

**KELKARI**  
**SEPA COMPLIANCE DOCUMENT**  
**February 15, 2015**

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Kelkari is a residential community located in the Sunrise neighborhood of south Issaquah. The Master Site Plan (MSP), Site Development Permit (SDP) and Binding Site Plan (BSP) for Kelkari was approved in 1998 (Resolution No. 98-15), with 189 dwelling units and a detached clubhouse. The approval is valid until August 31, 2018.

The approved development, which includes 9 multi-family buildings, a club house and related site improvements and open space, was subject to environmental review under the State Environmental Policy Act (SEPA) during 1996 (DEIS – April 23, 1996; FEIS - July 31, 1996).

Phase 1 of Kelkari was constructed in 1999, including 63 dwelling units in 3 buildings on Lots 3 through 5 and a clubhouse and associated parking on Lot 6. A portion of the development area for Phase 2 was also cleared and graded, and site improvements have been constructed (i.e., main access road and stormwater management system/vault for Phase 1 & 2). The BSP was recorded on September 2, 1999, and depicts all phases of the development lots and parcels containing critical areas. In late 1999, construction was suspended due to market conditions.

Subsequent to suspending construction, the current owner has continued to work toward development of the remaining phases, including participating with the City of Issaquah for construction of the 480 zone reservoir and obtaining extension of the development approvals.

IS Property Investments LLC (the “Applicant”) is the contract purchaser for Phases 2 & 3 and proposes some minor amendments to the approved proposal. The modified Kelkari proposal maintains the multifamily residential use with a reduction in the total number of dwelling units from 189 to 138 dwelling units. The modified project will include a series of townhouse style buildings, with a maximum height not to exceed 45 feet and located outside the buffers and building setbacks shown on the BSP. The change in building type responds to the changing residential market demand and provides for a more respectful transition to the adjacent lower density uses. The buildings, access, site amenities and surface parking are generally located in the same areas previously depicted for development. A more detailed description of these and other project elements is provided below.

To assist in developing the minor amendments, several technical reports and analyses were prepared for various elements of the environment evaluated in the EIS (e.g. wetlands, transportation). This SEPA compliance document describes the changes in the approved proposal and the additional technical information that builds on and updates the previous environmental analysis based on the changes in the proposal. This narrative and the supporting technical analyses provide documentation for issuance of an SEPA Addendum by the City. Pursuant to WAC 197-11-600(4)(c), an addendum is appropriate where it "adds analyses or information about a proposal but does not substantially change the analysis of significant impacts and alternatives in the existing environmental document."

The following information is provided to demonstrate how the changes in the proposal do not substantially change the impacts or alternatives discussed in the 1996 FEIS or the related environmental mitigation conditions included in the approved site plan and decision document (Resolution No. 98-15). Each element of the environment from the FEIS is described with text boxes that identify project impacts described in the FEIS and how the refined project differs, if any, from the initial environmental review. These descriptions are followed by a commentary identifying the project changes, if any, why the additional analyses or information does not substantially change the analyses of the FEIS, and how the proposal complies with the mitigation included in the 1999 Decision Document (i.e., Resolution No. 98-15 Conditions of Approval).

## I. NATURAL ENVIRONMENT

### A. STREAMS & WETLANDS

#### Approved Proposal

- Increase in runoff associated with site development.
- Wetland area for direct fill is approximately 5,837 sf, with 1,306 sf of “paper fill”.
- Wetland creation area of area of 5,250 sf.

#### Modified Proposal

- Minor increase in impervious surface from 4.47 acres to 4.55 acres.
- Wetland area for direct fill is 4,283 sf, with 5,657 sf of “paper fill”.
- Wetland creation area of 14,223 sf.

**Comments:** As stated in the 1999 Decision Document, storm drainage for the site is adequately designed (Finding 16). Additional analysis was performed for the modified proposal to ensure that stormwater runoff from the development would continue to mitigate for impacts associated with increases in stormwater runoff (*see* Preliminary Technical Information Report by CORE Design dated December 16, 2015). This subsequent analysis demonstrates that the modified proposal will have only a minor increase in impervious surface and the stormwater system will provide the applicable flow reduction and water quality treatment standards. Four stormwater detention vaults, with a combined storage capacity of 18,798 cubic feet, will be constructed as part of the modified proposal. The net result of the proposed detention will be a significant reduction in peak flows discharging into Issaquah Creek. The peak discharge associated with the 100-year storm event will be reduced from 0.79 cfs to 0.49 cfs for Phase 2, and from 1.22 cfs to 0.77 cfs for Phase 3. The proposed stormwater treatment will provide 50 percent removal of phosphorus in accordance with the 1990 King County Stormwater Manual, thereby mitigating impacts on streams.

The Decision Document also identified required buffers for Cabin Creek and wetlands (Conclusion F.33.), and the direct fill of 5,837 sf of wetlands and 1,300 sf of paper fill was indicated on the MSP. The paper fill, 50-foot wetland buffer, and wetland mitigation area were subsequently shown on the recorded BSP. The modified development reduces the direct fill to 4,283, maintains the 50-foot buffer on the development lots, and provides for an increased wetland mitigation area within Parcel B based on the changes in the wetland fill (*see* Kelkari Wetland and Stream Delineation Study dated February 12, 2016, and Issaquah Kelkari Critical Areas Study dated February 2016, both by The Watershed Company).

As described above, the analysis and mitigation associated with streams and wetlands in the Decision Document remains applicable. The modified proposal and additional technical reports add analyses and information about the proposal but does not substantially change the analysis of significant impacts. The impacts will continue to be mitigated with subsequent detailed engineering wetland mitigation design.

## B. BIOLOGICAL RESOURCES

### Approved Proposal

- Except for Cabin Creek restoration, no work within streams.
- No threatened or endangered species on site.

### Modified Proposal

- No change.
- No change.

**Comments:** The area for disturbance remains essentially the same (*see* Site Disturbance Exhibit dated February 12, 2016). All of the modified proposal potential impacts on Chinook and coho salmon EFH have been considered collectively (*see* Biological Evaluation dated February 2016 by The Watershed Company). Although construction could temporarily adversely affect essential fish habitat, such effects are discountable based on the construction BMPs that will be in place. Long-term effects will be a net benefit, as peak storm flows will be reduced due to the proposed stormwater retention facilities, and water quality effects related to stormwater will be insignificant and discountable. Over time, the implementation of the modified proposal would result in a net beneficial impact within a short period of time. In conclusion, the analysis associated with impacts to biological resources remains unchanged by the modified proposal, and the proposal will not have significant adverse environmental impacts.

## C. EARTH RESOURCES & COAL MINE HAZARDS

### Approved Proposal

- Clearing and grading for developable areas and wetland mitigation.

### Modified Proposal

- Change in grading to respond to refined site plan and storm water drainage plan.
- Revised wetland mitigation area based on updated wetland delineation and mitigation plan.

**Comments:** The modified proposal results in minor changes to the overall clearing and grading analyzed in the EIS and subsequently approved in the Decision Document. Areas anticipated to be disturbed for the residential development and wall construction are essentially unchanged. The modified proposal continues to include alterations to man-made steep slopes that will not adversely impact the stability of slopes (*see* Kelkari Geotechnical Report dated December 29, 2015 and Kelkari Critical Areas Report dated February 11, 2016, both by Terra Associates, Inc.). The prior analysis of the impacts from erosion, seismic hazards, steep slopes and landslides is not substantially changed by the modified proposal. The coal mine hazard areas analyzed in the EIS are not present in Phases 2 & 3.

## II. BUILT ENVIRONMENT

### A. NOISE & AIR QUALITY

#### Approved Proposal

- Short-term noise and air quality impacts from construction.
- Long-term noise and air quality impacts from new residential uses and vehicular traffic.

#### Modified Proposal

- No change.
- No change.

**Comments:** Temporary short-term noise will be generated from construction equipment and construction traffic. Long-term noise will occur from vehicular traffic and from residential uses. These noise impacts were identified in the EIS and are the same for the modified proposal, with a reduction in long-term noise in relation to the reduction in vehicular trips.

### B. LAND USE, RECREATIONAL FACILITIES & AESTHETICS

#### Approved Proposal

- 189 dwellings in 9 buildings.
- Clubhouse and on-site recreational amenities, including regional trail.
- Conversion of site from undeveloped land to multi-family residential use.

#### Modified Proposal

- 138 dwelling units overall, with townhouse style buildings for Phases 2 & 3.
- No change in clubhouse and regional trail, and equivalent on-site recreational amenities.
- No change.

**Comments:** The modified proposal results in a decrease in the proposed number of dwelling units from 189 to 138. The development will continue to be a multifamily residential development. The modified project will include a series of townhouse style buildings, with a maximum height not-to-exceed 45 feet. The change in building type responds to the changing residential market demand and provides for a more respectful transition to the adjacent lower density uses. The buildings, access, site amenities, access, and surface parking are generally located in the same areas previously depicted for development. The modified proposal meets the criteria for a minor amendment to the MSP and SDP and an alteration exception for the BSP. Land use, recreational facilities, and aesthetic impacts will continue to be mitigated through the modified proposal design and compliance with the Decision Document conditions of approval.

### C. HISTORIC AND CULTURAL RESOURCES

#### Approved Proposal

- No impacts expected.

#### Previous Proposal

- No change.

**Comments:** The site has been previously disturbed and the EIS indicated that no impacts were expected because of the site disturbance and development location. A field survey was conducted based on the modified proposal design and to satisfy regulatory requirements for Section 106 of the National Historic Preservation Act (NHPA) in support of the U.S. Army Corps of Engineers (USACE) permit for the project. (*see* Cultural Resources Assessment by Tierra Right-of-Way dated January 22, 2016). Tierra recommends a finding of No Effect to Historic Properties and that the project be permitted to continue without further archaeological oversight.

### D. TRANSPORTATION, PUBLIC SERVICES & UTILITIES

#### Approved Proposal

- 1,500 daily trips.
- New calls for fire and police service and demand on schools.
- Increased water consumption and demand for utilities.

#### Modified Proposal

- Approx. 444 fewer daily trips.
- Payment of impacts fees.
- Reduced demand corresponding to reduce number of dwelling units.

**Comments:** No change in land use is proposed, as the development will continue to be a multifamily residential development. The modified proposal will, however, include a variety of townhouse style buildings, with a total of 75 dwelling units. As such, a limited scope traffic impact analysis was prepared to quantify the change in the vehicle trip generation based on the reduced number of dwelling units (*see* Kelkari Phases 2/3 by Transportation Engineering Northwest dated February 8, 2016). The modified proposal results in a decrease of approximately 444 fewer daily trips.

In addition to analyzing the trip generation, Transportation Engineering Northwest also evaluated the modified proposal as to sight distance, pedestrian safety, turn lane warrants, and on-site circulation. TENW concluded that adequate entering/stopping sight distance would be provided at the existing/proposed driveways onto Sunrise Place SW and within the internal site drive aisles. As part of the modified proposal, raised sidewalks would be constructed between existing sidewalks along Sunrise Place SW to each development area, as well as internal sidewalks along a majority of interior drive aisles to serve individual housing units. Since traffic volumes along Sunrise Place SW and interior to the project are low, no separated or marked crosswalk treatments are warranted. Provision for raised sidewalks between the public sidewalk facilities, the project site development areas, and the building frontages provide adequate separation between on-site vehicle and non-motorized circulation. A review of separate left turning lanes concluded they would not be warranted given existing low volumes on Sunrise Place SW and low left turning volumes into either Phase driveway.

Impacts on services will be mitigated through the payment of impact fees as stated in the Decision Document and the modified proposal will include installation of required water and utility improvements.