Exhibit C—Environmental Checklist SMC 25.05.960

Troy Block Interim Action

A. BACKGROUND

1. Name of proposed project, if applicable:

Troy Block Interim Action

2. Name of applicant:

Touchstone SLU LLC

3. Address and phone number of applicant and contact person:

APPLICANT: Shawn Parry Touchstone Corporation 2025 First Avenue, Suite 1212 Seattle, Washington 98121

4. Date checklist prepared:

April 3, 2013

5. Agency requesting checklist:

Washington State Department of Ecology (Ecology)

6. Proposed timing or schedule (including phasing, if applicable):

Touchstone SLU LLC proposes two elements for the property: (1) Interim Action and (2) Redevelopment (Redevelopment). The environmental Interim Action activities are required to be approved by Ecology prior to the start of the Redevelopment activities at the property.

Pursuant to WAC 197-11-253, Ecology is the lead agency for the Interim Action, with SEPA review conducted for MTCA interim actions consistent with WAC 197-11-268. Redevelopment activities will be analyzed pursuant to separate SEPA Checklist was prepared for the proposed Redevelopment action and submitted to the City of Seattle Department of Planning and Development (DPD) as lead agency. As necessary, the City of Seattle and Ecology will confer regarding the possible combination of the public participation and other procedural requirements of SEPA and Washington State Model Toxics Control Act (MTCA), to the extent practicable pursuant to WAC 197-11-250(4).

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

As described above in response to A.6., the proposal involves two elements: (1) Interim Action and (2) Redevelopment. This environmental checklist analyzes potential impacts from the Interim Action. The City of Seattle will serve as lead agency for the Redevelopment action. No other plans for future additions, expansion, or further activity related to or connected with the Interim Action proposal is currently planned.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

- Subsurface Exploration, Geologic Hazard, and Preliminary Geotechnical Engineering Report. Troy Laundry Property, Seattle Washington, dated December 1, 2011, prepared by Associated Earth Sciences for Touchstone Corporation.
- Phase I Environmental Site Assessment, Troy Laundry Property, 307 Fairview Avenue North, Seattle, Washington, dated September 15, 2010, prepared by SoundEarth Strategies, Inc. (formerly Sound Environmental Strategies Corporation) for Touchstone Corporation.
- Summary of Limited Phase II Environmental Assessment at the Troy Laundry Property, 307 Fairview Avenue North, Seattle, Washington, dated October 28, 2010, prepared by SoundEarth Strategies, Inc. for Touchstone Corporation.
- Boren Investment Company Warehouse/David Smith & Co. Landmark Nomination Report, 334 Boren Avenue North, Seattle, Washington, dated April 2011, prepared by The Johnson Partnership.
- *Remedial Investigation Sampling and Analysis Plan, Troy Laundry Property, 307 Fairview Avenue North, Seattle, Washington,* dated September 23, 2011, prepared by SoundEarth Strategies, Inc. for Touchstone Corporation.
- Draft Remedial Investigation Report, Troy Laundry Property, 307 Fairview Avenue North, Seattle, Washington, dated May 2, 2012, prepared by SoundEarth Strategies, Inc. for Touchstone Corporation.
- Draft Feasibility Study Report, Troy Laundry Property, 307 Fairview Avenue North, Seattle, Washington, dated August 9, 2012, prepared by SoundEarth Strategies, Inc. for Touchstone Corporation.
- Draft Cleanup Action Plan, Troy Laundry Property, 307 Fairview Avenue North, Seattle, Washington, dated October 25, 2012, prepared by SoundEarth Strategies, Inc. for Touchstone Corporation.
- *Transportation Technical Report*, dated December 5, 2012, prepared by Heffron Transportation Inc. for Touchstone Corporation.
- Draft Addendeum—Supplemental Remedial Investigation Report, Troy Laundry Property, 307 Fairview Avenue North, Seattle, Washington, dated December 17, 2012, prepared by SoundEarth Strategies, Inc. for Touchstone Corporation.
- Draft Interim Action Plan. Troy Laundry Property, 307 Fairview Avenue North, Seattle, Washington, dated January 30, 2013, prepared by SoundEarth Strategies, Inc. for Touchstone Corporation.

The documents listed above are incorporated by reference into this SEPA Environmental Checklist.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

Interim Action activities related to the property are being managed and resolved by Ecology pursuant to an Agreed Order under MTCA. Pursuant to the Agreed Order, a remedial investigation/feasibility study and cleanup action plan is currently being prepared under Ecology supervision. As lead agency for the Interim Action, pursuant to WAC 197-11-253, Ecology is lead agency for this environmental review, conducted for a MTCA interim action consistent with WAC 197-11-268.

A Draft Interim Action Plan for the Troy Laundry Property was prepared on behalf of Touchstone SLU LLC. In accordance with WAC 173-340-430, Touchstone SLU LLC

initiated a remedial investigation to define the extent of contamination and characterize the property for the purpose of developing and evaluating the cleanup action alternatives summarized in the Draft Feasibility Study Report prepared by SoundEarth Strategies, Inc. and detailed in the Draft Interim Action Plan.

A separate SEPA Checklist was prepared for the Redevelopment action proposed for the property and submitted to the City of Seattle Department of Planning and Development (DPD) as lead agency.

10. List any government approvals or permits that will be needed for your proposal, if known.

	Deliverable/Task	Milestone Date(s)	
Washington Department of Ecology	Ecology approval of the Interim Remedial Action Plan after completion of public notice and comment.	TBA	Interim Action/ Engineering Design Document (describing remediation)
Washington Department of Ecology	Implementation of Phase 1 Interim Remedial Action at the Touchstone Property	Within 30 days of receipt of Ecology's approval of the IRAWP- subject to project permitting	NPDES Construction and Operations Permit
	Touchstone LLC submits a draft Preliminary Interim Remedial Action Completion Report to Ecology for review.	Within 60 days of completion of Phase 1 of the Interim Action	
	Ecology provides comments on the Preliminary Interim Remedial Action Completion Report to Touchstone LLC.	Within 30 days of receipt	
	Touchstone LLC incorporates Ecology comments in the draft Preliminary Interim Remedial Action Completion Report and submits final version of the document.	Within 30 days after receipt of Ecology's comments	
	Ecology approves of the Preliminary Interim Remedial Action Completion Report and provides Touchstone LLC with a Notice of Completion Letter for Phase 1 of the Interim Action completed at the property.	Within 30 days of receipt	
	Implementation of Phase 2 Interim Remedial Action at the property.	Conducted concurrent with Redevelopment – subject to project permitting	
	Touchstone LLC submits a draft Final Interim Remedial Action Completion Report to Ecology for review.	Within 30 days of completing Phase 2 of the Interim Action	
	Ecology provides comments on the Final Interim Remedial Action Completion Report to Touchstone LLC.	Within 30 days of receipt	
	Touchstone LLC incorporates Ecology comments in the draft Final Interim Remedial Action Completion Report and submits final version of the document.	Within 30 days after receipt of Ecology's comments	
	Ecology approves the Final Interim Remedial Action Completion Report and provides Touchstone LLC with a Notice of Completion Letter for property.	Within 30 days of receipt	

^{11.} Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask

you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

Project Background

Touchstone SLU LLC, a private developer, purchased property and proposes to construct one 13-story office building and one 12-story office building on a 2.5-acre site in the South Lake Union neighborhood in a phased development. The completed project would include an underground parking garage with approximately 800 parking stalls.

The results of previous subsurface investigations and the remedial investigation conducted at the property suggest that the chlorinated solvent impacts confirmed in soil and groundwater beneath the property are the result of a release from the laundry and dry cleaning facility that operated on the property from 1927 through 1985. Therefore, prior to any redevelopment action at the property, Touchstone is working with Ecology on implementing a remedial action for the property.

Proposed Project

SoundEarth Strategies, Inc. prepared a Draft Interim Action Plan for the property on behalf of Touchstone SLU LLC. In accordance with WAC 173-340-430, Touchstone SLU LLC initiated a remedial investigation to define the extent of contamination and characterize the property for the purpose of developing and evaluating the cleanup action alternatives summarized in the Draft Feasibility Study Report prepared by SoundEarth Strategies, Inc. and detailed in the Draft Interim Action Plan.

The Interim Action Plan prepared for the property provides a description of the cleanup action components that will be implemented in order to remediate soil and groundwater beneath the property containing concentrations of chemicals of concern exceeding the cleanup levels. The Interim Action Plan was prepared based on the results of Draft Feasibility Study Report and the Draft Addendum—Supplemental Remedial Investigation Report and presents the methods proposed to remediate the contaminated soil and groundwater associated with the release from the former Troy Laundry operations.

The objectives of the Interim Action for the property have been established in consideration of the future redevelopment and land use of the property and include the following:

- Excavate on-property soil containing PCE and other COCs at concentrations that present a risk to human health and the environment.
- Apply in situ treatment methods to reduce COCs in groundwater during redevelopment to take advantage of the efficiencies available during ongoing excavation activities and to avoid conflicts with future planned land use.
- Prevent further off-property migration of COCs at concentrations exceeding cleanup levels.
- Provide engineering controls to prevent the unacceptable risks to human health posed by COCs in groundwater until cleanup levels are achieved.
- Acquire phased completion letters from Ecology indicating the successful implementation of the interim action.
- To facilitate a Consent Decree at the Site, including a Covenant Not to Sue and contribution protection.

In conjunction with implementing the Interim Action on the property, the proponent proposes to construct one 13-story office building and one 12-story office building on the 2.5-acre site in the South Lake Union neighborhood in a phased development.

12. Location of the Proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The property is located at 307 Fairview Avenue North, Seattle, Washington (Figure 1). Assessor's Tax Parcel Numbers 198620-0515-00 and 198620-0480-01.

Legal Description:

Lots 1 thru 4, inclusive and lots 7 thru 12 inclusive, Block 109, D.T. Denny's 5th Addition to North Seattle, according to the plat recorded in Volume 1 of Plats, page 202 in King County, Washington; Except the east 21 feet thereof heretofore condemned by the City of Seattle in King County Superior Court Cause No. 204496, for street purposes, as provided under ordinance No. 51975, of said city; Together with a tract of land being described as follows: Beginning at the point measured at right angles 33.00 feet north of the centerline of Thomas Street and 54.00 feet west of the centerline of Fairview Avenue North, thence north 00°54'51" east, a distance of 119.99 feet along the west margin of Fairview Avenue North, to the south line of Lot 4 of said plat D.T. Denny's 5th Addition to North Seattle; Thence north 88°32'59" west, a distance of 167.75 feet along said south line to the east margin of the alley, as shown on said plat of D.T. Denny's 5th Addition to North Seattle; Thence south 01°26'08" west, a distance of 119.99 feet along said east margin of alley to the north margin of Thomas Street; Thence south 88°32'38" east, a distance of 168.84 feet along said north margin to the point of beginning; Together with all of the vacated alley adjoining and lying within Block 109 of said plat D.T. Denny's 5th Addition to North Seattle, vacated under ordinance No. 92708, of the City of Seattle, that would attach by operation of law.

B. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site (circle one): Flat, rolling, hilly, steep slopes, mountainous, other.

As this proposed project is located in the fully developed area of the South Lake Union neighborhood of Downtown Seattle, the property does not contain any primary topographic features. Although the project property is generally flat, elevations range from 68 feet (northwest corner of the property) to 105 feet (southeast corner of the property) above mean sea level and slope toward the northwest.

b. What is the steepest slope on the site (approximate percent slope)?

Much of the property is nearly level and gently slopes down toward the northwest. The elevation change across the property is 37 feet, an average grade of 8 percent.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.

There are basically three different types of soils present at the property:

- 1. Vashon recessional outwash very loose to medium dense, tan to gray sand minor quantities of silt.
- 2. Pre-Fraser glacial sediments dense to very dense, unsorted silty sand with gravel.
- 3. Pre-Olympia non-glacial sediments hard, dark brow to gray silt with finely disseminated organics and variable gravel content.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

Seattle is situated in a moderately active earthquake region where the Juan de Fuca plate is thrust beneath the North American plate along the toe of the continental slope (Galster and Laprade 1991). The International Building Code places the Puget Sound area within Seismic Zone 3, which indicates significant seismic risk. The design level earthquake for this zone is magnitude 7.0 to 7.5.

The site could experience seismic activity, which may cause surface rupture, liquefaction and subsidence, and landslides. Based on site conditions, the risk of these hazards is considered low and there is no history of unstable soils on the property.

e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.

Approximately 97,000 tons of material would be excavated and hauled off site to a site approved by jurisdictional regulatory agencies during the Interim Action.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

The erosion potential of site soils would temporarily increase as a result of site demolition, clearing, and cleanup action. However, erosion control measures are planned (see SEPA checklist Section B.1.h. below). In general, because of the relatively flat nature of the project site and proposed mitigation, erosion is not anticipated. Site work would expose soils, but the Temporary Erosion Sedimentation Control (TESC) plan would mitigate potential impacts.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

Currently, the property is approximately 90 percent covered with impervious surfaces. The property will be covered with approximately 80-85 percent of impervious surface after completion of the Interim Action and Redevelopment action.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

Construction

A Stormwater Pollution Prevention Plan (SWPPP) and a TESC plan will be prepared by the project engineer and submitted to the City of Seattle and Ecology for review and approval. The temporary erosion and sediment control plan would be implemented during construction. The contractor would be required to comply with applicable regulations in the City of Seattle's Stormwater, Grading, and Drainage Control Code (City of Seattle Municipal Code [SMC] 22.800), including pertinent best management practices (BMPs).

A temporary erosion/sedimentation control plan and the associated details would be included in cleanup documents clearly indicating the implementation of the BMPs (See Section B.3 d of this SEPA checklist for more information on BMPs). The contractor would also control any ground or surface water that could be encountered during excavation.

In the project area, wet weather generally begins about mid-October and continues through about May. It would be most advisable to schedule earthwork during the drier weather months; however, wet weather earthwork recommendations would be followed when appropriate.

2. Air

a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.

The proposed action could result in localized increases in air emissions (primarily from carbon monoxide) as a result of cleanup activities. The proposed action is not expected to result in violations of ambient air quality standards either during construction or during long-term operation.

Review of Greenhouse Gas Emissions

On December 3, 2007, the Seattle City Council adopted Ordinance 122574, which requires City departments that perform environmental review under the State Environmental Policy Act to evaluate greenhouse gas emissions (GHG) when reviewing permit applications for development. As of March 31, 2008, GHG emissions must be disclosed as part of SEPA review. The City of Seattle provides a worksheet to help in disclosing GHG emissions on the SEPA checklist (DPD 2009). King County created the initial release of the worksheet. The worksheet responses help estimate the quantity of GHG emissions that will be created over the life span of the building project. This includes emissions associated with:

- The extraction, processing, transportation, construction and disposal of materials and landscape disturbance (embodied emissions).
- Energy demands created by the development after it is completed (energy emissions).
- Transportation demands created by the development after it is completed (transportation emissions).

The total metric tons of carbon dioxide equivalent per year for the proposed cleanup action is estimated to be less than 25,000 metric tons a year. In accordance with Ecology's guidance, including *Greenhouse Gas Emissions in SEPA Reviews* published in June 3, 2011, by Ecology, proposals will be presumed to be not significant for GHG emissions and thus no further mitigation for GHG emissions will be necessary if it is expected to result in fewer than 25,000 metric tons a year.

The types of GHG emissions expected from the proposed project would be heavy-machinery emissions during property cleanup activities.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

No off-site source of emissions or odors that would affect this proposal has been identified.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

Construction

Contractors will be expected to use known, available, and reasonable measures to control constructionrelated emissions to meet the PSCAA requirements as further defined in the City of Seattle's BMP guidelines to reduce surface and air movement of dust during cleanup activities. These measures may include watering dirt driveways and construction surfaces to control dust. Cleanup action would be planned to minimize exposing areas of earth for extended periods. Contractors may also use temporary ground covers, sprinkle-approved dust palliatives, or use temporary stabilization practices upon completion of grading. Using well-maintained equipment would reduce emissions from construction equipment and construction-related trucks and avoid prolonged periods of vehicle idling. Using electrically operated small tools in place of gas powered small tools wherever feasible would reduce emissions.

A vapor barrier will be installed by virtue of the construction of a multi-level, belowground parking structure. Passive vapor barriers exhibit very low vapor flow permeability and can prevent the intrusion of vapor-phase VOCs into the interior of a building. The removal of all soil contamination via excavation, the substantial thickness of the proposed foundation, as well as the belowground parking structure and venting system, would mitigate the potential for intrusion and/or collection of unsafe levels of COC vapors into the parking garage and above-grade building for the future Redevelopment at the property. The foundation of the future development will include the floor and walls of a multilevel, belowground parking garage. The foundation will be comprised of several feet of concrete, which would form a permanent vapor barrier to contaminant migration.

3. Water

a. Surface:

(1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

There is no surface water on or immediately adjacent to the project property. The site is located approximately 1,000 feet south of Lake Union. Lake Union is a freshwater navigable lake, connected to Lake Washington to the east and Puget Sound to the west by man-made canals.

(2) Will the project require any work over, in, or adjacent to (within two hundred (200) feet) the described waters? If yes, please describe and attach available plans.

The project would not require any work over, in, or adjacent to any surface water body. It would not require any work within 200 feet of Lake Union.

(3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

No fill or dredge material would be placed in or removed from surface water or wetlands.

(4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

No surface water withdrawals or diversions are proposed.

(5) Does the proposal lie within a one hundred (100) year floodplain? If so, note location on the site plan.

The project site is not within a 100-year floodplain and is not identified as a flood prone area on the Seattle critical areas map.

(6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

The proposal would not involve any discharge of waste materials to surface waters.

b. Ground:

(1) Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known.

Perched groundwater was encountered in subsurface explorations, at an approximate depth of 18 to 20 feet below grade. A deeper water-bearing zone was also encountered in several other areas on site at approximately 50 to 89 feet below grade (i.e., approximately 16 feet above mean sea level). Observed groundwater conditions are above the level of proposed floor elevations (approximately 18 to 38 feet above mean sea level); therefore, it is likely that minor dewatering will be necessary during cleanup at this location.

(2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

No waste material would be discharged into the ground.

c. Water runoff (including stormwater):

(1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

Stormwater runoff at the property is from the building and impervious surface parking lot surfaces. Runoff flows into an underground drainage system via catch basins, then through a coalescing plate oil/water separator, and then into the local storm drainage system.

(2) Could waste materials enter ground or surface waters? If so, generally describe.

Construction

Sediment generated during cleanup activities could potentially leave the property and enter the storm sewer system; however, BMPs would be implemented to minimize sedimentation.

d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:

A SWPPP and a TESC plan will be prepared by the project engineer and submitted to the City of Seattle and Ecology for review and approval. Stormwater regulations are governed by the City of Seattle's Stormwater, Grading, and Drainage Control Code (SMC 22.800). City of Seattle Department of Planning and Development Director's Rule 16-2000 and Director's Rule 17-2000 provide explanations of plan requirements and application of BMPs. Also, the City of Seattle has issued the Construction BMP Manual to provide technical guidance for compliance with the Stormwater, Grading, and Drainage Control Code. This manual provides detailed a discussion of standards and specifications for control of erosion, sedimentation, and pollutants. During cleanup, BMPs will be implemented to ensure that sediment originating from disturbed soils would be retained within the limits of disturbance.

A temporary dewatering system will be installed at the property during the Interim Action. The system will be designed to extract the contaminated perched groundwater within the center of the excavation area. Two to three dewatering wells will be installed within the perched zone and pumping the water down until the wells are dry. The water generated will be transferred to a 6,800-gallon polyethylene aboveground storage tank. The storage tank will be located in an area that is accessible for a vacuum truck service to remove the contaminated water and transport it for treatment and disposal off the site.

Water that is generated from surface water runoff due to precipitation events and any groundwater encountered during the course of the excavation will be gathered at a low point in the excavation as determined by the contractor and pumped to the aboveground storage tank prior to off-site treatment and disposal. As discussed above, the final elevation of the excavation is anticipated to be between approximately 18 and 38 feet above mean sea level, or approximately 2 to 20 feet above the top of the primary water-bearing zone; therefore, extensive dewatering is not anticipated.

4. Plants

a. Check or circle types of vegetation found on the site:

<u>x</u> deciduous tree: alder, maple, <u>birch</u>, oak, black locust, <u>other</u>.

____ evergreen tree: fir, cedar, pine, other

 \underline{x} shrubs

<u>x_g</u>rass

___ pasture

- ____ crop or grain
- ____wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- ____ water plants; water lily, eelgrass, milfoil, other
- ____ other types of vegetation

Most surfaces within the project area are impervious. The exceptions are the street trees and grass along Fairview Avenue North with seven trees ranging in size from 8 to 14 inches diameter at breast height as well as seven trees within the property line ranging in size from 6 to 18 inches and approximately 3,000 square feet of unremarkable, non-native understory landscaping.

b. What kind and amount of vegetation will be removed or altered?

All of the vegetation within the property line will be removed. It has been determined that a Birch tree on the site is considered "exceptional." Mitigation for the removal of the tree will be in accordance with City of Seattle Directors Rule 16-2008.

c. List threatened or endangered species known to be on or near the site.

No threatened or endangered plant species are known to be present in this urbanized area (Swift Company LLC 2011).

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

No landscaping is proposed as part of the Interim Action.

5. Animals

a. Circle any birds and animals which have been observed on or near the site or are known to be on or near the site:

birds: hawk, heron, eagle, <u>songbirds</u>, other: <u>pigeons</u>, <u>crows</u>, <u>sparrows</u>, <u>gulls</u> mammals: deer, bear, elk, beaver, other: <u>rodents</u>, <u>squirrels</u>, <u>raccoons</u> fish: bass, salmon, trout, herring, shellfish:

Use of the site by animals is limited by its urban character. Small mammals and perching birds are present in the area.

b. List any threatened or endangered species known to be on or near the site.

This is an urban site in the South Lake Union neighborhood of Downtown Seattle. There is no known occurrence of threatened or endangered animal species on or near the site.

c. Is the site part of a migration route? If so, explain.

The Puget Sound area is part of the Pacific Flyway. Birds that inhabit the area vary seasonally due to migrations. The proposed project site is covered with structures and pavement, and located in a highly urbanized area. It offers no habitat attractive or essential to migrating birds.

d. Proposed measures to preserve or enhance wildlife, if any:

In the absence of adverse impacts on animal species, no mitigating measures are proposed.

6. Energy and Natural Resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Diesel- and gasoline-powered equipment would be used during the Interim Action.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

The Interim Action is not expected to affect the potential use of solar energy by adjacent properties.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

In the absence of direct impacts to energy and natural resources, no mitigation is proposed.

7. Environmental Health

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

The purpose of this project is to provide for the cleanup of hazardous substances at the property and reduce threats to human health and the environment.

According to historical records, by 1948 the property operated as one of the Pacific Northwest's largest laundry and dry cleaning facilities. At least 15 underground storage tanks containing heating oil, fuel, and dry cleaning solvents, as well as several aboveground storage tanks containing propane, wash water, water-softening agents, dry cleaning solvents, and heating oil, were used on the property. Land use in the vicinity of the property was primarily residential through the early 1900s, when the area transitioned toward commercial and light industrial use. The existing buildings contain asbestos materials, lead-based paints, and light fixture ballasts containing PCBs (polychlorinated biphenyls). It is expected that the Interim Action activities proposed at the property (with Ecology acting as lead agency) will occur prior to and in conjunction with Redevelopment.

Construction

There is a potential for spill or release of other hazardous or toxic substances during demolition and construction and during the operation of construction equipment and vehicles due to transport of petroleum products and leakage of petroleum products, including fuels, oil, grease, hydraulic fluids, and lubricants from construction equipment. The extent of impacts resulting from accidental discharge of petroleum products during construction depends on the amount and duration of the spill, but is expected to be low with small quantities involved.

Interim Action

Based on the results of the previous investigations and completion of a preliminary conceptual site model, the Interim Action described herein has been developed to remediate the portions of the property that have been confirmed to be impacted as a result of the release at the property. To the extent possible, the Interim Action also has been developed to be consistent with the requirements of a cleanup action in accordance with EAC 173-340-360 through 400.

The Draft Interim Action Plan has been prepared based on the results of the Draft Feasibility Study Report and the findings of the supplemental remedial investigation conducted by SoundEarth Strategies, Inc. in December 2012. It presents the methods proposed to remediate the contaminated soil and groundwater associated with the release from the former Troy Laundry operations. As part of the redevelopment, the Troy Laundry Property will generally be excavated from lot-line to lot-line; the final elevation of the excavation is anticipated to be between approximately 18 and 38 feet above mean sea level. The entire property will be excavated to completely remove the identified chlorinated solvent- and petroleumcontaminated soil. The vertical extent of the remedial excavation will extend to approximately 19 feet above mean sea level. Approximately 97,000 tons of chlorinated solvent- and petroleumcontaminated soil will be excavated of off the property. The estimated duration of the remedial excavation is 4 months, and the remedial excavation will be conducted as part of the larger redevelopment excavation.

If the deep soil contamination identified beneath the Thomas Street right-of-way resulted from a release at the property, a soil vapor extraction system will be installed along the southern property boundary. The soil vapor extraction system will target the thin zone of soil contamination identified during the installation of B50/MW16. Horizontal extraction wells will extend beneath the Thomas Street right-of-way. The recovered vapors will be monitored to assess the effectiveness of the system and mass recovery. The system conveyance piping will be installed prior to pouring the building foundation and routed to a system equipment enclosure.

After the final grades are achieved and prior to installing the building foundation, the remedial infrastructure required to treat the groundwater contamination plume using in situ reductive dechlorination would be installed. Angled borings/injection wells would be installed under the Boren Avenue North ROW that could provide access for the purpose of injecting an edible oil substrate and *Dehalococcoides* genus bacteria to treat the extent of the confirmed solvent plume. Edible oil substrate would be used as a carbon source to deplete dissolved oxygen present in the aquifer, generate free hydrogen, and sustain a robust anaerobic dechlorinating microbial population. The presence of degradation products in groundwater across the property confirms that site conditions are conducive to reductive dechlorination, and enhancing this naturally occurring process with edible oil substrate and *Dehalococcoides* will significantly reduce the remedial time frame.

Vertical injection wells would be installed on the property on approximate 15-foot centers along transects to a depth of approximately 35 feet below the saturated zone. The relatively wide spacing of the injection wells along each transect is based on soil bulk density estimates developed by EOS Remediation, as well as the relatively permeable soil texture. This information was used to develop the approximate volume of edible oil substrate necessary to support a zone of anaerobic dechlorination sufficient to degrade the chlorinated solvents within groundwater beneath the property.

Performance and confirmational vapor (if applicable) and groundwater monitoring will be conducted at the proposed compliance points following the completion of the cleanup activities. Vapor monitoring will continue until influent concentrations of chemicals of concern are below the laboratory detection limit or the soil vapor extraction system has de minimis mass recovery. Groundwater monitoring will continue until four consecutive quarters of compliant groundwater samples have been collected.

Upon completion of the contaminated soil excavation and system installation activities, Touchstone SLU LLC will submit an Initial Interim Action Completion Report documenting the removal of the contaminated soil and the as-builts of the remediation system(s) for review and approval by Ecology. Following collection of confirmational vapor and groundwater analytical data, Touchstone will submit an Interim Action Closure Report for review and approval by the Washington State Department of Ecology.

(1) Describe special emergency services that might be required.

No special emergency services are expected to be required.

(2) Proposed measures to reduce or control environmental health hazards, if any:

In conjunction with Redevelopment, the Interim Action will include the demolition of structures on the property and remediation of contaminated soil as needed. As part of that action, a hazardous materials survey will be conducted, quantifying the presence of hazardous materials in the building. The survey will stipulate methods for appropriate containment, removal, and disposal of any hazardous materials identified in the warehouse structure. Abatement will be consistent with local, regional, and state requirements for worker safety, containment, and disposal of hazardous materials. Former industrial activities on the property resulted in soil and groundwater impacts. The remediation action proposes to remediate contaminated soil to residential standards and reduce exposure to contamination at the property.

For emergencies arising from cleanup at the project property, the risk of fire, explosion, and release of hazardous substances may be minimized through the use of standard construction practices. Under the terms of the construction contract, the contractor should be required to undertake measures to reduce environmental hazards. All requirements imposed by city, state, and federal codes would be met including the PSCAA codes.

b. Noise:

(1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

Off-site sources of noise in the project area include numerous forms of aircraft activity that are scheduled Lake Union float plane service and motor vehicle noise associated with travel on local streets and Interstate 5.

None of the existing off-site noise sources in the area is projected to adversely affect the proposed project.

(2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Construction

Cleanup activities would generate short-term noise at the project property. Potentially affected receptors nearest the site would be employees and visitors of other nearby businesses. Construction noise and vibration would be generated by equipment, concrete delivery trucks, portable power generators, and a variety of miscellaneous construction equipment typically required for such a project.

(3) Proposed measures to reduce or control noise impacts, if any:

Construction

Cleanup activity would need to comply with the standards in the Seattle Noise Ordinance (SMC 25.08). The noise ordinance limits construction noise levels to 25 decibels above the maximum-noise levels otherwise permitted. Construction occurring outside of daytime hours (7:00 a.m. to 10:00 p.m. weekdays, 9:00 a.m. to 10:00 p.m. weekends) would need to meet nighttime noise level limits. Variances from these standards would require additional noise evaluations and approval from DPD.

No significant impacts are expected from the temporary increases in noise due to the cleanup activity that cannot be effectively addressed through compliance with the Seattle Noise Ordinance. At the City of Seattle's discretion, temporary construction noise impacts could be controlled at the property by controlling hours of activity and following noise abatement precautions to reduce noise levels of equipment.

8. Land and Shoreline Use

a. What is the current use of the site and adjacent properties?

The project site is bounded to the west by Boren Avenue North, to the north by Harrison Street, to the east by Fairview Avenue North, and to the south by Thomas Street. The site is in the South Lake Union

neighborhood and is northeast of Seattle's Central Business District. It is also about six blocks west of Interstate 5.

The property was initially developed before 1893 with residences. Residences exclusively occupied the property until 1925, when the David Smith building was constructed on the northwestern corner of the property.

The excavation to remove soil contamination will require demolition of all the structures on the property except for building structures retained per the Seattle Landmarks Board requirements. The buildings proposed for demolition include portions of three commercial/warehouse buildings: the Troy Laundry Building with an adjacent 85 stall parking structure, the Boren Investment Building, and a small coffee shop building.

The property is improved with three buildings. The 1925-vintage, single-story masonry warehouse building listed at 334 Boren Avenue North (David Smith Building/Boren Investment Building) is used as a sales floor and storage for David Smith Antiques, a home furnishings retailer, and a wholesaler. The masonry-framed structure has a tar and gravel roof and is heated by space heaters.

The original 1927-vintage building at 307 Fairview Avenue North (Troy Building) is presently used as storage space for Integrity Interior Solutions, as well as storage for David Smith Antiques. The current, expanded structure was formerly the main location of the Troy Laundry and commercial dry cleaning operations. The masonry-framed structure has a tar and gravel roof and is heated by a hot water furnace. Troy Building additions, which were constructed between 1943 and 1966, were formerly used for industrial laundry, fur storage (Fur Vault), a tumbling and cleaning area on the western portion of the property, and a two-story reinforced concrete parking garage on the southwest portion of the property. The reinforced concrete structure is heated using space heaters.

The 1960-vintage, single-story, masonry-framed structure located at 329 Fairview Avenue North (Mokas Building) has recently been vacated by Mokas Café and Coffee Bar.

The neighborhood is currently a mixed residential, commercial, and industrial neighborhood and also includes surface parking. The current use of the site is parking, warehousing, and retail.

Adjacent property uses include the following:

North – Harrison Avenue North and commercial buildings

South - Thomas Avenue North and Seattle Times building

East – Fairview Ave North and commercial buildings

<u>West</u> – Boren Avenue North and Amazon office buildings

b. Has the site been used for agriculture? If so, describe.

The site has not been used for agriculture for at least 100 years.

c. Describe any structures on the site.

The excavation to remove soil contamination will require demolition of most structures on the property as needed to complete the remediation except for portions of building structures retained in accordance with the Seattle Landmarks Board requirements. The buildings proposed for partial demolition include three commercial/warehouse buildings: the Troy Laundry Building with an adjacent 85-stall parking structure, the Boren Investment Building, and a small coffee shop building. The buildings total approximately 128,000 square feet.

d. Will any structures be demolished? If so, what?

Most existing structures on the property are expected to be removed prior to the Interim Action and in conjunction with Redevelopment. The only buildings expected to be on the property before the start of the proposed Redevelopment action are expected to be the portions of existing historic structures required to be incorporated into the new building structure by the Seattle Landmarks Board. Adjoining sidewalk and pavement would be demolished along with utilities, as required for the proposed project.

e. What is the current zoning classification of the site?

The site is zoned IC- 65 (Industrial Commercial with height limit of 65 feet).

f. What is the current comprehensive plan designation of the site?

The site is located in the South Lake Union Urban Center. The Future Land Use Map in the Seattle Comprehensive Plan identifies the site as industrial, with an urban center overlay. Urban centers are intended to provide mixed-use neighborhoods with nearby access to housing, jobs, and transportation.

g. If applicable, what is the current shoreline master program designation of the site?

The site is not within a 200-foot shoreline environment.

h. Has any part of the site been classified as an "environmentally critical" area? If so, specify.

The site of the proposed project has not been listed by the City of Seattle as an environmentally critical area.

i. Approximately how many people would reside or work in the completed project?

There would be no resident or employee population on the property immediately following the remediation action.

j. Approximately how many people would the completed project displace?

Currently, businesses at the site employ less than 10 workers.

k. Proposed measures to avoid or reduce displacement impacts, if any:

No measures are expected to be necessary.

I. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

The soil remediation pursuant to MTCA unrestricted/residential cleanup levels to prepare a contaminated industrial site for commercial development would be required. This remediation action is compatible with the King County Comprehensive Plan, the City of Seattle Comprehensive Plan, and applicable Neighborhood Plans. The project would benefit the community by cleaning up property containing identified contamination and thus removing a source of contamination.

The purpose of this project is to provide for the cleanup of hazardous substances at the property and reduce threats to human health and the environment. No people will reside or work during the completed remedial action. The interim remedial action project will allow for the completion of a redevelopment on the property.

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or lowincome housing.

No housing is proposed as part of the Interim Action.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or lowincome housing.

The proposal would not eliminate any existing housing units.

c. Proposed measures to reduce or control housing impacts, if any:

In the absence of direct impacts on housing, no mitigation is proposed.

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

No structures are proposed as part of the Interim Action.

b. What views in the immediate vicinity would be altered or obstructed?

No views in the immediate vicinity would be altered or obstructed.

c. Proposed measures to reduce or control aesthetic impacts, if any:

In the absence of direct impacts on aesthetics, no mitigation is proposed.

11. Light and Glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

The Interim Action will not produce light or glare.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

The completed Interim Action will not result in a safety hazard or interfere with views.

c. What existing off-site sources of light or glare may affect your proposal?

Existing lighting around the edges of the site currently consists of streetlights, illuminated signage, additional lighting at the entrances to major buildings, and lighting in the neighboring parking lots. Existing sources of light and glare would not affect the proposal.

d. Proposed measures to reduce or control light and glare impacts, if any:

In the absence of direct impacts on light and glare, no mitigation is proposed.

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity?

Existing designated recreational opportunities in the immediate vicinity of the site include the following:

Lake Union Park is located approximately one block north of the site at the north end of Terry Avenue North. The new Museum of History and Industry is located in Lake Union Park. Denny Park and Playfield is approximately 5 blocks southwest of the site at John Street and Westlake Avenue North. The closest informal recreational resource is located at Cascade Playground, which is approximately two blocks southeast of the project site at Harrison Street and Minor Avenue North.

b. Would the proposed project displace any existing recreational uses? If so, describe.

The Interim Action would result in no permanent displacement of any existing recreational uses.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

Temporary traffic control or pedestrian obstructions during the Interim Action would be managed in accordance with the current City of Seattle guidelines. In the event that work requires closure of an entire sidewalk or travel lane, a signing plan and traffic control plan would be prepared for approval by the City of Seattle. No other public recreational opportunities are proposed.

13. Historic and Cultural Preservation

a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.

The property was initially developed before 1893 with residences. Residences exclusively occupied the property until 1925, when the Boren Investment Building was constructed on the northwestern corner of the property. The Troy Building was constructed between 1926 and 1927, and the Mokas Building was constructed in 1960. According to historical records, by 1948 the property operated as one of the Pacific Northwest's largest laundry and dry cleaning facilities. Land use in the vicinity of the property was primarily residential through the early 1900s, when the area transitioned toward commercial and light industrial use.

The report titled Boren Investment Company Warehouse/David Smith & Co. Landmark Nomination Report, 334 Boren Avenue North, Seattle, Washington, dated April 2011, was the landmarks nomination report (The Johnson Partnership 2011). That report is incorporated by reference into this environmental review.

The City of Seattle Landmarks Board has designated the exteriors of the Troy Laundry Building and the Boren Investment Building with landmark status.

b. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.

The City of Seattle Landmarks Board has designated the exteriors of the Troy Laundry Building and the Boren Investment Building with landmark status.

c. Proposed measures to reduce or control impacts, if any:

Portions of the landmarked Troy Laundry Building and the Boren Investment Building will be preserved in accordance with final details that will be reviewed and approved by the Seattle Landmarks Board (via a Certificate of Approval) before building permit issuance before the redevelopment action on the property begins. Any building demolition required as part of the Interim Action will adhere to this approval.

The following recommendations, included in the City of Seattle's Director's Rule 2-98 (SMC), will be also implemented:

- Contractors and subcontractors would be supplied with copies of regulations regarding archaeological resources with the understanding that crews will comply with those regulations.
- Inadvertent discovery protocol should be implemented when appropriate.
- The project would abide by state and local regulations governing the discovery and excavation of archaeological resources.

14. Transportation

a. Identify public streets and highways serving the site, and describe the proposed access to the existing street system. Show on site plans, if any.

The proposed project site is bounded to the west by Boren Avenue North, to the north by Harrison Street, to the east by Fairview Avenue North, and to the south by Thomas Street. Fairview Avenue North is designated as a principal arterial, and the other three roadways located adjacent to the site are local access streets. Metered on-street parking is allowed along most of these streets. Primary arterial access to the local and regional roadway network (major City of Seattle arterials, Interstate 5, and State Route 99) occurs from Denny Way, two blocks south of the project site, and from Mercer Street, two blocks to the north of the site. Access to the project subsurface parking garage and truck loading dock will be provided mid-block on Harrison Street.

b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

The site vicinity is primarily served by King County Metro (Metro) public bus transportation. There are bus stops in both directions located adjacent to the site at Fairview Avenue North/Harrison Street. Existing transit service within one-quarter mile of the site includes 12 Metro bus routes (Routes 8, 17, 25, 70, 71, 72, 73, 79, 83, 304, 309, and 355).

The South Lake Union Streetcar provides service between South Lake Union and Downtown. The streetcar operates northbound on Terry Avenue North with a stop about one block west of the site, and southbound on Westlake Avenue North with a stop about two blocks west of the site. Both directions converge onto Westlake Avenue North south of Thomas Street. The streetcar operates seven days a week (Monday through Thursday 6:00 a.m. to 9:00 p.m., Friday and Saturday 6:00 a.m. to 11:00 p.m., and Sunday 10:00 a.m. to 7:00 p.m.) at15-minute headways (time between consecutive arrivals) during all hours of operation.

In addition, there are over 20 weekday commuter bus routes provided by Metro, Sound Transit, and Community Transit, which stop at the Stewart Street/Yale Avenue or Howell Street/Yale Avenue intersections, just under a half-mile south of the project site. These routes provide weekday service between Downtown Seattle and regional destinations to the north, east, and south, primarily traveling to Downtown Seattle during the morning peak period, and away from downtown during the evening peak period

c. How many parking spaces would the completed project have? How many would the project eliminate?

Not applicable.

d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).

No new roads or streets would be constructed with the project.

e. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

The proposed project is not located in the immediate vicinity of any water, rail, or air transportation facilities, and would not affect any water, rail, or air transportation facilities.

f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.

Construction

Construction Traffic and Pedestrian Control Plan: Before beginning any cleanup on the premises, the developer would develop and submit a plan to the City of Seattle for approval of a construction traffic and pedestrian control plan addressing the following issues: pedestrian safety, traffic routing, pedestrian routing, and mobilization of truck traffic to and from the premises.

Construction traffic may temporarily increase congestion in the area and would generate temporary, shortterm increases in traffic from construction vehicles. Of the construction vehicle traffic, soil-hauling trucks are expected to cause the greatest short-term impact during the construction period.

Typically, trucks with a capacity of 20 cubic yards are used to haul soil. For the property mass excavation, approximately 97,000 tons of soil would be hauled off site; about 3,500 trips (one entering and one exiting for each truck) would result. On soil-hauling days, soil would be hauled in at a maximum anticipated rate of about 10 to 14 truckloads per hour. Soil-hauling typically ends before the evening peak hour, as do most construction activities. However, if soil-hauling activities continued beyond normal hours, these trips could occur during the evening peak hour, but this could be avoided. The plan may prohibit soil-hauling or materials delivery during special events or within a set number of hours before or after major scheduled events.

g. Proposed measures to reduce or control transportation impacts, if any.

Construction

Contractors would be asked to limit construction traffic during non-peak hours on the surrounding street system as much as possible. Contractors may have to find parking through leasing of off-street lots since most of the area's on-street parking is limited to less than two hour stays.

Site work would be conducted in a manner that would interfere as little as possible with public travel, vehicular, pedestrian, and other non-motorized forms of circulation. Temporary traffic control or pedestrian obstructions during construction (if any) would be managed in accordance with the current City of Seattle guidelines. In the event that work requires closure of an entire sidewalk or travel lane, a signing plan and traffic control plan would be prepared for approval by the City of Seattle. Again, if any temporary closures were needed, a signing and control plan would be implemented.

15. Public Services

a. Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe.

The proposed Interim Action could slightly increase temporary fire hazards during demolition due to debris, stored building materials, cleanup activity, and construction-related traffic congestion. During cleanup, the contractor would follow specific guidelines for public safety as required.

b. Proposed measures to reduce or control direct impacts on public services, if any.

Compliance with fire codes for materials storage during the Interim Action would be required. Throughout the cleanup, adequate access for firefighting equipment would be maintained around the construction site, and the Seattle Fire Department would be kept informed of any temporary changes in access. During construction, the contractor would follow specific guidelines for public safety as required.

16. Utilities

a. Circle utilities currently available at the site: <u>electricity</u>, <u>natural gas</u>, <u>water</u>, <u>refuse service</u>, <u>telephone</u>, <u>sanitary sewer</u>, septic system, <u>other</u>.

All utilities are currently available.

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

Utilities will be served by the following companies:

- Water City of Seattle
- Sanitary Sewer City of Seattle
- Storm Sewer City of Seattle
- Electric Seattle City Light
- Natural Gas –
- Telephone/Data Century Link, Millennium, TW Telecom, Comcast, Integra Telecom, Zayo Group)
- Refuse Service Cleanscapes

During cleanup, there could be temporary disruptions to utility service on the site and in the vicinity. Affected utilities and properties would be advised in advance of such occurrences.

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature:

Title: Vice President, SoundEarth Strategies, Inc.

Date submitted: April 3, 2013

Attachments:

Figure 1, Property Location Map

