

September 14, 2015

Theresa Swan, Senior Planner  
City of Kirkland Planning and Community Development  
123 5th Avenue  
Kirkland, WA 98033

**Subject: PSRC comments on draft Kirkland Comprehensive Plan update**

Dear Theresa,

Thank you for providing an opportunity for the Puget Sound Regional Council to review draft elements of the City of Kirkland 2015 Comprehensive Plan. We recognize the substantial amount of time and effort invested in this plan and appreciate the chance to review it while in draft form. This timely collaboration helps to ensure certification requirements are adequately addressed and certification action can be taken by PSRC boards upon adoption.

We would like to note the many outstanding aspects of the draft, which represents a thorough review, update, and streamlining of the required plan elements. Several particularly noteworthy aspects include:

- A thorough VISION 2040 context statement that emphasizes consistency with the regional plan.
- Planning for housing and employment growth in the regional growth center, an emphasis on multimodal connections, and high-quality design.
- Goals and policies that emphasize the city's role in enabling and supporting high quality transit service to meet needs for future growth, along with policies that support transit planning and implementation of the Growing Transit Communities Strategy.
- Housing element policies that strengthen implementation of innovative development types. The success of the city's accessory dwelling unit program highlights the ability of innovative strategies to provide affordable housing, increase diversity of housing types, and maintain neighborhood character.
- Multiple goals and policies addressing the city's role in addressing greenhouse gas emissions and climate change.
- Emphasis on health and well-being in all aspects of the city's planning, with particular focus on expanding nonmotorized transportation, addressing safety and addressing food access.

The draft Kirkland Comprehensive Plan advances regional policy in many important ways. There are a few items, however, that the city should consider before the plan is finalized:

- The City of Kirkland is commended for affirmatively planning for a significant share of the county's growth, as called for in the regional growth strategy (RGS) in VISION 2040, as well as for extending land use assumptions beyond adopted countywide growth targets to cover a 20-year planning period that ends in 2035. However, the city should more clearly document how the targets have been extended to cover the period 2031-35.
- The city should resolve an internal inconsistency in the plan. In the land use element, the plan anticipates growth of 8,361 housing units. The housing element states that 8,570 units are expected. Additionally, table LU-4 should be corrected to state the targets in housing units, rather than households.
- Consistent with MPP-Action-18, the Transportation Master Plan includes mode split goals for the Totem Lake regional growth center. PSRC recommends including a baseline estimate of mode split to demonstrate the expected shift from current conditions and enable measurement over time. PSRC recently produced [additional guidance](#) about setting mode split goals, including data on existing conditions in centers, that the city may find helpful in this work.

- The Transportation Master Plan indicates that travel forecasting has been completed in support of the update, but the draft plan doesn't provide information about forecasted travel. The city should provide additional detail about the travel forecasts, including documentation of consistency with land use assumptions in other elements and estimated impacts to state-owned facilities per RCW 36.70A.070(6)(a)(iii)(E).
- The plan should reference level of service standards for state-owned facilities (RCW 36.70A.070(6)(a)(iii)(C)). In Kirkland, I-405 has been designated a Highway of Statewide Significance, and WSDOT has established a level of service of "D" for this facility. More information is available at <http://www.psrc.org/transportation/t2040/los/>.
- The Totem Lake Business District plan reflects that infrastructure funding will be prioritized to support development of the regional center, consistent with MPP-DP-7 and MPP-T-12. The city should consider including discussion of this policy direction in a relevant citywide element, such as the capital facilities element or Transportation Master Plan.
- The policies in the draft housing element go a long way to advancing VISION 2040's housing goals. Some of the policies (e.g. Housing Policies 2.2 and 3.1) appear to rely on future work for successful implementation. The city should consider adding more information on strategies and timelines for implementation of the policies in the housing element, particularly strategies to address the below 50% AMI need identified in the plan.

PSRC has resources available to assist the city in addressing these comments. Additional resources related to the plan review process can also be found at <http://www.psrc.org/growth/planreview/resources/>.

Thank you again for working with us through the plan review process. There is a lot of strong work in the draft and we are available to continue to provide assistance and additional reviews as the plan moves through the development process. If you have questions or need additional information regarding the review of local plans or the certification process, please contact me at 206-464-6174 or [LUnderwood-Bultmann@psrc.org](mailto:LUnderwood-Bultmann@psrc.org).

Sincerely,



Liz Underwood-Bultmann  
Associate Planner, Growth Management Planning

cc: Review Team, Growth Management Services, Department of Commerce