Stage 0 Mitigation: Measures needed for No Action Alternative.</b>		
25	I-90 EB Ramps / Front St N	Interchange improvement needed for No Action condition, and would be a regional improvement need coordinated with WSDOT and FHWA.
170	NW Gilman Blvd / NW Juniper St	Contribute to City's project to signalize intersection to improve the trail crossing (TIP Project Number T-26: Three Trails Crossing Intersection Improvements). Add southeast-bound right turn pocket on Gilman Blvd
<b>Stage 1 Mitigation: Triggered when total trips generated by project range from 0% to 30% of full-build trips (up to 1,400 PM peak hour trips)</b>		
10	SE 62 <sup>nd</sup> St / E Lake Samm Pkwy	Add eastbound right-turn pocket.
12	SE Black Nugget Rd / Issaquah-Fall City Rd	Add southbound right turn pocket with overlap phase, and optimize cycle length (140 sec)
<b>Stage 2 Mitigation: Triggered when total trips generated by project range from 50% to 60% of full-build trips (2,350 to 2,820 PM peak hour trips).</b>		
34	SE 58 <sup>th</sup> St / Issaquah Fall City Rd	Add eastbound right turn pocket
51	NW Gilman Blvd / Maple St NW	Modify signal phasing to add overlap phase for northbound right turn; and re-optimize splits.
26	Front St / NW Gilman Blvd	Add eastbound right turn pocket
59	NW Gilman Blvd / 12 <sup>th</sup> Ave NW	Widen south leg to provide shared northbound left-thru plus right turn lane; optimize cycle length and splits.
<b>Stage 3 Mitigation: Triggered when total trips generated by project range from 75% to 95% of full-build trips (3,500 to 4,470 trips).</b>		
16	2 <sup>nd</sup> Ave SE / Front St S	Restripe westbound approach as left AND left-thru-right to allow a dual-left turn movement (no widening proposed on this approach). Widen/modify south leg of intersection to provide 2 southbound lanes to accept dual left turn. Merge lanes back to one lane at a 35:1 taper
17	SW Newport Wy / Front St	Add southbound right turn pocket by converting outside parking lane (remove curb bulb). Add parking on north side of Newport Way adjacent to residence.
28	Newport Wy NW / NW Maple St	Widen the southwest leg of Newport Way NW to provide three northeast-bound approach lanes: a short left turn pocket (50 feet long), a thru-only lane, and a right-turn-only lane. Change the signal phasing at the intersection from split phasing for Newport Way NW/10th Avenue NW to conventional phasing with concurrent protected left turn phases.
61	Newport Wy NW / SR 900	Modify signal phasing to provide eastbound right turn overlap phase and optimize corridor. Extend right turn pocket (by 100 additional feet) to make the overlap phase more effective.
62	SE 62 <sup>nd</sup> St / 4 <sup>th</sup> Ave NW	City should consider mitigation for No Action condition. Potential option is to add eastbound right turn pocket; or could reconfigure intersection as roundabout.
79	NW Gilman Blvd / 4 <sup>th</sup> Ave W	Modify signal phasing to provide southwest-bound right turn overlap phase.
11	Issaquah-Fall City Rd / E Lake Samm Pkwy	Restripe and/or shift and slightly widen west leg to provide three lanes on the eastbound approach (left, thru and right).

**Table 3.5-2  
PREFERRED ALTERNATIVE MITIGATION & TRIGGER LEVELS**

ID#	Intersection	Mitigation for Preferred Alternative
<p>Site Access Mitigation: Dependent on development on either portion of the site that would add traffic exiting the site through the affected intersection. Signal installation is expected to be needed when traffic exiting the site through the intersection would exceed 150 PM peak hour trips, and intersections should be evaluated to determine if signal warrants are met.</p>		
21	NW Gilman Blvd / SR 900	<p>From the original Rowley Development Agreement (LID 21): 1) Add eastbound left turn lane to provide dual eastbound lefts, one thru, &amp; one thru-right lane; 2) Add westbound right turn lane to provide dual right turn movement; 3) modify signal phasing to provide overlap phase for westbound right turn.</p> <p><b>Potential Trigger:</b> Widen eastbound approach when Hyla Crossing trips = 25%; widen westbound approach when Rowley Center trips = 40%.</p>
65	NW Maple Street / SR 900	<p>Widen eastbound approach to provide three lanes (left, left-thru &amp; right turn lane), convert westbound approach to left, left-thru &amp; right turn lane. Modify signal phasing to split the eastbound and westbound phases.</p> <p><b>Potential trigger:</b> When any development on Hyla Crossing would add traffic to Maple Street.</p>
60	NW Gilman Blvd/ 15th Avenue NW	<p>Signalize when warranted. Convert existing two-way left-turn lane into left turn pockets at the intersection.</p> <p><b>Potential trigger:</b> Evaluate signal warrants when traffic exiting Rowley Center via 15<sup>th</sup> Avenue NW exceeds 150 vehicles per hour.</p>
194	NW Mall Street / 12 <sup>th</sup> Avenue NW	<p>Signalize when warranted. Convert existing two-way left-turn lane into left turn pockets at the intersection.</p> <p><b>Potential trigger:</b> Evaluate signal warrants when traffic exiting Rowley Center via 15<sup>th</sup> Avenue NW exceeds 150 vehicles per hour.</p>

Source: *Heffron Transportation, Inc., 2011.*

### **3.5.2 Queuing Analysis**

Vehicle queue lengths were determined for all locations where additional turn lanes were suggested as part of the Preferred Alternative’s mitigation. This analysis was performed to estimate the appropriate storage length for each new lane. In addition, queue lengths were determined for the key intersections near the Hyla Crossing and Rowley Center Areas to determine if the Preferred Alternative would create queues that could require additional mitigation, such as lengthening existing turn lanes.

The queuing analysis was performed using the *Synchro 7.0* traffic operations analysis software. Traffic volumes reflect the 2030 No Action and 2030 with Preferred Alternative conditions. **Table 3.5-3** presents the intersections where mitigation is suggested, describes the mitigation, and then lists the queue lengths and recommended storage lengths for the affected movements. The recommended storage lengths were determined based on the length needed to hold each movement’s queue. If needed, extensions of storage lanes were identified to improve operations if access to the storage lane could be blocked by traffic in an adjacent lane.

**Table 3.5-3  
HYLA CROSSING & ROWLEY CENTER –  
QUEUE LENGTHS THAT AFFECT MITIGATION FOR THE PREFERRED ALTERNATIVE**

<b>ID#</b>	<b>Intersection</b>	<b>Suggested Mitigation for Preferred Alternative</b>	<b>Queue Lengths in Feet Average (95<sup>th</sup>Percentile)</b>	<b>Recommended Storage Length</b>
10	SE 62 <sup>nd</sup> St / E Lake Samm Pkwy	Add eastbound right-turn pocket.	EB thru = 322 (429) EB right turn = 378 (720)	Eastbound right turn pocket = 300 feet
11	Issaquah-Fall City Rd / E Lake Samm Pkwy	Restripe and/or shift and slightly widen west leg to provide three lanes on the eastbound approach (left, thru and right).	EB left turn = 117 (249) EB thru = 182 (335) EB right = 7 (76)	Eastbound left and right turn pockets = 150 feet each
12	SE Black Nugget Rd / Issaquah-Fall City Rd	Add southbound right turn pocket with overlap phase, and optimize cycle length (140 sec)	SB thru = 188 (247) SB right = 39 (73)	Southbound right turn pocket = 150 feet
16	2 <sup>nd</sup> Ave SE / Front St	Restripe westbound approach as left AND left-thru-right to allow a dual-left turn movement (no widening proposed on this approach). Widen/modify south leg of intersection to provide 2 southbound lanes to accept dual left turn. Merge lanes back to one lane at a 35:1 taper	WB left = 242 (364) WB left-thru-right = 242 (364)	No changes proposed on westbound approach to limit adverse effect of potential lane widening.
17	SW Newport Wy / Front St	Add southbound right turn pocket by converting outside parking lane (remove curb bulb). Add parking on north side of Newport Way adjacent to residence.	SB thru = 489 (736) SB right = 31 (69)	Southbound right turn pocket = 75 feet
21	NW Gilman Blvd / SR 900	From the original Rowley Development Agreement (LID 21): 1) Add eastbound left turn lane to provide dual eastbound lefts, one thru, & one thru-right lane; 2) Add westbound right turn lane to provide dual right turn movement; 3) modify signal phasing to provide overlap phase for westbound right turn.	EB left (dual) = 252 (309) EB thru = 225 (293) WB right = 98 (131)	Eastbound left turn lane = 275 feet Westbound right turn lane = 300 feet (extend to or near shopping center driveway)
25	I-90 EB Ramps / Front St N	Interchange improvement needed for No Action condition, and would be a regional improvement need coordinated with WSDOT and FHWA.		

**Table 3.5-3  
HYLA CROSSING & ROWLEY CENTER –  
QUEUE LENGTHS THAT AFFECT MITIGATION FOR THE PREFERRED ALTERNATIVE**

ID#	Intersection	Suggested Mitigation for Preferred Alternative	Queue Lengths in Feet Average (95 <sup>th</sup> Percentile)	Recommended Storage Length
26	Front St / NW Gilman Blvd	Add eastbound right turn pocket	EB thru = 179 (263) EB right = 216 (443)	Eastbound right turn pocket = 200 feet
28	Newport Wy NW / NW Maple St	Widen the southwest leg of Newport Way NW to provide three northeast-bound approach lanes: a short left turn pocket (50 feet long), a thru-only lane, and a right-turn-only lane. Change the signal phasing at the intersection from split phasing for Newport Way NW/10th Avenue NW to conventional phasing with concurrent protected left turn phases.	NEB left = 5 (21) NEB thru = 318 (472) NEB right = 297 (533)	Northeast-bound left turn pocket = 50 feet
34	SE 58 <sup>th</sup> St / Issaquah. Fall City Rd	Add eastbound right turn pocket	Intended to separate left and right turns on minor leg of unsignalized intersection.	Eastbound right turn pocket = 75 feet
51	NW Gilman Blvd / Maple St NW	Modify signal phasing to add overlap phase for northbound right turn; and re-optimize splits.		No lane widening proposed
59	NW Gilman Blvd / 12 <sup>th</sup> Ave NW	Widen south leg to provide shared northbound left-thru plus right turn lane; optimize cycle length and splits.	NB left-thru = 99 (183) NB right = 159 (398)	Northbound right turn lane = 200 feet
60	NW Gilman Blvd/15th Avenue NW (New site access)	Signalize when warranted. Convert existing two-way left-turn lane into left turn pockets at the intersection.	EB left = 14 (45) WB left = 3 (16)	Eastbound left turn lane = 50 feet Westbound left turn lane = 75 feet
61	Newport Wy NW / SR 900	Modify signal phasing to provide eastbound right turn overlap phase and optimize corridor. Extend right turn pocket (by 100 additional feet) to make the overlap phase more effective.	EB thru = 332 (501) EB right = 272 (391)	Extend right turn pocket by 100 feet (from 100 to 200 feet)

**Table 3.5-3  
HYLA CROSSING & ROWLEY CENTER –  
QUEUE LENGTHS THAT AFFECT MITIGATION FOR THE PREFERRED ALTERNATIVE**

ID#	Intersection	Suggested Mitigation for Preferred Alternative	Queue Lengths in Feet Average (95 <sup>th</sup> Percentile)	Recommended Storage Length
62	SE 62 <sup>nd</sup> St / 4 <sup>th</sup> Ave NW	City should consider mitigation for No Action condition. Potential option is to add eastbound right turn pocket; or could reconfigure intersection as roundabout.	EB thru = 392 (377) EB right = 172 (148)	Eastbound right turn pocket = 150 feet (Not needed with roundabout)
65	NW Maple St / SR 900	Widen eastbound approach to provide three lanes (left, left-thru & right turn lane), convert westbound approach to left, left-thru & right turn lane. Modify signal phasing to split the eastbound and westbound phases.	EB left = 97 (150) EB left-thru = 189 (263) EB right = 18 (60)	Eastbound left turn pocket = 150 feet Eastbound right turn pocket = 75 feet
79	NW Gilman Blvd / 4 <sup>th</sup> Ave W	Modify signal phasing to provide southwest-bound right turn overlap phase.		No lane widening proposed
170	NW Gilman Blvd / NW Juniper St	Contribute to City's project to signalize intersection to improve the trail crossing (TIP Project Number T-26: Three Trails Crossing Intersection Improvements). Add southeast-bound right turn pocket on Gilman Blvd	SE right = 67 (120) SE thru = 867 (1,005)	Southeast-bound right turn pocket = 100 feet
194	NW Mall St / 12 <sup>th</sup> Ave NW (New site access)	Signalize when warranted. Convert existing two-way left-turn lane into left turn pockets at the intersection.	NB left = 19 (54) SB left = 2 (10)	NB left turn lane = 100 feet SB left turn lane = 100 feet

**Source: Heffron Transportation, Inc., 2011.**

Detailed analysis was performed for the six signalized intersection in the vicinity of the Hyla Crossing and Rowley Center Areas to determine if additional mitigation would be required because of project-related queue impacts. The results of this analysis are summarized in Table 4 of **Appendix A**.

As summarized below, for most of the intersection movements in the site vicinity, the queue lengths with the Preferred Alternative (and proposed mitigation) would be similar to queue lengths with the No Action condition. At some locations where changes in the lane configuration are proposed, a long queue in one lane may be shifted to multiple lanes. For example, a queue that would otherwise occur in a thru-right lane would be reduced by the addition of a right-turn-only lane. Two locations where the Preferred Alternative would substantially increase the queue and the length of the queue would not fit within the storage capacity of the lane are described below:

- **Intersection #21: NW Gilman Boulevard / SR 900, Westbound left turn** – This movement’s queue would increase when the opposing approach is widened to provide dual eastbound left turn lanes. The change, as well as the re-allocation of signal time among intersection movements, would reduce the green time available for westbound left turns. This would increase the queue length. Because the turn lane will be back-to-back with the turn lane at the proposed new access to the Rowley Center Area (and QFC shopping center on the north side of NW Gilman Boulevard), it will be difficult to increase the length of the left turn lane. No changes are recommended.
- **Intersection #59: NW Gilman Boulevard / 12<sup>th</sup> Avenue NW, Westbound left turn** – The 95<sup>th</sup>-percentile queue for this movement would increase from 225 feet to about 360 feet with the Preferred Alternative. The left turn lane could be extended back to the center landscape median, since there are no driveways that access the center turn lane in this area. The change may add about 90 feet of additional queue space. This change, which would essentially be a restriping project, is recommended.

### **3.5.3 Transportation Impact Fee**

The City of Issaquah has a Transportation Impact Fee (Issaquah Municipal Code 3.71). The latest fee schedule was adopted in February 2011. Typically, the fees are applied based on the size (square feet or units) of the proposed development. The basis for all fee rates is \$3,228 per net new PM peak hour trip.

The fee methodology based on development area is appropriate for stand-alone land uses; however, it cannot account for the trip characteristics of a mixed-use development where many trips are made between on-site uses and do not leave the site. The trip generation calculations presented in the DEIS did account for the Hyla Crossing and Rowley Center Areas internal trips as well as trips that could be made by non-vehicle modes of travel. Therefore, the transportation impact fee has been estimated using the per trip rate of \$3,228.

The net new trips generated by the proposed project were presented in the Draft EIS, and reflect the difference between the Preferred Alternative and the Previously-Approved Development (No Action Alternative). As allowed by IMC 3.71, the net new trips have also been adjusted to account for “pass-by trips” that would already use the area roadways. The residual “primary trips” presented in Table 5 of **Appendix A** represent the net new PM peak hour trips to which the impact fee would apply.

The full project would generate 1,271 net new PM peak hour trips. The transportation impact fee associated with these trips is summarized in **Table 3.5-4**. The total for both sites would be approximately \$4.1 million.

**Table 3.5-4  
TRANSPORTATION IMPACT FEE CALCULATION**

	Net New PM Peak Hour Trips	Impact Fee Rate (Per Net New Trip)	Impact Fee
Hyla Crossing	246	\$3,228	\$794,088
Rowley Center	1,025	\$3,228	\$3,308,700
<b>Total Both Sites</b>	<b>1,271</b>	<b>\$3,228</b>	<b>\$4,102,788</b>

*Source: Heffron Transportation, Inc., 2011.*

### **Potential Credits for Transportation Impact Fee**

The State law that authorized collection of Impact Fees also allows developers to receive credit for the value of dedicated land, improvements or construction provided by the developer, if the improvements made are part of an adopted Capital Facilities Plan upon which the impact fees were based (RCW 82.02.060(3)). The Transportation Impact Fee adopted in 2011 includes one project where mitigation needs were also identified for the Hyla Crossing and Rowley Center Project: Front Street/I-90 Off-ramp

The location listed above is noted as needing improvements under the “No Action Alternative.” However, no improvements were proposed or reflected in the traffic operations analysis performed for this intersection, since the project will require future planning and analysis by the City of Issaquah and other jurisdictions (e.g. WSDOT and FHWA). If the applicant were to make improvements at this location, the value of the improvements should be credited against the traffic impact fee. Alternatively, payment of the impact fee could be considered to fully mitigate the project’s impact at this location.

### **3.5.4 Significant Unavoidable Adverse Impacts**

The Hyla Crossing and Rowley Center Project would generate traffic and increase congestion at many intersections. Mitigation is required/proposed for all intersections that would meet the criteria for a “probable significant impact.” However, some of these improvement options may improve the traffic operations of an intersection, but could adversely impact other elements, such as the pedestrian environment, landscaping opportunities, and/or the general character of the surrounding area. Some of the improvement options may also not be possible without other impacts to local access or sensitive environmental areas. As a result, the City may determine that some improvements are not desirable or feasible and may prefer an alternate approach to mitigation. This could result in some location-specific impacts not being fully mitigated at the point of congestion, which could be considered a significant unavoidable adverse impact.

One of the suggested mitigation measures is to restripe the privately-owned approach (SE 64<sup>th</sup> Place) at the Issaquah-Fall City Road/East Lake Sammamish Parkway intersection (#11). Other alternative mitigation measures were tested, and no other reasonable options exist to return intersection operations to the No Action level at this location. If the private owner does not agree to the restriping plan, then the Hyla Crossing and Rowley Center Project would have a significant unavoidable adverse impact at this location.

### **3.7 AIR QUALITY/GREENHOUSE GAS EMISSIONS**

This section of the FEIS was prepared in response to comments on the DEIS regarding the potential for the proposed project to impact air quality and generate greenhouse gases (GHG). A qualitative analysis of the potential for the EIS alternatives to impact air quality during construction activities is contained in DEIS Section 3.6. The following is a qualitative evaluation of the potential for the EIS Alternatives to impact air quality during operation of the project and an estimation of the project's greenhouse gas (GHG) emissions, as they relate to climate change. These GHG analyses are based upon the best information available at this time. GHG emissions are calculated using the SEPA Greenhouse Gas Emissions spreadsheet tool developed by King County (see **Appendix B** for the full spreadsheets for existing site conditions, Alternative 1, Alternative 2 and the No Action Alternative). A qualitative discussion of the potential impacts of the alternatives on global climate change is also provided in this section.

#### **3.7.1 Affected Environment**

##### **Air Quality**

As described in DEIS Section 3.6.1, Construction Impacts – Air Quality, the primary source of existing air pollutants and emissions on the Rowley Properties site and in the site vicinity are emissions associated with vehicle traffic on area roadways (including I-90, SR-900, NW Gilman Boulevard, NW Mall Street, NW Maple Street, 12<sup>th</sup> Avenue NW and Newport Way NW). Existing buildings on the Rowley Properties site and in the site vicinity also contribute air pollutants and emissions. Primary building emission sources include building exhaust, mechanical equipment and other emission sources.

Temporary construction-related air pollutants and emissions are also currently being generated in the site vicinity in association with the SR-900 Pedestrian Overpass project (north of the site), and the new Eastside Fire and Rescue Station #72 project (south of the site). These temporary construction-related air pollutants and emissions include fugitive dust from demolition and earthwork, and emissions associated with construction vehicles and equipment.

Air quality in the City of Issaquah is regulated by three agencies: The U.S. Environmental Protection Agency (EPA), the Washington State Department of Ecology (DOE) and the Puget Sound Clean Air Agency (PSCAA). Each agency has established regulations to govern the concentration of air pollutants and contaminant emissions from air pollution sources. Key regulations include the U.S. Clean Air Act (amended in 1990 and administered by the EPA); the Washington State Air Quality Rules, as adopted by DOE (WAC Chapters 173-400 – 173-495); and, PSCAA Regulations, including regulations regarding emission standards (Regulation 1.9).

##### **Greenhouse Gas Emissions and Climate Change**

The global climate is continuously changing, as evidenced by repeated episodes of warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. Scientists have observed, however, an unprecedented increase in the rate of warming in the past 150 years. This recent warming has coincided with

the Industrial Revolution, which resulted in widespread deforestation to accommodate development and agriculture and an increase in the use of fossil fuels, which has released substantial amounts of greenhouse gases into the atmosphere.

Greenhouse gases (GHG), such as carbon dioxide, methane, and nitrous oxide, are emitted by both natural processes and human activities and trap heat in the atmosphere. The accumulation of GHG in the atmosphere affects the earth's temperature. While research has shown that the earth's climate has natural warming and cooling cycles, evidence indicates that human activity has elevated the concentration of GHG in the atmosphere beyond the level of naturally-occurring concentrations resulting in more heat being held within the atmosphere. The Intergovernmental Panel on Climate Change (IPCC), an international group of scientists from 130 governments, has concluded that it is "very likely" - a probability listed at more than 90 percent - that human activities and fossil fuels explain most of the warming over the past 50 years."<sup>1</sup>

The IPCC predicts that under current human GHG emission trends, the following results could be realized within the next 100 years:<sup>2</sup>

- Global temperature increases between 1.1 – 6.4 degrees Celsius;
- Potential sea level rise between 18 to 59 centimeters or 7 to 22 inches;
- Reduction in snow cover and sea ice;
- Potential for more intense and frequent heat waves, tropical cycles and heavy precipitation; and,
- Impacts to biodiversity, drinking water and food supplies.

The Climate Impacts Group (CIG), a Washington-state based interdisciplinary research group that collaborates with federal, state, local, tribal, and private agencies; organizations; and, businesses studies impacts of natural climate variability and global climate change on the Pacific Northwest. CIG research and modeling indicates the following possible impacts of human-based climate change in the Pacific Northwest:<sup>3</sup>

- Changes in water resources, such as decreased snowpack; earlier snowmelt; decreased water for irrigation, fish and summertime hydropower production; increased conflict over water; increased urban demand for water;
- Changes in salmon migration and reproduction;
- Changes in forest growth and species diversity and increases in forest fires; and,
- Changes along coasts, such as increased coastal erosion and beach loss due to rising sea levels; increased landslides due to increased winter rainfall, permanent inundation in some areas; and, increased coastal flooding due to sea level rise and increased winter streamflow.

GHG Emissions were calculated for the existing building uses on the Rowley Properties site, based on the SEPA Greenhouse Gas Emissions spreadsheet tool developed by King County. **Table 3.7-1** provides a summary of the existing estimated GHG emissions on the Rowley Properties site. See **Appendix B** for the SEPA GHG Emissions spreadsheet for the existing conditions.

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<sup>1</sup> IPCC, Fourth Assessment Report, February 2, 2007.

<sup>2</sup> IPCC, Summary for Policymakers, April 30, 2007.

<sup>3</sup> Climate Impacts Group, Climate Impacts in Brief, <http://www.cses.washington.edu/cig/pnwc/ci.shtml>.

**Table 3.7-1  
ESTIMATED GREENHOUSE GAS EMISSIONS SUMMARY–  
EXISTING CONDITIONS**

Source	Lifespan Emissions (MTCO <sub>2</sub> e)	Average Building Life Span (Years)	Average Annual Emissions (MTCO <sub>2</sub> e)
<b>Estimated Total GHG Emissions</b>	<b>558,597</b>	<b>62.5</b>	<b>8,937</b>

*Source: EA/Blumen, 2011.*

\*The numbers in this table differ slightly from the GHG Emissions Worksheet (Appendix B) due to rounding.

## Energy

One source of GHG emissions is the fossil fuels (especially coal) used to produce power used by consumers for electrical power and home heating needs. In the Pacific Northwest - unlike other regions in the United States - power companies are able to utilize hydro-electric energy sources which are considered renewable.

Puget Sound Energy (PSE) is the primary electrical service provider for the City of Issaquah, and provides service to the Rowley Properties site. PSE has a variety of sources of power including: hydro-electric (36 percent), coal (32 percent), natural gas (30 percent), nuclear (1 percent), and other sources<sup>4</sup> (1 percent)<sup>5</sup>. A percentage of the power provided by PSE is generated from fossil fuels with the majority coming from hydro-electric and natural gas sources. PSE offers consumers options for reducing or offsetting their energy carbon footprint as part of the Green Power Program. Consumers who participate in this program allow PSE to purchase renewable energy credits (solar and wind) from regional renewable energy sources on their behalf for a portion or all of their electricity use.

Other strategies that can further reduce greenhouse gas from energy use are: employing design features that naturally reduce energy use, such as daylighting and green roofs; retaining mature trees to provide carbon sequestration, air purification and cooling; and, providing on-site power generation, such as solar panels or wind turbines.

The Rowley Properties site currently contains several existing buildings, all of which are provided energy by PSE at this time.

## Regulatory Context

### United States Environmental Protection Agency

The United States Environmental Protection Agency (EPA) is charged with enforcing the Clean Air Act and has established air quality standards for common pollutants.

<sup>4</sup> Other sources include wind, petroleum, landfill gas, biomass and waste.

<sup>5</sup> Puget Sound Energy website, <http://pse.com/aboutpse/EnergySupply/Pages/Electric-Supply.aspx>

On September 22, 2009, the EPA released final regulations that require 29 categories of facilities to report their GHG emissions annually, starting in 2011. Facilities covered by these regulations include oil refineries, pulp and paper manufacturing, landfills, and a variety of other manufacturing and industrial sources of emissions. Individual development projects, such as the Hyla Crossing and Rowley Center Project, are not subject to these regulations.

### Western Regional Climate Action Initiative

On February 26, 2007, the Governors of Arizona, California, New Mexico, Oregon and Washington signed the Western Climate Initiative (WCI) to develop regional strategies to address climate change. WCI is identifying, evaluating and implementing collective and cooperative ways to reduce greenhouse gases in the region. Subsequent to this original agreement, the Governors of Utah and Montana, as well as the Premiers of British Columbia and Manitoba joined the Initiative. The WCI objectives include setting an overall regional reduction goal for GHG emissions, developing a design to achieve the goal and participating in The Climate Registry, a multi-state registry to enable tracking, management and crediting for entities that reduce their GHG emissions.

On September 23, 2008, the WCI released their final design recommendations for a regional cap-and-trade program. This program would cover GHG emissions from electricity generation, industrial and commercial fossil fuel combustion, industrial process emissions, gas and diesel consumption for transportation and residential fuel use. The first phase of the program, which will regulate electricity emissions and some industrial emission sources, is to begin January 1, 2012.

### State of Washington

In February of 2007, Executive Order No. 07-02 was signed by the Governor establishing goals for Washington regarding reductions in climate pollution, increases in jobs and reductions in expenditures on imported fuel.<sup>6</sup> This Executive Order established Washington's goals for reducing GHG emissions as follows: to reach 1990 levels by 2020, 25 percent below 1990 levels by 2035 and 50 percent below 1990 levels by 2050. This order was intended to address climate change, grow the clean energy economy and move Washington toward energy independence.

In 2007, the Washington legislature passed SB 6001, which among other things adopted the Executive Order No. 07-02 goals into statute.

In 2008, the Washington Legislature built on SB 6001 by passing E2SHB 2815, the Greenhouse Gas Emissions Bill. While SB 6001 set targets to reduce emissions, the E2SHB 2815 made those firm requirements and directed the state to submit a comprehensive GHG reduction plan to the Legislature by December 1, 2008. As part of the plan, the Washington State Department of Ecology (Ecology) was mandated to develop a system for reporting and monitoring GHG emissions within the state and a design for a regional multi-sector, market-based system to reduce statewide GHG emissions.

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<sup>6</sup> [http://www.governor.wa.gov/execorders/eo\\_07-02.pdf](http://www.governor.wa.gov/execorders/eo_07-02.pdf)

In 2008,<sup>7</sup> Ecology issued a memorandum stating that climate change and GHG emissions should be included in all State Environmental Policy Act (SEPA) analyses and committed to providing further clarification and analysis tools.

In 2009, Executive Order 09-05 was signed ordering Washington state actions to reduce climate-changing GHG emissions, to increase transportation and fuel-conservation options for Washington residents, and protect the state's water supplies and coastal areas. The Executive Order directs state agencies to develop a regional emissions reduction program; develop emission reduction strategies and industry emissions benchmarks to make sure 2020 reduction targets are met; work on low-carbon fuel standards or alternative requirements to reduce carbon emissions from the transportation sector; address rising sea levels and the risks to water supplies; and, increase transit options, such as buses, light rail, and ride-share programs, and give Washington residents more choices for reducing the effect of transportation emissions.

On October 7, 2009, Ecology issued a draft rule requiring certain industrial facilities and large vehicle fleets to report GHG emissions, starting in 2010.

On June 1, 2010, Ecology issued draft guidelines entitled, *Guidance on Climate Change and SEPA*. These draft guidelines include: guidance regarding the types of GHG emissions that should be calculated; a discussion of how to determine if emissions surpass a threshold of "significance"; and, a description of different types of mitigation measures. Guidance is also provided regarding the requirement to discuss the ability of a proposal to adapt to climate changes as a result of global warming. Ecology has subsequently narrowed the focus of the draft guidelines and in its place has developed internal guidance for Ecology staff to use when Ecology is the lead agency or an agency with jurisdiction. Ecology began using this guidance in the summer of 2011 and could make modifications as early as September 2011.

### City of Issaquah

The City of Issaquah Comprehensive Plan Land Use Element identifies goals and policies related to sustainable development and climate change. The goals and policies that are most relevant to the Hyla Crossing and Rowley Center Project include the following:

Land Use Goal L-2: Sustainable community development and climate change initiatives: Develop a Climate Action Plan in collaboration with local and regional partners that provides direction for Issaquah's reduction of City-wide GHG emissions while supporting sustainable community development principles.

Objective L-7: Implementation of Sustainable Community Development Principles: Adopt a multi-year Strategic Work Program to implement Sustainable Community Development Principles related to land use, urban design, energy, transportation, resource conservation, air quality, stormwater management, critical area protection, utilities and public service, urban forestry and other relevant fields. Consider methods to implement relevant non-City programs that contribute to sustainable development.

Objective L-8: The City shall identify and develop targets, strategies, regulations and policies to limit the community's impact upon climate change such as through development and

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<sup>7</sup> Manning, Jay. RE: Climate Change - SEPA Environmental Review of Proposals, April 30, 2008.

redevelopment requirements, improved efficiency, carbon sequestration and other climate solutions.

- Policy L-8.1 – Greenhouse Gas Reduction Target. The City is adopting the King County GHG emissions reduction target: City-wide reduction of GHG emissions below 80% of the 2007 levels by the year 2050.

When local data can be evaluated, ICLEI (Local Governments for Sustainability) or other method, local emission targets for Issaquah may replace the King County target. The City's progress on meeting the emissions target should be evaluated periodically using established GHG emissions protocol and monitoring and assessing the impacts of climate change regionally.

- Policy L-8.2 – Reduction of Climate Impact. The City shall ensure reduction of climate impacts by implementing actions, policies and regulations that require reduction and mitigation of GHG and carbon dioxide equivalent emissions in all land uses and by providing incentives for innovative climate solutions which advance the City towards a carbon neutral community.
  - 8.2.2 – The City should seek ways for applicants to evaluate and quantify the GHG emissions of their new development and provide an assessment of potential measures to reduce emissions. Assessments shall use best available science of climate change impacts, through sources such as the University of Washington's Climate Impacts Group and others, and established GHG emissions protocols. Mitigation measures for impacts to climate change may be determined through the SEPA process.
- Policy L-8.3 – Carbon Footprint Development. The City should complete the carbon footprint studies for the community and develop and track progress towards emissions reduction targets.

### **3.7.2      Impacts**

#### **Alternative 1 – Higher Density Development**

##### Air Quality

Construction-related air quality impacts under Alternative 1 are identified in the DEIS and would include air pollutants in the form of fugitive dust from demolition activities and earthwork, and emissions associated with construction vehicles and equipment. The primary types of pollutants that would be anticipated during construction activities would be particulates and hydrocarbons. Gasoline and diesel-powered machinery used for demolition, excavation and construction activities would also emit carbon monoxide and hydrocarbons.

Subsequent to construction, operational emissions and related potential air quality impacts could result from the primary air polluting sources in the area, including transportation-related emissions and building-related emissions. The increase in vehicle trips associated with redevelopment would result in an increase in vehicle emissions, including carbon monoxide (CO). Transportation-related emissions would represent an increase over existing site

conditions. However, proposed redevelopment under Alternative 1 is intended to create a pedestrian-oriented mixed-use neighborhood, which would encourage non-motorized transportation and would result in fewer vehicle trips to and from the site, thereby reducing emissions. The potential implementation of a Transportation Management Plan would also help to reduce vehicle trips and associated emissions (see DEIS Section 3.5, Transportation, and DEIS Appendix H for further details on the Transportation Management Plan).

Operation of new buildings on the Rowley Properties site would also result in exhaust (i.e. from the operation of HVAC systems) that would contribute to emissions in the area. Such emissions would represent an increase over existing conditions due to the increase in building area on the site. However, building emissions would be required to meet all applicable standards, and significant impacts would not be anticipated. In addition, the City and the applicant have demonstrated a commitment to sustainability by agreeing to incorporate the framework from “One Planet Living” into the Development Agreement. One Planet Living is a global initiative based on ten principals of sustainability developed by BioRegional and World Wildlife Federation. The intent of One Planet Living is to provide guidance for sustainability in the Hyla Crossing and Rowley Center Project, including making buildings more energy efficient and encouraging low carbon modes of transportation to reduce emissions (see the Mitigation Measures in this section for further details).

### Greenhouse Gas Emissions

The following tabulation of GHG emissions is based on the SEPA Greenhouse Gas Emissions spreadsheet tool developed by King County. In accordance with findings regarding the primary sources of greenhouse gas emissions, this tabulation focused on following three areas/sources of emissions:

- Building Materials and Processes (Embodied Emissions). This portion of the calculation considered emissions that are created through the extraction, processing, transportation, construction and disposal of building materials, as well as emissions created through landscape disturbance (by both soil disturbance and changes in above-ground biomass). The calculation includes the following types of buildings: residential, office, retail, lodging (hotel) and public assembly (entertainment complex); parking structures are assumed to be accessory to the building uses and are included as part of the transportation emissions for the site. The lifespan of the buildings is projected to be 62.5 years for retail/office, and 80.5 years for multifamily residential buildings, based on the King County spreadsheet model.
- Post-development Energy Usage (Energy). This element considered energy consumption, such as heating and electrical usage. For this calculation, the energy values were adjusted to reflect the usage reported for the Pacific Northwest (as opposed to national averages). For the analysis, there is no assumption of construction of Built Green or Energy Star ratings.
- Transportation (Transport). This component considered GHG emissions related to vehicle travel of residents and employees. The King County default calculation was used, because no other project-specific data were available.

Redevelopment of the Rowley Properties site under Alternative 1 would result in an increase in GHG emissions when compared to existing conditions due to the increase in building density

and site population. **Table 3.7-2** provides a summary of the potential estimated GHG emissions that could result from construction and operation of development under the EIS Alternatives.

**Table 3.7-2  
ESTIMATED GREENHOUSE GAS EMISSIONS SUMMARY – EIS ALTERNATIVES**

<b>Source</b>	<b>Lifespan Emissions (MTCO<sub>2</sub>e)</b>	<b>Average Building Life Span (Years)<sup>1</sup></b>	<b>Average Annual Emissions (MTCO<sub>2</sub>e)</b>
<b>Alternative 1 – 80/20 Land Use Mix</b>			
Estimated Total GHG Emissions	5,418,484	62.5 or 80.5	83,405
<b>Alternative 1 – 60/40 Land Use Mix</b>			
Estimated Total GHG Emissions	5,521,120	62.5 or 80.5	81,049
<b>Alternative 2 – 80/20 Land Use Mix</b>			
Estimated Total GHG Emissions	4,579,562	62.5 or 80.5	70,541
<b>Alternative 2 – 60/40 Land Use Mix</b>			
Estimated Total GHG Emissions	4,649,153	62.5 or 80.5	68,391
<b>Alternative 3 – Existing Zoning Sub-Alternative</b>			
Estimated Total GHG Emissions	2,293,887	62.5	36,702
<b>Alternative 3 – Existing Condition Sub-Alternative</b>			
Estimated Total GHG Emissions	1,158,548	62.5	18,537

**Source: EA/Blumen, 2011.**

<sup>1</sup> Average building life span is 62.5 years for commercial buildings and 80.5 years for residential.

\*The numbers in this table differ slightly from the GHG Emissions Worksheets (**Appendix B**) due to rounding.

As noted in **Table 3.7-2**, development under the Alternative 1 80/20 land use mix would result in an estimated total of 5,418,484 MTCO<sub>2</sub>e in lifespan GHG emissions, which equates to approximately 83,408 MTCO<sub>2</sub>e annually.<sup>8</sup> The 60/40 land use mix would result in an estimated total of 5,521,120 MTCO<sub>2</sub>e in lifespan GHG emissions, which would result in approximately

<sup>8</sup> MTCO<sub>2</sub>e is defined as Metric Ton Carbon Dioxide Equivalent and equates to 2,204.62 pounds of CO<sub>2</sub>. This is the standard measure of the amount of CO emissions reduced or sequestered. Carbon is not the same as CO<sub>2</sub>. Sequestering 3.67 tons of CO<sub>2</sub> is equivalent to sequestering one ton of carbon.

81,049 MTCO<sub>2</sub>e annually (see **Appendix B** for the SEPA GHG Emissions spreadsheet for Alternative 1). A majority of the emissions would be from residential and office development on the site.

Redevelopment under Alternative 1 would result in an increase in estimated annual GHG emissions when compared to the existing conditions on the Rowley Properties site (81,000 to 83,400 MTCO<sub>2</sub>e compared to 8,937 MTCO<sub>2</sub>e respectively), similar to any major development. However, consistent with the City of Issaquah Comprehensive Plan goals and policies, related to sustainable development and climate change, and the City's status as a Cascade Agenda City, proposed redevelopment would include features that would reduce GHG emissions and climate change impacts (i.e. the pedestrian oriented mixed-use nature of the proposed development would reduce vehicular trips). As a result, per person GHG emissions would be expected to be less than under existing conditions/suburban development.

Alternative 1 is intended to create a pedestrian-oriented mixed-use neighborhood, which would encourage non-motorized transportation and would result in fewer vehicle trips to and from the site, thereby reducing emissions. The potential implementation of a Transportation Management Plan would also help to reduce vehicle trips and associated emissions (see DEIS Section 3.5, Transportation, and DEIS Appendix H for further details on the Transportation Management Plan). In addition, these GHG emission calculations do not take into consideration any potential efforts to reduce GHG emissions and the carbon footprint of development under Alternative 1. As described in the DEIS, it is anticipated that sustainable development concepts would be incorporated in the Hyla Crossing and Rowley Center Project, which would help to reduce the project's GHG emissions and carbon footprint.

Sustainable measures and concepts would be identified in the Development Agreement (i.e. through adoption of the framework for "One Planet Living") that could reduce the project's GHG emissions and carbon footprint. "One Planet Living" uses guiding principles as a framework to examine sustainability challenges and foster appropriate solutions, including the following principles that would be applicable to preserving air quality and achieving sustainability with the Hyla Crossing and Rowley Center Project:

- Making buildings more energy efficient and delivering energy with renewable technologies.
- Encouraging low carbon modes of transportation to reduce emissions.
- Using sustainable healthy products/materials, with low embodied energy, sourced locally, and made from renewable or waste resources.
- Using water more efficiently in buildings and in products; tackling local flooding and water course pollution.
- Protecting and restoring biodiversity and natural habitats through appropriate land use and integration into the built environment

## Energy

New development on the Rowley Properties site under Alternative 1 would utilize energy in the form of electricity and natural gas. Electricity would be used for heating, cooling, lighting and other energy demands; natural gas would be used primarily for heating and cooking. PSE would continue to provide electricity and natural gas service to the site. Development under Alternative 1 would result in an increase in energy usage levels when compared to the existing conditions. However, Leadership in Energy and Environmental Design (LEED) building techniques and

other energy conservation measures could be incorporated into the final development that would lower the energy demands associated with site development. Over the lifetime of the project, alternative sources of energy could also be utilized that could reduce the demand for electricity and natural gas.

## **Alternative 2 – Lower Density Development**

### Air Quality

Construction-related air quality impacts are identified in the DEIS and would be similar to those described for Alternative 1. Operational emissions and related potential air quality impacts could result from transportation-related emissions and building-related emissions. These emissions would represent an increase over existing conditions; however, they would be lower than Alternative 1 due to the lower amount of redevelopment on the site and associated vehicle trips. As described under Alternative 1, the framework for One Planet Living would provide guidance for sustainability for the Hyla Crossing and Rowley Center Project, including making buildings more energy efficient and encouraging low carbon modes of transportation to reduce emissions (see the Mitigation Measures section for further details).

### Greenhouse Gas Emissions

Redevelopment on the Rowley Properties site under Alternative 2 would result in an increase in GHG emissions when compared to existing conditions due to the increase in building density and site population. However, this increase in emissions would be lower than Alternative 1. **Table 3.7-2** provides a summary of the potential estimated GHG emissions that could result from construction and operation of development under the Alternative 2 – 80/20 land use mix and the Alternative 2 – 60/40 land use mix.

New development under the Alternative 2 80/20 land use mix would result in an estimated total of 4,579,562 MTCO<sub>2</sub>e in lifespan GHG emissions, which equates to approximately 70,541 MTCO<sub>2</sub>e annually. A majority of the emissions would be from residential and office development on the site. The 60/40 land use mix would result in an estimated total of 4,649,153 MTCO<sub>2</sub>e in lifespan GHG emissions, which would equal approximately 68,391 MTCO<sub>2</sub>e annually (see **Appendix B** for the SEPA GHG Emissions spreadsheet for Alternative 2).

Alternative 2 would result in an increase in GHG emissions when compared to existing conditions, similar to any major development. However, as described under Alternative 1, these calculations have not taken into consideration any potential efforts to reduce GHG emissions or the carbon footprint of development (i.e. the pedestrian oriented mixed-use nature of the proposed development would reduce vehicular trips). As a result, per person GHG emissions would be expected to be less than under existing conditions/suburban development.

As described under Alternative 1, sustainability measures and concepts would be identified in the Development Agreement (i.e. through adoption of the framework for “One Planet Living”) that could reduce the project’s GHG emissions and carbon footprint.

## Energy

New development on the Rowley Properties site under Alternative 2 would utilize similar energy sources to those described under Alternative 1. Development under Alternative 2 would result in an increase in energy usage levels when compared to the existing conditions; however, the increase in energy usage would be lower than Alternative 1 due to lower density development on the site. LEED building techniques and other energy conservation measures could be incorporated into the final development that would lower the energy demands associated with site development. Alternative sources of energy could also be utilized over the lifetime of the project that could reduce the demand for electricity and natural gas.

## **No Action Alternative**

### No Action Alternative – Existing Zoning

#### *Air Quality*

Construction-related air quality impacts under the No Action - Existing Zoning sub-alternative are identified in the DEIS and would be lower than Alternatives 1 and 2 due to the lower redevelopment levels for the site. Subsequent to construction activities, operational emissions would represent an increase over existing conditions; however, they would be lower than Alternatives 1 and 2 due to the lower amount of redevelopment on the site and fewer associated vehicle trips.

#### *Greenhouse Gas Emissions*

Redevelopment under the No Action - Existing Zoning sub-alternative is assumed to provide substantially less redevelopment on the Rowley Properties site when compared to Alternative 1 (approximately 1.7 million square feet of commercial development compared to approximately 4.3 million square feet of mixed-uses respectively) and would therefore result in lower GHG emissions. However, the GHG emission levels under this sub-alternative would still represent an increase over existing conditions. **Table 3.7-2** provides a summary of the potential estimated GHG emissions that could result from the No Action - Existing Zoning sub-alternative.

Development under the No Action - Existing Zoning sub-alternative would result in an estimated total of 2,293,887 MTCO<sub>2</sub>e in lifespan GHG emissions, which equates to approximately 36,702 MTCO<sub>2</sub>e annually (see **Appendix B** for the SEPA GHG Emissions spreadsheet for No Action - Existing Zoning). The No Action- Existing Zoning sub-alternative would result in an increase in estimated total GHG emissions when compared to existing conditions, although less than Alternatives 1 and 2. As described under Alternative 1, these calculations have not taken into consideration any potential efforts to reduce GHG emissions or the carbon footprint of development, even though these measures could be incorporated into the final development. However, per person GHG emissions could be higher than Alternatives 1 and 2 due to the fact that the Existing Zoning sub-alternative would not provide the same level of mixed-use, pedestrian-oriented development that would reduce vehicle trips.

## *Energy*

New development on the Rowley Properties site under the No Action - Existing Zoning sub-alternative would utilize similar energy sources to those described under Alternative 1. Development under this sub-alternative would result in an increase in energy usage levels when compared to the existing conditions; however, the increase in energy usage would be lower than Alternative 1 and 2 due to lower density development on the site.

### No Action Alternative – Existing Conditions

#### *Air Quality*

Construction-related air quality impacts under the No Action - Existing Conditions sub-alternative are identified in the DEIS and would be lower than Alternatives 1 and 2 due to the lower redevelopment levels for the site. Operational emissions would represent an increase over existing conditions; however, they would be lower than Alternatives 1 and 2 due to the lower amount of redevelopment on the site and fewer associated vehicle trips.

#### *Greenhouse Gas Emissions*

Redevelopment under No Action - Existing Conditions is assumed to provide the least amount of redevelopment on the Rowley Properties site and would therefore result in the lowest amount of GHG emissions. However, the GHG emission levels under this sub-alternative would still represent an increase over existing conditions. **Table 3.7-2** provides a summary of the potential estimated GHG emissions that could result from the No Action - Existing Conditions sub-alternative.

Development under the Existing Condition sub-alternative would result in an estimated total of 1,158,548 MTCO<sub>2</sub>e in lifespan GHG emissions, which equates to approximately 18,537 MTCO<sub>2</sub>e annually (see **Appendix B** for the SEPA GHG Emissions spreadsheet for No Action - Existing Conditions).

The No Action Existing Condition sub-alternative would result in an increase in GHG emission when compared to the existing conditions on the Rowley Properties site; however, it would be less than Alternatives 1 and 2. As described under Alternative 1, these calculations have not taken into consideration any potential efforts to reduce GHG emissions or the carbon footprint of development, even though these measures could be incorporated into the Hyla Crossing MSP portion of the site. However, per person GHG emissions could be higher than Alternatives 1 and 2 due to the fact that the Existing Condition sub-alternative would not provide the same level of mixed-use, pedestrian-oriented development that would reduce vehicle trips.

## *Energy*

New development on the Rowley Properties site under the No Action - Existing Condition sub-alternative would utilize similar energy sources to those described under Alternative 1. Development under this sub-alternative would result in an increase in energy usage levels when compared to the existing conditions; however, the increase in energy usage would be lower than Alternative 1 and 2 due to lower density development on the site.

### **3.7.3 Mitigation Measures**

The following mitigation measures would address potential air quality during operation of the project and GHG emission impacts that would result from the Hyla Crossing and Rowley Center Project. See DEIS Section 3.6.3 and **Table 1-2** in this FEIS for mitigation measures to address potential air quality impacts during construction activities.

#### **Mitigation Measures Required by Code, Laws and Regulations**

- Emissions related to building operations will be required to meet all applicable standards, including Puget Sound Clean Air Agency (PSCAA) regulations.
- Implement a Transportation Management Plan for the Rowley Properties site to help to reduce vehicle trips and associated vehicle emissions.

#### **Mitigation Measures Proposed by the Applicant**

- Create a pedestrian-oriented mixed-use neighborhood, which encourages non-motorized transportation and results in fewer vehicle trips to and from the site, thereby reducing GHG emissions.
- Implement the following as part of the Development Agreement, to demonstrate the commitment to sustainability:
  - The sustainability field is a dynamic influence on the development community and one that is rapidly evolving;
  - The Hyla Crossing and Rowley Center Project will address the three constituent parts of sustainability: environmental, economic and sociopolitical;
  - A voluntary approach to sustainability will be adopted, which will allow the flexibility to seize opportunities and grow its outreach over time; and,
  - A continued dialogue will be maintained during the development process that will allow for the City and the applicant to exchange information that will benefit the project and the community.
- Incorporate the framework established in “One Planet Living” as part of the Development Agreement to provide guidance for the project and a comprehensive approach towards sustainability.

#### **Other Possible Mitigation Measures**

- Development could incorporate LEED or other low-impact/sustainable design features into the design of proposed buildings on the site to reduce the demand for energy and reduce the amount of GHG emissions. Such features have not been identified at this time, but could include architectural design features; sustainable building materials; use of energy efficient products; natural drainage/green roof features; use of native plants in landscaping; and/or, other design features.

### **3.7.4      Significant Unavoidable Adverse Impacts**

With implementation of the required/proposed mitigation measures, significant impacts on air quality during operation of the project would not be anticipated.

Redevelopment of the Rowley Properties site would result in an increase in GHG emissions and demand for energy relative to existing conditions, similar to any major development. Scientific research and analysis tools sufficient to determine a numerical threshold of significant impacts for GHG emissions and energy use are not available at this time. The proposed redevelopment would include features that would reduce GHG emissions and climate change impacts (i.e. the pedestrian oriented, mixed-use nature of the proposed development would reduce vehicular trips). As a result, per person GHG emissions would be expected to be less than under existing conditions/suburban development.

# **COMMENT LETTERS and RESPONSES**

## **CHAPTER 4**

### **COMMENT LETTERS AND RESPONSES**

This chapter of the Final EIS (FEIS) contains comments received on the Draft EIS (DEIS) and responses to the comments. A total of 11 letters were received during the comment period (see below for a list of the comment letters). Each letter is included in this section of the FEIS. Comment letters/numbers appear in the margins of the letters and are cross-referenced to the corresponding responses. Responses are provided directly after each letter. Expressions of opinions, subjective statements and positions for or against the Proposed Actions and EIS Alternatives are acknowledged without further comments.

The following comment letters were received on the Hyla Crossing and Rowley Center DEIS:

- Letter 1** Federal Highway Administration
- Letter 2** King County Wastewater Treatment Division
- Letter 3** King County Metro Transit
- Letter 4** Muckleshoot Indian Tribe – Fisheries Division
- Letter 5** Issaquah Environmental Council
- Letter 6** River and Streams Board
- Letter 7** Issaquah Alps Trails Club
- Letter 8** Overlake Management Company
- Letter 9** Laile Di Silvestro
- Letter 10** Barbara Extract
- Letter 11** Janet Wall

**Letter 1**

**From:** Pete.Jilek@dot.gov  
**Sent:** Friday, September 09, 2011 10:14 AM  
**To:** Peter Rosen  
**Subject:** Hyla Crossing and Rowley Center Project DEIS

Mr. Rosen:

Thank you for the chance to review the DEIS for the above project.

Any alternatives chosen for this project which would impact the Right of Way for I-90, including access breaks, air space leases, drainage issues, etc. need to be discussed with FHWA. This includes any alternatives which would allow pedestrian crossings in the area of limited access. | 1

Please keep me informed as this project progresses if any of these issues arise.

Respectfully,  
Pete

*Pete Jilek, P.E.*

Federal Highway Administration  
Urban Area Engineer  
Phone: 360-753-9550  
Fax: 360-753-9889

## **RESPONSE TO LETTER 1**

### Federal Highway Administration

1. Comment noted. The Federal Highway Administration (FHWA) would be consulted if any development associated with the Hyla Crossing and Rowley Center Project could potentially impact the Interstate-90 (I-90) right-of-way. The applicant's Preferred Alternative described in this FEIS (see **Chapter 2**) proposes no new pedestrian crossings in the area of limited access. However, any utility construction that would occur within the I-90 right-of-way would require approval by Washington State Department of Transportation (WSDOT) and the FHWA. The potential stormwater pipe alignment and more specific construction considerations associated with Stormwater Management Scenario 2 would be examined further in a separate SEPA review process, if that scenario is selected. The City of Issaquah would coordinate with FHWA and other state and federal agencies during the individual construction permit processes for the proposed project in order to keep all stakeholders informed.



**King County**

**Wastewater Treatment Division**  
Community Services and Environmental Planning  
King Street Center, KSC-NR-0505  
201 South Jackson Street  
Seattle, WA 98104-3855

*Sent via email 9/26/2011*

September 26, 2011

Peter Rosen  
Issaquah Planning Department  
PO Box 1307

Dear Mr. Rosen:

The King County Wastewater Treatment Division has reviewed the **DEIS notice for the Hyla Crossing and Rowley Center Project**. Please submit construction drawings for the project to our Asset Management section for review during design development so that King County staff can assess project impacts. Please send drawings to:

Todd Keithahn, Local Public Agency Administrator  
King County WTD Asset Management  
201 South Jackson Street, KSC-NR-0508  
Seattle, WA 98104-3855

Thank you for the opportunity to review and comment on this proposal.

Sincerely,

*hschafer*

Hillary Schafer  
Water Quality Planner  
Community Services and Environmental Planning

cc: Todd Keithahn, Local Public Agency Administrator, Engineering & Asset Management

Attachment

## **RESPONSE TO LETTER 2**

### King County Wastewater Treatment Division

1. Comment noted. During design development for the Hyla Crossing and Rowley Center Project, the King County Wastewater Treatment Division would be sent construction drawings for review.

**Letter 3**

**From:** Kriedt, Gary [Gary.Kriedt@kingcounty.gov]  
**Sent:** Tuesday, September 13, 2011 1:05 PM  
**To:** Peter Rosen  
**Cc:** Hahn, LG; Arrowsmith, Jim  
**Subject:** KC Metro Transit Comments on Hyla Crossing & Rowley Center Project DEIS

Hi -- King County Metro Transit staff reviewed the Hyla Crossing and Rowley Center Project DEIS, and we have the following comments. | 1  
Metro has bus stops and bus service on NW Gilman Blvd., 12th Ave. NW, and at the Issaquah Park-and-Ride. Because bus stop and routing opportunities are limited in the area, please ensure that future development plans for the Hyla and Rowley sites include bus stops and service in their current approximate locations. Please provide us with future plans for review when available. Thank you for the opportunity to comment on this DEIS.

**Gary Kriedt, Senior Environmental Planner**  
Metro Transit  
201 South Jackson St., MS KSC-TR-0431  
Seattle, WA 98104-3856  
(206) 684-1166 cell: (206) 818-8647  
[gary.kriedt@kingcounty.gov](mailto:gary.kriedt@kingcounty.gov)

## **RESPONSE TO LETTER 3**

### **King County Metro Transit**

1. As noted in this comment, King County Metro Transit operates bus service in the site vicinity, with stops on NW Gilman Boulevard and 12<sup>th</sup> Avenue NW, and provides extensive service at the Issaquah Park-and-Ride lot. DEIS page 3.5-27 indicates that the applicant intends that future development plans for the Hyla Crossing and Rowley Center Project would maintain transit stops in approximately their current locations. Two new public streets are proposed through the Rowley Center Area that would intersect NW Gilman Boulevard. The alignment of these new streets would be determined in coordination with the City of Issaquah, and one of them would likely be signalized in the future. If these streets affect the location of existing transit stops, the applicant and the City would coordinate future transit service options and any requested changes with King County Metro Transit. No changes to the site access locations are proposed on 12<sup>th</sup> Avenue NW.



**MUCKLESHOOT INDIAN TRIBE**  
**Fisheries Division**

39015 - 172<sup>nd</sup> Avenue SE • Auburn, Washington 98092-9763  
 Phone: (253) 939-3311 • Fax: (253) 931-0752



September 28, 2011

Peter Rosen  
 Environmental Planner  
 Issaquah Planning Department  
 P.O. Box 1307  
 Issaquah, WA 98027

**RE: Hyla Crossing and Rowley Center Project, Draft Environmental Impact Statement**

Dear Mr. Rosen:

The Muckleshoot Indian Tribe Fisheries Division has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed 59-acre Hyla and 19-acre Rowley Center areas redevelopment within the Tibbetts Creek basin area of Issaquah. As noted in our scoping comments, the Muckleshoot Indian Tribe and the Washington Department of Fisheries have been working to restore coho salmon runs by planting adult coho in Tibbetts Creek since 1997. The preferred alternative should be consistent with this and other region-wide efforts to protect and improve salmon runs, and their habitat and address stormwater impacts to the fullest extent possible. We request that our comments and recommendations for this project be incorporated into the Master Drainage Plan and Development Agreement as follows.

Both action Alternatives 1 and 2 have the potential to improve stormwater and water quality over existing conditions since they would implement the most current stormwater standards compared to the No Action alternatives. Both Alternatives 1 and 2 discuss two stormwater scenarios that could be implemented. Of these two scenarios, we recommend that Scenario 2, discharging stormwater to Lake Sammamish, be pursued with a modification that treats **all** project generated stormwater using **enhanced** water quality treatment and the Sensitive Lake Protection standard. | 1

As part of Scenario 2, the DEIS indicates that clean rooftop runoff would be directly discharged to Tibbetts Creek and Tributary 08.0170 at pre-development peak flow rates. We are concerned that there will be zinc and potentially copper in the rooftop materials that would not be treated with this approach. Using enhanced water quality treatment for all project generated runoff will provide increased treatment of metals generated from the project areas that are known to be detrimental to fish. Several pollutants are expected from rooftops, roadways, and driveways, including but not limited to copper, zinc and PAHs, all of which are toxic to salmonids ([http://www.fish4thefuture.com/pdfs/Copper\\_Abstracts.pdf](http://www.fish4thefuture.com/pdfs/Copper_Abstracts.pdf); Meador et al., 2006). Recent research has found that levels of copper as low as 2µg/l can cause sublethal effects on coho and other salmonids. Low levels of copper concentrations can impair both sensory physiology and predator avoidance in salmon ([http://www.fish4thefuture.com/pdfs/Copper\\_Abstracts.pdf](http://www.fish4thefuture.com/pdfs/Copper_Abstracts.pdf)). | 2

The project areas also should maximize source control of phosphorous and treatment of phosphorous to minimize nutrient inputs to Lake Sammamish that contribute to low dissolved oxygen levels documented in the Lake and other adverse effects on the aquatic ecosystem and salmonids. Since 1996, there has been a concerted effort to control phosphorous and stop the eutrophication process in Lake Sammamish that established in-lake goals for phosphorous and chlorophyll-a concentration. Per available water quality data, over the last ten years, two years have exceeded phosphorus in 2004 and 2006 and seven have exceeded chlorophyll-a goals from 1999 to 2006. <http://green.kingcounty.gov/lakes/LakeSammamish.aspx>

3

The lake environment may challenge kokanee and other salmonids' survival during the summer months. Lake Sammamish stratifies beginning in May through October. During the summer months, the upper 10 meters warm to above optimal temperatures, while the lower 5-10 meters falls below suitable dissolved oxygen levels that are suitable for salmonids. There is concern that these conditions force kokanee (and potentially other salmonids) into a narrow area in the water column making them more susceptible to predation or reduce access to food sources. <http://your.kingcounty.gov/dnrp/library/water-and-land/salmon/kokanee/hdr-lk-sammamish-kokanee-report-012109.pdf>.

4

The redevelopment project cannot be allowed to contribute to making these conditions in Lake Sammamish worse. Enhanced stormwater treatment, source control, education and other mitigation measures discussed below should all be required mitigation measures regardless of the alternatives/scenarios chosen.

5

Along with our recommendation to pursue Stormwater Management Scenario 2 (discharge to Lake Sammamish), we also recommend that the deep offshore outfall with diffuser (Option 3) be used as the conveyance approach to discharge stormwater to Lake Sammamish.

6

Additional mitigation measures beyond those described in Section 3.2.3 should be incorporated into the development agreement as follows:

7

- Low impact techniques should be incorporated to the fullest extent possible.
- Operational (nonstructural) source control best management practices (BMPs) should be required for this project to minimize copper and zinc loads and other pollutants expected from roadways, driveways, and rooftops into surface water, ground water, and wetlands. Galvanized metals should be avoided in housing construction, fences, and stormwater facilities in order to reduce the input of zinc in runoff. Roofing materials that minimize copper and zinc loads should be used.
- High- efficiency street sweeping should be used on a periodic schedule to reduce toxic metals exported from roadways to the stormwater system.
- Oil/water separators should be placed upstream of pretreatment and treatment structures and as close to oil sources as possible, and maintained on a frequent basis.

- Educational materials should be required and distributed to facility managers and homeowners about minimizing the use of pesticides, moss-control chemicals, and fertilizers on rooftops, lawns and gardens and available alternatives that protect fish and other aquatic life.
- Development agreement conditions should require that future water supply needs for the project areas for all uses be obtained from the Cascade Water Alliance and not new groundwater sources. Furthermore, any irrigation or domestic wells in the project area, including those on individual lots, should be prohibited. Finally, any existing wells should be abandoned and recorded with the Washington Department of Ecology.
- Any future trail crossing of Tibbetts Creek should be minimized and located in an area where it will have the least impact on existing or future riparian conditions (i.e. areas where the buffer is narrow due to existing development).
- The northern end of 19<sup>th</sup> Avenue NW to be converted to a pedestrian connection and service alley should be reconstructed using pervious materials to allow treatment and infiltration.

We appreciate the opportunity to review the DEIS and request an opportunity to review the Master Drainage Plan and Development Agreements prior to approval to ensure that our concerns are addressed. Please let me know if you have any questions.

Sincerely,



Karen Walter  
Watersheds and Land Use Team Leader

#### References

HDR Engineering, Inc. Lake Sammamish Late Run Kokanee Synthesis Report. *Prepared for the Lake Sammamish Kokanee Work Group*. Seattle, WA. January 21, 2009. 38p

[http://www.fish4thefuture.com/pdfs/Copper\\_Abstracts.pdf](http://www.fish4thefuture.com/pdfs/Copper_Abstracts.pdf)). Copper: Adverse Impacts on Salmonids. Scientific Abstracts and References. Compiled by: C. A. Woody, Fisheries Research and Consulting. Anchorage, AK.

Meador, J.P., F. C. Sommers, G.M. Ylitalo, and C. A. Sloan. 2006. Altered growth and related physiological responses in juvenile Chinook salmon (*Oncorhynchus tshawytscha*) from dietary exposure to polycyclic aromatic hydrocarbons (PAHs). *Can. J. Fish. Aquat. Sci.* 63(10): 2364-2376.

## RESPONSE TO LETTER 4

### Muckleshoot Indian Tribe – Fisheries Division

1. Comment noted. Stormwater treatment described for Stormwater Management Scenario 2 – Direct Discharge would comply with City, County, and State standards. Sensitive Lake Protection is proposed through the use of a media filter approved by Washington State Department of Ecology (Ecology) for phosphorous treatment, as summarized on DEIS page 3.1-13, and further described on page 3.24 of DEIS Appendix D. The goal of this treatment menu is 50 percent removal of annual average total phosphorous. Enhanced basic (metals) treatment is not proposed under Scenario 2, based on Sensitive Lake Water Quality (WQ) Treatment Areas Exception #6 in the City of Issaquah's *2009 Addendum to the 2009 King County Surface Water Design Manual* (Issaquah Addendum), on page 1-66. This exception states, "The Enhanced Basic WQ menu as specified above for commercial land uses may be waived if leachable metals (e.g., galvanized metals) are not used in areas exposed to the weather and a covenant is recorded that prohibits future such use of leachable metals on the site." The following "Proposed by Applicant" mitigation measure has been added to **Table 1-2** in this FEIS:

*Leachable metals (i.e. copper and galvanized metals) will not be used in areas exposed to weather, and a covenant will be recorded prohibiting future use of leachable metals onsite in order to preserve water quality. As a result, enhanced water quality treatment will not be required.*

For Scenario 2, Exception #5 in the Issaquah Addendum waives the requirement to provide enhanced basic treatment for direct discharges to Lake Sammamish. Per the Issaquah Addendum, Lake Sammamish is listed as a "major receiving water" on page 1-3, where the following note is made: "Major receiving waters are also considered safe for application of Basic WQ treatment in place of otherwise required Enhanced Basic WQ treatment (see Section 1.2.8.1)." This exemption is noted on page 1-62 as well, where the Issaquah Addendum states the following:

*The Enhanced Basic WQ menu is intended to apply to all such **project sites** that drain by surface flows to a fish-bearing stream. However, projects that drain entirely by pipe to the **major receiving waters** listed on page 1-30 are excused from the increased treatment and may revert to the Basic WQ menu because concentration effects are of less concern as the overall flow volume increases.*

Because of these allowed waivers of enhanced basic treatment requirements, enhanced basic treatment would not be included in the project under Scenario 2. Similarly-worded exemptions exist in the *2009 King County Surface Water Design Manual*.

2. Under Stormwater Management Scenarios 1 and 2, copper and galvanized roofs and other leachable materials would be restricted (see the response to Comment 1 in this letter). Rooftops would be treated to prevent leaching, as required by City code, and described on page 1-4 of the Issaquah Addendum. Further improvements to water quality could be made with additional water quality treatment. As such, the following new "Other Possible" mitigation measure has been added to **Table 1-2** in this FEIS:

Additional water quality treatment could be provided, including through the use of filter media, water quality swales or created wetlands, and/or stormwater infiltration, to further improve water quality.

3. Under Stormwater Management Scenarios 1 and 2, phosphorous loading would be minimized through the development and implementation of a landscape management plan, which would place agreed-upon limits on the type and quantity of fertilizers, pesticides, and solids used, as well as their places of use, as mentioned on DEIS page 3.1-22. As noted on page 2-19 of the Issaquah Addendum, “Approved landscape management plans are allowed to be used as an alternative to the requirement to formally treat (with a facility) the runoff from pollution generating pervious surfaces subject to Core Requirement #8 (see Section 1.2.8). A landscape management plan is a City approved plan for defining the layout and long-term maintenance of landscaping features to minimize the use of pesticides and fertilizers, and reduce the discharge of suspended solids and other pollutants.” Additionally, Low Impact Development (LID) would be used to the maximum extent feasible to provide biological uptake and filtration of any additional phosphorous or pesticides, as mentioned on DEIS page 3.1-22 and page 33 of Appendix D to the DEIS. Finally, runoff from pollutant generating impervious surfaces would receive Sensitive Lake Treatment, which has an annual average total phosphorous removal goal of 50 percent, as mentioned on DEIS page 3.1-10.
4. Comment noted.
5. Comment noted. See the responses to Comments 1 and 2 in this letter.
6. Comment noted.
7. As a clarification, stormwater management under Alternatives 1 and 2 would result in net water quality improvements relative to existing conditions rather than impacts. Several of the mitigation measures recommended in this comment have either already been proposed or are required by code; those required by code are identified in this FEIS as “Required by Code, Laws, and Regulations” or noted accordingly below. Other of the mitigation measures recommended in this comment could be beneficial, but would not be required as mitigation to reduce impacts to non-significant levels; these have been identified in **Table 1-2** in this FEIS as “Other Possible Mitigation Measures”. Responses to each of the suggested mitigation measures are provided below:
  - DEIS page 3.1-22 and **Table 1-2** in this FEIS indicate that LID techniques could be incorporated into the redevelopment to the maximum extent feasible, and that actual LID features would be determined through the Master Drainage Plan that will be contained in the Development Agreement.
  - Metals source control will be implemented as noted in the response to Comment 1 of this letter.
  - Street sweeping would be implemented based on City standards, as part of the NPDES permit.

- Oil/water separators will be placed at high oil areas and the separators will be maintained as required by Special Requirements #4 and #5 and Conveyance Requirement #4 of the Issaquah Addendum.
- Mitigation measure bullet 5 on DEIS page 3.1-21 references a landscape management plan. This mitigation has been updated as follows in **Table 1-2** in this FEIS:

*Develop and implement a landscape management plan to minimize the impacts of landscape chemicals on water quality. The management plan will include education and outreach for the on-site grounds-keeping staff.*

- Per the City's *Comprehensive Water Plan*, all new water supply needs for the city will be obtained from Cascade Water Alliance instead of new groundwater sources. The Development Agreement will include a provision indicating that future wells will be prohibited and existing wells abandoned onsite. The following new mitigation measure regarding groundwater protection has been added to **Table 1-2** in this FEIS:

*The Development Agreement will include a provision indicating that future wells will be prohibited and any existing wells abandoned onsite in order to protect groundwater resources.*

- DEIS page 3.2-34 and **Table 1-2** in this FEIS state that proposed trails will be located to avoid sensitive habitat areas as much as possible, and the trail through wetlands will include elevated boardwalks with footbridge crossings of the stream.

The following new mitigation measure has been added to Table 1-2 in this FEIS:

*Trails through buffers will be constructed with pervious materials, and the trail (boardwalk) through wetlands will be located at the narrowest crossing points.*



# ISSAQUAH ENVIRONMENTAL COUNCIL

September 29, 2011

Dear Peter Rosen,

Thank you for the opportunity to comment on the Rowley DEIS. This is an important document, that is likely to set the tone for how the entire Central Issaquah Plan(CIP) is reviewed. The DEIS says that the Rowley Development will be a demonstration project to inform the CIP, so it is imperative to set clear standards here that can be broadly used for other developments. It is with this extra cautious eye that we reviewed this DEIS.

Our most general comment is that this Draft EIS is needlessly redundant which has led to substantial variations in information chapter to chapter. There is also no single area where all impacts and required or voluntary mitigations are housed. Please reduce the duplication and create one area, preferably a chart, with impacts and mitigations.

Our next comments do not cite a particular page because they are referenced in many (in our opinion too many) areas of the Draft EIS.

1. The EIS envelope. It is vital that a clear envelope of development options is created by the EIS. This draft needs to clarify the development parameters. It is unclear whether the total development area is allocated/restricted into each neighborhood by the Alternatives or if all of the allowed development is “free floating.” Please make this very clear. 1
2. The DEIS covers 20 years while the Development Agreement is for 30 years at this point. This situation places the DA immediately outside of the “envelope” as the 10 years of impacts have not been studied. This would indicate an immediate need for further SEPA review to cover those final 10 years. 2
3. The intent of this Project is to vest in most current code. Please address the consequences of vesting in current code for 20 years and how the impacts from this decision will be mitigated. 3
4. The Development Agreement and the Planned Action Ordinance are being called “mitigation” when they are future documents that will describe code. Code is not mitigation. Future documents do not exist and cannot attribute action to avoid, minimize or mitigate impacts from a project, so any place where that terminology is used is inadequate for the purpose of this EIS. Please revise the DEIS to describe the necessary actions to ensure the fewest possible impacts with this development as is required by SEPA. These actions or requirements would then be used to create the DA and the Planned Action Ordinance. 4
5. The Hyla Master Site Plan is used as the baseline for both Alternative 3s. This Plan was negotiated including all component parts; trips, critical area improvements etc. The plan may be included in its entirety or excluded in its entirety, but not used in part. For example the auto trips are included yet the movement of Tibbetts Creek and 100ft buffers plus conditions in the Hyla Crossing MSP are not. 5

6. The transportation chapter is showing a system failure that is exacerbated by the RPI development if the trips are not mitigated. The DEIS describes potential mitigation but commits to none, leaving the unmitigated impacts unacceptable and the DEIS inadequate. Please commit to mitigation that would bring the impacts of transportation to an acceptable level. (Please note that the impacts shown already include significantly reduced trips for mixed-use development.) | 7
7. There is no road connection to Newport Way included in the plan covered by this DEIS. basically creating a large cul-de-sac in the Hyla Crossing Site and increasing the congestion on SR 900. Please include a connection in the model as a proposed mitigation improvement to avoid creating a large cul-de-sac in the Hyla Crossing area with all access off of SR900. | 8
8. There is no Master Drainage Plan included in the DEIS, though it is cited as mitigation often, as if it exists. (See number 4 for action requested.) | 9
9. There is a stormwater addendum currently going through the City as an underpinning of the Central Issaquah Plan (CIP). This, when approved by Council as it shows all signs of doing, will be a 2011 addendum to the 2009 stormwater permit. Another stormwater change is likely to be complete by the end of the year, best described as calling soils saturated rather than forested. Please add a spectrum of stormwater options into the EIS that describe three options: current code, expected new code and piping to the lake. These options should describe land required, water quality/quality comparisons and impacts to aquatic resources, plus any mitigations necessary for their creation. This information is necessary to inform chapters such as Land Use and Aesthetics, as different land requirements are likely to change the massing of buildings and the potential density in neighborhoods. | 10
10. There is an error in the description of alternatives chart 2.3 that describes no housing in the Alternative 3 options, when an area that covers nearly 1/3 of the Rowley Center Parcel is zoned "Retail", which encourages multifamily housing per code. Please include the amount of housing that can be included in the Alternative 3 options per code, including TDR potential. | 11
11. There is little consistency in comparison of impacts. Sometimes the alternatives are compared to one another, other times to existing conditions (meaning right now) only and even occasionally compared to the recommendations of the CIP draft plan for future development. Alternative 3 does not include an existing condition/existing condition option. Please compare the impacts consistently and provide tables whenever possible to show those comparisons. One missing table, as an example, is a table showing the amount of creek buffer, wetland buffer and flood enhancement area for all of the alternatives. | 12
12. The creek buffer obligations from the Hyla Master Site Plan are not being upheld by use of the map in Figure 16 alone. The entire creek and buffer obligation also includes the written conditions in the Hyla MSP decision, the Tibbetts Creek Greenway Restoration Project with its corresponding EIS that includes project reach #3. The map shows that 19<sup>th</sup> is a trail in both side view and the map itself. Please either use all of the conditions as a base for redevelopment or clearly show the impacts of the 90% buffer reduction proposed from the historic requirements. | 13
13. Further the critical area buffers that are proposed do not meet the SEPA requirements to protect critical area functions. | 14
14. This same obligation to turn 19<sup>th</sup> into a trail in the Tibbetts Creek Greenway Restoration Plan removes the argument of 19<sup>th</sup> being road ROW that creates the edge to a wetland buffer for wetland C which per best available science requires 100 ft buffer. While clearly a 5-10ft buffer does not provide an acceptable buffer per SEPA rendering the analysis and conclusion of no impact inadequate, it is also helpful to | 15

understand that the City Code language does not support this narrowed buffer as trails do no create a buffer edge.

15. There is no discussion of timing for the development and its corresponding impacts and mitigations. Please create timing linkages that require mitigation to be provided simultaneously or prior to the impact. Without a timing commitment the EIS is inadequate. | 16
16. Interim uses and their potential impacts are not addressed nor are criteria for a mechanism to avoid, minimize, mitigate or accept their impacts presented. Without this information impacts from interim uses remain unaddressed and the EIS is inadequate. | 17
17. While all of the alternatives (except existing condition for Rowley in Alt 3) propose structured parking and seemingly zero surface parking there is no discussion of this commitment in the parking area under transportation. Please include a discussion of how, when and where structured parking will be located. | 18
18. Temporary impacts are not appropriately addressed. When looking at a 20 year re-development period, where virtually all construction annoyances will have significant impact, a very considered plan must be created. Are temporary stormwater ponds really temporary when they are in place for 20 years? Please provide a plan of action w/avoidance, mitigation and monitoring measures that address these impacts | 19
19. There has been no discussion of the potential impacts to the aquifer from many pilings potentially being placed to secure tall buildings. Please provide. | 20
20. Terminology needs to be defined and timing and responsibilities for improvements determined. So far in this DEIS, would, shall, should, could, phasing, are not enforceable because actions cannot be identified nor is the language provided to require sufficient mitigations. | 21
21. There is no numbering system included in the DEIS for easy direction to paragraphs, please create some sort of structure that will allow the DEIS to used efficiently as a tool in the development. | 22

As stated in number 21 above there is little in wayfinding in the DEIS. This makes specific comments extraordinarily difficult to provide. Given the time constraints of a 30 day review we have groomed through this document a minimum of 4 times attempting to provide full comment. Below we are providing a list of comments per chapter, including at least a page number for reference.

#### Introduction:

1. Pg 1-2 The proposed development would “decrease” the amount of community space, as Alt 3 provides 31 acres and Alt 1 & 2 provide 16.8 acres. This information is misstated many times in this document (within the comparison chart pg 1-14 for example.) Please change and address the impacts of the reduction and the mitigation that will be provided. (The language indicating that additional land could be provided is not a committed mitigation and cannot be considered an offset to the reduced community space.)Please remove or commit to as a mitigation. | 23
2. Pg 1-3 The No Action Alternative-Existing Zoning summary does not include the residential development that is encouraged within the retail zone on the Rowley Center property. The language in Chapter 2 does indicate that residential is allowed. How much residential is never addressed in any area of the document. Please provide this information and place in document consistently as the comparison provided to understand the mixed-use component is currently incorrect, thus inadequate. | 24

3. Pg 1-5 This chart titled Impact Summary Table includes impacts, required mitigations and potential mitigations in its description of impacts. Please provide the impacts of the projects ONLY in one column. If you would like to add the mitigations in two new columns (committed mitigation and voluntary mitigation) that would be an excellent idea. | 25
4. Pg 1-8 Alt 3 does have a trail allocated through the buffer of the proposed Greenway and actually a creek crossing. Please correct. | 26
5. Pg 1-9 Alt 1 & 2 are actually reducing the buffer required in the Hyla Master Site Plan, please address those impacts here. | 27
6. Pg 1-9 Alt 3 existing conditions. The Enhancements to the Greenway would be that of Alt 3 current zoning, not alternative 1. | 28
7. Pg 1-11 Enhancements to Tibbetts Creek are substantially different for Alts 1 & 2 than both 3s. The enhancement is greatly reduced in 1 & 2, not providing the 100 ft buffer or moving the creek offsite to provide the 100 ft buffer but instead reducing the buffer to 50 feet in one area and 10 ft in others. Please address those impacts. | 29
8. Pg 1-16 Construction related activity for Alt 1&2. Construction impacts will be associated with all facets of construction, not just demolition & earthworks. | 30
9. Pg 1-16 Alternative 3 existing zoning is showing fewer trips than Alt 3 existing conditions. Please verify. | 31
10. Pg 1-17 Please include information on the internalization, reduced trips assumptions put in the model for alternative 1 & 2. Please also indicate that the model was only run for the Alt 1 80/20 and Alt 2 60/40. This is significant information and needs to be in the summary section. | 32
11. Pg 1-21 1.5 Mitigation Measures: Proposed mitigation measures and possible mitigation measures are defined, then not used. Or the language within the committed mitigation has a modifier like “to the extent possible” that refutes the commitment. Please clearly label actual committed mitigation. | 33
12. Pg 1-21 Would. Please define the term would. Would when exactly? | 34
13. Pg 1-22 Low Impact Development techniques. RPI consistently said they would use all LID techniques possible to utilize water on site. Now this is showing as a possible mitigation. Please require. | 35
14. Pg 1-2 Reduction of stream buffer to adhere to Exhibit 16. Problems with this have been addressed prior, but in this paragraph there is also a statement that alternative buffer and setback requirements could be established by the DA. More restrictive requirements could be provided, but less restrictive could not as that would be outside of the impacts studied. Please remove or clarify. | 36
15. Pg 1-28 Existing vegetated buffers...this is an impact rather than mitigation as it is allowed buffers less than code to be retained. Please remove to impact table and create mitigation for the impacts. | 37
16. Pg 1-24 Addition green space could be provided is a possible mitigation and needs to be moved to that section. The final sentence indicating that the green space provided meets or exceeds existing conditions is not true and should be removed. (The definitions and discussion of green space, shared space and community space is indecipherable throughout the document...so who really knows what is being committed to in that entire segment.) | 38
17. Pg 1-24 Landscaping with native species. Again the DA is used in combination with as possible. This is another example of a required mitigation that is not required. | 39
18. Pg 1-25 No significant impacts. This is not the case as both Alts 1 & 2 using figure 16 significantly reduce the stream buffer for Tibbetts Creek below requirement of best available science with no mitigation to offset those impacts. Further, code required | 40

wetland buffers will not be provided with no mitigation proposed to offset those impacts.	
19. Pg 1-25 A substantial portion...this is not a definable mitigation. Please define substantial and create criteria for what this looks like, or includes.	41
20. Pg 1-27 Lighting standards could be developed. This is such an extreme glimpse of what has made this DEIS difficult that it has to be pointed out. Why would these standards be voluntary? Ex. "All streets could be well lit for safety and security purposes...." A similar voluntary mitigation makes hazardous waste clean up voluntary. Please require standards for mitigations to be included in the DA. Code requirements are not mitigations and should not be included in the committed mitigation area.	42
21. Pg 1-27 Impacts from Aesthetics...This is not the first time that aesthetics have been addressed in EISs in Issaquah. Other EISs have required screening, color, landscaping and architectural requirements to mitigate impacts. There are literally no mitigations required in this section for the inclusion of 200 ft buildings and a conclusion that the impacts are in the eye of the viewer. Please provide a list of requirements to mitigate the visual impacts from a variety of view points and ensure the best possible end result. The lack of mitigation requirements makes the Aesthetics section of the EIS inadequate.	43
22. 1-28 Light impacts. There will be light impacts. They are unavoidable. Please indicate accepted unmitigated impacts.	44
23. 1-29 Off-site Intersection Improvements. What is a potential mitigation strategy? Is that a commitment? Are there any transportation mitigation commitments whatsoever?	45
24. 1-30 Site Access Improvements. "the following access improvements are expected to be required..." Please clarify to read "the following access improvements are required...", as it is not clear whether those improvements are required.	46
25. 1-31 Non-Motorized Facility Improvements. Where are those design features described and required in the DEIS please?	47
26. 1-31 Freight. Please create criteria to advise the requirements for building applications.	48
27. 1-32 Trip Goals and Monitoring. The traffic model was run assuming substantial internal trips because of the potential creation of a mixed-use development. The model run should show the total impacts of raw traffic, then provide for committed mitigation as trips are created in localized areas first and reach out to the more citywide spots as trips increase. If the internalization, transit and pedestrian uses are realized then these required mitigations will be unnecessary. Do not use the reduced trip model run to generate the trip mitigation requirements.	49
28. 1-31 The language regarding thresholds would be provided in the Final EIS, with no public review that actually responds to public input. These thresholds and the mitigation plan that is going to happen to offset traffic impacts needs the public review provided in SEPA and should have been part of the DEIS. Example: "A Master Transportation Finance Plan will be created that will provide for the following mitigation: (then provide the mitigation plan)."	50
29. 1-31 Change the word "could" to "shall" in the sentence starting with "monitoring" and you have the beginning of a mitigation/monitoring plan. But without this commitment the Transportation chapter has no particular plan to offset impacts to the transportation system other than the creation of new road segments and the chapter is inadequate. Please provide the mitigation plan.	51

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| 30. 1-31.1 Baseline trip generations are good, but this would be done to monitor the actual trips generated by the uses to date and help to judge how many trips are being taken off the road by mixed use.   | 52 |
| 31. 1-34 Significant Unavoidable Adverse Impacts. As no offsite mitigations have been committed to in this document the impacts must be accepted here for all the traffic failures generated by the trips less those mitigations provided by Hyla MSP and the Maple LID. Or actually commit to a mitigation plan.   | 53 |
| 32. 1-36 Other Possible Air Quality Mitigation. These two measures should clearly be commitments. The construction plan should include tenants of RPI.  | 54 |
| 33. 1-36 Other Possible Noise Mitigations Measures. It is unclear when/why these mitigations would be provided. Is there a commitment to on site noise monitoring that would then trigger further mitigation if noise is too high? Is it triggered by complaints regardless of actual noise monitoring? Please provide a mechanism for increased noise control. This should also include notification to tenants if construction will be outside of code hours. | 55 |
| 34. No information on visual impacts for construction, especially bare land for years at a time. Please provide commitments to reduce visual impacts by providing landscaping if land is cleared for more than 1 year.  | 56 |
| 35. 1-36 Significant Unavoidable Adverse Impacts. Given a 20 year timeline and heavy construction the conclusion that there are no significant construction-related impacts is simply untrue. Please accept the impacts or commit to provisions to avoid, minimize or mitigate those impacts. Currently there is only a suggestion list.  | 57 |

Alternatives:

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| 1. Pg 2-21 Residential Uses. “An array of housing choices “could”, this sentence should say will be provided, or it should say that the housing choices will be entirely market driven, then describe a density spectrum that is allowed. Low rise townhomes are very low density and thought should be given to their inclusion, especially when looking at the “no parking for residential” discussion further in the document.  | 58 |
| 2. Pg 2-21 Landscaping. There is no criteria or requirements provided to create this vision in the DA. Please provide. Without the criteria or requirements the EIS does not adequately address impacts to landscaping.  | 59 |
| 3. Pg 2-22 Two new roadways.... Only one roadway is shown in the transportation section, as the second roadway requires property not owned by Rowley. Please clarify or remove second roadway.   | 60 |
| 4. Pg 2-22 All roadways have public access at all times, is a commitment and should be in the mitigation section.  | 61 |
| 5. Pg 2-22 Unclear on on-street parking as there is no surface parking in Table 3. Please provide information on parking definitions and show the street parking count if it is included.  | 62 |
| 6. Pg 2-27 Water Storage. What are the conditions for utilities in the Hyla MSP, please provide for all utilities. A table would be good to show that information.   | 63 |
| 7. Pg 2-30 Community Space. The community space concept is impossible to follow here with different elements included in different tables and descriptions throughout the document. The definitions are not what are in the CIP document at this point, nor what is in the DA. The assumption of detention ponds as green space is not in the CIP definition. Please create exacting criteria for each component and be consistent throughout the document. Please require consistent terminology in the DA, as the commitments delineated in the EIS will be impossible to track if the language changes. | 64 |

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| 8. Table 2-2 Community Space Summary. The table leaves out Alts 3 altogether and randomly includes the CIP task force recommendation. Please remove the task force recommendation and provide the Alts 3.  | 65 |
| 9. Pg 2-31 What is the definition of circulation area?   | 66 |
| 10. Pg 2-32 1-2 acres of Community Space on Rowley Center Site is a significant reduction from the 10 acres provided in Alt 3 existing zoning. Please include as an impact and provide mitigation.   | 67 |
| 11. Pg 2-34 A temporary stormwater pond could be in place for 20 years. Please provide design, landscaping and maintenance of pond requirements.   | 68 |
| 12. Pg 2-38 Significant surface parking could be necessary. The parking table shows no surface parking for this Alternative. Please be consistent.   | 69 |
| 13. Pgs 2-46 & 47 Benefits and Disadvantages of Deferring Implementation of the Proposal. This is an odd bit for an EIS, but it does provide the opportunity to comment on the reality of the difference between existing code and Urban Village zoning. The majority of the bullet points in 2.8 are not accurate. The clearly promotional tone of this DEIS in the face of the facts is inappropriate. An EIS is supposed to be a clear, brief description of impacts and how they will be avoided, mitigated or accepted.   | 70 |
| <ul style="list-style-type: none"> <li>A. Deferring does not remove impacts from the transportation network, as development can occur without this agreement.</li> <li>B. Similar to above, development can occur.</li> <li>C. Buildings can go to 85 ft w/TDR's so only the impacts between 85 and 200 feet would be removed.</li> <li>D. Development can occur, and to potentially an equal extent under the future CIP allowances.</li> <li>E. These impacts can be avoided in any case by creating appropriate buffers that support best available science and improving the treatment of water and ensure correct water quantities in the creeks, wetland and aquifer.</li> <li>F. It is obvious that buffers and building setbacks on Tibbetts Creek can be improved, not simply maintained in any development scenario.</li> <li>G. Mixed-use development can already be created on the Rowley Center Site and would be an easily negotiated change, given the trend that the CIP is providing. Trails, and community spaces are already included in current code, so they would not be given up.</li> <li>H. Current Code can support the Cascade Agenda, placing density in return for TDR, establishing mixed use, which is encouraged in the retail area of Rowley Center. Hyla Crossing would require zoning changes.</li> <li>I. The Rowley Center and Hyla would both be able to take advantage of the CIP changes and Rowley Center already has those components outside of 150ft-200ft buildings.</li> <li>J. Pedestrian experiences are encouraged in the language for both properties already and the community space is actually greater in existing zoning on both parcels.</li> <li>K. Local services and goods are already available within walking distance of Rowley Center. SR 900 is going to be a barrier in any situation.</li> <li>L. Potential Opportunity?? Means nothing. Please remove.</li> <li>M. Given the alternative of zero housing on the Rowley Center Site this assumption cannot be supported.</li> </ul> |    |

## Water Resources:

1. Table 3.1-1 Please include Alternatives 3 & 3. It is impossible to understand the comparison with the use of an undefined “No Action Alternative” | 71
2. Figure 3.1-2 The proposed 2011 amendment to the 2009 stormwater manual is not allowing sand filters. This is an FYI as that is a future document. | 72
3. Pg 3.1-13 The stormwater permit does not allow the dewatering of Tibbetts Creek please clarify how the creek will not be dewatered. | 73
4. Pg 3.1-15 Please provide necessary criteria to mitigate impacts to be incorporated into a future landscape maintenance plan. This needs to include criteria for interim uses, lower densities and the higher densities as they all have “appropriate” looks and a single concept does not work everywhere. | 74

## Critical Areas:

1. As a general comment on all of the critical area impacts. The entire chapter spends time discussing how things are going to be made better than existing conditions. What is not discussed are the different impacts that are created for the different alternatives. Each map needs to show the buffers for the wetlands and separately for the creek per each alternative. This will create an easy visual for comparison. Please also create a table that compares these areas in acreage or square footage. Then discuss what the impacts will be given the buffers provided for the corresponding development options, what is being done to avoid those impacts, what mitigations will be required and when. Then finally, please describe the impacts that will be accepted. As this chapter currently stands the information is inadequate to ascertain any concept of how our critical areas are going to be protected as required by best available science. | 75
2. Maps “*This conceptual plan is drawn on aerial base for illustration purposes only. All graphic elements are not-to-scale and are estimated only.*” Please provide maps that are of a scale of 1” to 100ft and provide critical area information to scale, so that an accurate analysis is provided. The use of estimates makes this section inadequate. | 76
3. Vegetation: There is no analysis of vegetation removal. For example, how many trees will be taken, how many will be planted? What are the impacts of vegetation removal? How will they be tracked? How does the replanting plan adhere to the City standards for tree retention and the comprehensive plan guidance for a tree canopy? | 77
4. Pg 3.2-15 Existing wetland buffers A, B, E, F, G, H, I and J will be maintained in non-conforming standard. Please describe the impacts of maintaining non-conforming buffers, especially in A which is on site and could have conforming buffers through this redevelopment and any of the other wetlands that connected to expansion parcels. Improvements should be provided in these wetland buffers whenever possible. This section is inadequate without the impacts shown, or avoidance, minimization and mitigation provided. | 78
5. Pg 3.2-17 Smaller stream buffer widths... Please explain how narrow buffer widths are appropriate with high density development or commit to low density uses near reduced buffer areas. | 79
6. Pg 3.2-19 The paragraph beginning “Annual average summer...” Makes no sense, please clarify. | 80
7. Pg 3.2-19 Is this page attempting to address reduced base flows in the summer? Please provide information on the impacts of the potential for reduced base flows and commitments to offset those impacts, or clearly accept those impacts. | 81

Land Use:

1. Pg 3.3-2 Swedish is no longer there and the bridge is open. | 82
2. Pg 3.3-2 The Mull property is former farm land with residential that has recently had tried to develop and is owned by the bank. | 83
3. Figure 3.3-3 Please create a hard line around the Hyla Center Properties. | 84
4. Pg 3.3-10 ...tower structures on the site would be space a minimum of 110 feet from each other. This is a commitment and should be included on the mitigation pages. | 85
5. Pg 3.3-12 Please identify the uses of the businesses within the buildings that would be removed, how the removal would impact those businesses, what mitigation will be provided or what impacts will be accepted. | 86
6. Pg 3.3-13 Transition in land use pattern. Please include Table 2.3 in this chapter as it will make the information easier to comprehend. | 87
7. Pg 3.3-18 Clearly housing can already be provided on the Rowley Site given existing zoning. Please explain why there would be a choice allowed in the DEIS alternative for zero housing on the Rowley Site. This would not create a mixed used development, nor fulfill the vision of the CIP. Either change the alternative or provide a convincing argument for including zero residential. | 88
8. Pg 3.3-19 Area east of Rowley. How is there a general similarity? What does that mean. What are the criteria for judging appropriate land use proximity? What are the impacts for inappropriate placement of buildings or uses? How will that be avoided, minimized, mitigated or accepted as an impact? Several other EIS document have clearly stated what appropriate adjacent uses are and are not. Please provide in this document. | 89

Transportation:

1. Figure 3.5-3 Map of existing and planned future non-motorize facilities. This map is unlike the more detailed map in Figure 2.5. | 90
2. 3.5-28 Non-Motorized Facilities. This paragraph seems to be a mitigation commitment for traffic impacts and should be translated into the summary mitigation page...and a map created for this section that includes those items. (Does this list match Figure 2.5?) | 91
3. 3.5-29 Parking Impacts. The Parking requirements are significantly lower than existing code without providing any discussion of impacts or rational for the reduced parking, plus the 10-15% reduction per neighborhood. Please provide. | 92

This DEIS is very long but does not, in most areas, provide adequate impact analysis with information to understand what the end point impacts will be. In order to get the best change of a successful project for Issaquah, these deficiencies must be addressed.

Sincerely,

Connie Marsh  
President, Issaquah Environmental Council  
P.O. Box 921  
Issaquah, WA 98027

## **RESPONSE TO LETTER 5**

### Issaquah Environmental Council

1. Comment noted. Chapter 1 of the DEIS provides an Impacts Summary Table (Table 1-1) that compares the potential impacts of EIS Alternatives 1 - 3; that chapter of the DEIS also includes a list of mitigation measures and significant unavoidable adverse impacts. The table and list are included and updated in this FEIS (see **Tables 1-1** and **1-2**)
2. The DEIS identifies the maximum amount of the redevelopment that could occur on the Rowley Properties site under Alternatives 1 – 3 (see DEIS Table 2-3 for a summary of redevelopment under the EIS alternatives); redevelopment is allocated between the Hyla Crossing and the Rowley Center Areas. Proposed redevelopment is not assigned to particular redevelopment areas onsite at this point due to the fact that specific redevelopment plans for the site have not been developed and in order to maintain flexibility for future redevelopment to respond to changing economic and market conditions over the extended build-out period. DEIS Figure 2-3 presents the conceptual redevelopment plan for Alternatives 1 and 2. The conceptual redevelopment areas shown on this figure, numbered 1 through 13 in the Hyla Crossing Area, and A through K in the Rowley Center Area, indicate the areas where redevelopment could occur.
3. As indicated on DEIS page 2-32, *“redevelopment is analyzed for the 2030 time period which is assumed to represent full buildout. The actual buildout period could vary depending on specific economic and market conditions”*. As indicated above, for purposes of environmental analysis, the EIS assumes full buildout in 2030, but indicates that the actual timeframe for redevelopment could occur over a longer time period. The EIS assumes 2030 for several reasons: 1) 2030 corresponds with the City of Issaquah’s current Comprehensive Plan; 2) This year also corresponds with the City’s transportation model, which includes year 2030 traffic estimates; and, 3) Build-out of the project in 2030 reflects a relatively aggressive schedule for site redevelopment, providing a conservative worst-case redevelopment scenario for environmental review purposes. If redevelopment of the site were to occur over a longer timeframe than assumed in the EIS, environmental impacts would be similar to or less than those assumed in the DEIS and this FEIS, and redevelopment over a longer timeframe would be adequately addressed for SEPA purposes by the Hyla Crossing and Rowley Center EIS.

Additionally, the Hyla Crossing and Rowley Center Development Agreement is primarily linked to development and traffic levels rather than future years, and references to a 30-year redevelopment period are primarily descriptive.

4. In accordance with the state Development Agreement Statute, RCW 36.70B.170(4), the applicant proposes to vest to the project elements and development standards in the Development Agreement that is expected to be implemented between the applicant and the City. All applications submitted after adoption of the Agreement (i.e. for land use approvals, entitlements and permits which would implement the project) would be governed by the vested development standards for the term of the Agreement. These applications would include any permits for grading, site development, building, infrastructure, and other approvals.

During the term of the Development Agreement, the City would not modify or impose new or additional development standards, except:

- To the extent the Development Agreement does not establish project-specific development standards, the project would be governed by the City codes and standards in effect upon the date of adoption of the Development Agreement. However, all applications would conform to the most current versions of the International Building Code, and Uniform Fire Code and similar construction codes, as adopted by the City.
- Per the Development Agreement Statute, the City could impose new or different development standards to prevent a serious threat to public health and safety.

See the response to Comment 3 in this letter regarding the buildout date assumed in the DEIS and this FEIS.

5. Key provisions of the Washington State Environmental Policy Act (SEPA) are to:

- Consider environmental information (impacts, alternatives, and mitigation) before committing to a particular course of action<sup>1</sup>;
- Identify and evaluate probable impacts, alternatives, and mitigation measures, emphasizing important environmental impacts and alternatives<sup>2</sup>;
- Encourage public involvement in the process<sup>3</sup>
- Integrate SEPA with existing agency planning and licensing procedures, so that the procedures run concurrently rather than consecutively<sup>4</sup>.

Consistent with the purposes and procedures of SEPA, the Hyla Crossing and Rowley Center DEIS analyzed the environmental conditions for the elements of the environment initially identified by the City of Issaquah (SEPA Lead Agency) and refined based on the public scoping process conducted from December 1, 2010 to December 21, 2010. The elements of the environment analyzed in this EIS include: Water Resources, Critical Areas/Plants and Animals, Land and Shoreline Use/Relationship to Plans and Policies, Aesthetics/Views, Transportation and Traffic, Construction Impacts and Air Quality/Greenhouse Gas Emissions.

The Hyla Crossing and Rowley Center DEIS describes the existing conditions, analyzes the potential for environmental impacts, identifies mitigation measures to address identified impacts, and identifies any significant unavoidable adverse impacts for each element of the environment. The detailed analysis of existing conditions, potential environmental impacts, mitigation measures, and significant unavoidable adverse impacts is contained in Chapter 3 of the DEIS (based on the technical analyses in the DEIS appendices), with a summary provided in Chapter 1 of the DEIS.

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<sup>1</sup> WAC 197-11-055(2)(c)

<sup>2</sup> WAC 197-11-030(2)(b)

<sup>3</sup> WAC 197-11-030(2)(f)

<sup>4</sup> WAC 197-11-030(2)(e)

Consistent with the provisions of SEPA, the Hyla Crossing and Rowley Center EIS is being prepared concurrently with the Development Agreement anticipated to be adopted between the City of Issaquah and the applicant. The Development Agreement will include agreements on a variety of topics including: Goals, Design Guidelines, Level of Allowable Development (including building height), and Environmental Mitigation. The information contained in the Development Agreement will be consistent with the EIS. For example, the level of Allowable Development portion of the Development Agreement will be consistent with the level of development assumed for the Preferred Alternative and will be within the range of alternatives analyzed in the DEIS. The Environmental Mitigation portion of the Development Agreement will incorporate and build upon the mitigation measures identified in the DEIS. The development assumptions (including levels of density and building heights) and mitigation measures identified in the DEIS provide the intent and overall parameters, with specific implementation regulations to be spelled out in the Development Agreement. For example, a mitigation measure identified in the DEIS related to Aesthetics indicates that *"..... The Development Agreement would identify implementing land use regulations for the site which would include regulations related to building height"*. The Development Agreement would thus provide specific regulations for building height consistent with the building height scenarios analyzed in the DEIS and specified for the Preferred Alternative in this FEIS.

In summary, the mitigation measures identified in this EIS provide the overall intent and the parameters within which implementation regulations will be defined in the Development Agreement.

6. As noted in this comment, both of the No Action sub-alternatives analyzed in the DEIS assume completion of the Hyla Crossing Master Site Plan (MSP) in the Hyla Crossing Area of the site.

It is confirmed that the transportation analysis took into account the previously-approved PM peak hour trips identified in the July 1993 Mitigation Agreement for the Hyla Crossing and Rowley Center Areas (previously approved MSP).

The No Action sub-alternative assumptions include critical area improvements from the Hyla Crossing MSP. As indicated on DEIS page 3.2-22, no fill of wetlands or relocation of streams would occur onsite under the No Action sub-alternatives. Both sub-alternatives would preserve the already restored stream sections and associated wetlands in the Tibbetts Creek Greenway. Per the Hyla Crossing MSP, the southernmost expansion of the Tibbetts Creek floodplain and stream corridor enhancement would be completed with the No Action sub-alternatives. The No Action sub-alternatives do not include relocation of Tibbetts Creek on the adjacent Mull Property, as the applicant does not own this property. Relocation of this portion of the creek may or may not occur during redevelopment of the site.

DEIS Figures 3.2-3 and 3.2-4 show the required and proposed stream and wetland buffers on and adjacent to the site with redevelopment under the No Action sub-alternatives. Like Alternatives 1 and 2, the No Action sub-alternatives assume that the Hyla Crossing MSP stream buffer and 15-foot building setback from Tibbetts Creek depicted on Exhibit 16 in the approved Hyla Crossing MSP would be maintained (see the discussion of Hyla Crossing approval conditions relative to critical area buffers on DEIS page 3.2-8). This buffer would be less than the most restrictive interpretation of the original Hyla Crossing MSP condition (requiring a 100-foot buffer and 15-foot

building setback) in certain areas of the Greenway. If and when the creek is relocated on the Mull Property, the majority of the creek buffer onsite would be 100 feet wide or greater.

7. As described in the DEIS Section 3.5, Transportation, and DEIS Appendix H, there are numerous intersections and roadways that would require mitigation with the proposed redevelopment, according to the City of Issaquah's regulations. For nearly all of these, one or more potential mitigation measures were identified in the DEIS. The identified mitigation measures were described as 'potential', because all improvements to City roadways and intersections must be approved by the City. In some cases, identified mitigation measures may not be desirable to the City of Issaquah due to other environmental constraints, or preferences to retain the non-motorized or existing character of City roadways and intersections.

For this FEIS, the City of Issaquah reviewed the potential mitigation measures identified for the applicant's Preferred Alternative and determined which would be required. Extensive transportation mitigation in the form of traffic impact fees, near-site roadway and intersection improvements, off-site intersection improvements, and "pay-in-lieu-of" contributions will be required by the City of Issaquah for the Preferred Alternative. The mitigation package will mitigate the impacts of the proposed development as required by the State Environmental Policy Act (SEPA) and the City of Issaquah. The applicant is committed to providing the required mitigation as presented in this FEIS (see **Table 1-2**) and incorporated into the Master Transportation Finance Agreement (MTFA) with the City.

8. The DEIS evaluated a potential connection between SR-900 and Newport Way at Maple Street. This connection was identified by the City of Issaquah in its *2011-2016 Transportation Improvement Program* and may consist of a four-lane bridge over Tibbetts Creek. This connection was not considered as part of the future background conditions for the EIS alternatives analysis, due to potential environmental issues and feasibility constraints associated with the project. However, the DEIS did provide a separate supplemental analysis of this potential connection reflecting conditions with Alternative 1 (see DEIS page 3.5-24).

The applicant has not proposed any connections to Newport Way through its properties, and such a connection is not included in the "Proposed by Applicant" mitigation measures.

9. It is acknowledged that a Master Drainage Plan (MDP) was not provided in the DEIS. However, a Stormwater Management Analysis Report was included in that document (see DEIS Appendix D) and summarized in Section 3.1, Water Resources, of the DEIS. As indicated in **Table 1-2** of this FEIS, an MDP that is consistent with guidelines described in the *King County Master Drainage Planning for Large or Complex Site Development*, per the City of Issaquah's *2009 Addendum to the 2009 King County Surface Water Design Manual* will be included in the Development Agreement.
10. The EIS alternatives and the corresponding stormwater management scenarios evaluated in the DEIS represent the options deemed feasible within the current regulatory framework. The Conventional Detention and Direct Discharge to lake scenarios are Stormwater Management Scenarios 1 and 2, respectively. Both Scenarios 1 and 2 are allowed under current code. Scenario 1 is a more traditional solution.

Scenario 2, the direct discharge scenario, is allowed under current code as well, as described in Section 1.1.7.5 and 1.2.8.1 in DEIS Appendix D (also see the response to Comment 1 in Letter 4). Scenario 0 corresponds to the No Action – Existing Zoning sub-alternative, as described on DEIS page 3.1-7, and includes stormwater management per the current code, and per the 1998 code under the approved Hyla Crossing MSP. The new code referenced in this comment was not approved at the time the DEIS was prepared; as a result, a stormwater control system designed in accordance with a draft code would not be in compliance with City, County, or State regulations, as noted on DEIS page 3.1-7. For this reason, it was not evaluated as a potential stormwater management scenario in the DEIS. A discussion of the impacts of the various stormwater management scenarios begins on DEIS page 3.1-6.

Subsequent to the issuance of the DEIS, the City of Issaquah adopted the *2011 City of Issaquah Addendum to the 2009 King County Surface Water Design Manual* (October 17, 2011). Stormwater management for the Hyla Crossing and Rowley Center Project will be further addressed in the Master Drainage Plan (MDP) of the Development Agreement and through the further environmental review under SEPA that will be required prior to issuance of any applicable permits and approvals for the conveyance system and outfall.

11. It is acknowledged that DEIS page 1-26 and 3.3-27 include an inadvertent error, indicating that the existing zoning of the site would not allow residential development. This error has been corrected in **Chapter 5 Errata** and **Table 1.2** of this FEIS.

As described on DEIS pages 2-17, 3.3-6 and 3.3-46, the zoning classification of the northern portion of the Rowley Center Area (south of Gilman Boulevard) is Retail (R). Per IMC Section 18.06.110, the primary purpose of the R zoning classification is to provide retail services for the local service area, including banks, professional offices, personal services, auto services, restaurants and department stores; multifamily residential is also permitted to promote proximity of jobs to housing and mixed-use development.

It is acknowledged that multifamily uses could be developed in this area, in accordance with the R zoning classification. However, the No Action, Existing Zoning alternative analyzed in the DEIS was intended to represent the primary purpose of the R zone in this area of the site, which is to provide retail services to the local service area. This alternative also represents what the applicant would develop in this area of the site if the site were to remain in its existing R zoning: retail services.

A September 2008 assessment prepared for the Central Issaquah Sub-area by Heartland (a real estate consulting firm) determined that at this time it would not be economically viable to develop multifamily housing in this area under existing zoning, given that residential density in the R zoning classification is limited by the impervious surface ratio, height limits, setbacks, parking requirements, etc. The Heartland assessment supported the general vision for redevelopment of the sub-area as higher density, vertically mixed-use development that is pedestrian and transit-oriented in nature. Accomplishing this vision would require a change in zoning. As such, the No Action, Existing Zoning Alternative assumed retail service uses for this R-zoned area of the site.

The No Action, Existing Conditions alternative is intended to represent the continuation of existing uses in the R-zoned portion of the Rowley Center Area. Currently, only retail and office uses are present in this portion of the site; there are no multifamily uses (see DEIS Figure 2-2). As such, retail service uses were assumed for this area under this alternative.

In conclusion, no changes in assumptions for the No Action Alternatives were determined to be necessary for this FEIS.

12. The State Environmental Policy Act (SEPA) does not prescribe one particular way to present impact analyses in an EIS, and in fact gives the lead agency “wide latitude” on how to format the document (WAC 197-11-430(3)). SEPA directs that an EIS should, “Present a comparison of the environmental impacts of the reasonable alternatives, and include the no action alternative” (WAC 197-11-440(5)(vi)). As such, the comparison of impacts under the EIS alternatives is a key component of the Hyla Crossing and Rowley Center DEIS.

Under each element of the environment in DEIS Chapter 3, the impacts of Alternatives 1 and 2 are presented and compared to existing conditions and each other; the impacts under the No Action Alternative are then compared to Alternatives 1 and 2. In certain instances, comparisons are also made to the draft Central Issaquah Sub-Area Plan, given that the proposal is intended to be consistent with this plan. However, the comparisons to the Sub-area Plan are limited, because the plan is still in draft form.

Alternative 3, No Action analyzed in the DEIS is intended to represent what could reasonably occur onsite if the Proposed Actions were not approved (see DEIS page 1-1 for a list of the Proposed Actions). The No Action Alternative assumes that the site would remain in its existing zoning (Intensive Commercial and Retail) and that some level of development would occur onsite over the assumed approximately 20-year build-out period. This approach is supported by Section 3.3.2.1 of the SEPA Handbook, which indicates that if a rezone is proposed (as is the case with the Hyla Crossing and Rowley Center Project), the most likely development under existing zoning may be assumed for the No Action Alternative. The two No Action sub-alternatives evaluated in the DEIS are: 1) No Action, Existing Zoning – redevelopment onsite under existing zoning together with build-out of the previously approved Hyla Crossing MSP, and 2) No Action, Existing Conditions - continuation of existing conditions together with build-out of the previously approved Hyla Crossing MSP (see DEIS Section 2.6 for a complete description of these alternatives). As stated in Section 3.3.2.1 of the SEPA Handbook, since the SEPA Rules do not define what the no action alternative must look like, the lead agency has some discretion in its design.

The Affected Environment sections under each element of the environment in DEIS Chapter 3 contain a description of existing conditions on and in the vicinity of the site, without development under the existing zoning or the approved Hyla Crossing MSP.

13. The applicant intends to uphold the stream buffer as shown on Exhibit 16 in the approved Hyla Crossing MSP. DEIS page 3.2-7 paraphrases the condition for the stream buffer and also states that Exhibit 16 portrays “a stream setback line subsequent to the relocation of Tibbetts Creek.”

The applicant proposes to complete the southern floodplain expansion as part of the Hyla Crossing and Rowley Center Project. At some point in the redevelopment, the northern relocation of Tibbetts Creek may occur on the Mull property to the west of the Hyla Crossing Area. Following this relocation, the stream buffer at the northern end of the Hyla Crossing Area would be approximately 100 feet wide, as would the majority of the stream buffer on-site (see DEIS page 3.2-15). As explained in that section, there would remain an approximately 400-foot long section where the stream buffer would remain at an approximately 25- to 30-foot buffer width bordering the existing forested wetland where the stream was not and is not proposed to be relocated to avoid disturbance and preserve the more valuable wetland area.

Based on language on DEIS Appendix F page 28, the following new “Proposed by Applicant” mitigation measure has been added to **Table 1-2** in this FEIS

Along with expansion, enhancement, and other improvements to the northernmost buffer section near Poplar Way, portions of the existing buffer adjacent to Tibbetts Creek that are currently less than 10 feet wide will be increased to an average of 10 feet wide and re-vegetated, and, portions of the existing buffer that are currently approximately 10 feet wide will be maintained at an average width of 10 feet as an interim measure until the creek is relocated onto the adjacent Mull property. See **Table 3.2-1** and **Figure 3.2-1** for details on existing and proposed stream buffer widths.

While these actions would not result in the buffer width required in the City’s current Critical Areas Ordinance (CAO), they would result in an improvement over the existing conditions (see Figures 5 and 6 in DEIS Appendix F).

Also as shown on Figures 6 and 7 in DEIS Appendix F, the approximate stream buffer per Exhibit 16 (red) and the required stream buffer per the Issaquah CAO (blue) would correspond closely in the southern end of the Tibbetts Creek Greenway after removing existing impervious surface, widening the floodplain, and enhancing the stream corridor. Differences are due to the slight migration of the Tibbetts Creek Ordinary High Water Mark (OHWM) over the last decade and graphic discrepancies related to mapping records and scale limitation of these figures.

It is also expected that enhancement design for the south-end floodplain expansion area would include creation of floodplain wetlands as an integral part of increasing riparian functions. This would result in the presence of high quality streamside wetlands similar to those already completed in the Rowley Reach of the Tibbetts Creek Greenway.

14. Existing buffers would not be reduced and would be increased and restored in some sections of the Tibbetts Creek Greenway, as described on DEIS pages 3.2-14 and 3.2-15, and in **Chapter 3** of this FEIS. Maintaining the status quo can be considered neutral, not an impact. It is also important to consider the proposal within the context of redevelopment of an already developed area as opposed to new development of a natural or open space area.
15. As stated on DEIS page 3.2-15, access to the Metro sewer line and limited access on 19<sup>th</sup> Avenue NW would be maintained. This section of 19<sup>th</sup> Avenue NW would become a pedestrian connection and service alley with proposed redevelopment (see DEIS page 3.2-33). The service alley would be used to provide fire trucks and aid vehicles access

to the back sides of the buildings. As such, this could still be considered a “road right-of-way or similar infrastructure” and the edge of the improved right-of-way is proposed to become the wetland buffer, per IMC 18.10.650.A.2. There are also provisions in the City of Issaquah’s CAO that address circumstances specific to redevelopment of an already developed area, such as: exemptions for existing structures and non-conforming activities, exceptions for previously established buffers, and buffer reduction with removal of impervious surfaces.

As shown in DEIS Appendix F Figure 1, much of the Wetland C area was previously an RV storage parking lot that was removed for stream restoration. Figure 3 in DEIS Appendix F page 7 shows a comparison of pre- and post-restoration wetland area. DEIS Appendix F page 15 explains that wetland creation was not a primary goal of the Tibbetts Greenway Plan or mitigation for any action, but rather a restoration design element to enhance fish and wildlife habitat functions, flood conveyance, and storage. The Greenway could have been designed without creation of wetlands, but this element was included to improve the overall function and value of the stream corridor. This was a voluntary restoration action by Rowley Properties, Inc. A stream buffer was prescribed as part of implementation of the Tibbetts Greenway; wetland buffers were not.

As stated on DEIS page 3.2-17, to reconcile best available science recommendations with existing conditions, the applicant has indicated that they would meet or exceed existing vegetated stream and wetland buffer widths throughout the site, and provide improvements to critical area functions at the northern and southern ends of the Tibbetts Greenway in the combined stream and wetland buffer areas.

DEIS Alternatives 1 and 2, as well as the applicant’s Preferred Alternative described in this FEIS, would result in net improvements to critical area functions, such as water quality, habitat quality, disturbance screening, habitat connectivity, bank stabilization, shade and temperature control, and large woody debris recruitment. While larger buffer widths recommended according to best available science could further increase these functions, they would not be required as mitigation and redevelopment proposals often include negotiated trade-offs in order to reach a conclusion of no net loss in function.

On DEIS page 3.2-26, it is stated that, “The increased activity and outdoor lighting associated with more dense urban development could result in long-term disturbance to more sensitive wildlife species.” Possible long-term impacts associated with increased human activity in the Greenway are also addressed on DEIS page 3.2-32 and Appendix F page 68, including possible development of informal trails and trampling of vegetation, more garbage and more noise. These impacts would be minimized by enhancing the proposed narrow buffer areas with a densely vegetated forest community and by identifying specific trail routes through the Greenway to focus use and minimize access to critical areas.

16. **Table 1-2** of this FEIS includes a breakdown of the timing for when mitigation measures would likely occur: “Prior to Construction”, “During Construction” and “During Operation”. These are considered general timeframes given the long-term, phased approach of this redevelopment. The specific timing for mitigation measures will be specified in the adopted Development Agreement.

17. A temporary stormwater management system would be provided under Alternatives 1 and 2 and could include temporary stormwater detention ponds; no other interim uses

are proposed as part of Hyla Crossing and Rowley Center Project. Temporary stormwater impacts would be addressed through the City's Temporary Erosion and Sediment Control (TESC) and Stormwater Pollution Prevention and Spill (SWPPS) plan standards and monitoring, as detailed in Sections 2.2.3 and 2.2.4 of the Issaquah Addendum (see DEIS page 3.1-8). Until the exact details and phasing of construction are known, TESC plans and SWPPS cannot be prepared. TESC plans and SWPPS are required for construction permit approval. Temporary ponds would be removed or converted to permanent ponds at the completion of each individually-permitted project, in accordance with City standards. Both the temporary and permanent systems would provide greater stormwater quantity and quality control than under existing conditions. It is anticipated that landscaping could be provided for visible portions of the temporary stormwater system to enhance the aesthetic character of the system.

As noted on DEIS page 2-35, as specific areas are redeveloped onsite, existing buildings not to be reused would be demolished and surrounding existing paved areas may also be removed, used as temporary parking and/or planted with vegetation or hydroseeded and maintained until such time as they are redeveloped.

18. At full build-out, the on-site parking provided as part of the Preferred Alternative would mostly be located in structures. In order to achieve the densities proposed for full build-out of the site, structured parking would be required. However, some on-street parking would also be provided along internal site access roadways. The on-street parking is proposed to serve some of the short-term retail demand and to help define the character of the access roadways. On-street parking has the benefits of calming traffic flows, reducing speeds, and enhancing pedestrian and non-motorized environments. It should be noted that prior to full build-out, some project phases would rely on surface parking. The exact amount and timing for on-street and interim phase surface parking would depend on market conditions and the types and quantities of development in each phase.
19. Temporary construction-related impacts are analyzed in DEIS Section 3.6. This section evaluates potential construction-related impacts associated with soils, geology and geologic hazards, air quality, noise, and land use. Mitigation measures for temporary construction-related impacts are included in this section, and have been included and updated in **Table 1-2** in this FEIS.

Temporary stormwater impacts would be addressed through the City's Temporary Erosion and Sediment Control (TESC) and Stormwater Pollution Prevention and Spill (SWPPS) plan standards and monitoring, as detailed in Sections 2.2.3 and 2.2.4 of the Issaquah Addendum (see the response to Comment 17 in this letter). Final acceptance of the redevelopment facilities would require construction of permanent stormwater facilities that meet City standards for water quality and flow control, as described in the Issaquah Addendum. Permanent ponds and other stormwater facilities must meet City standards for water quality treatment and flow control, except as modified by the Development Agreement. There have been and will be several opportunities for public comment on the Agreement (see the City of Issaquah's website for details on public meetings associated with the Agreement).

20. A discussion regarding the installation of foundation piles for support of high rise structures was provided in DEIS Appendix I. As discussed on DEIS Appendix I page 7 and summarized on DEIS page 3.6-6, there would be no long-term adverse

environmental impacts associated with the pile installations. Short-term impacts would include possible localized, elevated pH levels in the groundwater from fresh pile grout during construction. This impact would be localized and would quickly dissipate as the grout column cures and hardens.

21. **Table 1-2** in this FEIS lists the mitigation measures for the Hyla Crossing and Rowley Center Project as “Required by Code, Laws, and Regulations”, “Proposed by the Applicant” and “Other Possible”, and provides a breakdown of the timing of when the mitigation measures would likely occur as “Prior to Construction”, “During Construction”, and “During Operation”. Passive language in the mitigation measures has been changed to active language where more prescriptive mitigation will be required and proposed, and the term “will” has been incorporated into the measures for consistency and to better reflect condition language that is anticipated to be included in the Development Agreement. Also see the response to Comment 16 in this letter.
22. Comment noted. The DEIS is not be reprinted in its entirety in this FEIS. Therefore, this numbering suggestion has not been implemented.
23. DEIS page 1-2 compares the community space (green and shared space) under Alternative 1 to existing conditions, not to Alternative 3, No Action. Approximately 16.8 acres of proposed community space (community space which the applicant proposes to provide) would be provided onsite under Alternatives 1 and 2, versus the approximately 16.3 acres under existing conditions. Therefore, there would be a net gain of approximately 0.5 acre of community space under Alternatives 1 and 2 relative to existing conditions.  
  
Table 1-1 on DEIS page 1-14 presents the approximate acreage in community space under each of the EIS Alternatives. There would be less proposed community space under Alternatives 1 and 2 than under either of the No Action sub-alternatives. Given the conceptual nature of the development plans at this point, it is not possible to pinpoint the exact amount of community space that would be provided with proposed redevelopment. It is possible that approximately 9 to 13 acres of additional community space could be provided within the redevelopment areas and in the circulation areas/public realm onsite under Alternatives 1 and 2.
24. See the response to Comment 3 in this letter.
25. DEIS Table 1-1 summarizes the impacts associated with Alternatives 1 - 3. DEIS Section 1.5 identifies “Require/Proposed” and “Other Possible” mitigation measures, as well as significant unavoidable adverse impacts. **Table 1-1** of this FEIS includes updates to impacts associated with Alternatives 1 - 3. **Table 1-2** of this FEIS presents the mitigation measures for the Hyla Crossing and Rowley Center Project as “Required by Code, Laws, and Regulations”, “Proposed by the Applicant” and “Other Possible” and includes a breakdown of the timing for when these mitigation measures would likely occur as “Prior to Construction”, “During Construction” and “During Operation”.
26. As described on DEIS pages 2-41 and 2-42, Alternative 3 assumes the completion of redevelopment under the previously approved Hyla Crossing MSP. As part of the MSP, a pedestrian and bicycle trail would be provided along the western edge of the Hyla Crossing Area, within the Tibbetts Creek Greenway. Alternative 3 does not include any pedestrian crossings of Tibbetts Creek.

27. Comment noted. DEIS page 1-9 does not state that there would be a reduction of the stream buffer onsite with proposed redevelopment, per the approved Hyla Crossing MSP. DEIS page 3.2-15 and Appendix F to the DEIS provide discussions of critical area buffers under Alternatives 1 and 2. A mitigation is included on DEIS page 3.2-32 regarding the proposed stream buffer and building setback adjacent to Tibbetts Creek. This mitigation was not intended to imply that less restrictive stream buffers and building setbacks could be established in the Development Agreement, and the mitigation has been clarified in **Table 1-2** in this FEIS as follows:

*With redevelopment, the applicant proposes to provide a stream buffer and building setback adjacent to Tibbetts Creek consistent with Exhibit 16 to the approved Hyla Crossing MSP (see DEIS Appendix B for Exhibit 16). The stream buffer and building setback will be the same or greater than what is currently being provided onsite. The City and the applicant will consider including more restrictive stream buffer and building setback requirements in the Development Agreement, as appropriate.*

28. Under Alternative 3, existing vegetated areas in the Tibbetts Creek Greenway area would be expanded, similar to Alternatives 1 and 2.
29. DEIS Table 1-1 and **Table 1-1** in this FEIS indicate that enhancements to Tibbetts Creek would be similar under all of the EIS alternatives. This is shown on DEIS Figures 3.2-2, 3.2-3 and 3.2-4; enhancements to the Tibbetts Creek Greenway area are essentially the same on all figures.
30. As described in DEIS Section 3.5, Transportation, the most noticeable construction-related traffic impacts would likely occur during demolition of existing uses and major earthwork stages, because these activities typically occur in a condensed time period. Other construction-related traffic impacts could occur during large concrete pours when a continuous supply of concrete would be trucked to the site and from construction employees. The delivery of building materials/supplies would also result in traffic impacts, but would not typically arrive in fleet shipments like those required for earthwork and concrete.
31. As shown in DEIS Table 1-1, the trip generation calculations for Alternative 3 are correct. The fourth column of Table 1-1 provides information about the Alternative 3 No Action, Existing Condition sub-alternative. This No Action sub-alternative reflects the previously approved development and the number of trips that have been vested within the City of Issaquah's traffic concurrency and long-range planning models. The third column reflects the Alternative 3 No Action, Existing Zoning sub-alternative that presents a development scenario reflecting the existing zoning onsite. As was described on DEIS page 3.5-16, the number of trips associated with the previously-approved development are similar, but higher than the number of trips that would be generated by the Existing Zoning sub-alternative.
32. Extensive details regarding internal trips, mode-of-travel assumptions, and modeling methodologies are provided in DEIS Appendix H. A reference to that information has been added to **Table 1-1** of this FEIS.
33. See the response to Comment 21 in this letter.

34. See the response to Comment 21 in this letter.
35. As described on DEIS page 3.1-21, specific LID features have not been identified at this time and will be determined through the Master Drainage Plan (MDP); the MDP will be included in the Development Agreement. The applicant proposes to use the framework in “One Planet Living” to provide project guidance for sustainability in the Development Agreement. As described in **Chapter 3** of this FEIS, the principles for “One Planet Living” include using water more efficiently in buildings and in products we buy and tackling local flooding and water course pollution.
36. Comment noted. DEIS page 1-2 does not state that there would be a reduction of the stream buffer onsite with proposed redevelopment, per the approved Hyla Crossing MSP. DEIS page 3.2-15 and Appendix F to the DEIS provide discussions of critical area buffers under Alternatives 1 and 2. A mitigation is included on DEIS page 3.2-32 regarding the proposed stream buffer and building setback adjacent to Tibbetts Creek. This mitigation was not intended to imply that less restrictive stream buffers and building setbacks could be established in the Development Agreement. As such, this measure has been clarified in this FEIS in **Table 1-2** (see the response to Comment 27 in this letter).
37. See the response to Comment 14 in this letter.
38. As indicated in the mitigation measure referenced in this comment, approximately 12.9 acres of proposed green space would be provided onsite under Alternatives 1 and 2 (approximately 12.6 acres in the Hyla Crossing Area and approximately 0.3 acre in the Rowley Center Area). This is the green space that the applicant has proposed to provide onsite at this time. DEIS page 3.2-25 indicates that under Alternatives 1 and 2, there would be an increase in green space in the Hyla Crossing Area relative to existing conditions (from approximately 21 percent to 22 percent of this area), and a decrease in green space in the Rowley Center Area (from approximately 4 percent to 2 percent). The referenced mitigation measure notes that the applicant intends to provide green space onsite that would meet or exceed existing conditions.
39. Comment noted. As indicated in the response to Comment 5 in this letter, the DEIS describes the potential for environmental impacts and identifies mitigation measures to minimize the impacts. In certain cases, the mitigation measures identified in the DEIS provide the overall intent and/or parameter of the mitigation, with the specific implementation regulation defined in the Development Agreement. Thus, the mitigation measures identified in the DEIS are carried forward through the Development Agreement as implementation regulations.
- Please note that as indicated in **Chapter 1** of this FEIS, the wording of the mitigation measures in this FEIS have been updated to more closely reflect the wording anticipated to be included in the Development Agreement. The cited mitigation measure is now classified as a “Mitigation Measure Proposed by the Applicant”. See **Table 1-2** in this FEIS for the updated mitigation measures.
40. See the responses to Comments 14 and 36 in this letter. In addition, this comment states that no mitigation has been proposed. As indicated throughout the DEIS, improvements to the southern and northern ends of the Greenway would be completed

with the proposed redevelopment. Also, the applicant has already completed extensive improvements to Tibbetts Creek in the Rowley Reach (central portion) of the Greenway.

41. DEIS Table 2-2 identifies the amount of community space that would be provided in the Hyla Crossing and Rowley Center Areas under Alternatives 1 and 2. Approximately 16.8 acres of proposed community space would be provided onsite; approximately 15.8 acres in the Hyla Crossing Area and approximately 1.0 acre in the Rowley Center Area. An additional 4.7 to 11.0 acres of community space could be provided in the redevelopment areas and circulation/public realm in the Hyla Crossing Area. An additional 1.0 to 2.0 acres of community space could be provided in the redevelopment areas and circulation/public realm in the Rowley Center Area.
42. Comment noted. It is acknowledged that lighting standards would be developed for the Hyla Crossing and Rowley Center Project and the lighting standards would be incorporated into the Development Agreement; the provision of lighting standards would not be a “possible” or “voluntary” measure. The cited mitigation measure was listed as a possible measure in the DEIS due to the range of lighting design standards that are possible.

Please note that as indicated in **Chapter 1** of this FEIS, the text of the mitigating measures have been updated to more closely reflect the wording anticipated to be included in the Development Agreement. The cited mitigation measure is now classified as a “Mitigation Measure Proposed by the Applicant”. See **Table 1-2** in this Final EIS for the updated mitigation measures.

43. DEIS pages 3.4-97 and 3.4-98 contain several mitigation measures related to Aesthetics. These measures have been included and updated in **Table 1-2** in this FEIS. Chapter B of the Development Agreement will contain design guidelines that will be utilized for future redevelopment in the Hyla Crossing and Rowley Center Areas.
44. Potential light impacts are identified on page 3.4-95 of the DEIS and would include new light sources and an increase in light levels when compared to existing conditions on the site. “Required” and “Other Possible” mitigation measures are identified in the DEIS; these measures have been updated in **Table 1-2** in this FEIS. In addition, the presence of existing trees and forested area along the western and southern boundary of the Hyla Crossing Area would serve as buffers to limit light spillage onto adjacent properties. With implementation of the “Required by Code, Laws, and Regulations” mitigation measures identified in **Table 1-2**, significant lighting impacts would not be anticipated.
45. See the response to Comment 7 in this letter.
46. See the response to Comment 7 in this letter.
47. The proposed pedestrian and non-motorized transportation improvements are described on the DEIS page 3.5-28. A list of these improvements has been included in this FEIS in **Table 1-2**.
48. Loading docks will be addressed in the Parking Standards (Appendix F) of the Development Agreement. Not all buildings would have loading docks.

49. The transportation analyses and modeling were performed according to accepted standard practice for mixed-use developments outlined by the Institute of Transportation Engineers (ITE). ITE, as well as many other transportation planning and engineering organizations, such as: the Texas Transportation Institute (TTI), the Transportation Research Board (TRB), American Planning Association (APA), and the Urban Land Institute (ULI), have numerous publications recognizing the fact that mixed-use developments result in internalized trips. As such, this approach was used for the evaluation of the proposed Hyla Crossing and Rowley Center mixed-use development alternatives (Alternatives 1 and 2). The analyses also relied on long-range future transit and non-motorized mode share estimates derived from data provided by the Puget Sound Regional Council (PSRC), as described in Appendix H to the DEIS. It is possible that early phases of the development could be focused on a single land use (e.g. an initial phase where only residential or office uses are built). However, in those early phases even if no internal trips occur, the project would generate many fewer trips than evaluated in the DEIS at full build-out.
50. The mitigation plan, implementation thresholds, and other development mitigation requirements are described **Table 1-2** in this FEIS and have been incorporated into a Master Transportation Finance Agreement (MTFA) with the City. Both of these documents are and will continue to be subject to a public review process.
51. See the response to Comment 7 in this letter.
52. The initial “baseline” traffic monitoring effort would be used to document trips from existing uses. As these uses are removed and replaced with new uses, the trip generation models would be employed to track the cumulative trip generation for the new development. Subsequent site traffic counts (after 50 percent of the total trip generation has been reached) could be used to monitor the success of transportation and parking management plans and would reflect the levels of internal trips and relative reductions from non-automobile trips (transit and non-motorized).
53. See the response to Comment 7 of this letter.
54. Comment noted. This mitigation measures has been updated in the “Other Possible” mitigation measures in **Table 1-2** in this FEIS as follows:

*The applicant could work with adjacent property owners and remaining tenants onsite to devise a construction plan that minimizes construction-related impacts (including dust, air emissions, noise, and vibration).*

At this time, it is has not been confirmed whether any hazardous materials are present on the Rowley Properties site. If any hazardous materials are encountered on the site, the mitigation measures that are identified in the DEIS and **Table 1-2** in this FEIS would be implemented to mitigate potential hazardous materials impacts.

55. Comments noted. “Other Possible” noise mitigation measures were identified in the DEIS that describe additional actions that could be undertaken to further mitigate environmental impacts or provide additional site amenities; at this point, the applicant has not committed to implement these measures. Implementation of the “Other Possible” mitigation measures would not be required to reduce the impacts of the project to less

than significant levels. The “Other Possible” noise mitigation measures could be included as part of the Development Agreement.

56. Comment noted. See the response to Comment 17 in this letter.
57. Redevelopment of the Rowley Properties would occur on a phased basis over the approximately 20+-year buildout period, and as such, construction-related impacts for individual redevelopment projects would be phased over that time period as well. Potential construction-related impacts are identified in DEIS Section 3.6 and updated in **Table 1-2** in this FEIS. With the implementation of the “Required by Code, Laws, and Regulations” and “Proposed by Applicant” mitigation measures in **Table 1-2**, significant construction-related impacts would not be anticipated.
58. DEIS page 2-21 indicates that the applicant intends to provide an array of housing choices in the Hyla Crossing and Rowley Center Project. The exact type and mix of housing to be included in the development will ultimately depend on economic and market conditions. Your comment regarding the possible inclusion of low-rise townhomes in the project is noted.

In addition, the following new “Other Possible” mitigation measure has been added to **Table 1-2** in this FEIS:

*The Development Agreement could include a provision to ensure that mixed-use development will be provided on the site. Specifically, the development of the initial 2,500,000 square feet of commercial uses in the Hyla Crossing and Rowley Center Project could require the development of at least 500 residential units. Additional residential units could also be required to coincide with commercial development beyond 2,500,000 square feet.*

59. DEIS page 2-21 describes the landscaping concept for the project. Appendix G to the Development Agreement will include provisions to implement the landscaping concept.
60. The EIS evaluated two new roadway connections on the Rowley Center portion of the site. One—identified as 15<sup>th</sup> Avenue NW—would extend from Gilman Boulevard through Mall Street to Maple Street. The second—identified as 13<sup>th</sup> Avenue NW—would have two segments. The southern segment would extend from Mall Street to Maple Street; the northern segment would extend from Gilman Boulevard into the project site as a site access roadway. Although the potential exists to connect the north and south segments of 13<sup>th</sup> Avenue NW in the future, Rowley Properties, Inc. does not control the property to ensure this connection is completed. Therefore, the analyses were completed assuming 13<sup>th</sup> Avenue NW would not connect between Gilman Boulevard and Mall Street. In addition, there would be internal site access alleys connecting east-west through the Rowley Center site. A notation was also added to **Figures 2-3** and **2-4** in this FEIS regarding the ownership of a portion of the property that is identified for circulation.
61. As noted in Chapter 2 of the DEIS, all roadways under Alternatives 1 and 2 would have public access at all times. Public access via on-site roadways is included as part of the proposal and is not considered a mitigation measure.
62. See the response to Comment 18 in this letter.

63. Domestic water service is addressed on DEIS pages: 2-12 and 2-13 (Hyla Crossing Area, existing water service), 2-17 (Rowley Center Area, existing water service), 2-27 and 2-28 (water service under Alternatives 1 and 2), 2-41 (water service under No Action – Existing Zoning), 2-42 (water service under No Action – Existing Conditions), and Appendix C (existing water service figure). The Hyla Crossing MSP notes, in Findings of Fact #15, the following:

*The project is adequately served with utilities. The applicant provided some civil plans with the application, showing the concept for serving the site and managing storm drainage. The final utility drawings with each development with the Master Plan will need to comply with the City's requirements.*

64. DEIS Table 2-2 summarizes the community space (comprised of green space and shared space) that is proposed to be provided under Alternatives 1 and 2. DEIS pages 2-30 through 2-32 include further details about this community space. Also see the responses to Comments 23 and 38 in this letter for further clarifications about the community space and green space under these alternatives.

The definitions of community space, green space, and shared space that were used in the DEIS were generally consistent with those being developed by the City of Issaquah Land Use Task Force for the Central Issaquah Subarea Plan at that time. It is acknowledged that some minor changes to these definitions have occurred through the Sub-area planning process since the DEIS was published (i.e. detention ponds have been removed from the definition of green space). The community space provisions in the Development Agreement will take into account these changes. Your comment regarding the use of consistent terminology in the Development Agreement is noted.

The community space that would be provided under the No Action sub-alternatives is described on DEIS pages 2-39 and 2-42. The No Action, Existing Zoning sub-alternative incorporates the pervious surface area requirements of the existing zoning classifications onsite, as well as the pervious surface area requirements of the approved Hyla Crossing MSP. The No Action, Existing Conditions sub-alternative represents the existing open space onsite, as well as the pervious surface area requirements of the approved Hyla Crossing MSP.

65. DEIS Table 2-2 summarizes the community space under Alternatives 1 and 2. Since these alternatives are intended to be consistent with the Central Issaquah Sub-area Plan, the community space under these alternatives is compared to the City of Issaquah Task Force recommendations for the plan at that time. See DEIS page 1-9 for a comparison of the green space and DEIS page 1-14 for a comparison of the community space under the EIS alternatives.
66. Circulation areas include the vehicular and pedestrian circulation systems onsite. DEIS pages 2-22 and 2-23 describe the proposed circulation system under Alternatives 1 and 2. Several of the types of roadways proposed onsite are intended to provide opportunities for enhanced pedestrian amenities, such as landscaping and courtyards (i.e. the local streets, mews, and pedestrian-only trails)
67. See the response to Comment 23 in this letter.

68. Design, landscaping, and maintenance requirements for stormwater ponds are detailed in the *2009 Issaquah Addendum to the King County Surface Water Design Manual* and Issaquah Municipal Code, as well as other county and state design and regulatory documents, as noted on DEIS page 3.1-6 and 3.1-7. These documents are available online for review. A temporary stormwater pond would only be allowed for the duration of time that a permitted redevelopment project is actively under construction. Final acceptance of the redevelopment facilities would require construction of permanent stormwater facilities that meet City standards for water quality and flow control, as described in the Issaquah Addendum.
69. As stated in Note #3 of DEIS Table 2-3, the Hyla Crossing MSP would provide approximately 1,859 parking stalls within the area; however, it does not specify whether these stalls would be provided in structured areas or surface lots. This table has been revised in **Chapter 2** of this FEIS to clarify these numbers.
70. Comments noted. The discussion of the “Benefits and Disadvantages of Deferring Implementation of the Proposal” in Chapter 2 of the DEIS is required by the SEPA Rules (WAC 197-11-440(5)(vii)). This section of the DEIS specifically addresses deferring the proposed actions identified under Alternatives 1 and 2. It does not address development that could occur onsite under the site’s existing zoning, because this is not proposed by the applicant.
71. DEIS Table 3.1-1 includes the modeling results for Scenario 0, which is the “No Action” scenario. This scenario corresponds to both of the Alternative 3, No Action sub-alternatives, as described on DEIS page 3.1-7. Both No Action sub-alternatives were modeled as the present-day, existing conditions. The distinctions between stormwater management under the two No Action sub-alternatives are described in DEIS section 3.1-18.
72. Comment noted.
73. The potential impacts of de-watering Tibbetts Creek for construction of the direct discharge pipeline will be analyzed in a separate SEPA process, as mentioned on DEIS page 3.1-21.
74. The specifics of the landscape management plan would be detailed in individual project permits, which would be available for public review and comment. Landscape Management Plan requirements are described in Section 2.2.4.1 of the Issaquah Addendum and would be incorporated into the specifics identified in the individual project permits.
75. See the response to Comment 29 in this letter. DEIS Figures 3.2-2, 3.2-3 and 3.2-4 show the Greenway area under the EIS alternatives. Enlargements of the northern and southern ends are also provided in DEIS Appendix F as Figures 6 and 7 for Alternatives 1 and 2, and Figures 13 and 14 for the No-Action Alternatives. As indicated on DEIS page 3.2-32, the existing approximately 10-acre Greenway would be expanded by approximately 1.4 acres under all of the alternatives. See FEIS **Table 3.2-1** and **Figure 3.2-1** for details on existing and proposed buffer widths.
76. Development plans are conceptual at this stage. As plans progress, additional survey and design detail will be provided.

77. The vegetation analysis is based on plan view area at this point in the design process. Additional inventory and replanting plans per the Development Agreement would be developed at later design stages for individual development projects.

78. See the response to Comment 14 in this letter.

79. See the response to Comment 15 in this letter.

On DEIS page 3.2-17, the sentence regarding smaller stream buffer widths indicates that unless surrounding land uses are of low intensity, narrower buffers must be “densely vegetated by high-quality forest” to be effective. In other words, narrow stream buffers may be appropriate with high density development if they are densely forested (or planted to mature into such). On DEIS page 3.2-26, it is stated that, “The increased activity and outdoor lighting associated with more dense urban development could result in long-term disturbance to more sensitive wildlife species.” Possible long-term impacts associated with increased human activity in the Greenway are also addressed on DEIS page 3.2-32 and Appendix F page 68, including possible development of informal trails and trampling of vegetation, more garbage, and more noise. These impacts would be minimized by enhancing the proposed narrow buffer areas with a densely vegetated forest community, similar to the already established forest along the Tibbetts Creek Greenway to the south. Impacts would be further minimized by identifying specific trail routes through the Greenway to focus use and limit access to critical areas.

80. The paragraph in question has been clarified as follows:

*Annual average summer flow rates to Tibbetts Creek from the Rowley Properties site have already increased markedly from pre-development conditions and would increase slightly more under Scenario 1 (see Figure 9 in Appendix F). These summer flow rates would be proportionately similar for Tributary 0170 (see Table 5 in Appendix F). ~~Though counter-intuitive, base flow can remain relatively constant while total flow volume increase in summer months. The i~~Increases in runoff generally occur with increased development, because less precipitation is infiltrated (since it falls mostly onto impervious surfaces) and less is re-evaporated through evapo-transpiration (due to vegetation being removed). Instead, it contributes to surface runoff and this effect is more pronounced in the summer when precipitation is less, groundwater tables are lower, vegetation is fully leafed and temperatures are higher to increase evaporation (see Appendix F for further details).*

81. DEIS page 3.2-19 is intended to convey that:

- 1) Development results in increased runoff, particularly during the summertime;
- 2) Since the affected areas are already developed and summertime flows are not typically subject to flow control, there would be little effect on base flow; and,
- 3) There is a potential to manage the discharge from smaller, summertime storm events such that low stream flows fluctuate less, to the benefit of fish and wildlife habitat.

Base flows would not be reduced under the proposal, although they would be if flows were returned to pre-development, forested levels.

82. Comment noted.
83. Comment noted.
84. Comment noted. At the scale of this figure, the site boundaries are necessarily approximate. Dotted lines were used to distinguish the site boundaries from the individual property boundaries.
85. The spacing of tower structures a minimum of 110 feet from each other is included as a design feature for Alternatives 1 and 2 and, therefore, it is not listed as a mitigation measure in the DEIS. The following new “Mitigation Measure Proposed by Applicant” has been added to **Table 1-2** in this FEIS:

*Include design guidelines regarding the distance between buildings (including tower structures) in the Development Agreement (Appendix B, Design Guidelines) to allow for view corridors through the Rowley Properties site.*

86. The applicant owns a majority of the buildings located in the Hyla Crossing and Rowley Center Areas. Existing uses within those buildings are noted in DEIS Figure 2-2. Certain uses on the Rowley Properties site (i.e. office uses, retail uses, etc.) could relocate within the proposed redevelopment on the Rowley Properties site. Other uses (i.e. storage/warehouse facilities and light industrial uses) could relocate to new locations within the City of Issaquah or the greater Seattle area.
87. Comment noted. References to DEIS Table 2-3 are provided throughout DEIS Section 3.3-13, Land Use.
88. See the response to Comment 11 in this letter.
89. The general similarity between assumed land uses and uses to the east of the Rowley Center Area refers to the existing land uses types adjacent to the Rowley Center Area (commercial, retail, and office uses) and their similarity to assumed commercial uses under Alternative 1 and 2 (office and retail). Chapter C, Land Use, of the Development Agreement anticipated to be adopted between the City of Issaquah and Rowley Properties will further describe the proposed land uses for the Rowley Properties site and their compatibility with the vision for the site and the Central Issaquah Area.
90. This comment is correct—the two referenced maps are intentionally not depicting the same information. DEIS Figure 3.5-3 is presenting the existing and planned future non-motorized facilities in the larger area surrounding the site. These facilities are unrelated to the Hyla Crossing and Rowley Center proposal and would be in place regardless of the alternative selected. In contrast, DEIS Figure 2.5 shows the conceptual pedestrian circulation plan proposed as part of the project under Alternatives 1 and 2.
91. The following new “Mitigation Measure Proposed by Applicant” has been added to **Table 1-2** in this FEIS as suggested in this comment and as depicted in DEIS Figure 2-5.

*Include design features in the mixed-use redevelopment to enhance pedestrian connections through and adjacent to the site, particularly along walking routes that lead to the Issaquah Transit Center or a potential future transit station along*

I-90 (possibly at 12<sup>th</sup> Avenue NW). This would include sidewalks or walking paths, landscaping, and pedestrian-scale lighting.

92. Details about the extensive parking demand analysis performed for the EIS alternatives were provided in DEIS Appendix H (Section 3.10.2 of the Transportation Technical Report). This section outlines the methodology, assumptions, and results of the parking demand and shared parking accumulation analyses. These analyses account for the mixed-use nature of the redevelopment alternatives (Alternatives 1 and 2), the various levels of internalization of trips, the projected mode of travel, and temporal distribution of parking demand. For example, a mixed-use development may attract retail customers that also visit a restaurant or entertainment venue (theater). These customers would only park once for their visit. Similarly, an office worker onsite or a resident that lives on the site might visit a retail space or restaurant without generating demand for another parking space. Finally, office parking demand typically peaks during daytime hours while residential demand peaks overnight.

The parking analysis performed and outlined in DEIS Appendix H accounts for these characteristics in ways that cannot be accounted for by simply applying code requirements for individual uses. The City of Issaquah's Municipal Code Section 18.09.060 – Administrative Adjustments of Parking Standards, outlines the procedures to adjust parking requirements based on several factors, including shared parking among compatible uses. Further, IMC Section 18.09.070 addresses criteria for special uses such as mixed-use developments with shared parking facilities.

TO: Peter Rosen, Environmental Planner  
FROM: River & Streams Board  
SUBJECT: **Comments on Hyla Crossing and Rowley Center Draft EIS**

The River & Streams Board appreciates the opportunity to review and comment on the *Hyla Crossing and Rowley Center Project Draft EIS*. Our comments are limited to the critical area and stormwater elements, consistent with the overall purpose and purview of the River & Streams Board.

**Support for Development Concept**

The River & Streams Board supports the overall approach of the Hyla Crossing and Rowley Center proposal to increase density in existing developed areas and create a mixed-use, pedestrian-oriented neighborhood.

1

**Tibbetts Creek Buffer – South End**

The Board commends Rowley for their proposed improvements at the south end of Hyla Crossing; removing existing impervious area and buildings close to the creek to widen the floodplain, provide a 100-foot buffer, and restore the stream buffer area consistent with the Tibbetts Creek Greenway Plan.

2

**Tibbetts Creek Buffer – North End**

The proposal maintains the existing 5-10 foot buffer width between Tibbetts Creek and 19<sup>th</sup> Ave NW. The Board strongly believes that the Tibbetts Creek buffer at the north end of the project should be increased to meet current buffer requirements for the following reasons:

3

1. The Hyla Crossing Master Site Plan (MSP) required a 100-foot buffer and 15-foot building setback and specified no structures or roads within the buffer (Condition #1). The proposed redevelopment substantially increases the amount of development in Hyla Crossing, yet reduces stream buffer widths agreed to 15 years ago.
2. The City’s current critical area code standards were reviewed based on the Best Available Science (as required by the State) in 2006, and adopted buffer standards are based on scientific findings of buffer widths necessary to protect the functions and values of streams and wetlands. The Board believes the current code provisions for buffer averaging and buffer reductions provide adequate flexibility for site planning, with limits that ensure protection of the resource.
3. While the Board recognizes the Tibbetts Creek Greenway Plan calls for the eventual relocation of Tibbetts Creek onto the Mull property, we believe that the Rowley proposal should maintain a 100-foot buffer (consistent with the Hyla MSP) until this reach of the creek is relocated. This would provide an incentive for Rowley to relocate the creek since the 100 foot buffer on their property would be reduced once the creek was relocated.

4

5

4. The Draft EIS includes analysis of buffer widths necessary to protect critical area functions (page 3.2-17). However, it doesn't address buffer widths needed to protect wildlife functions which are in the range of 100 to 300 feet according to Best Available Science. Tibbetts Creek is an important wildlife corridor connecting the Issaquah Alps and Lake Sammamish.

6

5. A buffer width that meets the above objectives, is consistent with the best available science, and provides adequate protection of the environmental functions and long-term viability of the Tibbetts Creek corridor is, in our view, a fair tradeoff for the large increase in building height and density proposed in the DEIS.

7

### **Wetland C Buffer**

The proposal does not provide the required buffer for Wetland C, in the middle segment of Hyla Crossing - the wetland is almost adjacent to 19<sup>th</sup> Ave NW. Wetland C is a Class 1 wetland (per the critical area report) and requires a 100-foot buffer. The Board understands that most of Wetland C along Tibbetts Creek was created with the voluntary stream relocation/restoration. However, this doesn't exempt the wetland from buffer requirements or from the need for a buffer to protect the wetland functions.

8

The Draft EIS provides information on minimum wetland buffer widths necessary to protect wetland functions, but then fails to disclose that the proposal would result in practically no buffer for a Class 1 wetland and ignores the potential long-term impacts on wetland functions. The Draft EIS suggests that the 100-foot wetland buffer does not apply in this case because, by code, wetland buffers may not be required to extend across an existing, improved roadway. However, 19<sup>th</sup> Ave NW will become a pedestrian trail under the proposal, and therefore the buffer requirements should apply.

9

### **Cumulative Impacts and Precedent**

Overall, if current critical area wetland and stream buffer standards are not required for Hyla Crossing and Rowley Center, it sets a bad precedent for other redeveloping properties in Central Issaquah. Issaquah has many non-conforming situations, where development was established prior to current code requirements. Improvement and enhancement of critical area buffers over existing conditions, not maintaining the existing status quo, is the key to long term sustainability of our natural systems as these areas redevelop to greater urban densities.

10

### **Stormwater System**

The Board recognizes the stormwater alternative to pipe stormwater directly to Lake Sammamish is important given the land area that would be needed to accommodate traditional stormwater detention ponds. However, we believe the DEIS is silent on, or has not adequately addressed the following related issues:

1. Cumulative impacts if the pipe is oversized and available to handle stormwater from other properties.

11

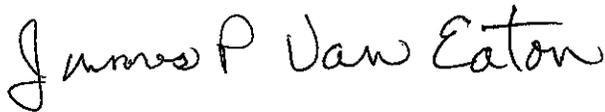
2. Potential impacts of de-watering Tibbetts Creek and potential impacts to base flows resulting from the direct discharge stormwater proposal.

12

3. The impacts of the outfall, (the volume and velocity of stormwater and lack of energy diffusion) on the lake ecology. | 13
4. The water quality treatment of the stormwater directly discharged to the lake. Direct discharge requires only ‘basic water quality treatment’; a reduced level of water quality treatment as compared to the “enhanced basic water quality treatment” which would be required for discharge to Tibbetts Creek. With all the existing efforts to address water quality (including Sensitive Lake Water Quality Goals) and habitat issues facing Lake Sammamish, the piped stormwater alternative should provide an equal level of water quality treatment as a conventional system. The DEIS should provide information on the water quality impacts of this stormwater alternative. | 14
5. Kerry Ritland, Public Works Engineering, updated the Board on proposed changes to the City’s stormwater code. These amendments could allow Rowley Center to discharge directly into Trib 170 and soil assumptions could reduce detention requirements for Hyla Crossing. These new measures are not addressed in the Draft EIS and may reduce the need and financial feasibility for a piped stormwater system. | 15

Thanks for the opportunity for the River & Streams Board to review and comment on the *Hyla Crossing and Rowley Center Project Draft EIS*. Our comments are intended to be productive, to support a sustainable environment with the redevelopment of the Rowley property and Central Issaquah.

Sincerely,



James (Pat) Van Eaton  
Chair, River & Streams Board

## **RESPONSE TO LETTER 6**

### River and Streams Board

1. Comment noted.
2. Comment noted.
3. The recommendation in this comment to increase the stream buffer along the northern portion of Tibbett Creek to meet current requirements is noted.
4. See the response to Comment 79 in Letter 5.

Appendix J of the approved Development Agreement will identify regulations used to establish guidelines appropriate for this specific property, circumstance, and unusual site conditions, including protection of critical areas (IMC 18.10.400.1). Any critical area regulations not specifically addressed in this Appendix are regulated by IMC 18.10.

5. Commented noted. See the response to Comments 13 and 36 in Letter 5.
6. Page 32 of DEIS Appendix F includes a discussion of buffer widths and riparian zone functions. As stated, effective buffer widths vary depending on target function...wider buffer widths (197 feet or more) are recommended for most wildlife habitat needs. Further discussion on page 33 of DEIS Appendix F indicates that "As with wetlands, streams require the greatest buffer when seeking to protect wildlife habitat for targeted animal species."

DEIS page 3.2-17 also points out that to reconcile best available science recommendations with existing conditions, local jurisdictions typically require applicants to demonstrate that functions and values of critical areas would be equal or greater than existing conditions. This would be achieved through completion of the Tibbetts Greenway restoration at the northern and southern ends of the Greenway, which would provide net improvements to critical area functions, such as water quality, habitat quality, disturbance screening, habitat connectivity, bank stabilization, shade and temperature control, and large woody debris recruitment. As stated on DEIS Appendix F page 60, although existing and proposed buffers may limit development of maximum habitat values, the ecologic functions provided by the Greenway today would not only be preserved, but also improved with proposed redevelopment.

The value of the Tibbetts Greenway as an important wildlife corridor and other wildlife corridors in the vicinity are discussed on DEIS Appendix F pages 19 and 60.

7. Comment noted. See the response to Comment 6 in this letter.
8. See the response to Comment 15 in Letter 5. As shown on Figure 1 of DEIS Appendix F, much of the Wetland C area was previously an RV storage parking lot that was removed for stream restoration. Figure 3 on DEIS Appendix F page 7 provides a comparison of pre- and post-restoration wetland area. DEIS Appendix F page 15 explains that wetland creation was not a primary goal of the Tibbetts Greenway Plan or mitigation for any action, but rather a restoration design element to enhance fish and wildlife habitat functions, flood conveyance, and storage. The Greenway could have

been designed without creation of wetlands, but this element was included to improve the overall function and value of the stream corridor. This was a voluntary restoration action by the applicant. A stream buffer was prescribed as part of the implementation of the Tibbetts Greenway; wetland buffers were not.

As stated in the response to Comment 6 in this letter, while full buffer widths per Issaquah Code could further increase critical area functions, the proposed project, including Greenway enhancements, would result in net improvements to ecologic functions relative to existing conditions.

9. Proposed wetland buffer widths for each alternative are shown on DEIS Figures 3.2-2, 3.2-3 and 3.2-4, with discussion provide on DEIS page 3.2-15 and DEIS Appendix F page 27. On DEIS page 3.2-26, long-term impacts during operation of the project are described as follows, "The increased activity and outdoor lighting associated with more dense urban development could result in long-term disturbance to more sensitive wildlife species." Possible long-term impacts associated with increased human activity in the Greenway are also addressed on DEIS page 3.2-32 and DEIS Appendix F page 68, including possible development of informal trails and trampling of vegetation, more garbage and more noise.

See the response to Comment 15 in Letter 5 regarding buffer requirements adjacent to 19<sup>th</sup> Avenue NW.

10. Comment noted. DEIS page 3.2-15 indicates that with proposed redevelopment under Alternatives 1 and 2, critical area buffers (buffers adjacent to Tibbetts Creek and wetlands on and adjacent to the site) would be the same or greater than the vegetated buffers that are currently provided onsite. The DEIS acknowledges that in certain areas these existing buffers are presently less than required by the Issaquah Critical Areas Ordinance (CAO), and would continue to be less than required under the proposal. Maintaining these buffers in their current condition would not necessarily set a precedent for other development in Central Issaquah, however, as there are unique conditions at the Rowley Properties site and in the proposed redevelopment that would not apply to other sites/development proposals.

The project site is bounded by I-90 to the north and is bisected by SR-900. These and other roadways onsite, as well as existing development, currently encroach upon required critical area buffers. The wetlands adjacent to these roadways are typically ditch-type wetlands, with limited habitat value. As noted on DEIS page 2-45, there have been preliminary discussions about removing the Boardwalk along SR-900 to increase access to adjacent properties and enhance pedestrian and bicycle connections in the area. This potential project could require filling existing wetlands. Given the degraded condition of many of the on-site wetlands, and the potential for their elimination with removal of the Boardwalk, it is appropriate to consider maintaining existing wetland buffers onsite.

Redevelopment under Alternatives 1 and 2 would result in net improvements to critical area functions, such as: water quality, habitat quality, disturbance screening, habitat connectivity, bank stabilization, shade and temperature control and large woody debris recruitment. These improvements would largely be accomplished by continuing the enhancements to the Tibbetts Creek Greenway Area onsite (the applicant has already relocated and restored the majority of the on-site portion of Tibbetts Creek on their own

initiative). The existing approximately 10-acre Greenway would be expanded by approximately 1.4 acres under the current proposal (see DEIS Appendix F for details on the proposed improvements to the Greenway). While providing stream/wetland buffer widths per the Issaquah CAO in the Greenway could further increase critical area functions, they would not necessarily be required to mitigate the potential impacts of the project on critical areas, and redevelopment proposals often include negotiated trade-offs in order to reach a conclusion of no net loss in critical areas functions. As such, the unique attributes of the proposal would not apply to other sites and development projects. Whether or not no net loss in critical areas functions has been achieved must be evaluated on a project-by-project basis.

The DEIS contains a mitigation measure that provides for the possibility to adjust the stream buffer and building setback requirements adjacent to Tibbetts Creek in the Development Agreement; this mitigation measure has been updated in **Table 1-2** to this FEIS as follows:

*With redevelopment, the applicant proposes to provide a stream buffer and building setback adjacent to Tibbetts Creek consistent with Exhibit 16 to the approved Hyla Crossing MSP (see DEIS Appendix B for Exhibit 16). The stream buffer and building setback will be the same or greater than what is currently being provided onsite. The City and the applicant will consider including more restrictive stream buffer and building setback requirements in the Development Agreement, as appropriate.*

Also see the response to Comment 14 in Letter 5.

11. Cumulative impacts if the pipe is oversized and available to handle stormwater from other properties are addressed on DEIS Appendix D page 3.29, where it is noted that the pipeline would provide substantial flood control improvement that would be realized by existing development on nearby properties, as well as proposed redevelopment on the Rowley Properties site. Additionally, Section 1.1.7.5 of Issaquah's *2009 Addendum to the 2009 King County Stormwater Design Manual* (Issaquah Addendum) states that projects utilizing the direct discharge exemption shall size the direct discharge pipeline to "be capable of conveying the 25-year peak flow rate, with capacity available for current and future development within the drainage basin served by the storm line." It should also be noted that any future development of nearby, non-Rowley-owned properties would require a separate SEPA review that would identify potential environmental impacts of those future redevelopments, and appropriate mitigation. There are no anticipated adverse impacts to nearby properties by building a direct discharge pipeline that is potentially oversized, as not all of the pipe capacity has to be utilized. It is available should it be needed for future flood control.
12. The potential impacts of de-watering Tibbetts Creek for construction of the direct discharge pipeline will be further analyzed in a separate SEPA process, as mentioned on page 3.1-21 of the DEIS.

Potential impacts to base flows in Tibbetts Creek as a result of the Stormwater Scenario 2 - direct discharge are described on DEIS pages 3.2-18 through 3.2-20, and DEIS page 3.2-24, along with data included in Table 3.2.5 of Appendix D. As the data shows, Scenario 2 would result in a minor reduction in base flows from existing conditions, but a

major increase in runoff that entered the streams as base flows over historical conditions.

Table 3.2.5 on page 3.35 of DEIS Appendix D, indicates that annual dry season volume and annual average dry season flowrate under Stormwater Management Scenario 2 would diminish by only about 5 percent, as compared to the No Action Alternative, and each would remain in excess of seven times the values for the historical condition. "Summer" flowrates and volumes are also presented in DEIS Appendix D Table 3.2.5 and are similar, based on a July-September period rather than a May-September period. These decreases relative to the existing condition would be considered minor and would not result in significant impacts.

13. The impacts of the outfall on Lake Sammamish ecology will be discussed in more detail in the further SEPA review, as noted on page 3.1-21 of the DEIS. Additionally, see page 3.27 of DEIS Appendix D.
14. See the response to Comment 1 in Letter 4.
15. The DEIS did not discuss the changes to the retention/detention requirements in the City's Stormwater Manual, because the proposed changes to the Stormwater Manual were not approved by the City Council at the time the DEIS was issued, August 31, 2011. Subsequent to the issuance of the DEIS, the City of Issaquah adopted the *2011 City of Issaquah Addendum to the 2009 King County Surface Water Design Manual* (October 17, 2011).

The project's site-specific stormwater system is currently being designed and will be described in the Master Drainage Plan (MDP) adopted as an appendix to the Development Agreement. A MDP consistent with the City's Stormwater Manual and other approved stormwater guidelines is a required mitigation measure (see **Table 1-2**). The MDP may reflect the NPDES Phase II redevelopment standards. In any case, the EIS assumes that the temporary and permanent stormwater management systems would be similar for Alternatives 1 and 2 and would comply with the Stormwater Manual in place at the time of implementation.



**PO Box 351 Issaquah, WA 98027**

The Issaquah Alps Trails Club welcomes the opportunity to comment on the Planned Action Draft EIS for the Rowley Center and Hyla Crossing proposed developments. The Trails Club has been in existence for over thirty years and for all that time has been involved with development, park and open space issues in the Tibbetts Creek Basin.

At the September 20<sup>th</sup> meeting of the Urban Villages Development Commission the “Cascade Agenda” was mentioned by staff, commissioners and by the public verbally and in several letters to the commission. The City of Issaquah is committed to being one of the Cascade Agenda Leadership Cities. So what does it mean for this project to be a “Cascade” project and what environmental review through the EIS process is expected so environmental impacts can be recognized and mitigation strategies analyzed and recommended?

1

Recognizing the role of the Rowley Properties in the region, the city, the basin and the neighborhood would all be expected if one were to review this project through the Cascade Agenda lens. The Trails Club has comments as to the adequacy of the document as it pertains to the natural environment, recreational amenities associated with trails, parks and open space, aesthetics related to view impacts and length of time covered.

With so many efforts and financial resources devoted to the health of Tibbetts Creek and associated streams and wetlands, the concerns raised in the letter from the Chair of the Rivers and Streams Board must be given serious consideration and are fully supported by the Club. The buffers mandated by best available science are not adequately addressed in this document for both Tibbetts Creek and associated wetlands. Also, much about storm water management is left to future review and thus the potential impacts and mitigations are not reviewed in this document nor is a process described for further environmental review once the management plan is developed.

2

One of the basic tenants of the Agenda is to encourage growth where infrastructure can be provided most efficiently and to reduce sprawl, especially into sensitive and hard to serve areas. The transfer of development rights (TDR) strategy is one strongly supported by Cascade and the city, but is ignored as a way of mitigating the higher density and higher view impacting alternatives in the DEIS. Within a mile on the northeast corner of Cougar Mountain there are numerous properties that are severely constrained by steep slopes, creeks, wetlands and difficult access that would be prime candidates for consideration as TDR sending sites. These are exactly the kind of properties the Cascade Agenda and the city call for protection. These are especially important properties in the Issaquah view shed and all the more important to the western area of the valley floor where the Rowley property is located.

3

How this project will be phased will have much to do with making it successful. Recreational opportunities are one of the major requirements that must be met if people are going to choose to live, work, shop and play in such a high density environment. The “Green Necklace” is cited in the CIP as a critical amenity for recreation and pedestrian/bicycle mobility. How and when the Necklace will be incorporated in the Rowley projects needs analysis, especially since key links to regional trails come through or adjoin Rowley. These include the Mountains to Sound Greenway I-90 Trail, the long proposed Lake Sammamish/Cedar River Trail, a safer and more direct trail over I-90 to Lake Sammamish State Park to the west of SR 900, and connections to Cougar Mountain Regional Wildland Park. Furthermore, the draft provides no evaluation of pedestrian and bicycle connections with the Mull property.

4

Trails and pedestrian facilities as recreational amenities will be important to the age groups that have been discussed as prime candidates for living in the type of community envisioned for the Rowley property. Even more important to making this vision work will be the abundance and quality of trails, pedestrian facilities and bicycle facilities that will be a critical part of the transportation system. Great dollar costs and environmental costs can be reduced if walking and biking are actually workable elements of the transportation network. The consideration of walking and biking in the DEIS is inadequate. Generally allocating a number of trips to walking and biking is insufficient unless it describes the design and quantity of facilities needed to actually reduce parking needs and vehicle trips.

5

Protecting views of the forested slopes of the Issaquah Alps has been a community priority for decades. This means both keeping them forested and able to be seen from the valley floor and surrounding areas. The earlier mentioned TDR strategy is important to keeping them forested, but actually keeping them visible has much to do with building height and location. Therefore, maximum building height should be near 100 feet. Buildings of this height should only be approved for projects that receive TDRs, meet more than minimum open space requirements and/or provide other benefits beyond what is required.

6

Given that this document is for a Planned Action, it will be the primary environmental document for the next 20 to 30 years for this project. Therefore, the lack of detail and analysis make this draft inadequate. Providing additional analysis and outlining a process for future review of the project is essential for a Planned Action proposed covering decades, not years. This process must address the development of adjoining projects, changing conditions and unanticipated impacts. A number of planning documents and studies have been adopted over the last thirty years for the Tibbetts Basin area. Many of those plans were well thought out and well supported at the time they were adopted. Had they not been substantially updated and in some cases completely replaced, salmon would have been in much more trouble, flooding problems with Tibbetts Creek would be far worse and traffic on the SR 900 corridor would have been much greater.

7

The greatest benefits from plan updates and code changes in the basin have been to the Rowley property. For example, the Newcastle Plan of less than 30 years ago called for much more development spread over much more land with far fewer storm water controls than what was actually permitted in the Talus Urban Village. Had a developer been able to lock in for thirty years on the Newcastle Plan, Rowley would be facing much more flooding and far more traffic on SR 900 with little mitigation of off-site impacts. Other property owners, governmental bodies and the public need a means to update plans when conditions warrant it. This

8

EIS needs to address a process where the property owner's desire for certainty is balanced with the changing needs and best interests of the community.

Sincerely,

David Kappler  
President

## **RESPONSE TO LETTER 7**

### **Issaquah Alps Trails Club**

1. DEIS pages 2-18 and 2-21 indicate that one of the Applicant's Objectives for site redevelopment is, as possible, the project would implement sustainable strategies to reduce development impacts. DEIS page 2-21 provides a general definition of sustainability, and indicates that the sustainable features proposed to be incorporated into the project would be consistent with the Cascade Agenda. In particular, the overall form of the proposed project as a compact, pedestrian-oriented mixed-use development close to transit would promote the Cascade Agenda's vision for cities that are complete, compact and connected. The following sustainable development concepts would be incorporated into the project: smart growth, new urbanism and green design (see DEIS pages 2-21 and 2-22 for definitions of these concepts). Low impact development (LID) features could be included in the Hyla Crossing and Rowley Center stormwater management system to the maximum extent feasible (see DEIS Section 3.1 Water Resources, and DEIS Appendix D for further details on LID). The applicant has not committed to provide LID stormwater management features at this point, because it is unclear if LID will be feasible across the entire site. The ability to incorporate LID features into the stormwater system would be determined through site-specific studies (i.e. of soils conditions) that would be conducted as individual parcels are developed.

As indicated on DEIS page 2-9, the Hyla Crossing and Rowley Center DEIS, together with this FEIS, are intended to fulfill the SEPA requirements for Planned Action environmental review for future redevelopment of the Rowley Properties site, per RCW 43.21C.031. After issuance of this EIS, it is contemplated that the City of Issaquah will adopt a Planned Action Ordinance for the Hyla Crossing and Rowley Center Project. When specific applications for redevelopment on the site are submitted in the future, the applications would be reviewed and determinations would be made by the City on whether the type and scale of the proposal is within the range of redevelopment assumptions analyzed in this EIS and adopted as part of the Planned Action Ordinance. If the type/scale of proposed redevelopment is within the range, further environmental analysis would not be required under SEPA. If not, additional environmental review may be required.

2. Comments noted. A Master Drainage Plan (MDP) will be included in the approved Development Agreement between the City and the applicant to further clarify proposed and required stormwater mitigation. The Development Agreement has been and will be available for review and comment. Future stormwater improvements will be in compliance with the City of Issaquah's *2009 Addendum to the King County Surface Water Design Manual*, and any modifications included in the Development Agreement.

Also see the responses to the comments in Letter 6.

3. Consistent with the Cascade Agenda, the proposed Hyla Crossing and Rowley Center Project would be located in an existing urban area adjacent to I-90 and SR-900 where infrastructure already exists and can be efficiently provided. The proposal is for a compact, pedestrian-oriented, mixed-use redevelopment that would be close to transit opportunities, such as the Issaquah Transit Center, Issaquah Park and Ride, and multiple bus routes, in order to reduce potential sprawl (see DEIS pages 2-19 and 2-20 for a more complete description of the redevelopment concept).

As described on DEIS page 2-4, the City of Issaquah is in the process of preparing an EIS to analyze the potential environmental impacts of implementing the proposed Central Issaquah Subarea Plan. That EIS will cumulatively study growth in the entire subarea, including development associated with the Hyla Crossing and Rowley Center Project, as well as potential Transfer of Development Rights (TDR) program amendments, and other Subarea plan, development regulation and planned action components. At this point, it is not contemplated that the Rowley Properties site will be part of the TDR program. However, other properties in the Central Issaquah Subarea are being considered for inclusion in the TDR program.

Mitigation measures to address the land use and aesthetic impacts of the proposed redevelopment are listed on DEIS pages 3.3-26 and 3.3-27, and DEIS pages 3.4-97 and 3.4-98, respectively. These mitigation measures are also included and updated in **Table 1-2** to this FEIS.

4. Comments noted. Trails and pedestrian/bicycle facilities that would be provided with proposed redevelopment under Alternatives 1 and 2 are described on DEIS pages 2-23 through 2-26. **Figure 2-5** in the DEIS shows the conceptual pedestrian circulation system under these alternatives. As shown on this figure, a pedestrian connection could be provided over Tibbett's Creek onto the Mull property that would ultimately connect to trails on Cougar Mountain. Given the conceptual nature of the redevelopment plans at this point and the extended timeframe for build-out of the project, the specifics of where trails and pedestrian/bicycle facilities would be located and when they would be implemented is not known. Further details on the location and timing of proposed trails and pedestrian/bicycle facilities may be included in the approved Development Agreement between the City of Issaquah and the applicant.
5. Comments noted. See the response to Comment 4 in this letter. The applicant's vision, goal, and design strategy for the development is centered on providing a mixed-use community with a focus on non-motorized access. Design guidelines for the Preferred Alternative contained in the adopted Development Agreement will emphasize the creation of quality non-motorized access and connectivity. Within the proposed redevelopment, access roadways would have sidewalks, trails, and/or pathways connections among all uses. Based on the volumes of pedestrian and bicycle trips forecast to be generated by the EIS alternatives, the existing and planned non-motorized facilities are anticipated to be adequate and would not result in significant adverse impacts to non-motorized facilities.
6. The Issaquah Alps Trail Club's preference for a maximum building height of approximately 100 feet, and the use of TDRs, open space, etc. to achieve this maximum height, are noted. See the response to Comment 3 in this letter for additional discussion of TDRs and mitigation measures to address aesthetic impacts.
7. As noted in this comment, it is proposed that certain elements of redevelopment of the Hyla Crossing and Rowley Center site be designated by the City of Issaquah as a Planned Action, pursuant to SEPA (WAC 197-11-168(C)). The Planned Action review process is described in DEIS Section 2.3. The specific Hyla Crossing and Rowley Center redevelopment projects that are anticipated to be included in the Planned Action Ordinance are identified in DEIS Sections 2.5 and 2.6. The Planned Action Ordinance would pertain to future development features that have been reasonably defined for

environmental review purposes and that are subject to City of Issaquah permit approvals. Ultimately, the City of Issaquah will determine which redevelopment features are to be included in the Planned Action Ordinance.

DEIS Chapter 2 indicates that a definitive plan for long-term redevelopment of The Hyla Crossing and Rowley Center site cannot be formulated at this stage, as specific tenants and users have not and cannot reasonably be identified for a 20+-year redevelopment buildout. Therefore, specific building footprints, sizes and designs, location of uses, and the specific layout and design of community space cannot be pinpointed. However, in order to conduct comprehensive environmental review of the range of redevelopment features assumed under the EIS Alternatives in the DEIS, and under the Preferred Alternative in this FEIS, a series of conservative assumptions were formulated regarding the mix and level of uses, parking, community space, roadway network, stormwater treatment, etc. The assumptions create an envelope of potential redevelopment and a range of redevelopment scenarios (without having specific building plans) and allow for the analysis of significant environmental impacts under SEPA (see DEIS Sections 2.5 and 2.6 for descriptions of these assumptions). These assumptions allow the identification of probable significant environmental impacts and mitigation under SEPA for the range of environmental elements analyzed in this EIS, consistent with a Planned Action designation.

Certain elements of Hyla Crossing and Rowley Center redevelopment cannot be reasonably defined at this time and would not be subject to the City's Planned Action Ordinance. Such elements may require additional environmental review at the time application for permits are submitted to the relevant agencies (see DEIS Section 2.7 for identification of those projects that have not been defined and may require additional SEPA environmental review). When permit applications for the elements not covered by the Planned Action Ordinance are submitted to the City or applicable agencies, the City/agencies would determine the form of additional environmental review required under SEPA.

**Table 1-2** in this FEIS includes an updated list of the mitigation measures, reflecting the wording anticipated to be included in the Development Agreement. Listed as a "Mitigation Measure Required by Code, Laws, and Regulations" is a measure to provide for periodic review of the Development Agreement; this will allow for the review of Development Agreement provisions relative to updates associated with applicable federal, state and local regulations.

8. Comment noted. As indicated in the response to Comment 7 of this letter, **Table 1-2** in this FEIS includes an updated list of mitigation measures, reflecting the wording anticipated to be included in the Development Agreement. Listed as a "Mitigation Measure Required by Code, Laws, and Regulations" is a measure to provide for periodic review of the Development Agreement; this will allow for review for consistency with updates to federal, state and local regulations, as applicable.

September 26, 2011

Issaquah Planning Department  
P.O. Box 1307  
Issaquah, Wa 98207  
Attn: Peter Rosen

Re: Rowley Redevelopment

Dear Mr. Rosen

I represent Overlake Management Company, the management agent for the Issaquah Town and Country Shopping Center located at 1025 Northwest Gilman Blvd. We recently reviewed the Draft Environmental Impact Statement for the proposed 78 acre Rowley Property and would like the City of Issaquah to consider the following input when evaluating the project:

- The underlying vision of the City of Issaquah concerning the Central Planning Area would be best accomplished with the Alternative 1 specifying 60% commercial and 40% residential. | 1
- Any future signalization required at the NW Mall Street and 12th Ave NW should be entirely at the cost of the Rowley Development, which will be the proximate cause for requiring such construction. | 2
- The listed items in the Transportation Management Plan appear acceptable. | 3
- Right and left turn lanes into and out of the Town and Country Shopping Center at NW Mall Street and 12th Avenue NW must continue to be allowed. Furthermore, no center divider can be installed on the 12th Avenue NW which would hinder traffic from entering and leaving the shopping center. | 4
- Any approved alternative should require a minimum of one parking space per residential unit. The burden of inadequate parking would ultimately fall on adjacent properties with unauthorized walkoffs, requiring more monitoring, towing and an overall undesirable situation for all involved. | 5
- Town and Country Square's traffic concurrency standard should not increase for future tenants due to any increase in the City's standards as brought about as result of the Rowley project. | 6

Please review these issues the Town and Country Square would like to present for the City of Issaquah's consideration. While the overall vision of the City of Issaquah is a worthwhile endeavor, the current economic reality must also be recognized. The existing businesses and properties are not in a position to be able to withstand additional burdens in terms of taxes, assessments, access, parking, traffic concurrency or other factors that may impede the already tough business environment. Thank you.

J.J. Sato  
Overlake Management Company

**RESPONSE TO LETTER 8**  
Overlake Management Company

1. Comment noted.
2. This FEIS and the Master Transportation Finance Agreement (MTFA) negotiated with the City of Issaquah recognize that signalizing the Mall Street/12<sup>th</sup> Avenue NW intersection would be the responsibility of the applicant.
3. Comment noted.
4. The traffic operations analyses and proposed mitigation assumes that the Town and Country Shopping Center driveway opposite Mall Street on 12<sup>th</sup> Avenue NW would be fully integrated into any future signalization of the intersection. No changes to access or any restrictions on turn movements have been assumed and none are proposed for the Hyla Crossing and Rowley Center Project.
5. The minimum parking requirements created for the Preferred Alternative will consider the anticipated demand, internalization of activities, mode of travel, and temporal distribution of parking demand among uses. The required parking supply for various types of uses, including residential units, may evolve over time as development phases are completed and travel behaviors change. The mitigation plan for the development will include a traffic and parking management plan that will monitor parking demand and supply, as well as any parking overflow. If parking overflow is observed and documented, the applicant will implement measures to address and eliminate the impacts.
6. The applicant has not proposed any changes to the City's traffic concurrency standards as part of its development.

**Letter 9**

**From:** Laile Di Silvestro [laile@mindspring.com]  
**Sent:** Friday, September 30, 2011 11:36 AM  
**To:** Peter Rosen  
**Subject:** Hyla Crossing and Rowley Center Draft EIS

30 September 2011

As a resident who lives up the hill from Hyla Crossing and Rowley Center areas, I have particular interest in the draft EIS and the potential impact development of these areas will have on quality of life for me, my family, and my neighbors. In this regard, I welcome the plans for higher-density, mixed-use development and the developer's clear intent to minimize impact on our water resources and animal habitats. However, the draft EIS is notably deficient in its consideration of air quality/climate impact. A dedicated section (or sections) covering the potential impact of the development alternatives on air quality and climate is notably missing, and the discussion of air quality in the Construction Impacts section is extremely limited. These omissions are likely to preclude identification of mitigations necessary to prevent degradation of air quality in Issaquah and enable the city to meet regulatory requirements and its land use goals.

I recommend the following modifications:

- Add a section that covers air quality and climate (or two separate sections). I conducted a quick review of similar EISs and noted that a) it is fairly standard for EISs to include a section on Air Quality and that b) an increasing number of EISs for urban developments are including a separate section on Climate to address carbon footprint and greenhouse gas emissions, typically in relation to the cities' targets and policies. The section(s) should include the following:
  - References to the current levels of ozone, VOCs, nitrogen dioxide, carbon monoxide, and particulates.
  - References to the city's most recent carbon footprint measurements.
  - References to the City of Issaquah Comprehensive Plan's sections that pertain to air quality and climate.
  - Analysis of the anticipated impact of each alternative on the ability of the city to meet its goals per the Comprehensive plan and comply with applicable air quality regulations. At a minimum, this analysis should include anticipated impact to levels of ozone, VOCs, nitrogen dioxide, carbon monoxide, particulates, and carbon footprint, and should take into account related elements of the Transportation and Traffic section, as well as an assessment of the kinds of businesses anticipated.
  - Recommended mitigations based on best practices implemented by other cities with similar goals. These tend to be cost-effective from both an implementation and maintenance perspective, and often enhance a development's appeal and value.
- Augment the Construction Impacts section to include the following:
  - Release of VOCs, silicates, and other substances during construction that could impact human health.
  - A more comprehensive list of mitigations.
- Augment the Transportation and Traffic section to include the following:
  - Targets that take into account not just traffic density and circulation, but air quality

impacts.

- o Expansion of the Transportation Mitigation Plan section such that the mitigations would be considered not just when the total number of off-site vehicle trips approaches an established threshold, but when air quality and carbon footprint measures approach established thresholds (which will change over time).

4  
cont.

In considering mitigations, I recommend that the EIS does not assume that applicable standards, compliance incentives, and enforcement policies are or will be sufficient to adequately address the impacts of the proposed development alternatives on air quality. There is evidence that a) these do not necessarily result in consistent compliance with existing regulations (see the recent ozone measurements for an example) and b) they will not support the city's goals per the City of Issaquah Comprehensive plan.

5

It would be useful to include mitigations that have been successful in other cities. These include increasing the reflectivity of the buildings; positioning the buildings to promote airflow; planting evergreen species with a high surface area adjacent to intersections and arteries; using no-VOC construction materials; using particulate-based construction materials (such as sheetrock, joint cement, etc.) designed to reduce the release of silica, silicates, and calcium carbonates into the environment during construction; and staging of high-emissions construction vehicles in a location that has a tree canopy.

6

Thank you for considering my comments. I look forward to the final draft.

Kind Regards,

Laile

**L. Laile Di Silvestro**  
 130 Big Bear Place NW  
 Issaquah WA 98027  
 Voicemail: 1.425.557.2805  
 Mobile: 1.425.444.2805  
 Email: [laile@mindspring.com](mailto:laile@mindspring.com)  
 Web: [www.lailedisilvestro.com](http://www.lailedisilvestro.com)

## **RESPONSE TO LETTER 9**

Laile Di Silvestro

1. Comment noted. In response to the comments in this letter, **Chapter 3, Section 3.7** in this FEIS includes a quantitative analysis of the potential impacts from the EIS alternatives on greenhouse gas (GHG) emissions, as they relate to climate change and a qualitative discussion of the potential air quality impacts during operation of the project. DEIS Section 3.6, Construction Impacts, contains a qualitative analysis of the air quality impacts of the EIS alternatives during construction activities.
2. Comment noted. **Chapter 3, Section 3.7** of this FEIS provides a discussion of air quality during operation of the project, and GHG emissions, as they relate to climate change. See **Section 3.7** for further details, including a summary of potential GHG emissions from redevelopment under the EIS alternatives.
3. Comment noted. Additional mitigation measures were identified for air quality and GHG emissions in this FEIS (see **Chapter 3, Section 3.7** and **Table 1-2** of this FEIS). As part of the Development Agreement, the applicant selected the framework established in “One Planet Living” to provide guidance for the project and a comprehensive approach towards sustainability. Part of the framework for “One Planet Living” includes the principle to use sustainable healthy products/materials, with low embodied energy, sourced locally, and made from renewable or waste resources.
4. As described on DEIS page 3.5-46, the potential implementation of a Transportation Management Plan would help to reduce vehicle trips to and from the site and as a result, would reduce associated vehicle emissions in the process. In addition, as described in the response to Comment 3 in this letter, the applicant has selected the framework established in “One Planet Living” to be incorporated into the Development Agreement to provide guidance for the project and a comprehensive approach towards sustainability. One of the principles included as part of the “One Planet Living” framework is to encourage low carbon modes of transportation to reduce emissions.
5. In addition to applicable standards and regulations, the applicant has demonstrated their commitment to sustainability by selecting the framework established in “One Planet Living” to provide guidance for the project and a comprehensive approach towards sustainability. See **Chapter 3, Section 3.7** of this FEIS for additional details on the framework and principles of “One Planet Living.”
6. Comment noted. As described in the response to Comment 5 in this letter, the applicant has selected “One Planet Living” to provide guidance for sustainability for the Hyla Crossing and Rowley Center Project. Additional measures related to sustainability could also be included in the approved Development Agreement, as appropriate.

**Letter 10**

**From:** Barbara Royce Extract [extract22@hotmail.com]  
**Sent:** Thursday, September 22, 2011 4:32 PM  
**To:** Peter Rosen  
**Subject:** Rowley Proposal for Hyla Crossing, etc.

Dear Peter,

The River & Streams Board has submitted Comments on the Hyla Crossing and Rowley Center Draft EIS to you. While they support the overall approach to the project, they make some very important recommendations which I hope you will take very seriously. These recommendations include:

\* Increasing the Tibbetts Creek buffer at the north end to meet current buffer requirements | 1

\* Provide the required buffer for Wetland C, a Class 1 wetland requiring a 100-foot buffer in the middle of Hyla Crossing. | 2

\* Issues regarding the proposed storm water system. | 3

The River & Streams Board points out that if buffers standards are not maintained for critical wetlands and streams, it sets a bad precedent for other developments in Issaquah. This could result in a major character change for our city. | 4

Issaquah residents rely upon you to see that maintaining these standards will be required for this proposal.

Thank for your consideration,  
Barbara Extract,  
Issaquah, WA

## **RESPONSE TO LETTER 10**

### Barbara Extract

1. See the response to Comments 3 and 4 in Letter 6.
2. See the responses to Comments 8 and 9 in Letter 6.
3. See the responses to Comments 11 through 15 in Letter 6.
4. See the response to Comment 10 in Letter 6.

The creation and presence of the Tibbetts Creek Greenway at this site has resulted in an unusual and unprecedented situation. Comprehensive restoration, enhancement, and preservation activities have already been designed and many completed for the Tibbetts Creek drainage basin. Efforts have been on-going for over two decades. It is unlikely that another development proposal would have this history of previously providing new and improved habitat, increased wetland and stream functions, aesthetics, and recreational opportunities in the context of non-required, non-mitigation-related actions on a proposed redevelopment site.

Janet M. Wall  
22740 SE 56<sup>th</sup> St  
Issaquah, WA 98029

September 29, 2011

Peter Rosen, Environmental Planner  
Issaquah Planning Department  
P O Box 1307  
Issaquah, WA 98027

RE: Comments on Hyla Crossing and Rowley Center Project DEIS

As a member of the River and Streams Board, I fully support the comments recently submitted by the Board in regards to this DEIS. In view of the density planned in this proposal, I feel it is especially important for both Tibbetts Creek and its associated wetland C to have the full 100-ft buffer along their entire length, as agreed upon in the Hyla Crossing Master Site Plan to help maintain all of the functions of the creek and wetland including as wildlife habitat and a wildlife corridor. I also do not feel that alternatives to installing a sotrmwater pipe to Lake Sammamish have been adequately explored, nor have the potential impacts of this system been fully addressed.

1

In addition to supporting the comments presented by the River and Streams Board, I have additional comments as a private citizen and local resident:

Percentage of impervious surface/dedicated green space/parks

According to the description in the section 3.2-25 Plants; the proposed dedicated green space under both Alternatives 1 and 2 would be only 12.9 acres, or 22% of the site. Under the existing requirements of the Hyla Master Plan, there would be much more dedicated green space as it requires 20% pervious in the Hyla Crossing area and 35% pervious on the rest of the site, for a total of 21.3 acres. The percentage pervious and total acreage of dedicated green space should increase, not decrease with redevelopment. As buildings are allowed to be built to greater heights, surface parking areas can be removed and more green and/or landscaped areas planted.

2

Also, the proposed increase in residential apartments in the area will necessitate more communal areas for tot-lots, playfields, garden areas, and space for trees to be planted to help alleviate the increase in vertical concrete/glass. I could not find any mention of the provision of parks, even pocket-parks in the DEIS. Although there was some mention of the ability to “live-work-play” in Alternatives 1 and 2 in the Land Use section, and some oblique references to recreational demands increasing with the number of residents, I could find no discussion about providing those facilities within the development. To require residents to go some distance across busy highways to a city-provided recreational facility would defeat the premise of a walkable urban neighborhood. Some

3

discussion should be provided in the DEIS and promises made in the Development Agreement about such facilities.

| 3 cont.

Additional comments on stormwater pipe

There was no discussion about what public benefit would be provided in return for being able to place a private stormwater outfall in Sammamish Cove Park. Other than re-vegetation of disturbed areas, no mitigation was proposed.

| 4

Page 3.2-21 mentions that further environmental review under SEPA would be required to obtain permits, but it seems like there isn't enough information to make an informed decision on which alternative would be least environmentally damaging. Could any of the outfall alternatives conceivably cause an overturn of the hyperlimnion if a large quantity of stormwater were dumped into the lake while it was stratified?

| 5

Lack of guarantees, promises

Although the changes to the Shoreline Master Program may not apply to the Rowley Property, the Critical Area Ordinances are also in the process of being revised, which include a section on requirements upon redevelopment. These proposed regulations (on hold for over 2 years now) should be applied to the Development Agreement, to provide some improvement over existing conditions.

| 6

Although there was a list of required/proposed mitigation measures in 3.2-32 and a list of other possible mitigation measures to critical area impacts on p. 3.2-34, there were not many guarantees or promises in exchange for the tremendous advantages that a 30-year development agreement with the ability to build to a 150 or 200 ft height would have over the existing zoning. No promises were made in regards to public parks, setting aside space for at least an elementary school, or some form of interim shuttle service to help deal with traffic/transportation issues. There was no promise to produce a percentage of low-income housing.

| 7

It seems that there is very little provision for dealing with the huge infrastructure changes that the City would have to provide in order to accommodate the traffic and demand for services that such a large increase in density requires. This would mean that the existing taxpayers would have to pay a disproportionate amount for the new infrastructure rather than having it pay for itself. I urge you to require the estimation of these expected costs and devise methods by which they can be paid for in the development process by those who will profit from it.

| 8

Sincerely,

*Janet M. Wall*  
Janet M. Wall

## RESPONSE TO LETTER 11

Janet Wall

1. Comment noted.

See the response to Comment 13 in Letter 5 and the responses to Letter 6 for details on the existing and proposed buffers from Tibbetts Creek. See also FEIS **Table 3.2-1** and **Figure 3.2-1** for details on existing and proposed stream buffer widths.

All stormwater management scenarios would meet the requirements of the City of Issaquah's *2009 Addendum to the 2009 King County Surface Water Design Manual*. As indicated on DEIS page 2-46 and in **Table 1-2** of this FEIS, if Scenario 2 is selected, further SEPA review will be conducted prior to issuance of any applicable permits and approvals for the conveyance system and outfall to Lake Sammamish.

2. Comment noted. See the response to Comment 38 in Letter 5.
3. As described in Chapter 2 of the DEIS (pages 2-30 through 2-32), Alternatives 1 and 2 would include approximately 16.8 acres of proposed community space on the Rowley Properties site. Community space in the Hyla Crossing Area would include approximately 12.6 acres of proposed green space which would include pervious areas associated with the Tibbetts Creek Greenway and other wetland/wetland buffer areas. Approximately 3.2 acres of proposed shared space would be provided in the Hyla Crossing Area, which would include a park, amphitheater, pavilion, or other community gathering space. Community space in the Rowley Center Area would include approximately 0.3 acre of proposed green space. Approximately 0.8 acre of proposed shared space would be provided in the Rowley Center Area, which would be intended to serve as a multi-functioning gathering space/plaza area. Private community space areas for area residents could also be provided as part of redevelopment onsite and could include children's play areas, garden areas, or other amenities. Specifics about the proposed community space will be provided in Appendix D of the approved Development Agreement between the applicant and the City.

As indicated on DEIS page 3.3-58, redevelopment of the Rowley Properties site under the EIS Alternatives (Alternatives 1-3) would require the payment of impact fees in accordance with City of Issaquah regulations, including impact fees for parks. A portion of the impact fees for parks could be fulfilled through the construction of new parks and recreational facilities or the investment in unfunded projects at Tibbetts Valley Park.

4. DEIS pages 3.1-13 through 3.1-16 generally describe the two possible conveyance routes and three possible outfall options for discharge of stormwater to Lake Sammamish under Stormwater Management Scenario 2 (see DEIS Appendix D for details). DEIS page 3.2-21, and pages 3.2-29 through 3.2-31 generally analyze the potential impacts to critical areas and water quality with construction and operation of the conveyance system and outfall (see DEIS Appendices E and F for details). Several mitigation measures are listed on DEIS page 3.2-33 that would address the potential impacts of constructing and operating the conveyance system outfall, including bullets 7, 8, 9, and 10. The specific mitigation measures related to Scenario 2 have been removed from **Table 1-2** in this FEIS, because if Scenario 2 is selected, additional SEPA review will be performed and appropriate mitigation measures identified for the

conveyance system in Sammamish Cove Park and outfall to Lake Sammamish. Stormwater management under either Stormwater Management Scenarios 1 or 2 would provide greater stormwater quality and quantity control than under existing conditions (approximately 94 percent of the stormwater generated onsite currently flows offsite with little or no detention or water quality treatment) and water quality conditions in Tibbetts Creek and Lake Sammamish would likely improve.

If the conveyance system through Sammamish Cove Park and the outfall to Lake Sammamish are built, they would be owned, operated, and maintained by the City of Issaquah, and would be considered public facilities. It is acknowledged that the public benefit of this outfall is not specifically described in the DEIS. Implementation of Scenario 2 with redevelopment of the Rowley Properties site would not impact any use of Sammamish Cove Park, nor access to or use of Lake Sammamish. According to the parks inventory in the Parks, Recreation, Trails, and Open Space Element of the City of Issaquah's Comprehensive Plan, Sammamish Cove Park was purchased by the City as open space/wildlife habitat on the shores of Lake Sammamish. The inventory indicates that no lake access is available from the park. Vol. 2 of the Plan includes the 2009 Parks, Recreation, Trails and Open Space Capital Improvement Projects (CIPs) for 2010-2015. No projects are listed for Sammamish Cove Park in the CIP list.

5. See the response to Comment 1 in this letter.
6. Comment noted. As indicated in the response to Comment 39 in Letter 5, **Table 1-2** of this FEIS includes an updated list of the mitigation measures, reflecting wording that is anticipated to be included in the Development Agreement. Listed as a "Required by Code, Laws, and Regulations" is a measure to provide for periodic review of the Development Agreement; this will allow for the review of the provisions for consistency with updates to federal, state and local regulations, as applicable. Thus, the mitigation measures identified in this FEIS and in the Development Agreement include a provision for review of updates to the Critical Area Ordinance, and consideration of updates for the Hyla Crossing and Rowley Center redevelopment.
7. Mitigation Measures. The mitigation measures listed in **Table 1-2** of this FEIS are categorized as "Required by Code, Laws, and Regulations", "Proposed by the Applicant" and "Other Possible" mitigation measures. The applicant has agreed to implement all of the mitigation measures listed as "Proposed by the Applicant" (other mitigation measures that the applicant has volunteered to implement, beyond the required mitigation). Implementation of the mitigation measures identified as "Required by Code, Laws and Regulations" and "Proposed by the Applicant" is expected to reduce impacts to less than significant levels. The "Other Possible" mitigation measures are additional actions that could be undertaken to further mitigate environmental impacts or provide additional site amenities; at this point, the applicant has not committed to implement these measures. Implementation of the "Other Possible" mitigation measures would not be required to reduce the impacts of the project to less than significant levels.

Community Space. See the response to Comment 3 in this letter.

Schools. The proposed residential uses in on the Rowley Properties site under Alternatives 1 and 2 would be located in an urban area and would be multifamily in character. These residential uses would not be expected to include substantial numbers

of school-age children, and significant impact on schools would not be expected. Therefore, Schools was not included as an element to be analyzed in the DEIS.

The site is located within the Issaquah School District. The District does its own planning and on a yearly basis prepares a capital facilities plan to account for changes in student population and the need for any changes in capital facilities. As part of their planning, the District collects and tracks data on new housing development to enhance the accuracy of their enrollment projections. The District has not indicated the need to retain space for an elementary school on the Rowley Properties site in order to accommodate future students from the proposed redevelopment in its most current Capital Facilities Plan.

As indicated on DEIS page 3.3-58, redevelopment of the site under the EIS alternatives would require the payment of City of Issaquah impact fees, including impact fees for schools.

Shuttle Service. Shuttle service is not proposed, because of the site's proximity to I-90, SR-900, the Issaquah Transit Center, and the Issaquah Park and Ride.

Low-income Housing. Since issuance of the DEIS, the applicant has committed to work with the City to provide low-income housing in the Hyla Crossing and Rowley Center Project, and has agreed to work with the City to provide 100 rental housing units for households with incomes between 30 and 70 percent of King County's annual median income in the proposed redevelopment.

8. See the response to Comment 7 in Letter 5.

# ERRATA

## **CHAPTER 5 ERRATA**

This chapter of the Final EIS (FEIS) identifies corrections to the August 2011 Draft EIS (DEIS), including text changes and clarifications, based on comments received on the DEIS and other updated information.

### **Chapter 1 – Summary**

Chapter 1 is included in the FEIS and identifies updates and corrections subsequent to the issuance of the DEIS.

### **Chapter 2 – Description of Applicant’s Preferred Alternative**

On DEIS page 2-22, the fourth paragraph has been revised as follows:

Two new roadways are also proposed in the Rowley Center Area under Alternatives 1 and 2, and would provide new north/south roadways through the area to connect NW Gilman Boulevard to NW Maple Street and create walkable blocks through the Rowley Center Area<sup>1</sup>. New east/west alleys would also be included to provide further access through the area.

On DEIS page 2-23, the sixth bullet has been revised as follows:

- Pedestrian-Only Trails – designed for non-motorized access only, ~~approximately 10 formal and informal trails a minimum of four-foot wide~~ with associated landscaping.

On DEIS page 2-26, the first bullet has been revised as follows:

- **Scenario 1** – Conventional detention and water quality treatment in pond systems would be provided. All stormwater runoff would be directed to a few regional wetponds with sand or media filters for ~~enhanced~~ basic water quality treatment and Sensitive Lake Protection. Regional detention ponds would provide flow control. Existing stormwater lines would be used and existing discharge locations to Tibbetts Creek and Tributary 0170 would be maintained. Flows would be released to the streams matching pre-developed peak flow rate durations for half of the two-year event through the 50-year event, along with matching peak flows from the 2- and 10-year events.

On DEIS page 2-27, the second paragraph has been revised as follows:

Low impact development (LID) strategies could be incorporated into the redevelopment to the maximum extent feasible. The actual LID features included in the redevelopment would be determined through the Master Drainage Plan, to be ~~developed prior to ground-disturbing activities~~ included in the approved Development Agreement.

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<sup>1</sup> It should be noted that at this time Rowley Properties does not control all of the property to provide the connection of the proposed 13th Avenue NW north and south segments through the Rowley Center Area.

On DEIS page 2-33, the third paragraph regarding distances between buildings (including tower structures) has been updated with the following mitigation measure:

- Design guidelines specific to the distance between buildings (including tower structures) would be included in Appendix B (Design Guidelines) of the Development Agreement and would allow for view corridors through the Rowley Properties site.

On DEIS page 2-34, Table 2-3 has been revised as follows:

**Table 2-3  
SUMMARY OF REDEVELOPMENT UNDER THE EIS ALTERNATIVES**

	Alternative 1 (6.5 million sq. ft.)		Alternative 2 (5.5 million sq. ft.)		Alternative 3 (No Action w/ Existing Zoning)	Alternative 3 (No Action w/ Existing Conditions)
	80% / 20% Mix <sup>1</sup>	60% / 40% Mix	80% / 20% Mix	60% / 40% Mix		
<b><u>Hyla Crossing Area</u></b>						
Residential (sq.ft.)	756,000	1,130,600	228,000	628,000	0	0
Commercial (sq.ft.)	1,593,500	1,131,500	1,275,350	1,063,000	1,035,700	684,042 <sup>2</sup>
Parking (sq.ft.)	1,194,930	1,041,845	799,971	813,540	<u>1,054,842<sup>3</sup></u>	<u>604,175<sup>3</sup></u>
<b>Sub Total Built Area</b>	<b>3,544,505</b>	<b>3,303,945</b>	<b>2,303,321</b>	<b>2,504,540</b>	<b><u>2,090,542</u></b>	<b><u>1,288,217</u></b>
Residential Units	796	1,190	240	661	0	0
Parking Stalls	3,664	3,227	2,536	2,574	3,246	2,459
<b><u>Rowley Center Area</u></b>						
Residential (sq.ft.)	0	544,000	400,000	750,000	0	0
Commercial (sq.ft.)	1,945,000	1,629,000	1,753,000	1,322,800	676,500	174,663
Parking (sq.ft.)	1,103,960	1,116,396	1,137,086	1,008,256	676,500	0
<b>Sub Total Built Area</b>	<b>3,048,885</b>	<b>3,289,396</b>	<b>3,290,086</b>	<b>3,081,056</b>	<b>1,353,000</b>	<b>174,663</b>
Residential Units	0	573	421	789	0	0
Parking Stalls	3,369	3,404	3,463	3,096	2,255	603
<b>Total Built Area</b>	<b>6,593,390</b>	<b>6,593,341</b>	<b>5,593,407</b>	<b>5,585,596</b>	<b><u>3,443,542</u></b>	<b><u>1,462,880</u></b>
<b>Total Residential Units</b>	<b>796</b>	<b>1,763</b>	<b>661</b>	<b>1,450</b>	<b>0</b>	<b>0</b>
<b>Total Parking Stalls</b>	<b>7,034</b>	<b>6,631</b>	<b>5,999</b>	<b>5,669</b>	<b>5,501</b>	<b>3,062</b>

**Source: VIA Architecture, 2011.**

<sup>1</sup> Indicates the percentage of commercial use/ percentage of residential use.

<sup>2</sup> Includes approximately 620,000 square feet of development as part of the previously approved Hyla Crossing Master Site Plan and approximately 64,042 square feet of existing retained development in the Hyla Crossing Area that is outside of the Master Site Plan area.

<sup>3</sup> The Hyla Crossing Master Site Plan would provide approximately 1,859 parking stalls within the area; however, it does not specify whether these stalls would be provided in structured areas or surface lots. To provide a conservative analysis, parking area for the MSP Area was calculated based on the assumed parking stall size that was utilized for the remainder of the Hyla Crossing Area (325 sq. ft. per stall).

On DEIS page 2-35, the second paragraph has been revised as follows:

Future redevelopment assumed under the Redevelopment Alternatives (Alternatives 1 and 2) would consist of three primary activities: 1) demolition of existing buildings and paved areas and removal, replacement or abandonment of existing utilities; 2) construction of new major site infrastructure, including roadways, utilities and parks/trails; 3) construction of new buildings and associated parking (structured or temporary surface); and, 4) the provision of ~~open space and~~ community space, including landscaping

On DEIS page 2-39, the first paragraph has been revised as follows:

Under this sub-alternative, redevelopment is assumed to occur on the Rowley Properties site consistent with the existing zoning together with the previously approved Hyla Crossing MSP. The majority of the existing structures on the site would be demolished, with the exception of the Hilton Garden Inn Hotel and John L Scott Building in the Hyla Crossing Area (approximately 132,000 square feet). Redevelopment would include commercial uses consistent with an office campus environment and could include limited retail uses within the commercial buildings; shared parking structures would also be provided on the site. Approximately 3.4 million square feet of development would be provided on the site, including 1.7 million square feet of commercial development and 1.7 million square feet of parking (structured parking and/or surface parking<sup>2</sup>).

On DEIS page 2-42, the first paragraph has been revised as follows:

Under this No Action sub-alternative, it is assumed that existing uses on the Rowley Properties site would continue and development on the site would occur in conjunction with the previously approved Hyla Crossing MSP (see **Figure 2-7** for an illustration of the site plan under the No Action Alternative – Existing Conditions sub-alternative). Approximately 620,000 square feet of office and intensive commercial uses and approximately 604,175 square feet of parking for approximately 1,800 vehicles would be developed on the site as part of the previously approved Hyla Crossing MSP<sup>2</sup>.

### **Chapter 3.1 – Water Resources**

On DEIS page 3.1-8, the first paragraph has been revised as follows:

For the permanent stormwater management system, the City's 2009 Addendum to the 2009 KCSWDM requires that all projects exceeding certain size thresholds provide Sensitive Lake Water Quality treatment, unless certain exemptions are met. The goal of Sensitive Lake Water Quality treatment is to remove 50 percent of annual average total phosphorous and 80 percent of the total suspended solids for all of the water leaving the site. Many projects, including the Hyla Crossing and Rowley Center Project, require Enhanced Basic Water Quality treatment, which targets 50% removal of total zinc, which is used as the indicator metal. For the Rowley Properties site, this requirement is only applicable for the stormwater management scenarios that would discharge treated stormwater to Tibbetts Creek. Piped discharges to major receiving waters are allowed to

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<sup>2</sup> The previously approved Hyla Crossing MSP does not specify whether parking stalls would be provided in structured areas or surface lots.

only provide Basic Water Quality treatment, as noted on page 1-62 of the City Addendum. Lake Sammamish is considered a “major receiving water”. Additionally, another exception for Enhanced Basic treatment exists for sites that have a covenant preventing the use of leachable materials on areas of the site exposed to the weather. The Development Agreement for the Rowley Properties redevelopment will contain this covenant, and as such, be further waived of the requirement to provide enhanced treatment for runoff from the site.

On DEIS page 3.1-10, the second paragraph as been modified as follows:

Two main approaches under consideration for stormwater quality treatment include: 1) ~~enhanced~~ basic water quality treatment and sensitive lake protection via conventional detention and filtration; and, 2) basicwater quality treatment and sensitive lake protection via filtration. Clean water would be released to Tibbetts Creek at predevelopment (forest) rates. A landscape management plan would also be developed and implemented to minimize the impacts of landscape chemicals on water quality.

On DEIS page 3.1-10, the fourth paragraph has been modified as follows:

With Stormwater Management Scenario 1, water quality treatment and flow control would comply with the City’s 2009 Addendum to the 2009 KCSWDM requirements by providing ~~enhanced~~ basic water quality treatment and sensitive lake protection, and matching pre-developed peak flow rate durations for half of the two-year event through the 50-year event, along with matching peak flows from the 2- and 10-year events.

DEIS Table 3.1-1 has been modified as follows:

**Table 3.1-1  
SUMMARY OF STORMWATER MANAGEMENT SCENARIOS**

	SCENARIO 0 (No Action)	SCENARIO 1	SCENARIO 2
Area with Flow Control	6%	100%	100%
Area with WQ Basic (TSS) Treatment	6%	100%	100%
Area with WQ Enhanced Basic (Metals) Treatment	<6%	0%*	0%*
Area with WQ Sensitive Lake (Phosphorus) Treatment	6%	100%	100%
<b>Peak Flows to Tibbetts Creek (cfs)</b>			
2-year	16.3	1.4	2.4
10-year	19.1	3.9	4.2
25-year	19.5	5.2	4.2
100-year	27.1	13.9	6.1
<b>Peak Flows to Tributary 0170 (cfs)</b>			
2-year	7.1	0.6	1.1
10-year	8.4	1.7	1.8
25-year	8.5	2.3	1.9
100-year	11.8	6.1	2.7
<b>Peak Flows Directly to Lake Sammamish (cfs)</b>			
2-year	-	-	25.1
10-year	-	-	27.7
25-year	-	-	28.0
100-year	-	-	34.7
Complies with SWM Flow Control Standard	N/A	X	X
Complies with SWM Water Quality TSS Treatment Standard	N/A	X	X
Complies with SWM Water Quality Metals Treatment	N/A	X	X
Complies with SWM Water Quality Phosphorus Treatment	N/A	X	X

\* Enhanced Basic Treatment not provided for Scenarios 1 or 2 per Sensitive Lake WQ Treatment Areas Exception #6 in 2009 Issaquah Addendum to 2009 KCSWDM (restriction of leachable metals).

### **Chapter 3.3 – Land and Shoreline Use**

On DEIS page 3.3-26, the third paragraph has been modified as follows:

Specific building development plans, layouts for uses and building footprints have not been established at this stage of the redevelopment process. The redevelopment would emphasize a mix of uses and a variety of housing types, with greater attention to streetscape and the design of the public realm. For purposes of this DEIS, assumptions were made regarding the mix, type and density of uses in given areas of the site to address on and off-site land use compatibility issues on a “maximum potential impact”

basis. The actual mix and layout of uses and buildings would be determined by ~~the City of Issaquah~~ and the applicant based on future market conditions and the specific development regulations and standards that are ultimately adopted. Consistent with the provisions for a Planned Action EIS, further SEPA review would not be required for future development that is consistent with the project description in the Planned Action Ordinance and that implements the conditions and mitigation therein. Further SEPA review could be required if a project does not meet the requirements for the Planned Action.

The Hyla Crossing and Rowley Center Project includes areas that are zoned as Retail (R). Per IMC Section 18.06.110, the primary purpose of the R zoning classification is to provide retail services for the local service area, including banks, professional offices, personal services, auto services, restaurants and department stores; multifamily residential is also permitted to promote proximity of jobs to housing and mixed-use development.

Multifamily residential uses could be developed in this area, in accordance with the R zoning classification. However, the No Action, Existing Zoning sub-alternative analyzed in the DEIS was intended to represent the primary purpose of the R zone in this area of the site, which is to provide retail services to the local service area. This alternative also represents what the applicant would develop in this area of the site if the site were to remain in its existing R zoning. As a result, the seventh paragraph of DEIS page 3.3-27 has been removed as follows:

~~The No Action Alternative would not result in a transition of the site to a mixed use neighborhood, due to the fact that residential uses are not allowed under the existing zoning. The No Action Alternative would result in continued commercial uses on the site and no new housing units. However, the City of Issaquah's vision or Guiding Principles for the Central Issaquah Area anticipate future mixed use development in the area.~~

# REFERENCES

## **CHAPTER 6 REFERENCES**

Central Issaquah Task Force. *Central Issaquah Plan Task Force Recommendations*. November 12, 2010.

City of Issaquah. *City of Issaquah Comprehensive Plan*. Amended 2010.

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Intergovernmental Panel on Climate Change. *Summary for Policy Makers*. April 30, 2007

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King County. Issaquah Creek Basin and Nonpoint Action Plan Summary website. <http://www.kingcounty.gov/environment/watersheds/sammamish/issaquah-basin-plan.aspx>. Accessed March 4, 2011.

Puget Sound Energy website. <http://pse.com/aboutpse/EnergySupply/Pages/Electric-Supply.aspx>. Accessed October 11, 2011.

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# FINAL EIS DISTRIBUTION LIST

## **CHAPTER 7**

### **DISTRIBUTION LIST**

#### **HYLA CROSSING AND ROWLEY CENTER PROJECT – FINAL EIS**

##### Federal Agencies

U.S. Army Corps of Engineers, Seattle District Office  
U.S. Environmental Protection Agency, Region X  
National Marine Fisheries Service (NOAA), NW Region  
U.S. Fish and Wildlife Service  
Federal Emergency Management Agency  
Federal Highway Administration

##### Tribes

Muckleshoot Indian Tribe, Fisheries Department  
Muckleshoot Indian Tribe, Cultural Resources Program  
Snoqualmie Tribe

##### State Agencies

Department of Ecology, Environmental Review Section  
Department of Ecology, Northwest Regional Office  
Department of Fish and Wildlife (WDFW)  
Department of Transportation (WSDOT), Northwest Region Office  
Department of Transportation (WSDOT)  
Department of Archaeology and Historic Preservation  
Department of Commerce  
Department of Natural Resources  
Social & Health Services, King County Eastside Service Office  
Washington State Parks  
Lake Sammamish State Park

##### Local Agencies

King County Development and Environmental Services  
King County Wastewater Treatment Division  
King County Office of Cultural Resources  
Metro Transit  
Sound Transit  
Puget Sound Regional Council  
Puget Sound Clean Air Agency  
City of Bellevue, Planning and Community Development Department  
City of Sammamish Community Development  
Sammamish Plateau Water and Sewer District  
Issaquah School District  
Seattle Public Utilities

Companies and Organizations

Puget Sound Energy

Issaquah Environmental Council

Issaquah Alps

Issaquah Chamber of Commerce

Save Lake Sammamish

Mountains to Sound Greenway

Cascade Land Conservancy

Newspapers and Libraries

Issaquah Press

Issaquah Reporter

Seattle Times - Eastside Bureau

Issaquah Library

Copies of the FEIS will also be distributed to individuals who commented on the DEIS and/or requested a copy.

**TRANSPORTATION TECHNICAL  
MEMORANDUM**

# **TECHNICAL MEMORANDUM**

Project: Hyla Crossing/Rowley Center Project  
Subject: FEIS Chapter 3 - Additional Analysis - Transportation  
Date: October 14, 2011  
Author: Marni C. Heffron, P.E., P.T.O.E.

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This technical memorandum presents additional transportation analysis for the Hyla Crossing/Rowley Center project's Preferred Alternative.

The additional analyses presented below were performed to provide details related to suggested mitigation measures. The additional analyses include the following:

- Phasing analysis to determine the approximate trip thresholds when mitigation measures are expected to be triggered by the Preferred Alternative,
- Queuing analyses to determine the length of new auxiliary turn lanes suggested as mitigation, and to make sure that the Preferred Alternative would not create substantial queues that would require additional mitigation, and
- Determination of the Preferred Alternative's traffic impact fee.

## **1. Phasing Analysis and Mitigation Thresholds**

### **Summary of Trip Generation for the Preferred Alternative**

The number of trips generated by the Preferred Alternative will be limited through an agreement with the City of Issaquah to the level previously evaluated in the Draft EIS as the Alternative 2 -60/40 Mix Scenario. Monitoring of the trips will be performed as part of the project's Transportation and Parking Management Plan, which was described in Section 3.5.3 of the Draft EIS.

Trip generation for the Preferred Alternative was derived for the Draft EIS, and was the basis for the mitigation program. Table 1 summarizes the total number of vehicle trips expected to enter or exit the site at full build out. It reflects trips generated by relatively new uses on the Hyla Crossing site that are expected to remain, such as the John L. Scott Building and the Hilton Garden Inn. However, it assumes that other existing uses would be demolished and removed to accommodate the new development. The trips reflect only the external site trips, and do not include trips that may be made among on-site uses (internal trips). As summarized below, the combined sites would generate about 45,000 trips per day (22,500 in and 22,500 out) with about 4,710 of those trips occurring in the PM peak hour. These totals reflect the full Preferred Alternative development, not the net change between the Preferred Alternative and the No Action Alternative (Previously-Approved Development). The values listed below provide the basis for any future trip monitoring. It is anticipated that early phases of project development would be monitored using the trip generation models developed for the EIS and later subsequent monitoring could be accomplished by performing traffic counts at each site's external access points.

Table 1. Hyla Crossing & Rowley Center –Vehicle Trip Summary for Preferred Alternative <sup>a</sup>

Land Use	Daily Trips <sup>b</sup>	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Hyla Crossing <sup>c</sup>	22,930	1,313	496	1,809	828	1,528	2,356
Rowley Center	22,020	1,165	492	1,657	860	1,490	2,350
<b>Total Project</b>	<b>44,950</b>	<b>2,478</b>	<b>988</b>	<b>3,466</b>	<b>1,688</b>	<b>3,018</b>	<b>4,706</b>

Source: Heffron Transportation, Inc., August 2011.

- a. The number of trips listed is for all trips that would enter and exit the site driveways at full build out. Trips that would occur among on-site uses (or internal trips) are not included in these values.
- b. Daily trips represent the total for inbound plus outbound trips.
- c. Trips for newly developed uses, including the John L. Scott Building and Hotel, are included in the trip generation for Hyla Crossing.

## Alternative Mitigation Measures

Schematic engineering design was performed for intersections where mitigation was suggested as part of the Draft EIS. That design analysis determined that one of the suggested mitigation measures – at the Newport Way NW/NW Maple Street intersection (#28)—could adversely affect an existing wetland. Therefore, an alternative remedy was evaluated. The analysis determined that the following measure would mitigate the full-build impacts associated with the Preferred Alternative:

*Widen the southwest leg of Newport Way NW to provide three northeast-bound approach lanes: a short left turn pocket (50 feet long), a thru-only lane, and a right-turn-only lane. Change the signal phasing at the intersection from split phasing for Newport Way NW/10<sup>th</sup> Avenue NW to conventional phasing with concurrent protected left turn phases.*

With the mitigation listed above, the intersection would operate at LOS E (68.0 seconds of delay per vehicle) with the Preferred Alternative. Compared to the No Action Alternative level of service reported for this intersection (LOS F, delay of 106.6 seconds), the suggested mitigation measure would fully mitigate the project impacts and would provide substantial improvement in operations over existing conditions.

Based on the subsequent schematic engineering review, alternative mitigation for the SE 56<sup>th</sup> Street/Issaquah-Fall City Road intersection (#34) is also recommended. Instead of adding a southbound right turn lane at this unsignalized intersection, the side street approach of SE 58<sup>th</sup> Street could be widened to separate the left- and right-turn movements. This mitigation option results in a better level of service for side street movements than the mitigation that had previously been proposed.

Mitigation was also suggested for the Issaquah-Fall City Road/East Lake Sammamish Parkway intersection (#11) that would restripe the privately-owned intersection approach (SE 64<sup>th</sup> Place) on the southwest side of the intersection. Other alternative mitigation measures were tested, and no other reasonable options exist to return intersection operations to the No Action level. If the private owner does not agree to the restriping plan, then the Hyla Crossing & Rowley Center projects would have a Significant Unavoidable Adverse Impact at this location.

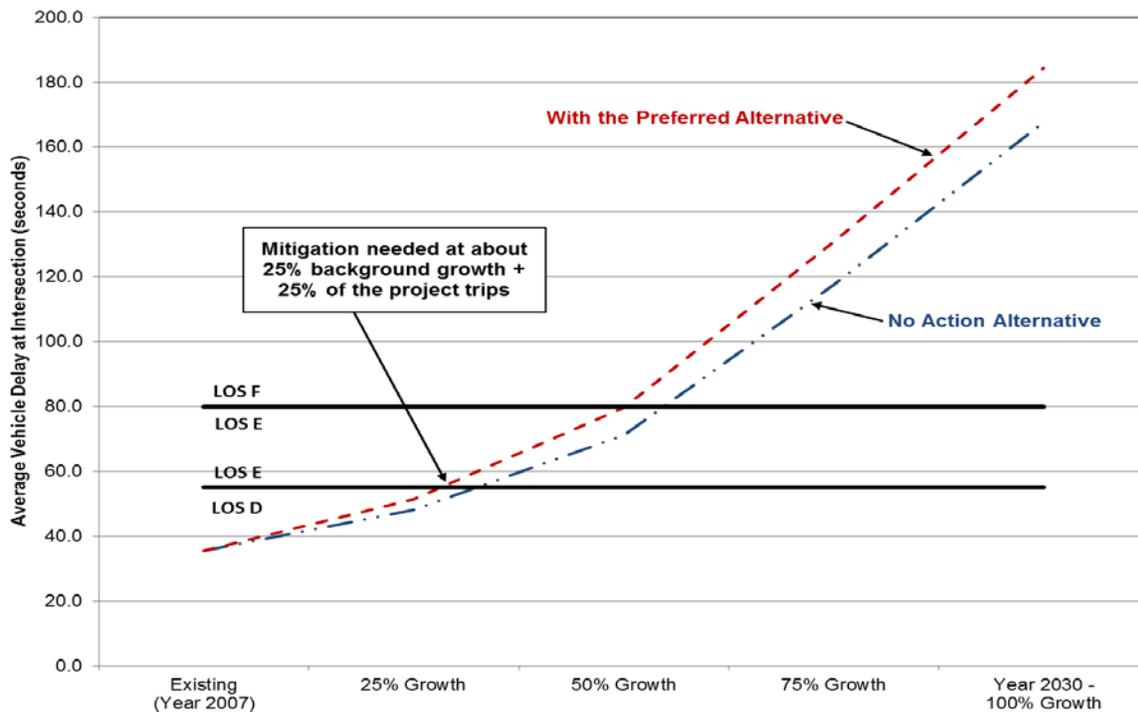
## Phasing Analysis

Additional analysis was performed for each of the suggested mitigation measures to determine the approximate level of development that would trigger each mitigation need. Level of service analysis was

performed for quartile growth increments of both background traffic associated with the No Action Alternative and increased traffic associated with the Preferred Alternative. Results for the 25% growth, 50% growth, 75% growth and 100% growth were then compared to determine the trigger for the mitigation. It is noted that this analysis assumes that growth for both the background traffic and project occur in steady increments between now and the year 2030. It is recognized that some spurts of development or background growth are likely; however, the analysis provides a reasonable tool to determine when mitigation could be needed. Full results of this level of service analysis are presented in Appendix A.

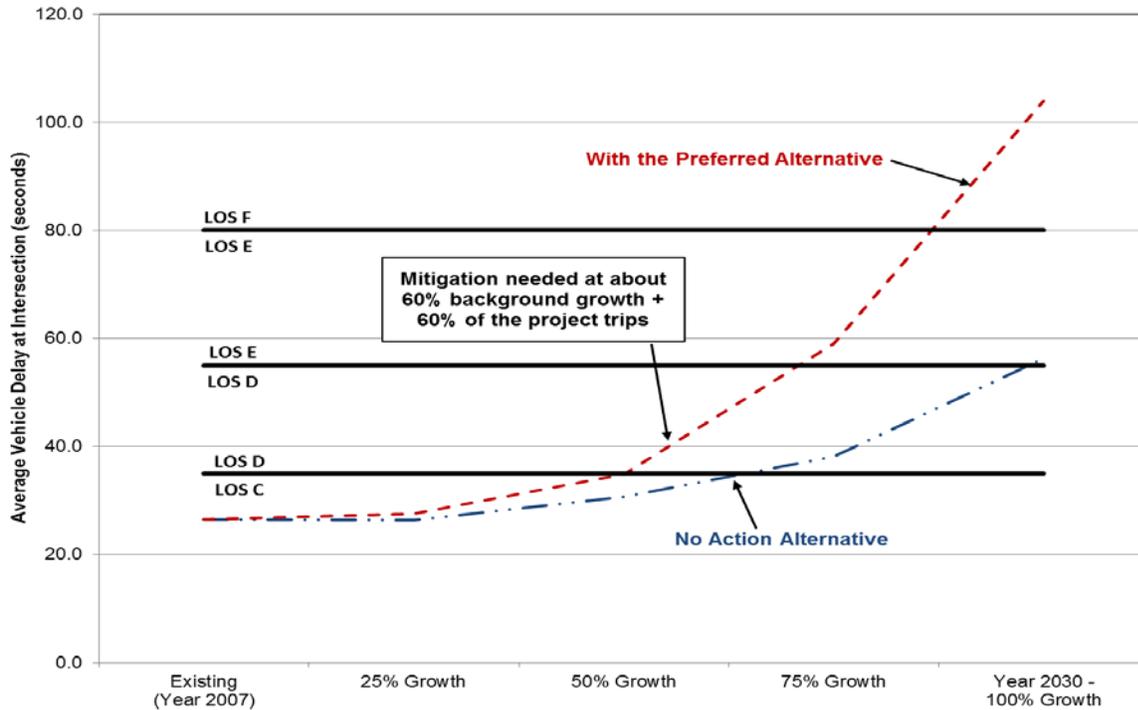
The analysis process for two example locations are illustrated below. Figure 1 shows the quartile level of service results for the intersection of SE 62<sup>nd</sup> Street/East Lake Sammamish Parkway (intersection #10). The need for mitigation at this location is estimated to occur with about 25% of the Preferred Alternative's trips, which would degrade the level of service from LOS D to LOS E. Figure 2 shows the quartile level of service results for the intersection of NW Gilman Boulevard and 12<sup>th</sup> Avenue NW (intersection #59). For this location, the level of service would remain at LOS D through about 75% growth in trips; however, the increase in project-related delay is estimated to exceed the 5.0 second increase when growth is at about 60%. The method of interpolation for LOS D intersection was used to approximate mitigation timing needs for several intersections.

**Figure 1. Mitigation Phasing for Intersection #10  
SE 62<sup>nd</sup> Street / East Lake Sammamish Parkway**



Source: Heffron Transportation, Inc. September 2011.

Figure 2. Mitigation Phasing for Intersection #59  
NW Gilman Boulevard/12<sup>th</sup> Avenue NW



Source: Heffron Transportation, Inc., September 2011.

### Trigger Levels

The trip generation estimate and the phasing analysis were combined to establish “trigger levels” for each suggested mitigation measure. For intersections adjacent to the sites (or providing direct access the Rowley Properties), the trigger for the mitigation could be trips generated by just one portion of the site that would add trips to the subject intersection. Further away from the site, the increase in trips could be related to development on either the Hyla Crossing or Rowley Center sites. Again, it is acknowledged that the impact characteristics at a particular location could change depending on the type of land use developed in any particular phase of the project. For example, intersections on the Issaquah Plateau, such as SE Issaquah-Fall City Road/SE 58<sup>th</sup> Street (intersection #34), are more likely to be affected by office or retail land uses developed at the Hyla Crossing/Rowley Center site than residential land uses. However, over time, the development is expected to be balanced. The trigger level mechanism is intended to provide a reasonable basis for phasing the mitigation as development occurs without having to perform extensive analysis for each development phase.

Table 2 summarizes the suggested mitigation measures. The measures are presented in groups according to the range of trigger levels. This analysis shows the mitigation that would be needed early in the development versus the measures that would be needed later. It also lists the mitigation that is dependent upon where site trips would access the roadway network. In these locations, some additional monitoring, such as signal warrant analysis, will likely be needed.

Table 2. Preferred Alternative Mitigation & Trigger Levels

ID#	Intersection	Mitigation for Preferred Alternative
<b>Stage 0 Mitigation: Measures needed for No Action Alternative.</b>		
25	I-90 EB Ramps / Front St N	Interchange improvement needed for No Action condition, and would be a regional improvement need coordinated with WSDOT and FHWA.
170	NW Gilman Blvd / NW Juniper St	Contribute to City's project to signalize intersection to improve the trail crossing (TIP Project Number T-26:Three Trails Crossing Intersection Improvements). Add southeast-bound right turn pocket on Gilman Blvd
<b>Stage 1 Mitigation: Triggered when total trips generated by project range from 0% to 30% of full-build trips (up to 1,400 PM peak hour trips)</b>		
10	SE 62 <sup>nd</sup> St /E Lake Samm Pkwy	Add eastbound right-turn pocket.
12	SE Black Nugget Rd / Issaquah-Fall City Rd	Add southbound right turn pocket with overlap phase, and optimize cycle length (140 sec)
<b>Stage 2 Mitigation: Triggered when total trips generated by project range from 50% to 60% of full-build trips (2,350 to 2,820 PM peak hour trips).</b>		
34	SE 58 <sup>th</sup> St /Issaquah Fall City Rd	Add eastbound right turn pocket
51	NW Gilman Blvd /Maple St NW	Modify signal phasing to add overlap phase for northbound right turn; and re-optimize splits.
26	Front St / NW Gilman Blvd	Add eastbound right turn pocket
59	NW Gilman Blvd /12 <sup>th</sup> Ave NW	Widen south leg to provide shared northbound left-thru plus right turn lane; optimize cycle length and splits.
<b>Stage 3 Mitigation: Triggered when total trips generated by project range from 75% to 95% of full-build trips (3,500 to 4,470 trips).</b>		
16	2 <sup>nd</sup> Ave SE / Front St S	Restripe westbound approach as left AND left-thru-right to allow a dual-left turn movement (no widening proposed on this approach). Widen/modify south leg of intersection to provide 2 southbound lanes to accept dual left turn. Merge lanes back to one lane at a 35:1 taper
17	SW Newport Wy / Front St	Add southbound right turn pocket by converting outside parking lane (remove curb bulb). Add parking on north side of Newport Way adjacent to residence.
28	Newport Wy NW /NW Maple St	Widen the southwest leg of Newport Way NW to provide three northeast-bound approach lanes: a short left turn pocket (50 feet long), a thru-only lane, and a right-turn-only lane. Change the signal phasing at the intersection from split phasing for Newport Way NW/10th Avenue NW to conventional phasing with concurrent protected left turn phases.
61	Newport Wy NW / SR 900	Modify signal phasing to provide eastbound right turn overlap phase and optimize corridor. Extend right turn pocket (by 100 additional feet) to make the overlap phase more effective.
62	SE 62 <sup>nd</sup> St / 4 <sup>th</sup> Ave NW	City should consider mitigation for No Action condition. Potential option is to add eastbound right turn pocket; or could reconfigure intersection as roundabout.
79	NW Gilman Blvd / 4 <sup>th</sup> Ave W	Modify signal phasing to provide southwest-bound right turn overlap phase.
11	Issaquah-Fall City Rd / E Lake Samm Pkwy	Restripe and/or shift and slightly widen west leg to provide three lanes on the eastbound approach (left, thru and right).

Table 2. Preferred Alternative Mitigation & Trigger Levels

ID#	Intersection	Mitigation for Preferred Alternative
<p>Site Access Mitigation: Dependent on development on either portion of the site that would add traffic exiting the site through the affected intersection. Signal installation is expected to be needed when traffic exiting the site through the intersection would exceed 150 PM peak hour trips, and intersections should be evaluated to determine if signal warrants are met.</p>		
21	NW Gilman Blvd / SR 900	<p>From the original Rowley Development Agreement (LID 21): 1) Add eastbound left turn lane to provide dual eastbound lefts, one thru, &amp; one thru-right lane; 2) Add westbound right turn lane to provide dual right turn movement; 3) modify signal phasing to provide overlap phase for westbound right turn.</p> <p><b>Potential Trigger:</b> Widen eastbound approach when Hyla Crossing trips = 25%; widen westbound approach when Rowley Center trips = 40%.</p>
65	NW Maple Street / SR 900	<p>Widen eastbound approach to provide three lanes (left, left-thru &amp; right turn lane), convert westbound approach to left, left-thru &amp; right turn lane. Modify signal phasing to split the eastbound and westbound phases.</p> <p><b>Potential trigger:</b> When any development on Hyla Crossing would add traffic to Maple Street.</p>
60	NW Gilman Blvd/ 15th Avenue NW	<p>Signalize when warranted. Convert existing two-way left-turn lane into left turn pockets at the intersection.</p> <p><b>Potential trigger:</b> Evaluate signal warrants when traffic exiting Rowley Center via 15<sup>th</sup> Avenue NW exceeds 150 vehicles per hour.</p>
194	NW Mall Street / 12 <sup>th</sup> Avenue NW	<p>Signalize when warranted. Convert existing two-way left-turn lane into left turn pockets at the intersection.</p> <p><b>Potential trigger:</b> Evaluate signal warrants when traffic exiting Rowley Center via 15<sup>th</sup> Avenue NW exceeds 150 vehicles per hour.</p>

## 2. Queuing Analysis

Vehicle queue lengths were determined for all locations where additional turn lanes were suggested as part of the Preferred Alternative’s mitigation. This analysis was performed to estimate the appropriate storage length for each new lane. In addition, queue lengths were determined for the key intersections near the Hyla Crossing/Rowley Center sites to determine if the Preferred Alternative would create queues that could require additional mitigation such as lengthening existing turn lanes.

The queuing analysis was performed using the *Synchro 7.0* traffic operations analysis software. Traffic volumes reflect the 2030 No Action and 2030 with Preferred Alternative conditions, and were developed by the City of Issaquah’s consultant CH2M Hill. These volumes were presented in the Draft EIS. Table 3 presents the intersections where mitigation is suggested, describes the mitigation, and then lists the queue lengths and recommended storage lengths for the affected movements. The recommended storage lengths were determined based on the length needed to hold each movement’s queue. If needed, extensions of storage lanes were identified to improve operations if access to the storage lane could be blocked by traffic in an adjacent lane.

**Table 3. Hyla Crossing & Rowley Center –Queue Lengths that Affect Mitigation for the Preferred Alternative**

ID#	Intersection	Suggested Mitigation for Preferred Alternative	Queue Lengths in Feet Average (95 <sup>th</sup> Percentile)	Recommended Storage Length
10	SE 62 <sup>nd</sup> St / E Lake Samm Pkwy	Add eastbound right-turn pocket.	EB thru = 322 (429) EB right turn = 378 (720)	Eastbound right turn pocket = 300 feet
11	Issaquah-Fall City Rd / E Lake Samm Pkwy	Restripe and/or shift and slightly widen west leg to provide three lanes on the eastbound approach (left, thru and right).	EB left turn = 117 (249) EB thru = 182 (335) EB right = 7 (76)	Eastbound left and right turn pockets = 150 feet each
12	SE Black Nugget Rd / Issaquah-Fall City Rd	Add southbound right turn pocket with overlap phase, and optimize cycle length (140 sec)	SB thru = 188 (247) SB right = 39 (73)	Southbound right turn pocket = 150 feet
16	2 <sup>nd</sup> Ave SE / Front St	Restripe westbound approach as left AND left-thru-right to allow a dual-left turn movement (no widening proposed on this approach). Widen/modify south leg of intersection to provide 2 southbound lanes to accept dual left turn. Merge lanes back to one lane at a 35:1 taper	WB left = 242 (364) WB left-thru-right = 242 (364)	No changes proposed on westbound approach to limit adverse effect of potential lane widening.
17	SW Newport Wy / Front St	Add southbound right turn pocket by converting outside parking lane (remove curb bulb). Add parking on north side of Newport Way adjacent to residence.	SB thru = 489 (736) SB right = 31 (69)	Southbound right turn pocket = 75 feet
21	NW Gilman Blvd / SR 900	From the original Rowley Development Agreement (LID 21): 1) Add eastbound left turn lane to provide dual eastbound lefts, one thru, & one thru-right lane; 2) Add westbound right turn lane to provide dual right turn movement; 3) modify signal phasing to provide overlap phase for westbound right turn.	EB left (dual) = 252 (309) EB thru = 225 (293) WB right = 98 (131)	Eastbound left turn lane = 275 feet Westbound right turn lane = 300 feet (extend to or near shopping center driveway)
25	I-90 EB Ramps / Front St N	Interchange improvement needed for No Action condition, and would be a regional improvement need coordinated with WSDOT and FHWA.		

**Table 3. Hyla Crossing & Rowley Center –Queue Lengths that Affect Mitigation for the Preferred Alternative**

ID#	Intersection	Suggested Mitigation for Preferred Alternative	Queue Lengths in Feet Average (95 <sup>th</sup> Percentile)	Recommended Storage Length
26	Front St / NW Gilman Blvd	Add eastbound right turn pocket	EB thru = 179 (263) EB right = 216 (443)	Eastbound right turn pocket = 200 feet
28	Newport Wy NW / NW Maple St	Widen the southwest leg of Newport Way NW to provide three northeast-bound approach lanes: a short left turn pocket (50 feet long), a thru-only lane, and a right-turn-only lane. Change the signal phasing at the intersection from split phasing for Newport Way NW/10th Avenue NW to conventional phasing with concurrent protected left turn phases.	NEB left = 5 (21) NEB thru = 318 (472) NEB right = 297 (533)	Northeast-bound left turn pocket = 50 feet
34	SE 58 <sup>th</sup> St / Issaquah. Fall City Rd	Add eastbound right turn pocket	Intended to separate left and right turns on minor leg of unsignalized intersection.	Eastbound right turn pocket = 75 feet
51	NW Gilman Blvd / Maple St NW	Modify signal phasing to add overlap phase for northbound right turn; and re-optimize splits.		No lane widening proposed
59	NW Gilman Blvd / 12 <sup>th</sup> Ave NW	Widen south leg to provide shared northbound left-thru plus right turn lane; optimize cycle length and splits.	NB left-thru = 99 (183) NB right = 159 (398)	Northbound right turn lane = 200 feet
60	NW Gilman Blvd/15th Avenue NW (New site access)	Signalize when warranted. Convert existing two-way left-turn lane into left turn pockets at the intersection.	EB left = 14 (45) WB left = 3 (16)	Eastbound left turn lane = 50 feet Westbound left turn lane = 75 feet
61	Newport Wy NW / SR 900	Modify signal phasing to provide eastbound right turn overlap phase and optimize corridor. Extend right turn pocket (by 100 additional feet) to make the overlap phase more effective.	EB thru =332 (501) EB right = 272 (391)	Extend right turn pocket by 100 feet (from 100 to 200 feet)
62	SE 62 <sup>nd</sup> St / 4 <sup>th</sup> Ave NW	City should consider mitigation for No Action condition. Potential option is to add eastbound right turn pocket; or could reconfigure intersection as roundabout.	EB thru = 392 (377) EB right = 172 (148)	Eastbound right turn pocket = 150 feet (Not needed with roundabout)

**Table 3. Hyla Crossing & Rowley Center –Queue Lengths that Affect Mitigation for the Preferred Alternative**

ID#	Intersection	Suggested Mitigation for Preferred Alternative	Queue Lengths in Feet Average (95 <sup>th</sup> Percentile)	Recommended Storage Length
65	NW Maple St / SR 900	Widen eastbound approach to provide three lanes (left, left-thru & right turn lane), convert westbound approach to left, left-thru & right turn lane. Modify signal phasing to split the eastbound and westbound phases.	EB left = 97 (150) EB left-thru = 189 (263) EB right = 18 (60)	Eastbound left turn pocket = 150 feet Eastbound right turn pocket = 75 feet
79	NW Gilman Blvd / 4 <sup>th</sup> Ave W	Modify signal phasing to provide southwest-bound right turn overlap phase.		No lane widening proposed
170	NW Gilman Blvd / NW Juniper St	Contribute to City's project to signalize intersection to improve the trail crossing (TIP Project Number T-26: Three Trails Crossing Intersection Improvements). Add southeast-bound right turn pocket on Gilman Blvd	SE right = 67 (120) SE thru = 867 (1,005)	Southeast-bound right turn pocket = 100 feet
194	NW Mall St / 12 <sup>th</sup> Ave NW (New site access)	Signalize when warranted. Convert existing two-way left-turn lane into left turn pockets at the intersection.	NB left = 19 (54) SB left = 2 (10)	NB left turn lane = 100 feet SB left turn lane = 100 feet

Source: Heffron Transportation, Inc., September 2011.

Detailed analysis was performed for the six signalized intersection in the vicinity of the Hyla Crossing/Rowley Center sites to determine if additional mitigation would be required because of project-related queue impacts. The results of this analysis are summarized in Table 4.

As summarized below, for most of the intersection movements in the site vicinity, the queue lengths with the Preferred Alternative (and proposed mitigation) would be similar to queue lengths with the No Action condition. At some locations where changes in the lane configuration are proposed, a long queue in one lane may be shifted to multiple lanes. For example, a queue that would otherwise occur in a thru-right lane would be reduced by the addition of a right-turn-only lane. Two locations where the Preferred Alternative would substantially increase the queue AND the length of the queue would not fit within the storage capacity of the lane are described below:

- **Intersection #21: NW Gilman Boulevard / SR 900, Westbound left turn** – This movement’s queue would increase when the opposing approach is widened to provide dual eastbound left turn lanes. The change, as well as the re-allocation of signal time among intersection movements, would reduce the green time available for westbound left turns. This would increase the queue length. Because the turn lane will be back-to-back with the turn lane at the proposed new access to the Rowley Center site (and QFC shopping center on the north side of NW Gilman Boulevard), it will be difficult to increase the length of the left turn lane. No changes are recommended.
- **Intersection #59: NW Gilman Boulevard / 12<sup>th</sup> Avenue NW, Westbound left turn** – The 95<sup>th</sup>-percentile queue for this movement would increase from 225 feet to about 360 feet with the Preferred Alternative. The left turn lane could be extended back to the center landscape median since there are no driveways that access the center turn lane in this area. The change may add about 90 feet of additional queue space. This change, which would essentially be a restriping project, is recommended.

**Table 4. Vehicle Queue Lengths at Intersections Near Sites – 2030 PM Peak**

Location/ Movement	Turn Lane Length (ft) With Mitigation	Average Queue Lengths (ft)			95 <sup>th</sup> Percentile Queue Lengths (ft)		
		No Action	Preferred Alternative	Pref. Alt With Mitigation	No Action	Preferred Alternative	Pref. Alt With Mitigation
<b>Int. #21: NW Gilman Blvd / SR 900</b>							
Northbound							
Left-turn (2) <sup>a</sup>	300	60	120	101	64	112	100
Thru	--	760	755	806	181	502	568
Right-turn	250	100	274	282	97	229	259
Southbound							
Left-turn (2) <sup>a</sup>	650	321	368	165	360	410	192
Thru	--	587	587	496	556	580	502
Right-turn	350	46	59	25	69	66	40
Eastbound							
Left-turn (2)	275	385	498	252	610	735	309
Thru	--	282	342	225	369	479	293
Right-turn	--	--	--	--	--	--	--
Westbound							
Left-turn	175	175	196	206	285	293	405
Thru	--	51	79	83	97	135	147
Right-turn	300	587	723	98	811	953	131
<b>Int. #28: NW Maple Street / Newport Way NW</b>							
Northbound							
Left-turn	150	264	245	241	447	430	407
Thru	--	223	250	233	291	320	322
Right-turn	--	--	--	--	--	--	--
Southbound							
Left-turn	150	180	185	186	294	307	262
Thru	--	500	550	500	636	687	637
Right-turn	--	--	--	--	--	--	--
Eastbound							
Left-turn	--	--	--	--	--	--	--
Thru	--	361	338	334	576	534	522
Right-turn	85	390	353	343	618	579	569
Westbound							
Left-turn	185	201	188	202	296	280	299
Thru	--	498	486	341	723	708	541
Right-turn	100	--	--	52	--	--	115
<b>Int. #51: NW Maple Street / NW Gilman Blvd</b>							
Northbound							
Left-turn	--	--	--	--	--	--	--
Thru	--	157	156	155	253	252	252
Right-turn	125	35	23	27	182	158	159
Southbound							
Left-turn	--	--	--	--	--	--	--
Thru	--	155	152	149	248	247	247
Right-turn	--	--	--	--	--	--	--
Eastbound							
Left-turn	120	28	28	27	60	62	62
Thru	--	626	701	655	852	944	920
Right-turn	--	--	--	--	--	--	--
Westbound							
Left-turn	180	407	375	383	695	668	692
Thru	--	197	222	213	288	327	327
Right-turn	--	--	--	--	--	--	--

**Table 4. Vehicle Queue Lengths at Intersections Near Sites – 2030 PM Peak**

Location/ Movement	Turn Lane Length (ft) With Mitigation	Average Queue Lengths (ft)			95 <sup>th</sup> Percentile Queue Lengths (ft)		
		No Action	Preferred Alternative	Pref. Alt With Mitigation	No Action	Preferred Alternative	Pref. Alt With Mitigation
<b>Int. #54: NW Maple Street / 12<sup>th</sup> Avenue NW</b>							
Northbound							
Left-turn	185	34	41	41	73	77	77
Thru	--	147	170	170	284	305	305
Right-turn	--	--	--	--	--	--	--
Southbound							
Left-turn	185	38	46	46	80	84	84
Thru	--	123	169	169	235	325	325
Right-turn	--	--	--	--	--	--	--
Eastbound							
Left-turn	250	41	61	61	82	112	112
Thru	--	193	235	235	402	459	459
Right-turn	--	--	--	--	--	--	--
Westbound							
Left-turn	250	3	3	3	13	13	13
Thru	--	115	145	145	180	206	206
Right-turn	--	--	--	--	--	--	--
<b>Int. #59: NW Gilman Blvd/12<sup>th</sup> Avenue NW</b>							
Northbound							
Left-turn	150	19	20	--	50	52	--
Thru	--	297	428	99	540	704	183
Right-turn	200	--	--	159	--	--	398
Southbound							
Left-turn	80	154	151	151	275	263	263
Thru	--	81	62	62	118	122	122
Right-turn	--	--	--	--	--	--	--
Eastbound							
Left-turn	235	7	5	5	21	18	18
Thru	--	172	165	165	238	231	231
Right-turn	--	--	--	--	--	--	--
Westbound							
Left-turn	235	98	163	163	225	357	357
Thru	--	61	66	66	121	129	129
Right-turn	--	--	--	--	--	--	--
<b>Int. #65: NW Maple Street / SR 900</b>							
Northbound							
Left-turn	200	39	71	65	80	147	141
Thru	--	951	908	920	1097	1054	1054
Right-turn	100	73	159	102	131	232	191
Southbound							
Left-turn (2) <sup>a</sup>	430	530	577	396	553	560	659
Thru	--	406	438	384	474	419	516
Right-turn	--	--	--	--	--	--	--
Eastbound							
Left-turn	150	--	--	97	--	--	150
Thru	--	290	329	189	389	492	263
Right-turn	75	--	--	18	--	--	60
Westbound							
Left-turn	215	341	487	233	561	712	316
Thru	--	26	42	235	58	82	317
Right-turn	--	12	28	28	124	152	141

Source: Heffron Transportation, Inc., September 2011. Queue lengths determined using the Synchro 7.0 model.

a. (2) indicates that there is a dual left turn lane. The length indicated is for each lane.

### 3. Transportation Impact Fee

The City of Issaquah has a Transportation Impact Fee (Issaquah Municipal Code 3.71). The latest fee schedule was adopted in February 2011. Typically, the fees are applied based on the size (square feet or units) of the proposed development. The basis for all fee rates is \$3,228 per net new PM peak hour trip.

The fee methodology based on development area is appropriate for stand-alone land uses; however, it cannot account for the trip characteristics of a mixed-use development where many trips are made between on-site uses and do not leave the site. The trip generation calculations presented in the Draft EIS did account for the Hyla Crossing and Rowley Properties internal trips as well as trips that could be made by non-vehicle modes of travel. Therefore, the transportation impact fee has been estimated using the per trip rate of \$3,228.

The net new trips generated by the proposed project were presented in the Draft EIS, and reflect the difference between the Preferred Alternative and the Previously-Approved Development (No Action Alternative). As allowed by IMC 3.71, the net new trips have also been adjusted to account for “pass-by trips” that would already use the area roadways. The residual “primary trips” presented in Table 5 represent the net new PM peak hour trips to which the impact fee would apply.

**Table 5. Hyla Crossing & Rowley Center – Net New PM Peak Hour Vehicle Trips**

	Hyla Crossing			Rowley Center			Total Both Sites		
	In	Out	Total	In	Out	Total	In	Out	Total
<b>Preferred Alternative</b>									
Primary ( New) Trips	709	1,409	2,118	706	1,336	2,042	1,415	2,745	4,160
<u>Pass-by Trips</u>	<u>119</u>	<u>119</u>	<u>238</u>	<u>154</u>	<u>154</u>	<u>308</u>	<u>273</u>	<u>273</u>	<u>546</u>
Total Trips	828	1,528	2,356	860	1,490	2,350	1,688	3,018	4,706
<b>Previously-Approved Development (No Action Alternative)</b>									
Primary (New) Trips	505	1,367	1,872	275	742	1,017	780	2,109	2,889
<u>Pass-by Trips</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total Trips	505	1,367	1,872	275	742	1,017	780	2,109	2,889
<b>Net Change in Site Trips</b>									
<b>Primary (New) Trips</b>	<b>204</b>	<b>42</b>	<b>246</b>	<b>431</b>	<b>594</b>	<b>1,025</b>	<b>635</b>	<b>636</b>	<b>1,271</b>
<u>Pass-by Trips</u>	<u>119</u>	<u>119</u>	<u>238</u>	<u>154</u>	<u>154</u>	<u>308</u>	<u>273</u>	<u>273</u>	<u>546</u>
Total Trips	323	161	484	585	748	1,333	908	909	1,817

Source: Heffron Transportation, Inc., August 2011. See data in the *Draft Environmental Impact Statement for Hyla Crossing and Rowley Center Project*, (City of Issaquah, August 2011); Table 3.5-3 “Total Vehicle Trip Generation Summary.” Detailed calculations are also provided in Appendix D of the DEIS Transportation Technical Report.

As summarized above, the full project would generate 1,271 net new PM peak hour trips. The transportation impact fee associated with these trips is summarized in Table 6 below. The total for both sites would be approximately \$4.1 million.

Table 6. Transportation Impact Fee Calculation

	Net New PM Peak Hour Trips	Impact Fee Rate (Per Net New Trip)	Impact Fee
Hyla Crossing	246	\$3,228	\$794,088
Rowley Center	1,025	\$3,228	\$3,308,700
Total Both Sites	1,271	\$3,228	\$4,102,788

### Potential Credits for Transportation Impact Fee

The State law that authorized collection of Impact Fees also allows developers to receive credit for the value of dedicated land, improvements or construction provided by the developer, if the improvements made are part of an adopted Capital Facilities Plan upon which the impact fees were based (RCW 82.02.060(3)). The Transportation Impact Fee adopted in 2011 includes one project where mitigation needs were also identified for the Hyla Crossing/Rowley Center project: Front Street/I-90 Off-ramp

The location listed above is noted as needing improvements under the “No Action Alternative.” However, no improvements were proposed or reflected in the traffic operations analysis performed for this intersection since the project will require future planning and analysis by the City of Issaquah and other jurisdictions (e.g. WSDOT and FHWA). If Rowley Properties were to make improvements at this location, the value of the improvements should be credited against the traffic impact fee. Alternatively, payment of the impact fee could be considered to fully mitigate the project’s impact at this location.

## 4. Significant Unavoidable Adverse Impacts

The Hyla Crossing and Rowley Center projects would generate traffic and increase congestion at many intersections. Mitigation has been suggested for all intersections that would meet the criteria for a “probable significant impact.” However, some of these improvement options may improve the traffic operations of an intersection, but could adversely impact other elements, such as the pedestrian environment, landscaping opportunities, and/or the general character of the surrounding area. Some of the improvement options may also not be possible without other impacts to local access or sensitive environmental areas. As a result, the City may determine that some improvements are not desirable or feasible and may prefer an alternate approach to mitigation. This could result in some location-specific impacts not being fully mitigated at the point of congestion, which could be considered a significant unavoidable adverse impact.

One of the suggested mitigation measures is to restripe the privately-owned approach (SE 64<sup>th</sup> Place) at the Issaquah-Fall City Road/East Lake Sammamish Parkway intersection (#11). Other alternative mitigation measures were tested, and no other reasonable options exist to return intersection operations to the No Action level. If the private owner does not agree to the restriping plan, then the Hyla Crossing & Rowley Center projects would have a Significant Unavoidable Adverse Impact at this location.

***DRAFT***

APPENDIX A  
LEVEL OF SERVICE CALCULATIONS  
FOR PHASING ANALYSIS

Table A. Level of Service Summary for Various Levels of Growth – Unmitigated Conditions

INT ID		Existing		25% Growth				50% Growth				75% Growth				2030 Full Build				Recommended Trip Trigger
		LOS	Delay	No Action		w/ Pref. Alt		No Action		w/ Pref. Alt		No Action		w/ Pref. Alt		No Action		w/ Pref. Alt		
				LOS	Delay	LOS	Delay													
10	SE 62nd St/E Lk Samm Pkwy	E	57.5	D	53.5	D	54.2	E	64.1	F	83.6	F	112.7	F	121.5	F	176.5	F	153.3	25%
11	Issaquah-Fall City Rd / E Lk Samm Pkwy	C	33.6	D	39.6	D	39.6	D	40.6	D	40.7	D	51.7	D	52.5	F	83.6	F	85.6	95%
12	SE Black-Nugget Rd / Issaquah-Fall City Rd	D	35.6	D	48.1	D	51.4	E	71.1	E	79.7	F	117.5	F	130.8	F	167.7	F	184.3	30%
16	2nd Ave SE / Front St S	C	34.0	C	20.9	C	21.1	C	29.2	C	30.0	D	46.0	D	47.0	E	68.7	E	73.6	75%
17	SW Newport Way / Front St	NA		C	29.6	C	29.9	C	34.9	D	36.1	D	47.8	D	50.4	E	68.5	E	73.5	75%
21	NW Gilman Blvd / SR 900	D	42.8	D	53.0	D	51.9	E	75.0	F	82.7	F	83.1	F	121.9	F	119.1	F	153.2	Site Access
25	I-90 EB Ramps / Front St N	D	42.1	E	55.7	E	55.9	F	81.6	F	82.5	F	124.7	F	127.5	F	172.2	F	176.0	25%
26	Front St / NW Gilman Blvd	D	48.4	E	56.3	E	56.2	E	67.2	E	67.2	F	96.9	F	98.8	F	140.0	F	143.3	60%
28	Newport Wy NW / NW Maple St	D	47.1	D	40.5	D	40.3	D	53.1	D	52.5	E	73.9	E	73.4	F	106.6	F	107.4	75%
34	SE 58th St / Issaquah-Fall City Rd	NA		D	29.9	D	29.7	E	40.7	E	40.3	F	69.5	F	71.8	F	141.4	F	146.2	50%
51	NW Gilman Blvd / Maple St NW	C	26.2	C	31.3	C	31.1	D	38.6	D	39.7	D	52.5	E	59.3	E	73.6	F	83.8	50%
59	NW Gilman Blvd / 12th Ave NW	C	26.5	C	26.4	C	27.5	C	30.7	C	34.9	D	38.2	E	59.0	E	56.3	F	104.0	60%
60	NW Gilman Blvd /15th Avenue NW (Site Access)	NA		Would not exist		D	25.0	Would not exist		F	72.4	Would not exist		F	313.1	Would not exist		F	741.6	Site Access
61	Newport Wy NW / SR 900	D	43.4	D	38.5	D	37.9	D	46.1	D	45.0	E	61.5	E	58.6	E	79.4	F	81.4	75%
62	SE 62nd St / 4th Ave NW	C	28.8	C	31.2	C	31.3	D	38.6	D	40.1	E	73.5	E	77.5	F	131.2	F	139.3	75%
65	NW Maple St / SR 900	C	30.6	D	36.6	D	51.9	E	76.2	F	84.6	F	122.8	F	147.1	F	194.8	F	254.4	Site Access
79	NW Gilman Blvd / 4th Ave W	F	102.1	D	40.3	D	40.4	D	46.2	D	47.7	E	71.0	E	61.3	F	83.5	F	87.0	75%
170	NW Gilman Blvd / NW Juniper St	NA		F	n/a	F	n/a	25%												
194	NW Mall St / 12th Ave NW	NA		C	24.2	F	56.1	D	28.7	F	89.1	E	36.3	F	185.9	E	44.6	F	207.5	Site Access

Stop-Controlled intersection  
Mitigation Needed  
n/a = delays are not reported for very poor unsignalized conditions  
NA = No data were available for the existing conditions

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# **GHG EMISSIONS WORKSHEETS**

**ESTIMATED GREENHOUSE GAS EMISSIONS –  
EXISTING CONDITIONS**

<b>Source</b>	<b>Square Footage</b>	<b>Lifespan Emissions (MTCO<sub>2</sub>e)</b>	<b>Average Building Life Span (Years)</b>	<b>Average Annual Emissions (MTCO<sub>2</sub>e)</b>
<u>Existing Conditions</u>				
Warehouse & Storage	227,015	129,787	62.5	2,077
Office	89,602	120,901	62.5	1,934
Retail	173,609	149,774	62.5	2,396
Lodging	103,192	96,112	62.5	1,538
Other <sup>1</sup>	39,365	62,023	62.5	992
<b>Estimated Total GHG Emissions</b>		<b>558,597</b>		<b>8,937</b>

*Source: EA/Blumen, 2011.*

<sup>1</sup> Refers to existing light industrial uses on the site.

\*The numbers in this table differ slightly from the GHG Emissions Worksheet due to rounding.

**Hyla Crossing and Rowley Center Project - Existing Conditions**

**Section I: Buildings**

Type (Residential) or Principal Activity (Commercial)	# Units	Square Feet (in thousands of square feet)	Emissions Per Unit or Per Thousand Square Feet (MTCO2e)			Lifespan Emissions (MTCO2e)
			Embodied	Energy	Transportation	
Single-Family Home.....	0		98	672	792	0
Multi-Family Unit in Large Building .....	0		33	357	766	0
Multi-Family Unit in Small Building .....	0		54	681	766	0
Mobile Home.....	0		41	475	709	0
Education .....		0.0	39	646	361	0
Food Sales .....		0.0	39	1,541	282	0
Food Service .....		0.0	39	1,994	561	0
Health Care Inpatient .....		0.0	39	1,938	582	0
Health Care Outpatient .....		0.0	39	737	571	0
Lodging .....		103.0	39	777	117	96112
Retail (Other Than Mall).....		173.6	39	577	247	149774
Office .....		89.6	39	723	588	120901
Public Assembly .....		0.0	39	733	150	0
Public Order and Safety .....		0.0	39	899	374	0
Religious Worship .....		0.0	39	339	129	0
Service .....		0.0	39	599	266	0
Warehouse and Storage .....		227.0	39	352	181	129787
Other .....		39.4	39	1,278	257	62023
Vacant .....		0.0	39	162	47	0

**Section II: Pavement.....**

Pavement.....		0.00				0
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**Total Project Emissions:**

**558597**

**ESTIMATED GREENHOUSE GAS EMISSIONS SUMMARY–  
ALTERNATIVE 1**

<b>Source</b>	<b>Square Footage</b>	<b>Lifespan Emissions (MTCO<sub>2</sub>e)</b>	<b>Average Building Life Span (Years)</b>	<b>Average Annual Emissions (MTCO<sub>2</sub>e)</b>
<u>80/20 Land Use Mix</u>				
Residential	796 <sup>1</sup>	919,933	80.5	11,428
Office	2,938,500	3,965,051	62.5	63,441
Retail	355,000	306,278	62.5	4,900
Lodging	120,000	111,975	62.5	1,792
Public Assembly <sup>2</sup>	125,000	115,247	62.5	1,844
<b>Estimated Total GHG Emissions</b>		<b>5,418,484</b>		<b>83,405</b>
<u>60/40 Land Use Mix</u>				
Residential	1,763 <sup>1</sup>	2,037,489	80.5	25,310
Office	2,233,500	3,013,763	62.5	48,220
Retail	293,000	252,787	62.5	4,045
Lodging	120,000	111,975	62.5	1,792
Public Assembly <sup>2</sup>	114,000	105,105	62.5	1,682
<b>Estimated Total GHG Emissions</b>		<b>5,521,120</b>		<b>81,049</b>

**Source: EA/Blumen, 2011.**

<sup>1</sup> Indicates the total number of residential units under Alternative 1.

<sup>2</sup> Refers to entertainment complex uses that are proposed under Alternative 1.

\*The numbers in this table differ slightly from the GHG Emissions Worksheet (**Appendix B**) due to rounding.

**Hyla Crossing and Rowley Center Project - Alternative 1 (80/20 mix)**

**Section I: Buildings**

Type (Residential) or Principal Activity (Commercial)	# Units	Square Feet (in thousands of square feet)	Emissions Per Unit or Per Thousand Square Feet (MTCO2e)			Lifespan Emissions (MTCO2e)
			Embodied	Energy	Transportation	
Single-Family Home.....	0		98	672	792	0
Multi-Family Unit in Large Building .....	796		33	357	766	919933
Multi-Family Unit in Small Building .....	0		54	681	766	0
Mobile Home.....	0		41	475	709	0
Education .....		0.0	39	646	361	0
Food Sales .....		0.0	39	1,541	282	0
Food Service .....		0.0	39	1,994	561	0
Health Care Inpatient .....		0.0	39	1,938	582	0
Health Care Outpatient .....		0.0	39	737	571	0
Lodging .....		120.0	39	777	117	111975
Retail (Other Than Mall).....		355.0	39	577	247	306278
Office .....		2,938.5	39	723	588	3965051
Public Assembly .....		125.0	39	733	150	115247
Public Order and Safety .....		0.0	39	899	374	0
Religious Worship .....		0.0	39	339	129	0
Service .....		0.0	39	599	266	0
Warehouse and Storage .....		0.0	39	352	181	0
Other .....		0.0	39	1,278	257	0
Vacant .....		0.0	39	162	47	0

**Section II: Pavement.....**

Pavement.....		0.00				0
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**Total Project Emissions:**

**5418484**

**Hyla Crossing and Rowley Center Project - Alternative 1 (60/40 mix)**

**Section I: Buildings**

Type (Residential) or Principal Activity (Commercial)	# Units	Square Feet (in thousands of square feet)	Emissions Per Unit or Per Thousand Square Feet (MTCO <sub>2e</sub> )			Lifespan Emissions (MTCO <sub>2e</sub> )
			Embodied	Energy	Transportation	
Single-Family Home.....	0		98	672	792	0
Multi-Family Unit in Large Building .....	1763		33	357	766	2037489
Multi-Family Unit in Small Building .....	0		54	681	766	0
Mobile Home.....	0		41	475	709	0
Education .....		0.0	39	646	361	0
Food Sales .....		0.0	39	1,541	282	0
Food Service .....		0.0	39	1,994	561	0
Health Care Inpatient .....		0.0	39	1,938	582	0
Health Care Outpatient .....		0.0	39	737	571	0
Lodging .....		120.0	39	777	117	111975
Retail (Other Than Mall).....		293.0	39	577	247	252787
Office .....		2,233.5	39	723	588	3013763
Public Assembly .....		114.0	39	733	150	105105
Public Order and Safety .....		0.0	39	899	374	0
Religious Worship .....		0.0	39	339	129	0
Service .....		0.0	39	599	266	0
Warehouse and Storage .....		0.0	39	352	181	0
Other .....		0.0	39	1,278	257	0
Vacant .....		0.0	39	162	47	0

**Section II: Pavement.....**

Pavement.....		0.00				0
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**Total Project Emissions:**

**5521120**

**ESTIMATED GREENHOUSE GAS EMISSIONS SUMMARY –  
ALTERNATIVE 2**

<b>Source</b>	<b>Square Footage</b>	<b>Lifespan Emissions (MTCO<sub>2</sub>e)</b>	<b>Average Building Life Span (Years)</b>	<b>Average Annual Emissions (MTCO<sub>2</sub>e)</b>
<u>80/20 Land Use Mix</u>				
Residential	661 <sup>1</sup>	763,914	80.5	9,490
Office	2,438,000	3,289,704	62.5	52,635
Retail	332,400	286,737	62.5	4,588
Lodging	120,000	111,975	62.5	1,792
Public Assembly <sup>2</sup>	138,000	127,232	62.5	2,036
<b>Estimated Total GHG Emissions</b>		<b>4,579,562</b>		<b>70,541</b>
<u>60/40 Land Use Mix</u>				
Residential	1,450 <sup>1</sup>	1,675,757	80.5	20,817
Office	1,847,800	2,493,320	62.5	39,893
Retail	290,000	250,199	62.5	4,003
Lodging	110,000	102,644	62.5	1,642
Public Assembly <sup>2</sup>	138,000	127,232	62.5	2,036
<b>Estimated Total GHG Emissions</b>		<b>4,649,153</b>		<b>68,391</b>

**Source: EA/Blumen, 2011.**

<sup>1</sup> Indicates the total number of residential units under Alternative 2.

<sup>2</sup> Refers to entertainment complex uses that are proposed under Alternative 2.

\*The numbers in this table differ slightly from the GHG Emissions Worksheet (**Appendix B**) due to rounding.

**Hyla Crossing and Rowley Center Project - Alternative 2 (80/20 mix)**

**Section I: Buildings**

Type (Residential) or Principal Activity (Commercial)	# Units	Square Feet (in thousands of square feet)	Emissions Per Unit or Per Thousand Square Feet (MTCO2e)			Lifespan Emissions (MTCO2e)
			Embodied	Energy	Transportation	
Single-Family Home.....	0		98	672	792	0
Multi-Family Unit in Large Building .....	661		33	357	766	763914
Multi-Family Unit in Small Building .....	0		54	681	766	0
Mobile Home.....	0		41	475	709	0
Education .....		0.0	39	646	361	0
Food Sales .....		0.0	39	1,541	282	0
Food Service .....		0.0	39	1,994	561	0
Health Care Inpatient .....		0.0	39	1,938	582	0
Health Care Outpatient .....		0.0	39	737	571	0
Lodging .....		120.0	39	777	117	111975
Retail (Other Than Mall).....		332.4	39	577	247	286737
Office .....		2,438.0	39	723	588	3289704
Public Assembly .....		138.0	39	733	150	127232
Public Order and Safety .....		0.0	39	899	374	0
Religious Worship .....		0.0	39	339	129	0
Service .....		0.0	39	599	266	0
Warehouse and Storage .....		0.0	39	352	181	0
Other .....		0.0	39	1,278	257	0
Vacant .....		0.0	39	162	47	0

**Section II: Pavement.....**

Pavement.....		0.00				0
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**Total Project Emissions:**

**4579562**

**Hyla Crossing and Rowley Center Project - Alternative 2 (60/40 mix)**

**Section I: Buildings**

Type (Residential) or Principal Activity (Commercial)	# Units	Square Feet (in thousands of square feet)	Emissions Per Unit or Per Thousand Square Feet (MTCO2e)			Lifespan Emissions (MTCO2e)
			Embodied	Energy	Transportation	
Single-Family Home.....	0		98	672	792	0
Multi-Family Unit in Large Building .....	1450		33	357	766	1675757
Multi-Family Unit in Small Building .....	0		54	681	766	0
Mobile Home.....	0		41	475	709	0
Education .....		0.0	39	646	361	0
Food Sales .....		0.0	39	1,541	282	0
Food Service .....		0.0	39	1,994	561	0
Health Care Inpatient .....		0.0	39	1,938	582	0
Health Care Outpatient .....		0.0	39	737	571	0
Lodging .....		110.0	39	777	117	102644
Retail (Other Than Mall).....		290.0	39	577	247	250199
Office .....		1,847.8	39	723	588	2493320
Public Assembly .....		138.0	39	733	150	127232
Public Order and Safety .....		0.0	39	899	374	0
Religious Worship .....		0.0	39	339	129	0
Service .....		0.0	39	599	266	0
Warehouse and Storage .....		0.0	39	352	181	0
Other .....		0.0	39	1,278	257	0
Vacant .....		0.0	39	162	47	0

**Section II: Pavement.....**

Pavement.....		0.00				0
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**Total Project Emissions:**

**4649153**

**ESTIMATED GREENHOUSE GAS EMISSIONS SUMMARY–  
ALTERNATIVE 3 (NO ACTION - EXISTING CONDITIONS)**

<b>Source</b>	<b>Square Footage</b>	<b>Lifespan Emissions (MTCO<sub>2</sub>e)</b>	<b>Average Building Life Span (Years)</b>	<b>Average Annual Emissions (MTCO<sub>2</sub>e)</b>
<u>Existing Condition Sub-Alternative</u>				
Office	858,600	1,158,548	62.5	18,537
<b>Estimated Total GHG Emissions</b>		<b>1,158,548</b>		<b>18,537</b>

*Source: EA/Blumen, 2011.*

\*The numbers in this table differ slightly from the GHG Emissions Worksheet (**Appendix B**) due to rounding.

**Hyla Crossing and Rowley Center Project - Alternative 3 (Existing Conditions Sub-Alternative)**

**Section I: Buildings**

Type (Residential) or Principal Activity (Commercial)	# Units	Square Feet (in thousands of square feet)	Emissions Per Unit or Per Thousand Square Feet (MTCO2e)			Lifespan Emissions (MTCO2e)
			Embodied	Energy	Transportation	
Single-Family Home.....	0		98	672	792	0
Multi-Family Unit in Large Building .....	0		33	357	766	0
Multi-Family Unit in Small Building .....	0		54	681	766	0
Mobile Home.....	0		41	475	709	0
Education .....		0.0	39	646	361	0
Food Sales .....		0.0	39	1,541	282	0
Food Service .....		0.0	39	1,994	561	0
Health Care Inpatient .....		0.0	39	1,938	582	0
Health Care Outpatient .....		0.0	39	737	571	0
Lodging .....		0.0	39	777	117	0
Retail (Other Than Mall).....		0.0	39	577	247	0
Office .....		858.6	39	723	588	1158548
Public Assembly .....		0.0	39	733	150	0
Public Order and Safety .....		0.0	39	899	374	0
Religious Worship .....		0.0	39	339	129	0
Service .....		0.0	39	599	266	0
Warehouse and Storage .....		0.0	39	352	181	0
Other .....		0.0	39	1,278	257	0
Vacant .....		0.0	39	162	47	0

**Section II: Pavement.....**

Pavement.....		0.00				0
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**Total Project Emissions:**

**1158548**

**ESTIMATED GREENHOUSE GAS EMISSIONS SUMMARY–  
ALTERNATIVE 3 (NO ACTION - EXISTING ZONING)**

<b>Source</b>	<b>Square Footage</b>	<b>Lifespan Emissions (MTCO<sub>2</sub>e)</b>	<b>Average Building Life Span (Years)</b>	<b>Average Annual Emissions (MTCO<sub>2</sub>e)</b>
<u>Existing Zoning Sub-Alternative</u>				
Office	1,700,000	2,293,887	62.5	36,702
<b>Estimated Total GHG Emissions</b>		<b>2,293,887</b>		<b>36,702</b>

*Source: EA/Blumen, 2011.*

\*The numbers in this table differ slightly from the GHG Emissions Worksheet (**Appendix B**) due to rounding.

**Hyla Crossing and Rowley Center Project - Alternative 3 (Existing Zoning Sub-Alternative)**

**Section I: Buildings**

Type (Residential) or Principal Activity (Commercial)	# Units	Square Feet (in thousands of square feet)	Emissions Per Unit or Per Thousand Square Feet (MTCO <sub>2e</sub> )			Lifespan Emissions (MTCO <sub>2e</sub> )
			Embodied	Energy	Transportation	
Single-Family Home.....	0		98	672	792	0
Multi-Family Unit in Large Building .....	0		33	357	766	0
Multi-Family Unit in Small Building .....	0		54	681	766	0
Mobile Home.....	0		41	475	709	0
Education .....		0.0	39	646	361	0
Food Sales .....		0.0	39	1,541	282	0
Food Service .....		0.0	39	1,994	561	0
Health Care Inpatient .....		0.0	39	1,938	582	0
Health Care Outpatient .....		0.0	39	737	571	0
Lodging .....		0.0	39	777	117	0
Retail (Other Than Mall).....		0.0	39	577	247	0
Office .....		1,700.0	39	723	588	2293887
Public Assembly .....		0.0	39	733	150	0
Public Order and Safety .....		0.0	39	899	374	0
Religious Worship .....		0.0	39	339	129	0
Service .....		0.0	39	599	266	0
Warehouse and Storage .....		0.0	39	352	181	0
Other .....		0.0	39	1,278	257	0
Vacant .....		0.0	39	162	47	0

**Section II: Pavement.....**

Pavement.....		0.00				0
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**Total Project Emissions:**

**2293887**