



**DEPARTMENT OF COMMUNITY  
AND ECONOMIC DEVELOPMENT**

**ENVIRONMENTAL REVIEW COMMITTEE REPORT**

<b>ERC Meeting Date:</b>	September 9, 2024		
<b>Project File Number:</b>	PR24-000054		
<b>Project Name:</b>	Ion Renton LLC Demolition Environmental Review		
<b>Land Use File Number:</b>	LUA24-000202, ECF		
<b>Project Manager:</b>	Jill Ding, Senior Planner		
<b>Owner:</b>	ION Renton, LLC, 1450 Frazee Rd, Ste 409, San Diego, CA 92108		
<b>Applicant:</b>	Rosalie Merks, AAA Management LLC, 1450 Frazee Rd, Ste 409, San Diego, CA 92108		
<b>Contact:</b>	Chris Kelly, AAA Management LLC, 1450 Frazee Rd, Ste 409, San Diego, CA 92108		
<b>Project Location:</b>	500 Park Ave N and 535 Garden Ave N, Renton, WA 98057		
<b>Project Summary:</b>	<p>The applicant is requesting Environmental (SEPA) Review for the removal of two (2) existing buildings at 500 Park Ave N and 535 Garden Ave N (APNs 7564600055 and 7564600095) leaving the slabs of each building. The buildings proposed for removal include a 60,573 square foot three-story office building and a 245,899 square foot seven-story office building. In addition, the proposal includes the removal of the two (2) skybridges connecting the 500 Park Ave N and 535 Garden Ave N buildings to an on-site multi-story parking garage. An additional fitness area located within the footprint of the parking garage will be demolished, however the parking garage itself will be retained. The project site is located within the Urban Center - 2 (UC-2) zone and totals 207,242 square feet (4.76 acres) in area. A high seismic hazard area, wellhead protection area zone 2, and sensitive slopes are mapped on the project site.</p>		
<b>Exist. Bldg. Area SF:</b>	645,907 sq. ft.	<b>Proposed New Bldg. Area (footprint):</b>	N/A
		<b>Proposed New Bldg. Area (gross):</b>	N/A
<b>Site Area:</b>	207,242 sq. ft. (4.76) acres	<b>Total Building Area GSF:</b>	339,435 sq. ft.
<b>STAFF RECOMMENDATION:</b>	<b>Staff Recommends that the Environmental Review Committee issue a Determination of Non-Significance (DNS).</b>		



*Project Location Map*

**ENVIRONMENTAL REVIEW**

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

**A. Environmental Threshold Recommendation**

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

**Issue a DNS with a 14-day appeal period**

**B. Exhibits**

- Exhibit 1:** Environmental Review Committee (ERC) Report
- Exhibit 2:** Demolition Plan Set
- Exhibit 3:** Preliminary Traffic Control Plan
- Exhibit 4:** Washington State Department of Ecology (DOE) Comments
- Exhibit 5:** Washington State Department of Archeology and Historic Preservation (DAHP)
- Exhibit 6:** Duwamish Tribe Comments
- Exhibit 7:** Public Comments
- Exhibit 8:** Advisory Notes

**C. Environmental Impacts**

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

**1. Earth**

**Impacts:** The topography of the site is relatively flat with a maximum grade of approximately two (2) percent. No grading activities are proposed as part of the building demolition activities as the existing slabs on grade supporting the existing structures are proposed to remain.

It is anticipated that the City’s currently adopted erosion control, construction, and drainage regulations would adequately mitigate for any impacts that could result from the proposed demolition; therefore, no further mitigation is recommended.

**Mitigation Measures:** No further mitigation recommended.

**Nexus:** N/A

**2. Air**

**Impacts:** Demolition activities may result in temporary additional dust, which could impact the air on and around the project site. The contractor would be required to follow Best Management Practices regarding air quality during building demolition activities. It is anticipated that air quality would return to its previous condition once demolition activities have been completed.

The applicant would be required to comply with Best Management Practices regarding dust control and air quality; therefore, no further mitigation is recommended.

**Mitigation Measures:** No further mitigation recommended.

**Nexus:** N/A

### 3. Plants

**Impacts:** There are a total of 94 trees identified on the demolition plans (*Exhibit 2*), of those existing 94 trees, a total of 38 trees are proposed to be retained, resulting in a retention percentage of forty (40) percent. The City's adopted Tree Retention and Land Clearing Regulations (4-4-130) require the retention of thirty (30) percent of trees. Tree credit requirements shall apply at a minimum rate of 30 credits per net acre. The tree density may consist of existing trees, replacement trees, trees required pursuant to RMC 4-4-070F1, Street Frontage Landscaping Required, or a combination. The proposal to retain forty (40) percent of the existing onsite trees would exceed the minimum thirty (30) percent retention requirement. Based on a total site area of 4.76 acres, the project site would be required to provide a total of 143 tree credits. Compliance with the minimum tree density requirements would be verified at the time of future development on the project site. Tree protection measures as required by City code would be implemented to ensure that trees are not damaged as a result of building demolition; therefore, no further mitigation is recommended.

**Mitigation Measures:** No further mitigation recommended.

**Nexus:** N/A

### 4. Environmental Health

**Impacts:** The City received comments from the Washington State Department of Ecology (DOE) (*Exhibit 4*) during the 14-day public comment period. According to DOE, the project site is located on a site listed on the Model Toxics Control Act (MTCA) Confirmed and Suspected Contaminated Sites List – Garden Plaza site (cleanup site ID 3049, facility site ID 2475). Recent data indicates that the soil at the site is contaminated with gasoline-range petroleum hydrocarbons (TPH-G), naphthalene, carcinogenic polycyclic aromatic hydrocarbons (cPAHs), and polychlorinated biphenyls (PCBs). Shallow groundwater is contaminated with diesel- and heavy oil-range petroleum hydrocarbons (TPH-D and TPH-O), dissolved arsenic, and vinyl chloride. Groundwater was encountered at the site at depths from approximately 5 to 14 feet below ground surface. Ecology issued a No Further Action (NFA) determination for the Garden Plaza site in April 2001, with a condition of a restrictive covenant. Ecology rescinded the NFA determination after a periodic review in 2023, based on the site soil and groundwater data collected in 2017 through 2021. Any activities that are prohibited by the 2001 restrictive covenant need prior approval from Ecology.

The proposal does not include any soil excavation or grading activities during the proposed demolition of buildings and structures on the site. DOE further comments that their February 2023 Period Review noted the following: "No active monitoring wells were noted on the property. Monitoring wells appear to have been decommissioned; however, no decommissioning well reports were on file at Ecology." Per the terms of the 2001 restrictive covenant, information regarding these wells (which are elements of the Remedial Action completed to date at the site) must be provided to Ecology prior to initiation of the proposed action as follows:

- Evidence that all monitoring wells have been properly decommissioned per Chapter 173-160 WAC, or
- Identification and labeling of all existing monitoring wells, and specification of procedures to protect these wells during the proposed action.

Ecology's approval is required before initiation of the proposed activities per the terms of the 2001 restrictive covenant.

If any soil on the site will be exposed or disturbed as part of the proposed action, the following information must be provided to Ecology for review and approval prior to implementation of the site work:

- Hazardous waste operations worker training, health/safety plan, and site control requirements, per WAC 296-843.
- Management of potential contaminated soil and groundwater encountered during proposed activities.

As the proposal would include the removal of the buildings and the retention of the existing slabs on grade, it is expected that soil disturbance would be minimal and limited to the cutting and capping of existing utilities. Compliance with DOE's requirements regarding the existing onsite soil contamination be deferred to future redevelopment of the project site. No further mitigation is recommended at this time.

**Mitigation Measures:** No further mitigation recommended.

**Nexus:** N/A

## 5. Historic and Cultural Preservation

**Impacts:** Staff received comments from the Duwamish Tribe (*Exhibit 6*) and Washington State Department of Archeology and Historic Preservation (DAHP) (*Exhibit 5*), both agencies requested that an Inadvertent Discovery Plan (IDP) be followed in the case that archeological deposits are discovered during demolition activities. As the proposal would include the removal of the buildings and the retention of the existing slabs on grade, it is expected that soil disturbance would be minimal and limited to the cutting and capping of existing utilities. Based on the scope of work proposed it is not anticipated that an IDP would be necessary. An IDP would likely be required as part of future redevelopment of the project site. No further mitigation is recommended at this time.

**Mitigation Measures:** No further mitigation recommended.

**Nexus:** N/A

## 6. Transportation

**Impacts:** The applicant submitted a preliminary traffic control plan with the project application materials (*Exhibit 3*). Traffic impacts are anticipated to be temporary in nature; therefore, no further mitigation is recommended.

**Mitigation Measures:** No further mitigation recommended.

**Nexus:** N/A

## D. Comments of Reviewing Departments

The proposal has been circulated to City Department and Division Reviewers. Where applicable, their comments have been incorporated into the text of this report and/or "Advisory Notes to Applicant" (*Exhibit 8*).

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

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

**Environmental Determination Appeal Process: Appeals of the environmental determination must be filed in writing on or before 5:00 p.m. on September 23, 2024.** Appeals must be submitted electronically to the City Clerk at [cityclerk@rentonwa.gov](mailto:cityclerk@rentonwa.gov) or delivered to City Hall 1st floor Lobby Hub Monday through Friday. The appeal fee, normally due at the time an appeal is submitted, will be collected at a future date if your appeal is submitted electronically. The appeal submitted in person may be paid on the first floor in our Finance Department. Appeals to the Hearing Examiner are governed by RMC 4-8-110 and additional information regarding the appeal process may be obtained from the City Clerk's Office, [cityclerk@rentonwa.gov](mailto:cityclerk@rentonwa.gov).



**CITY OF RENTON**

DEPARTMENT OF COMMUNITY AND ECONOMIC DEVELOPMENT  
 STAFF REPORT TO THE ENVIRONMENTAL REVIEW COMMITTEE  
**EXHIBITS**

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**The following exhibits are included with the ERC Report:**

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