



Draft Wetlands and Streams Technical Memorandum for Alternative 6

City of Tukwila Allentown Truck Reroute
Supplemental Environmental Impact
Statement

City of Tukwila, Washington

September 9, 2025



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Abbreviations

BNSF	BNSF Railway
City	City of Tukwila
DEIS	Draft Environmental Impact Statement
DNR	(Washington State) Department of Natural Resources
DSEIS	Draft Supplemental Environmental Impact Statement
EIS	Environmental Impact Statement
FEIS	Final Environmental Impact Statement
FGDC	Federal Geographic Data Committee
GIS	geographic information system
HDR	HDR Engineering, Inc.
HGM	hydrogeomorphic
NAA	No-Action Alternative
NWI	National Wetlands Inventory
PAB	palustrine aquatic bed
PEM	palustrine emergent
PFO	palustrine forested
Proposed Project	Proposed Allentown Truck Reroute Project
PSS	palustrine scrub/shrub
SEIS	Supplemental Environmental Impact Statement
SEPA	State Environmental Policy Act
SWIFD	Statewide Washington Integrated Fish Distribution
USFWS	United States Fish and Wildlife Service
WDFW	Washington Department of Fish and Wildlife

1.0 Introduction

The BNSF Railway's (BNSF's) South Seattle Intermodal Facility (BNSF facility) in the Allentown neighborhood of Tukwila, Washington, is an important economic link to the Puget Sound region. It serves as an inland port, providing domestic intermodal transloading between truck and rail. Currently incoming freight trucks access the BNSF facility from the S 129th Street bridge to S 50th Place. Outgoing trucks can either use the S 129th Street bridge or take S 124th Street to the 42nd Avenue S bridge. After the planned replacement of the 42nd Avenue S bridge, truck traffic will also be able to access the BNSF facility by traveling north on the 42nd Avenue S bridge and reaching the facility via S 124th Street. To improve livability and safety in Allentown while supporting the operations of the facility, the City of Tukwila (City) evaluated potential alternative truck access routes to the BNSF facility through the Allentown Truck Reroute Project State Environmental Policy Act Final Environmental Impact Statement (FEIS) (City 2025a).

After the scoping period for the Draft Environmental Impact Statement (DEIS), and during the time the FEIS was being prepared, an additional alternative (Alternative 6) to the current BNSF facility truck route was determined. The resulting Draft Supplemental Environmental Impact Statement (DSEIS) analyzes two alternatives: the No-Action Alternative (NAA) as described in the FEIS (Figure 1) and Alternative 6 (the Rainier Avenue S alternative (Figure 2).

The City is the lead agency for the Environmental Impact Statement (EIS) and is overseeing the preparation of the DSEIS for the Proposed Allentown Truck Reroute Project (Proposed Project) under the State Environmental Policy Act (SEPA). One proposed truck route alternative (Alternative 6) and the long-term route that has been used for several decades (the NAA) will be analyzed in the Supplemental Environmental Impact Statement (SEIS) to determine their potential impacts on the built and natural environments. Alternative 6, which was developed through additional public comment, is intended to reduce the impacts of truck traffic in residential and recreational areas.

This Wetlands and Streams technical memorandum identifies existing wetlands and streams in the Proposed Project vicinity and documents the wetland and stream components along and near the NAA and one proposed route alternative for the Proposed Project.

1.1 Proposed Project Location

The Proposed Project would be located in the cities of Tukwila and Renton and in unincorporated King County, Washington. The Proposed Project is in the Duwamish/Green River watershed, Washington Water Resource Inventory Area 9 in Sections 3, 4, 9, 10, 11, 13, 14, 18, 19, 23, 24, and 26, Township 23N, Range 4E, Willamette Meridian.



Figure 1. No-Action alternative Proposed Project location

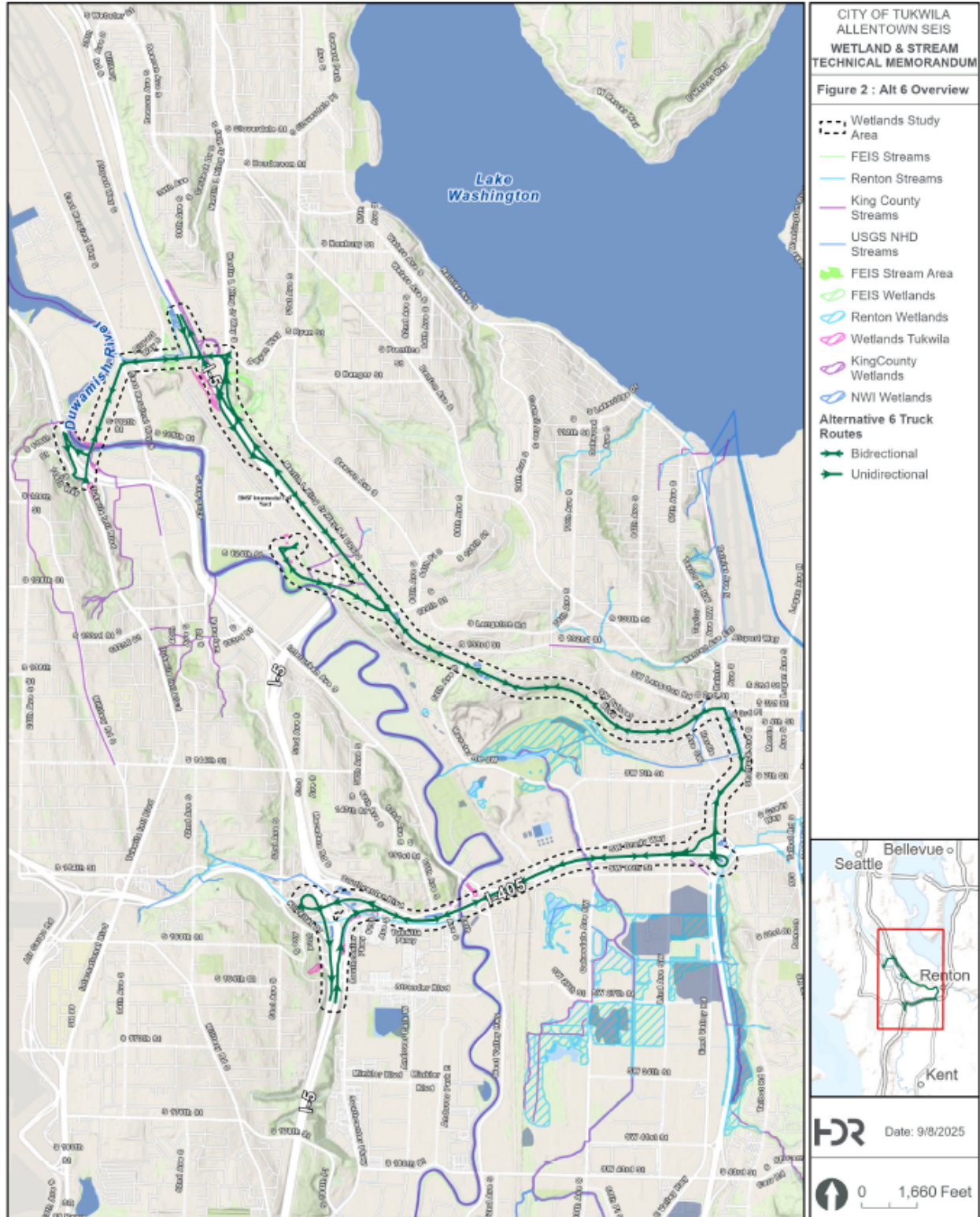


Figure 2. Alternative 6 Proposed Project location

1.2 Data Gathered

HDR Engineering, Inc. (HDR) conducted a literature and data review to identify and characterize potentially affected wetlands and streams in and near the Alternative 6 study area. Existing wetland and stream information was gathered from local, state, and federal agencies. This information included published reports, maps, websites, and aerial photographs. The data sources are listed in the following sections and in Section 0.

1.3 Study Area

The NAA study area is the existing physical footprint and did not include additional study areas. The wetlands and streams study area for Alternative 6 is described below, henceforth referred to as the “Alternative 6 study area.”

1.3.1 Wetlands and Streams

The Alternative 6 study area for wetlands and streams encompasses the area within 300 feet of the edges of the Alternative 6 footprint, which is defined as the physical footprint of the truck access route that could result in permanent impacts on wetlands. This distance was selected to match the typical largest applicable potential buffer width for wetlands within the cities of Tukwila, Seattle, and Renton and unincorporated King County. Wetlands evaluated in this technical memorandum include wetlands that are wholly or partly within the Alternative 6 study area. Streams evaluated in this technical memorandum include streams that intersect the Alternative 6 study area.

2.0 Study Methods

This section describes the objectives and methods used to study wetlands and streams. HDR biologists reviewed the existing resources listed in Section 0. HDR identified and characterized wetlands and streams that intersect the Alternative 6 study area.

2.1 Review of Existing Information

HDR biologists reviewed the following databases to determine the presence of wetlands and streams in the Alternative 6 study area:

- Washington State Department of Natural Resources (DNR) Forest Practices Application Mapping Tool (DNR 2025)
- Statewide Washington Integrated Fish Distribution (SWIFD) (WDFW 2025a) data portal
- WDFW SalmonScape (WDFW 2025b)
- City of Seattle Department of Construction & Inspections geographic information system (GIS) (City of Seattle 2024)
- City of Tukwila iMap (City 2025b)
- King County iMap (King County 2025)

- City of Renton’s “COR Maps” (City of Renton 2025)
- United States Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) website (USFWS 2024)

These databases provided information on the hydrology, wetlands, and streams in the Alternative 6 study area. No field reconnaissance was conducted as part of the SEIS.

The wetland and stream findings presented in Section 0 reflect existing available wetland and stream databases; the presence or absence of wetlands was not confirmed through field reconnaissance. Only wetlands and streams that are currently mapped in the above databases were included; no new wetlands or streams were identified or mapped for the purposes of this technical memorandum.

In some cases, multiple databases have mapped a wetland or stream in the same location, with slight variations to the geographical boundaries. In areas where this occurs, the wetland or stream geographical boundary was selected from the database that most closely matched aerial signatures, vegetation, or topography indicative of wetland or stream conditions. The database sources of the wetland polygons and stream lines are included in Figure 3 through Figure 13.

2.2 No-Action Alternative

No wetlands were identified for the NAA (see FEIS [City 2025a]).

2.3 Alternative 6

Wetlands within the Alternative 6 study area are described in Section 0. The stream identified within the Alternative 6 study area is described in Section 0. These findings are depicted in Figure 3 through Figure 13.

Alternative 6 is an additional alternative to the current BNSF facility truck route that was determined while the FEIS was being prepared. Alternative 6, which was developed through additional public comment, is intended to reduce the impacts of truck traffic in residential and recreational areas. Alternative 6 does not propose development of new roads or stormwater facilities.

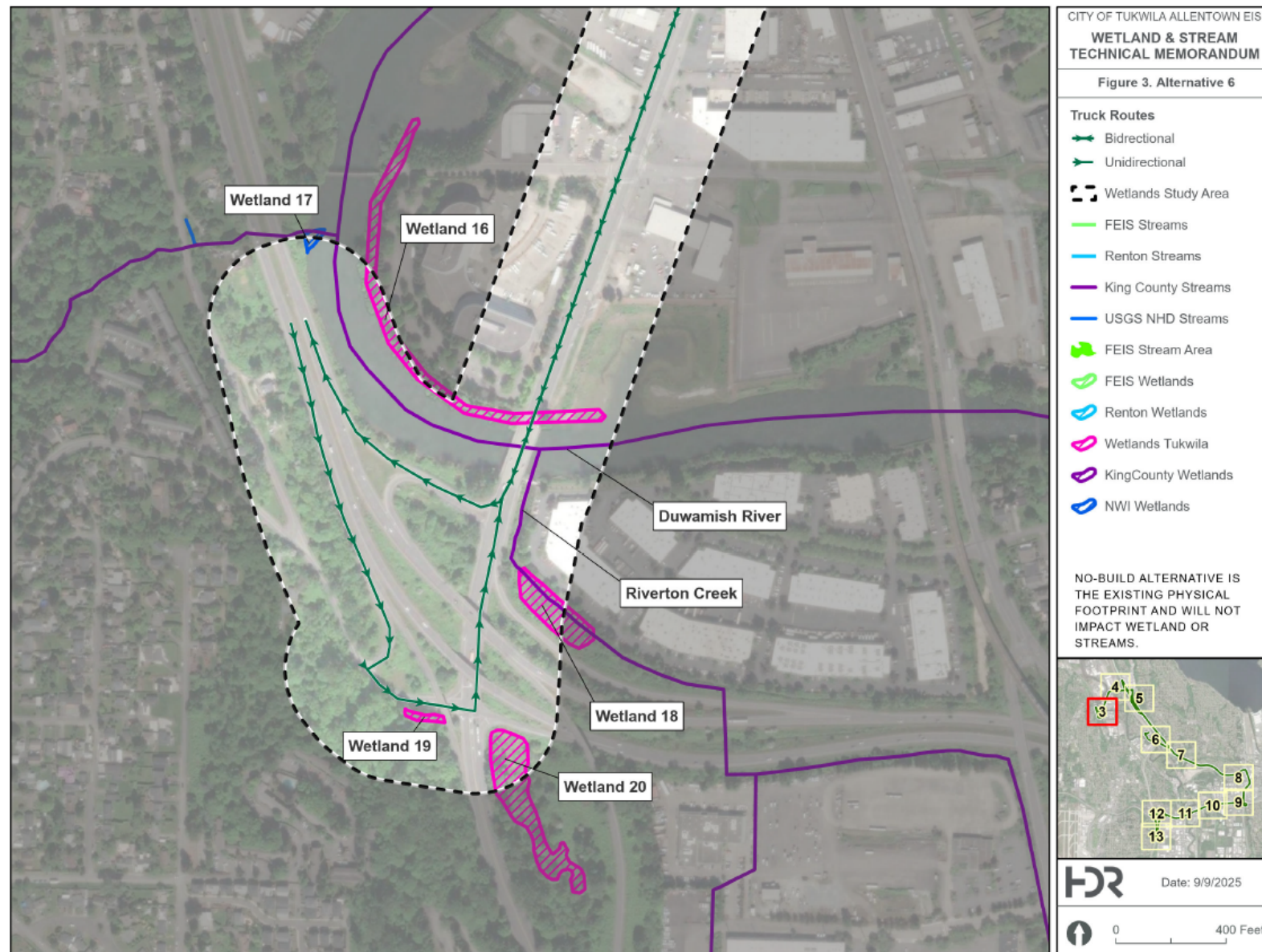


Figure 3. Alternative 6 wetlands and streams: map 1 of 11

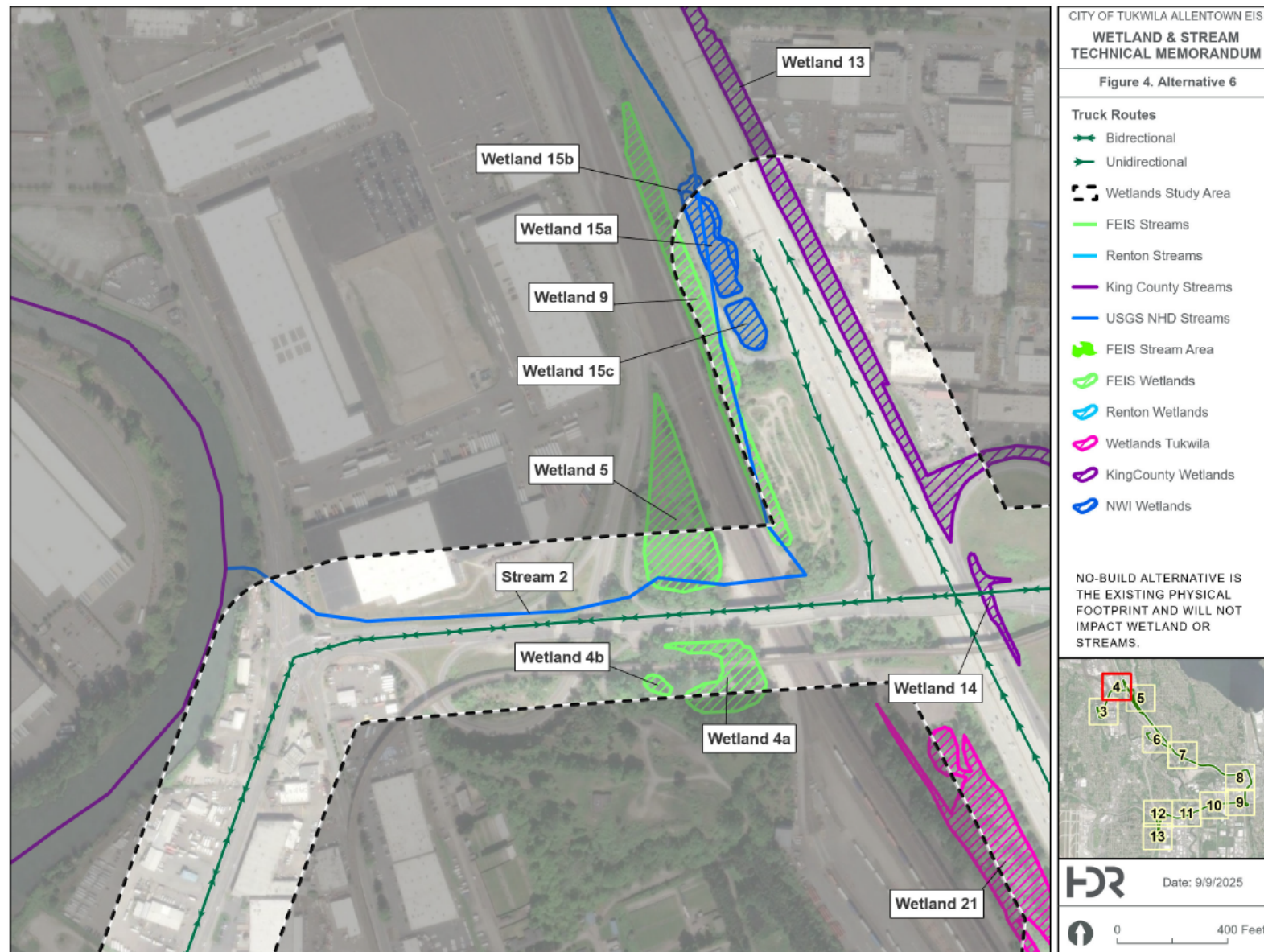


Figure 4. Alternative 6 wetlands and streams: map 2 of 11

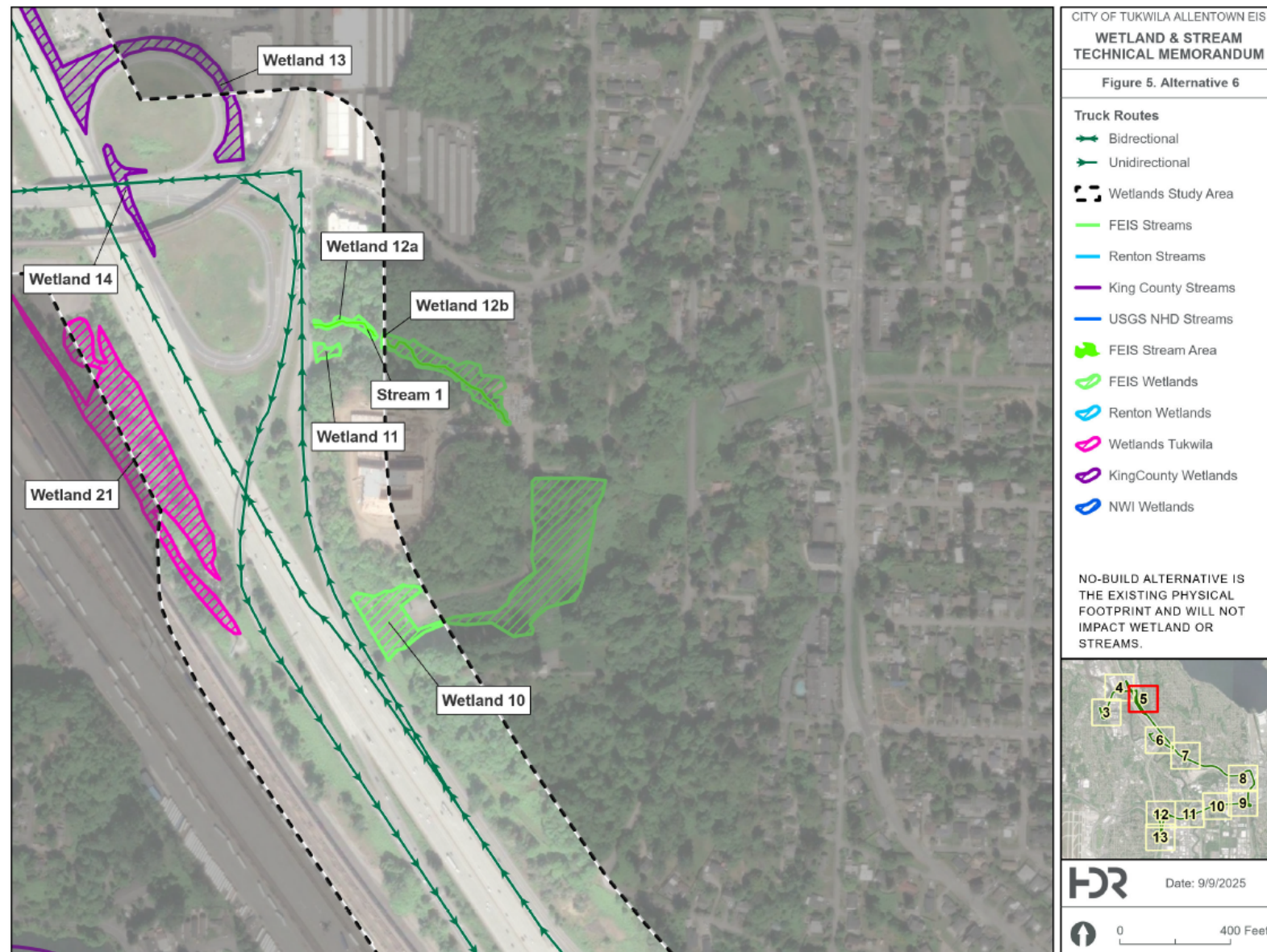


Figure 5. Alternative 6 wetlands and streams: map 3 of 11

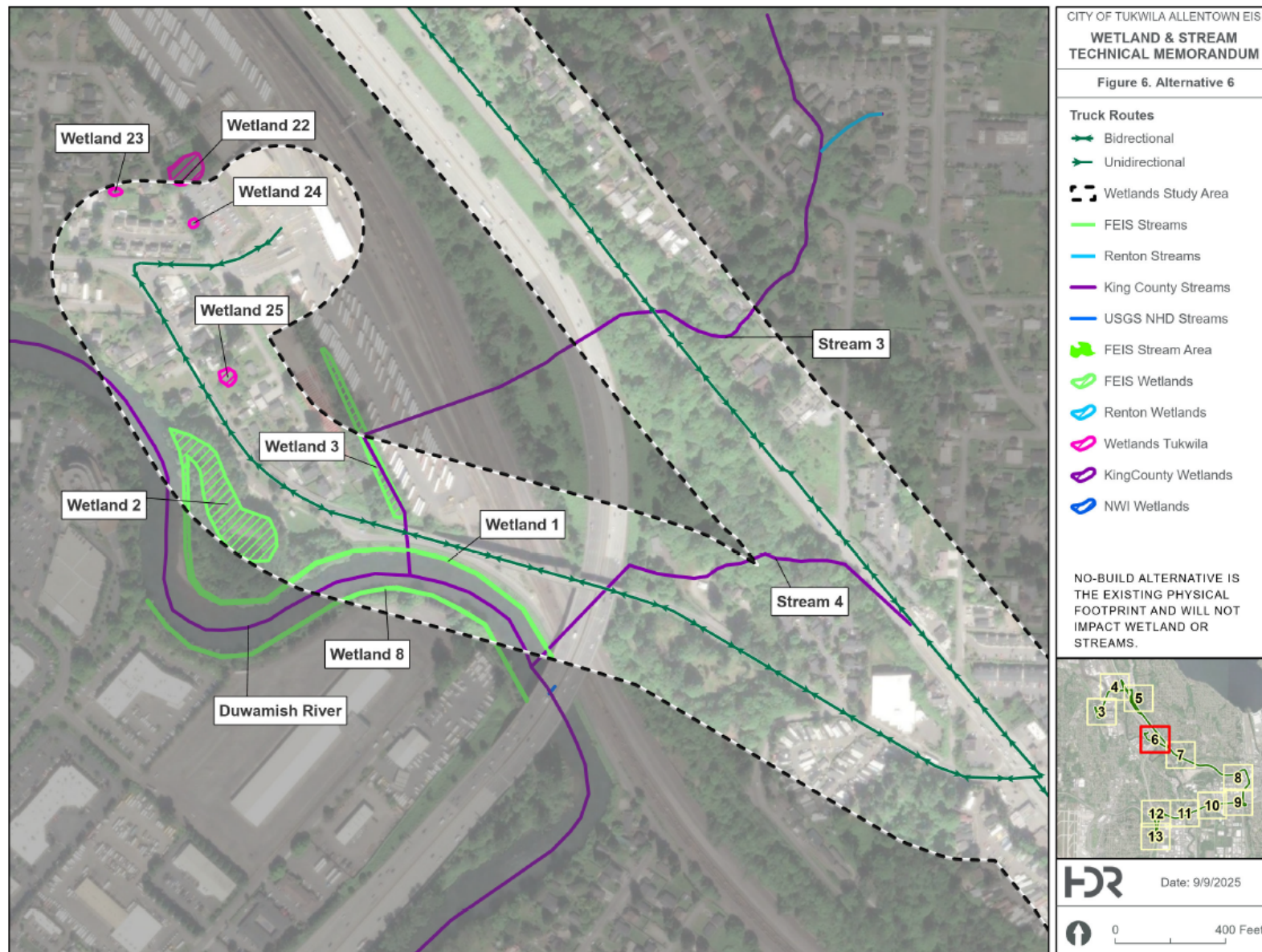


Figure 6. Alternative 6 wetlands and streams: map 4 of 11

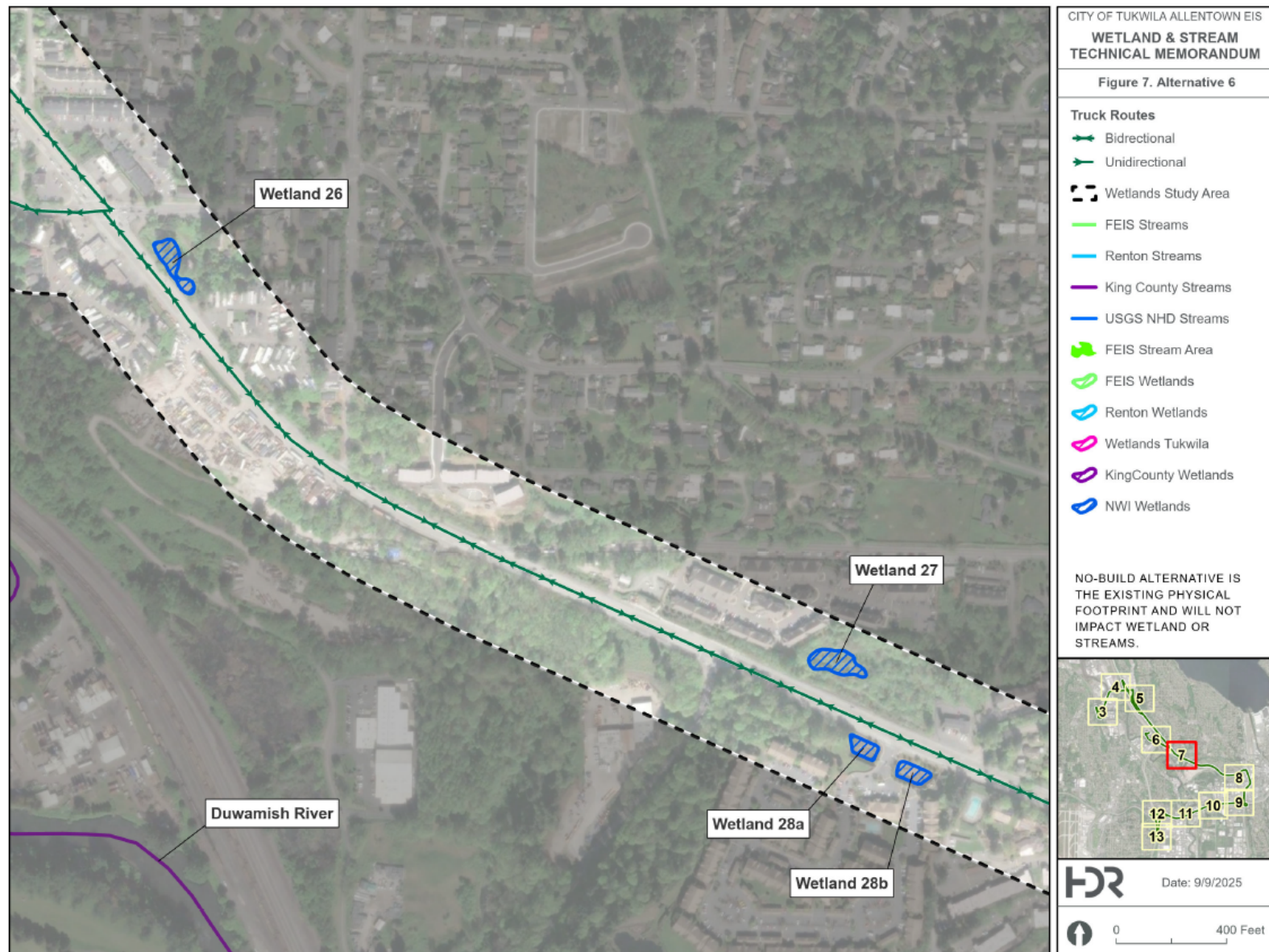


Figure 7. Alternative 6 wetlands and streams: map 5 of 11

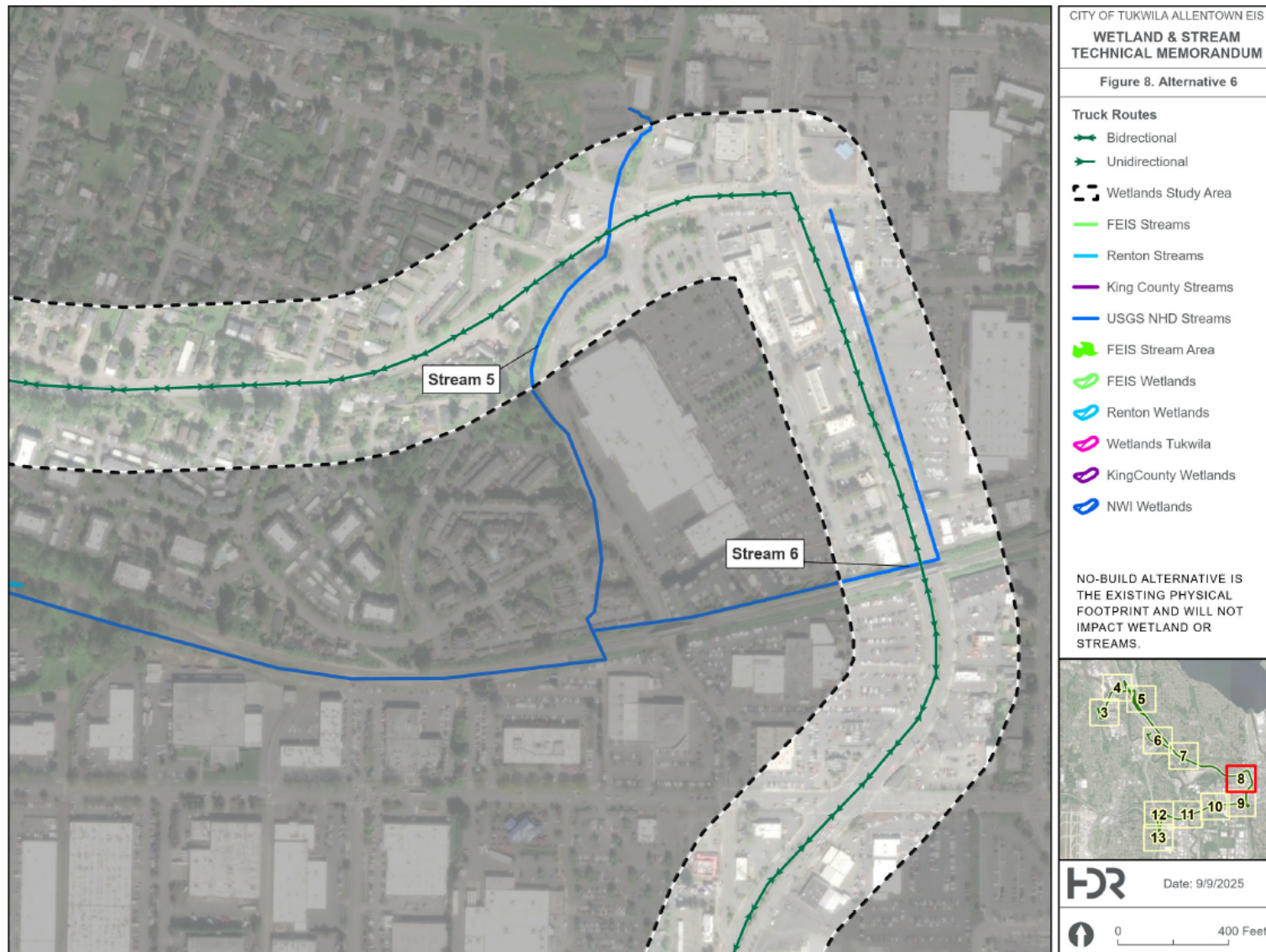


Figure 8. Alternative 6 wetlands and streams: map 6 of 11

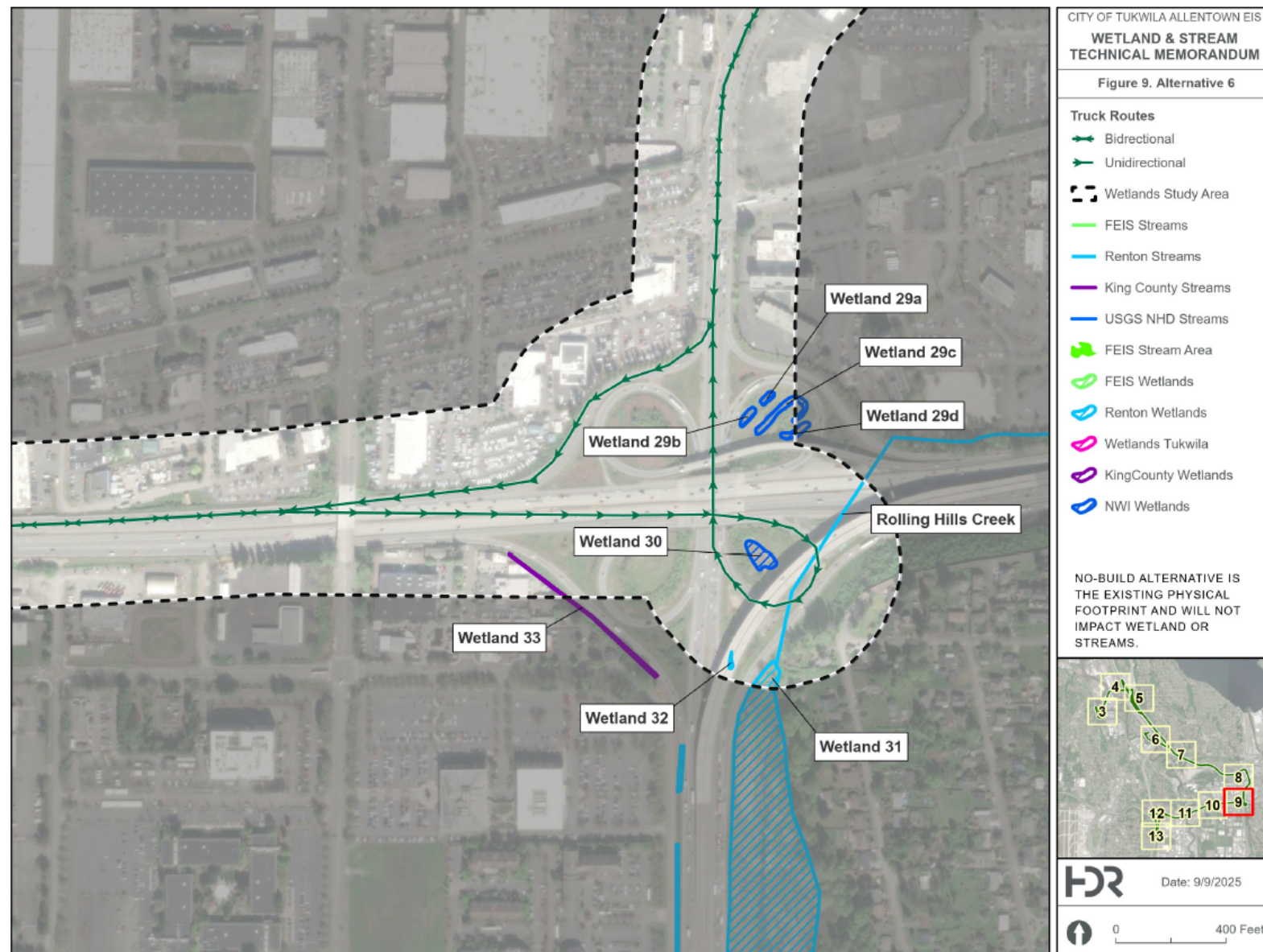


Figure 9. Alternative 6 wetlands and streams: map 7 of 11

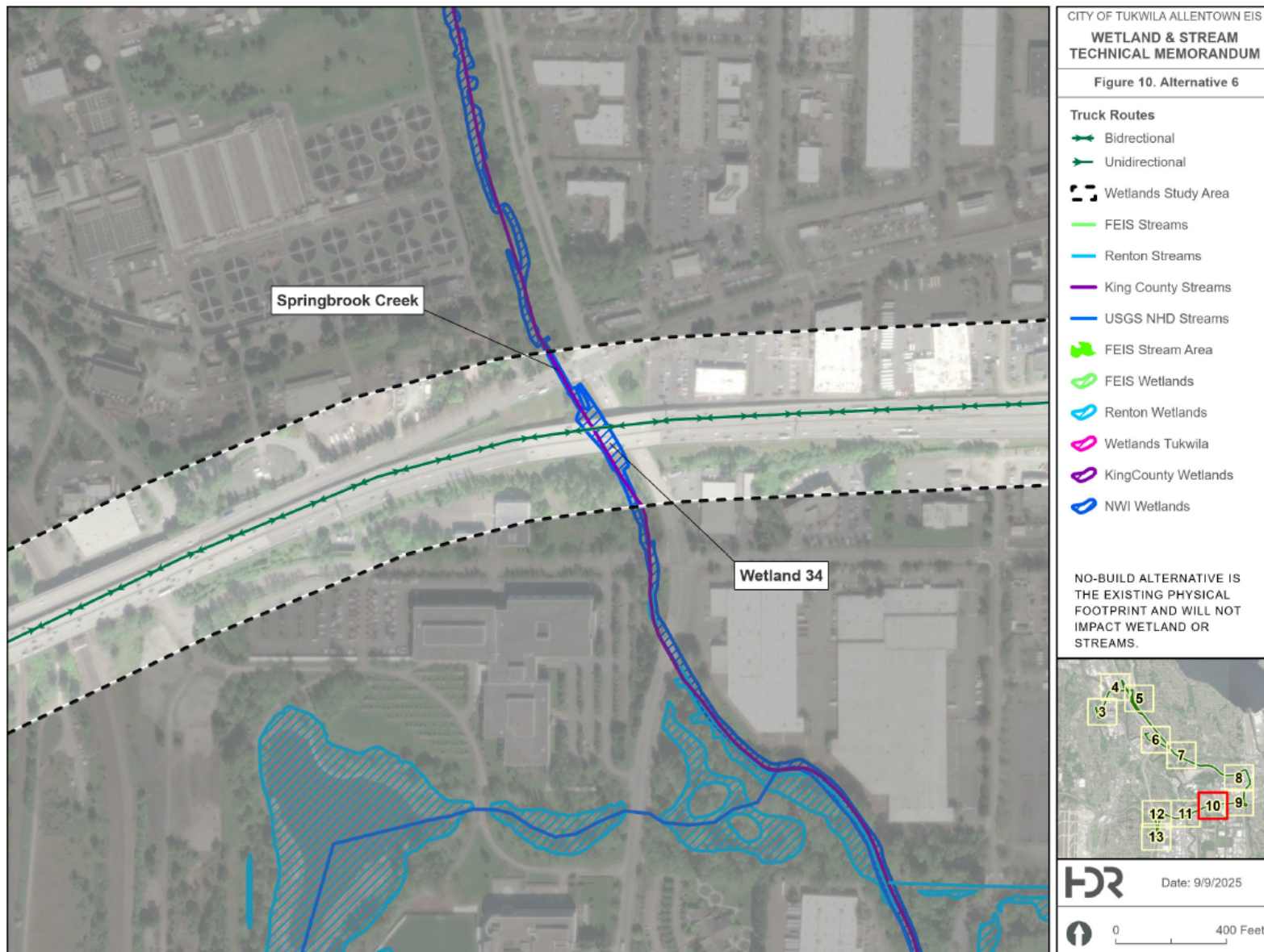


Figure 10. Alternative 6 wetlands and streams: map 8 of 11

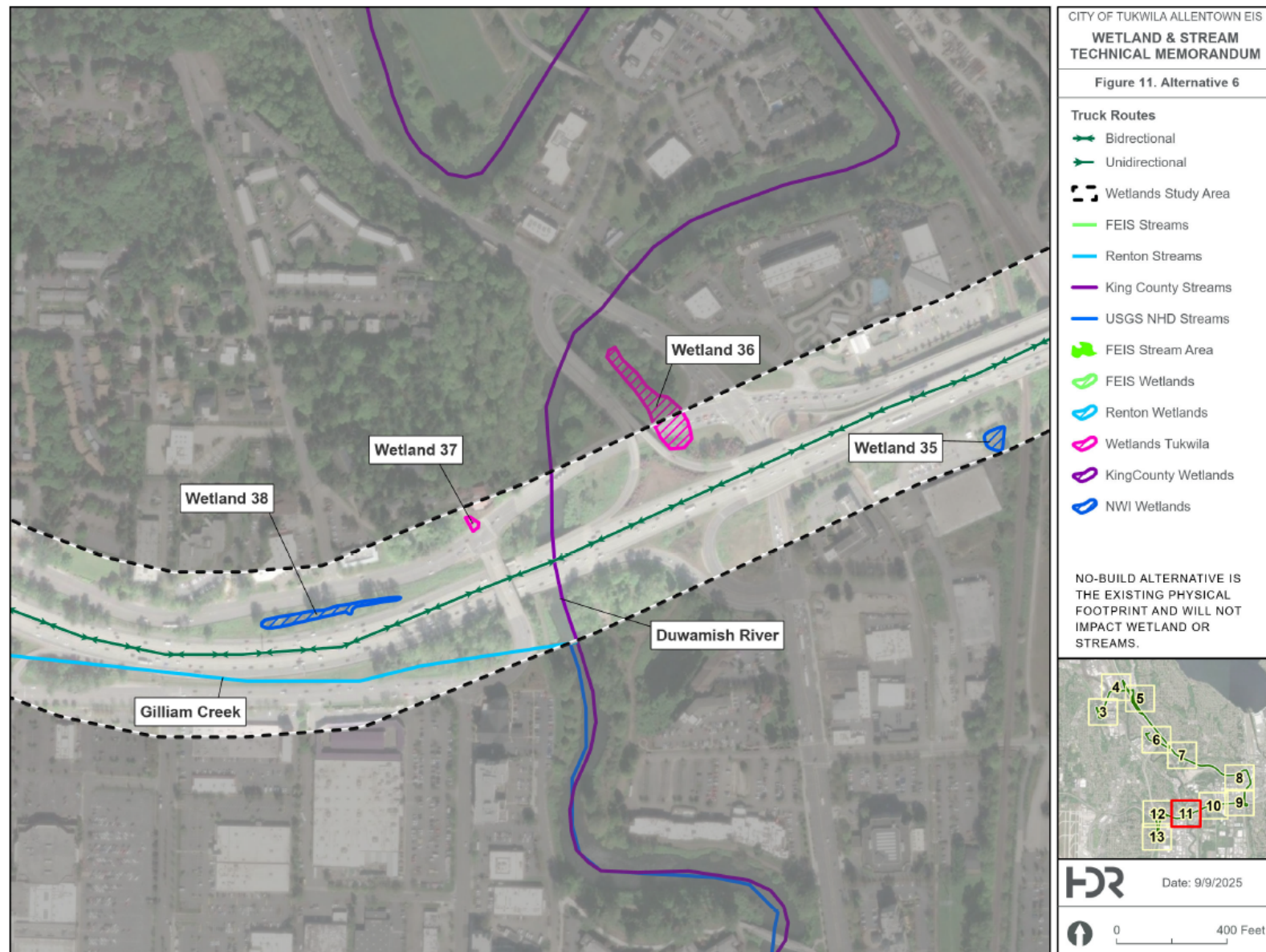


Figure 11. Alternative 6 wetlands and streams: map 9 of 11

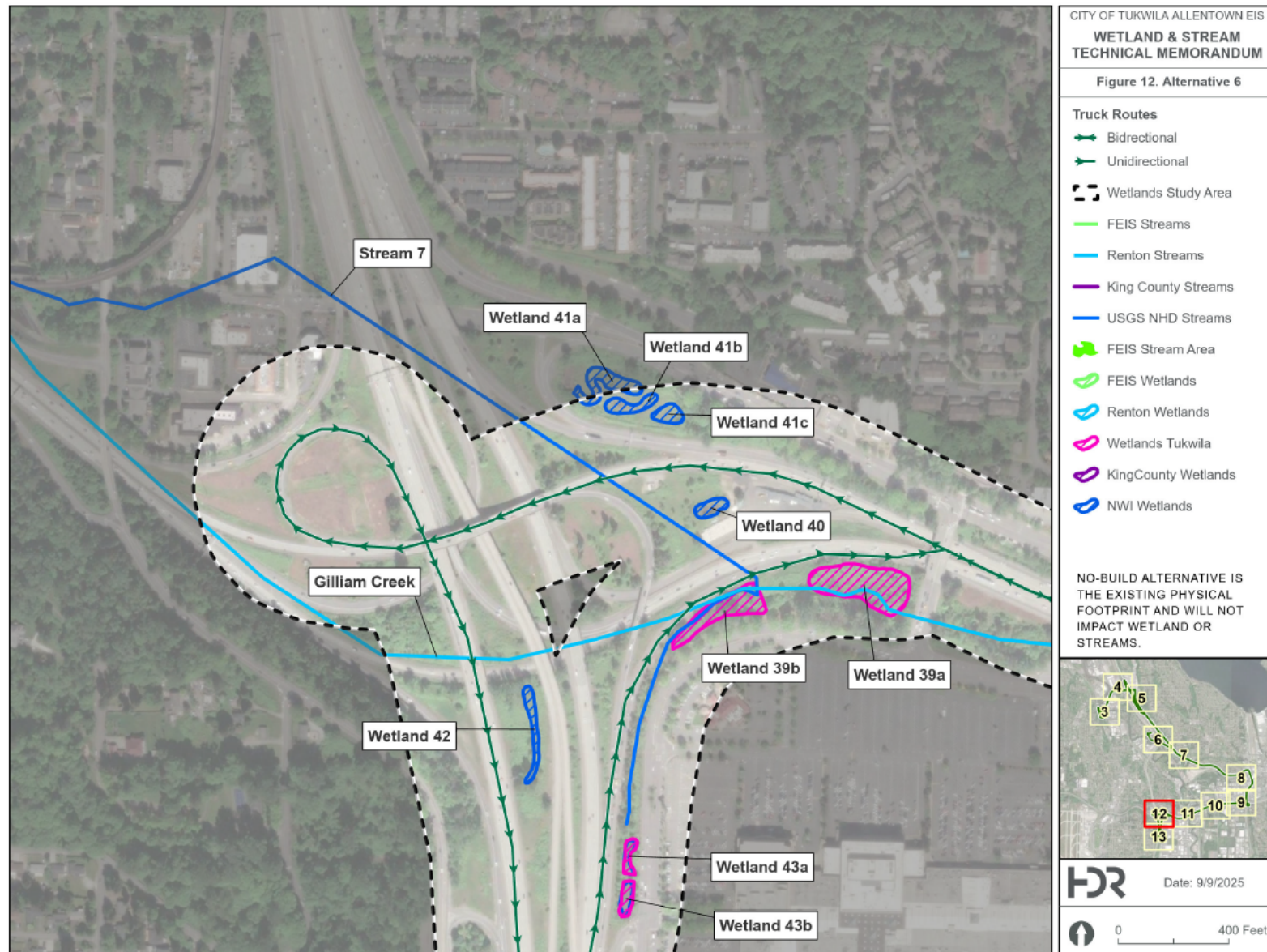


Figure 12. Alternative 6 wetlands and streams: map 10 of 11

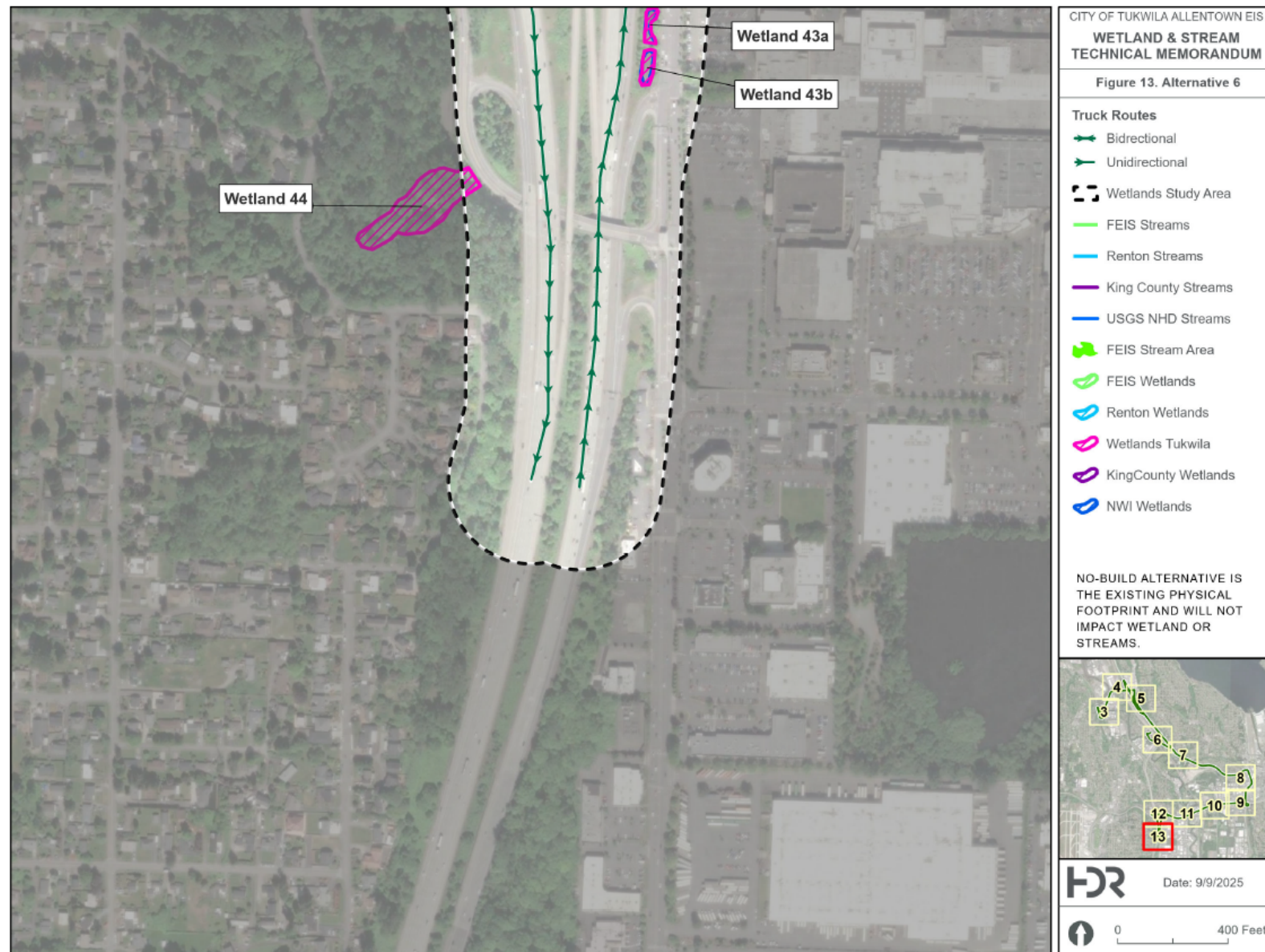


Figure 13. Alternative 6 wetlands and streams: map 11 of 11

2.3.1 Wetlands

Forty-two wetlands (Wetlands 13 through 44) were identified within the Alternative 6 study area, which was not previously reviewed in the FEIS. These wetlands are summarized below in Table 1 and are shown in Figure 3 through Figure 13.

Wetlands 1, 2, 3, 4a, 4b, 5, 8, 9, 10, 11, and 12b intersect the Alternative 6 study area but were previously described in the FEIS (City 2025a) and, therefore, are not included in Table 1 below. Please refer to the FEIS for a summary of these wetlands.

Wetlands in the Alternative 6 study area include riverine wetlands along the Duwamish River and other streams. Other depressional wetlands are interspersed throughout the Alternative 6 study area within developed areas or in fragmented habitats surrounded by development. The findings below represent the results of the desktop review of wetland databases.

Table 1. Summary of wetlands in the Alternative 6 study area

Wetland name	Total size (acres)	Hydrogeomorphic classification ^a	Cowardin classification ^b	Jurisdiction
13	4.36	Depressional	PEM, PFO	Seattle, Tukwila
14	0.29	Depressional	PEM	Tukwila
15a	0.74	Depressional	PSS	Seattle
15b	0.21	Depressional	PSS	Seattle
15c	0.40	Depressional	PEM, PSS	Seattle
16	1.43	Riverine	PEM, PSS, PFO	Tukwila
17	0.07	Riverine	PEM	Tukwila
18	0.73	Depressional	PEM	Tukwila
19	0.08	Depressional	PFO	Tukwila
20	1.33	Depressional	PEM, PFO	Tukwila
21	3.92	Depressional	PEM, PFO	Tukwila
22	0.23	Depressional	PEM	Tukwila
23	0.02	Depressional	PEM	Tukwila
24	0.02	Depressional	PSS	Tukwila
25	0.06	Depressional	PEM	Tukwila
26	0.24	Depressional	PSS	King County
27	0.31	Depressional	PSS	King County
28a	0.13	Depressional	PEM	King County
28b	0.14	Depressional	PEM	King County

Wetland name	Total size (acres)	Hydrogeomorphic classification ^a	Cowardin classification ^b	Jurisdiction
29a	0.03	Depressional	PEM	Renton
29b	0.04	Depressional	PEM	Renton
29c	0.13	Depressional	PEM	Renton
29d	0.06	Depressional	PEM	Renton
30	0.15	Depressional	PEM	Renton
31	6.44	Slope/Riverine	PEM, PSS	Renton
32	0.01	Depressional	PEM	Renton
33	0.11	Depressional	PEM, PSS	Renton
34	24.9	Riverine	PEM, PSS, PFO	Renton
35	0.11	Depressional	PEM	Renton
36	0.70	Depressional	PSS, PFO	Tukwila
37	0.03	Depressional	PEM	Tukwila
38	0.28	Depressional	PSS	Tukwila
39a	0.99	Slope	PSS	Tukwila
39b	0.55	Slope	PEM, PSS	Tukwila
40	0.13	Depressional	PEM	Tukwila
41a	0.32	Depressional	PEM	Tukwila
41b	0.17	Depressional	PEM	Tukwila
41c	0.13	Depressional	PEM	Tukwila
42	0.18	Depressional	PEM	Tukwila
43a	0.09	Depressional	PFO	Tukwila
43b	0.11	Depressional	PAB, PEM	Tukwila
44	1.27	Depressional	PFO	Tukwila

^a Hydrogeomorphic (HGM) classifications are based on *A Hydrogeomorphic Classification of Wetlands* (Brinson 1993).

^b *Classification of Wetlands and Deepwater Habitats of the United States* (Cowardin et al. 1979, FGDC 2013). PAB = palustrine aquatic bed, PEM = palustrine emergent, PSS = palustrine scrub/shrub, PFO = palustrine forested.

2.3.2 Streams

Eleven streams have been identified within the Alternative 6 study area, which were not previously reviewed in the FEIS. These streams are summarized below in Table 2 and are shown in Figure 3 through Figure 13. Stream 1 and the Duwamish River are located within the Alternative 6 study area, were previously described in the FEIS (City 2025a), and are not included in Table 2 below. Please refer to the FEIS for a summary of these streams.

Streams in the Alternative 6 study area include larger water bodies, such as the Duwamish and Green Rivers, medium-sized tributaries such as Springbrook and Riverton Creeks, and several smaller streams that flow either directly to the Duwamish or Green River, or to their tributaries. Some streams may be piped via culverts through the Alternative 6 study area.

The findings below represent the results of a desktop review of streams mapped within the Alternative 6 study area and available online information.

Table 2. Summary of streams in the Alternative 6 study area

Water body	Tributary to	Water type ^a	Jurisdiction within the study area
Stream 2	Duwamish River	Undetermined	Tukwila
Riverton Creek	Duwamish River	F	Tukwila
Stream 3	Duwamish River	F	Tukwila, King County
Stream 4	Duwamish River	Undetermined	Tukwila
Stream 5	Black River	Undetermined	Renton
Stream 6	Black River	F	Renton
Rolling Hills Creek	Black River	F	Renton
Springbrook Creek	Black River	S	Renton
Green River	Duwamish River	S	Tukwila
Gilliam Creek	Green River	F	Tukwila

^a Stream typing based on available online resources (King County 2025 and DNR 2025). The stream typings presented in this table are preliminary findings based on a desktop review of existing information.

3.0 Conclusion

The presence or absence of wetlands within the Alternative 6 study area would need to be confirmed with a field investigation. Because Alternative 6 does not include any alteration to the existing roadways, no direct impact to wetlands is anticipated.

The presence or absence of streams within the Alternative 6 study area, and the stream typing, would need to be confirmed with a field investigation. Because Alternative 6 does not propose any development, these streams would not be directly impacted.

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