

2 Description of the Proposed Action and Alternative

2.1 Introduction

This Chapter of the Draft Environmental Impact Statement (EIS) provides a description of the Proposal and No Action Alternative. Major sections of this Chapter include:

Section	Page
2.1 Introduction	2-1
2.2 Environmental Review.....	2-3
2.3 Scope of Review.....	2-6
2.4 Organization of this EIS.....	2-7
2.5 Proposed Action and Alternatives	2-9

The proposed action is the 10-year update of the City of Kirkland’s GMA Comprehensive Plan in accordance with the requirements of the Growth Management Act (GMA). In general, the proposed update is intended to revise and refine the 1995 GMA Comprehensive Plan policy direction, rather than markedly depart from the original Plan vision. A previous environmental impact statement was originally prepared in 1995 as a part of the Comprehensive Plan adoption process. The City has been continually updating and revising the Plan and associated development regulations since 1995 to respond to new GMA legislation and case law. The proposed 10-year update includes:

1. Updated Growth Targets and Land Use Capacity

- Extension of the City’s GMA planning horizon from 2012 to 2022;
- Adoption of new housing and employment targets to meet 2022 population and employment growth forecasts from the State of Washington as required by GMA and by Countywide Planning Policies from King County.

2. Policy and Text Amendments

- Revisions associated with court or Growth Management Hearing Board decisions or changes to GMA;
- Technical and editorial refinements to Comprehensive Plan goals and policies;
- Creation of a new Human Services Element;

- Rewrite of the Economic Development Element that generally maintains the same intent of the existing element, except for industrial areas;
- Revisions to the Land Use Element policies on “Regional and Community Facilities” to incorporate state law on essential public facilities and on industrial uses;
- Few minor new policies in other elements;
- Addition of new or updated information since adoption of the 1995 GMA Comprehensive Plan.

3. Zoning Code Amendments

- Zoning Code Amendments to Chapters 135, 140, 160 and minor changes to other chapters relating to the Comprehensive Plan Update items above.

4. Private Comprehensive Plan Amendment Requests

- Potential Comprehensive Plan and Zoning changes relating to two private amendment study areas.

5. Comprehensive Plan Land Use and Zoning Map Consistency Amendments

- Map changes to the City Wide Land Use Map, the Subarea Neighborhood Maps and the Zoning Map to correct a few mapping errors and to change the land use designations and zoning to Park/Open Space for several parcels of land obtained by the City for park use;
- Neighborhood map corrections to the Subarea Neighborhood Plan Land Use Maps and implementing Zoning Map corrections to make them consistent with the Comprehensive Plan’s Land Use Map for all land use designations and residential density.
- Map changes to the City Wide Land Use Maps to re-designate RS 5.0 parcels (8 to 9 dwelling units per acre) from medium to low density residential to make consistent the Land Use Map, and Zoning Map and development regulations. This change is also needed to implement the proposed revisions to the text in Comprehensive Plan Appendix H (text is revised and moved to the Land Use Element).
- Correction to Split Zone Parcels in Planned Area 6B

2.1.1 Overview of Plan Area

The City of Kirkland is located in King County, immediately adjacent to the eastern shore of Lake Washington. The City is bounded by the communities of Bellevue, Yarrow Point and Clyde Hill to the south, Redmond to the east, and unincorporated King County to the north, northwest and northeast (Figure 2-1). Within its incorporated boundaries, the City’s gross land area consists of approximately 7,000 acres. Excluding public rights-of-way, the total net land area is approximately 5,200 acres.

The City of Kirkland’s population as of April 2003 is 45,630 persons; Kirkland is the eighth largest city in King County and the seventeenth largest city in Washington State (Source: Office of Financial Management, April 1, 2003).

2.2 Environmental Review

2.2.1 Purpose

The purpose of this EIS is to assist the public and agency decision makers in considering future decisions on comprehensive plan goals, policies, and development regulations for the City of Kirkland as part of the 10-year Comprehensive Plan Update. These broad decisions will provide direction and support for more specific actions by the City, such as capital improvements and implementing regulations.

This EIS addresses three levels of analysis for the proposal. These are: (1) a broad Citywide analysis of potential impacts associated with proposed amendments to the Comprehensive Plan to incorporate the 2022 growth targets and other related amendments; (2) a more detailed analysis of the Totem Center Study Area for 2022; and (3) an analysis of potential impacts associated with two private amendment study areas, including transportation impacts on the 2022 network system.

Specific uses and objectives of the EIS document at each of these three levels of analysis include the following:

2.2.1.1 Citywide Analysis

- Compile and document information about the natural and built environment in the City.
- Analyze proposed households and employment forecasts to meet GMA requirements and the City vision.
- Provide a framework for analysis of potential environmental impacts associated with future development in areas proposed for plan or policy amendment.
- Provide programmatic environmental analysis that can be incorporated or referenced in future non-project planning efforts or project-level development proposals.

2.2.1.2 Totem Center Study Area Analysis

- Provide greater certainty to potential developers, city decision-makers and the general public regarding the future development pattern and likely impacts of future development in the Totem Center Study Area by 2022.
- Analyze the potential development envelope within the Totem Lake (TL)1& Totem Lake (TL)2 zones and potential aesthetic impacts.
- Consolidate and provide a record of previous environmental review of the Totem Center Study Area in one document.
- Conduct sufficient environmental analysis to support a more efficient review process for future project-level development proposals or a future categorical exemption of new residential or mixed-use development pursuant to RCW 43.21C.229.

2.2.1.3 Private Amendment Study Areas

- Consider the general impacts of increasing the allowable residential density in the Planned Area 6B zone from Medium Density Residential at 10-12 dwelling

units per acre/RM3.6 to Office Multifamily at 19-24 dwelling units per acre/RM1.8, including impacts on the 2022 transportation network.

- Consider the general impacts of changing the land use designation and zoning for the area west of 6th Street South and east of the BNSF Railroad from Industrial/Light Technology (LIT) to Office-Multifamily at potentially up to 19-24 dwelling units per acre/PR1.8 or Office-Multifamily/PLA (impacts on the 2022 transportation network have been assessed for 10-14 dwelling units per acre. If the City decides to consider 19-24 dwelling units per acre for the study area, then the City will need to assess the change in transportation impacts).

2.2.2 Non-Project Environmental Analysis

The State Environmental Policy Act (SEPA) (RCW 43.21C) requires government officials to consider the environmental consequences of actions they are about to take and seek better or less impacting ways to accomplish those proposed actions. They must consider whether the proposed action will have a probable, significant, adverse environmental impact on the following elements of the natural and built environment: earth, air, water, plants and animals, energy and natural resources, environmental health, land and shoreline use, transportation, and public services and utilities.

This Draft EIS provides qualitative and quantitative analysis of environmental impacts as appropriate to the general nature of the Comprehensive Plan amendment proposals. The adoption of comprehensive plans or other long-range planning activities is classified by SEPA as a non-project (i.e. programmatic) action. A non-project action is defined as an action that is broader than a single site-specific project, and involves decisions on policies, plans or programs. An EIS for a non-project proposal does not require site-specific analyses; instead the EIS discusses impacts and alternatives appropriate to the scope of the non-project proposal and to the level of planning for the proposal (WAC 197-11-442).

2.2.3 Phased Review

SEPA encourages the use of phased environmental review to focus on issues that are ready for decision, and to exclude from consideration issues already decided or not yet ready for decision-making [WAC 197-11-060 (5)]. Phased review is appropriate where the sequence of a proposal is from a programmatic document, such as an EIS addressing a comprehensive plan, to other documents that are narrower in scope, such as for a site-specific, project-level analysis. The City of Kirkland is using phased review, as authorized by SEPA, in its environmental review of growth management planning actions. The analysis in this Draft EIS will be used to review the environmental impacts of the proposed Comprehensive Plan alternatives and other related actions, including subarea plans and implementing regulations.

This analysis will also provide specific review of the potential development envelope within the Totem Center Study Area based upon the land use goals and policies addressed in the Totem Lake Center Neighborhood Plan, as implemented through Totem Center zoning code amendments (in progress). This DEIS provides a more detailed analysis for the Totem Center Study Area in compliance with the provisions of RCW 43.21C.229. This provision allows for a categorical exemption of environmental review for new residential or mixed-use development if the development is within an urban growth area and the current density and intensity of

use is called for in the goals and policies in the City's comprehensive plan, provided the plan was previously subjected to environmental analysis through an EIS. This analysis will provide the necessary environmental analysis to apply the categorical exemption under RCW 43.21C.229.

2.2.4 Future Use of Document

The analysis in this EIS will be used to review the environmental impacts of the proposed Comprehensive Plan Update and related actions. Additional environmental review will occur as other project or non-project actions are proposed to the City of Kirkland in the future. Future environmental review could occur in the form of Supplemental EISs, SEPA addenda, or Determination(s) of Non-Significance (DNS).

An agency may use environmental documents that have previously been prepared in order to evaluate proposed actions, alternatives, or environmental impacts. The proposals may be the same as, or different than, those analyzed in the existing documents. (WAC 197-11-600(2)).

Existing documents may be used for a proposal by use of one or more of the following methods: (WAC 197-11-600)

- "Adoption," where an agency may use all or part of an existing environmental document to meet its responsibilities under SEPA. Agencies acting on the same proposal for which an environmental document was prepared are not required to adopt the document.
- "Incorporation by reference," where an agency preparing an environmental document includes all or part of an existing document by reference. Incorporation by reference is a technique that may be used with any SEPA document for a proposal. Unlike the adoption process that is limited to environmental documents issued under either SEPA or NEPA (National Environmental Policy Act), any information may be incorporated by reference. This may include any study or report that provides information relevant to a proposal. (Department of Ecology, 1998, SEPA Handbook, Publication 98-114)
- An "addendum" that adds analyses or information about a proposal but does not substantially change the analysis of significant impacts and alternatives in the existing environmental document. A notice of adoption of a prior SEPA environmental document (e.g. FEIS, DNS, or Mitigated DNS) accompanies the addendum.
- Preparation of a Supplemental Environmental Impact Statement (SEIS) if there are:
 - ♦ Substantial changes so that the proposal is likely to have significant adverse environmental impacts; or
 - ♦ New information indicating a proposal's probable significant adverse environmental impacts.
- If a proposal is substantially similar to one covered in an existing EIS, that EIS may be adopted; additional information may be provided in an addendum or SEIS.

2.3 Scope of Review

Pursuant to SEPA Rules (WAC 197-11-408-410), a Determination of Significance was issued by the City of Kirkland on March 12, 2004. The Determination of Significance/Scoping Notice and supporting Environmental Checklist are included as Appendix A to this Draft EIS. Scoping is designed to narrow the focus of the EIS to significant environmental issues, to eliminate insignificant impacts from detailed study, and to identify alternatives to be analyzed in the EIS. The scoping process provides notice to the public and other agencies that an EIS is being prepared. Interested citizens, agencies, organizations, and affected tribes were invited to submit comments on the scope of the EIS. The scoping period closed on April 1, 2004. The City provided for public input during the scoping period by accepting written comments. The Determination of Significance/Scoping Notice was sent to the State, various agencies and jurisdictions, neighborhood and business associations, property owners in and within 300 feet of the two study areas, City commissions and boards, and other interested parties. The notice was also available on the City's web site and cable channel, the Kirkland Library and in the local newspaper.

Two comments were received on the private amendment study areas regarding the proposed zoning allowing for greater density of development. Traffic and building height were related issues of concern.

Additional public participation opportunities are provided with the publication of this Draft EIS. A 30-day comment period has been established for this Draft EIS. To obtain oral comments, the City has scheduled a courtesy hearing before the Houghton Community Council on July 19, 2004 and a public hearing before the Planning Commission on July 22, 2004. In addition, a public open house is scheduled for July 12, 2004. Please refer to the Fact Sheet for information on upcoming comment opportunities.

This Draft EIS addresses the key elements of the environment raised in the scoping notice and scoping comments and includes the following:

- **Natural Resources.** The Natural Resource analysis includes a review of potential impacts to earth (soils and natural hazards), water resources, and plants and animals associated with the alternatives.
- **Land Use Patterns.** The Land Use analysis includes a description of current land uses based on City land use inventories, the City's 2012 and 2022 household and employment growth targets, the City's 2003 capacity analysis, and an assessment of the potential for induced or secondary growth impacts associated with the alternatives.
- **Relationship to Plans and Policies.** This analysis considers current and proposed draft Comprehensive Plans and regulatory framework as well as consistency with applicable external planning documents, including Growth Management Act goals, Shoreline Management Act goals, Countywide Planning Policies, adjacent jurisdiction plans, and Puget Sound Regional Council plans.
- **Population, Housing and Employment.** The population, employment, and housing analysis consists of a programmatic analysis of population, housing and employment growth (and their indirect impacts) associated with the alternatives.
- **Aesthetics.** Potential impacts of the alternatives related to urban design, including building height, mass, form and design, and streetscape are reviewed.

- **Transportation.** The transportation analysis includes an analysis of transportation infrastructure, existing and projected future traffic link volumes and levels of service (LOS), collision data, projects in the City's Capital Improvement Plan (CIP) and Capital Facilities Plan (CFP) that will mitigate the transportation impacts, and the proposed network of non-motorized facilities identified in the Non-Motorized Transportation Plan (NMTP).

2.3.1 Prior Environmental Review

The Final EIS for the City of Kirkland's Comprehensive Plan was issued on March 9, 1995. Since the adoption of the Comprehensive Plan on July 11, 1995, the City of Kirkland has issued the following Addenda:

- 1996 Comprehensive Plan Amendment, September 1996
- 1997 Comprehensive Plan Amendment, November 1997
- 1998 Comprehensive Plan Amendment, November 1998
- 1999 Comprehensive Plan Amendments, October 1999
- NE 85th Street Corridor Subarea Plan, June 2000
- 2001 Comprehensive Plan Amendments, September 2001
- Totem Lake Neighborhood Subarea Plan, September 2001
- North Rose Hill Neighborhood Plan Update, February 2003
- Lake Washington Technical College Legislative Rezone and Plan Amendment, February 2003
- Evergreen Hospital Master Plan, June 2003
- 2003 Legislative Rezones (Private Amendment Requests), October 2003
- Totem Center Zoning Code and Map Amendments TL 1 and TL 2, February 2004
- Market Incentives for Affordable Housing, March 2004
- Zoning Code Amendments to the LI zones, May 2004

The City issued the following Adoption Notices and DNS's:

- Legislative Rezones, March 1996
- Legislative Rezones, August 1999
- Legislative Rezones, March 2000
- Totem Center Zoning Code and Map Amendments TL 3 , June 2002

2.4 Organization of this EIS

Chapter 3 of this EIS analyzes potential environmental impacts associated with the No Action Alternative and the Proposed Action. The Proposed Action considers potential environmental impacts at three different levels. These are: (1) a broad Citywide analysis of potential impacts associated with proposed amendments to the Comprehensive Plan to incorporate the 2022 growth targets; (2) a more detailed analysis of the Totem Center Study area; and (3) an analysis of potential impacts associated with two private amendment study areas. Potential impacts, mitigating measures and significant unavoidable adverse impacts will be described at each of these three levels of analysis.

Each of these three analysis levels is briefly described below.

2.4.1 Citywide Analysis

The Citywide analysis considers the entire incorporated City of Kirkland, as described in above and in Figure 2-1 of this DEIS. This analysis is broad and programmatic in nature. The analysis addresses direct, indirect and cumulative impacts to the environment.

2.4.2 Totem Center Study Area

The portion of Totem Center under study is located in the Totem Lake Neighborhood and is generally bounded by I-405 to the west, NE 132nd Street to the north (north City boundary), Evergreen Health Care Center to the east, and NE Totem Lake Way to the south (Figure 2-2). The study area does not include Evergreen Healthcare Center and therefore does not encompass the entire area referred to as “Totem Center” within the Comprehensive Plan. Throughout this document, the portion of Totem Center under study shall be referred to as the “Totem Center Study Area.” The Totem Center Study Area comprises approximately 70.9 acres, excluding public rights-of-way.

This environmental review analyzes potential transportation and land use impacts between 2012 and 2022 for a general development scenario in the Totem Center Study Area. The general development scenario is based on the proposed development standards and the adopted Totem Lake Neighborhood Plan goals and policies for the Totem Center. In addition, potential aesthetic and view impacts from possible building massing and shadowing are analyzed.

2.4.3 Private Amendment Study Areas

Two private amendment requests are being considered as a part of the Comprehensive Plan Update. The City of Kirkland has decided to conduct a broader review of the area surrounding the private property owners’ request. This environmental review analyzes potential impacts associated with development under the proposed changes to the Comprehensive Plan’s Land Use Map and text, the Zoning Map and/or the Zoning Code text.

The Lakeshore Clinic PLA 6B Private Study Area, “Amendment A” consists of approximately 9.4 acres (excluding right-of-way) and is located in the Moss Bay Neighborhood of Kirkland. The study area is bounded by 2nd Avenue S to the north, 7th Avenue S to the south, 2nd Street S to the west, and 3rd Pl S to the east.

The Sedorco Partnership 6th Street South Study Area, “Amendment B”, consists of approximately 15.6 acres (excluding right-of-way) and is located in the Everest Neighborhood of Kirkland. The study area is bounded by the Burlington Northern Santa Fe (BNSF) railroad to the west, 6th Street S to the east, and the existing commercial area to the south.

Figure 2-3 depicts the two private amendment requests under consideration.

2.4.4 Potential Annexation Area

This analysis does not address the City's potential annexation area (PAA), which is the subject of ongoing discussion between the City and King County and will be analyzed through future environmental review as needed.

2.5 Proposed Action and Alternatives

The proposed action is an update to the City of Kirkland's Comprehensive Plan. The two alternatives described below include the No Action and the Proposed Action alternatives.

2.5.1 Objectives of the Proposal

As part of describing proposed actions and alternatives, SEPA requires the description of proposal objectives and features. Agencies are encouraged to describe a proposal in terms of objectives, particularly for agency actions to allow for consideration of a wider range of alternatives and measurement of the alternatives alongside the objectives. The following objectives apply to all of the Alternatives reviewed in this EIS including the No Action Alternative:

- Revise and refine the 1995 GMA Comprehensive Plan goals and policies and add new goals and policies, but not markedly depart from the original Plan vision.
- Accommodate housing and employment targets to meet GMA requirements and the City vision.
- Include revisions that may be needed because of court or Growth Management Hearings Board decisions and GMA changes.
- Address changes to the City since the Plan's adoption in 1995.
- Provide an incentive to development proposals that are consistent with the overall intent of the Totem Lake Neighborhood vision for the Totem Center study area.
- Assess impacts for two private amendment requests.

2.5.2 Growth Targets and Land Use Capacity

The 10-Year Update of the City of Kirkland Comprehensive Plan is required by GMA to accommodate the forecasted population and employment in the City through 2022. The City's growth targets are the result of a multi-jurisdictional, regional process that establishes how each City is able to accommodate its fair share of future regional growth. The population and employment targets for the City of Kirkland are a net household target of 5,480 and an employment target of 8,800 jobs for the years 2000 to 2022. These targets, added to current populations would result in a 2022 residential population of 55,327 and employment population of 41,184. In adopting its 10-Year Comprehensive Plan Update, the City must demonstrate that these population and employment levels can be achieved.

Land use capacity is the measure that is used to determine the ability of the City to accommodate its adopted targets. The capacity analysis uses a combination of

baseline information, land use assumptions, and growth factors to assign development to land that is undeveloped or is considered likely to redevelop. The basic formula for calculating the capacity is described in the “King County Land Capacity Task Force Recommendations,” dated November 1995.

The assumptions about redevelopment, densities, critical area factors, market factors, and right-of-way factors, etc. are at the discretion of the City of Kirkland. The City uses these factors to come up with its “best guess” for available capacity. As market factors changes, so can the capacity analysis results. Therefore, the City’s capacity for household units and employment noted in this document are based on the capacity analysis completed in June 2003 using the factors assumed at that time.

Capacity calculations are conducted annually to 1) provide input into the City’s traffic model for level of service estimates; and 2) to verify that there is enough land available for the City to accommodate its regional population and employment allocations, or targets. For more information regarding the methodology of the capacity analysis see Appendix D.

Targets and available capacity are identified below for each alternative.

2.5.3 No Action Alternative

For the purpose of this analysis, the No Action Alternative represents the continuation of the City’s current Comprehensive Plan (adopted July 1995, with amendments through December 9, 2003) through the adopted 2012 planning horizon. The adopted Land Use Map depicting Comprehensive Plan land use designations under the No Action Alternative is provided in Figure 2-4. The adopted Zoning Map is provided in Figure 2-5.

The No Action Alternative does not achieve the City’s goal of extending the planning horizon to 2022 and is not a likely course of action for the City. However, this Alternative serves two key purposes in this EIS. First, the analysis of the 2012 horizon provides a snapshot of the impacts that could be expected at the mid-point of growth to 2022. This mid-point assessment may be useful for mid-term capital and resource planning and budgeting. Second, the No Action analysis provides a basis for comparison to assess the impacts that are likely to be experienced with population and employment growth between 2012 and 2022. The comparison of conditions at the 2012 and 2022 planning horizons will allow the public and decision-makers the ability to make more informed decisions about future growth in the City.

The No Action Alternative would not include any technical or editorial amendments to Comprehensive Plan goals and policies, a new Human Services Element, a rewrite of the Economic Development Element, a few new policies in several existing elements, revisions to be consistent with GMA, corrections to the land use map, neighborhood sub-area maps and the zoning map, any procedural Zoning Code amendments or consideration of any private Comprehensive Plan amendment requests.

2.5.3.1 No Action Growth Targets and Land Use Capacity

Under the “No Action” alternative, as of 2003 approximately 2,381 new residential units are required to achieve the 2012 growth target for housing units. As of 2003,

the employment target has already been achieved with an excess of 4,379 employees provided over the 2012 target. Table 2-1 summarizes population, housing and employment targets and capacity.

Table 2 - 1 2012 Housing and Employment Targets and Capacity

Citywide	1991	2003	Capacity ⁵	2012 Target
Population^{1,2}	40,753	45,630	50,547	50,756
Housing Units	18,664	22,120 ³	24,400	24,501 ⁴ (range 24,258 - 25,327)
Employment	21,864	34,843 ³	38,600	30,464 ⁴ (range 29,664 - 31,664)

¹Year 1991 and 2003 based on State Office of Financial Management. Year 2012 based on 2004 Comprehensive Plan Update statistics. Capacity population applies similar persons per household as for 2012 target ²The City is assigned a household target as the method to accommodate the forecasted population. ³Source: City of Kirkland 2003 Existing/Future Capacity Analysis. ⁴Source: Countywide Planning Policies for King County, November 2002, added to year 1991 employment and households. ⁵Capacity analysis done by the City in 1991 and cited in the 1995 Community Profile, City of Kirkland.

2.5.4 Proposed Action

The Proposed Action consists of the following components:

1. Updated Growth Targets and Land Use Capacity Data

- Extension of the City’s GMA planning horizon from 2012 to 2022;
- Adoption of new housing and employment targets to meet 2022 population and employment growth forecasts from the State of Washington as required by GMA and by Countywide Planning Policies from King County.

2. Policy and Text Amendments

- Revisions associated with court or Growth Management Hearing Board decisions or changes to GMA; Technical and editorial refinements to Comprehensive Plan goals and policies;
- Creation of a new Human Services Element;
- Rewrite of the Economic Development Element that generally maintains the same intent of the existing element, except for industrial areas;
- Revisions to the Land Use Element policies on “Regional and Community Facilities” to incorporate state law on essential public facilities and on industrial uses;
- Few minor new policies in other elements (see Table 2-4 for more detail);
- Addition of new or updated information since adoption of the 1995 GMA Comprehensive Plan.

3. Zoning Code Amendments

- Zoning Code Amendments to Chapters 135, 140, 160 and minor changes to other chapters relating to the Comprehensive Plan Update items above.

4. Private Comprehensive Plan Amendment Requests

- Potential Comprehensive Plan and Zoning changes relating to two private amendment study areas.

5. Comprehensive Plan Land Use and Zoning Map Consistency Amendments

- Map changes to the City Wide Land Use Map, the Subarea Neighborhood Maps and the Zoning Map to correct a few mapping errors and to change the land use designations and zoning to Park/Open Space for several parcels of land obtained by the City for park use;
- Neighborhood map corrections to the Subarea Neighborhood Plan Land Use Maps and implementing Zoning Map corrections to make them consistent with the Comprehensive Plan’s Land Use Map for all land use designations and residential density.
- Correction to Split Zone Parcels in Planned Area 6B

Map changes are shown in Figures 2-6 and 2-7. All of the proposed action components are described below.

2.5.4.1 Proposed Action Growth Targets and Land Use Capacity

Citywide Growth Targets and Land Use Capacity

The 2022 target and capacity information for the Proposed Action is summarized in Table 2-2. Compared to 2003 housing units and employment levels, an additional 5,191 new residential units and 6,341 employees are necessary to achieve the 2022 target.

Table 2 - 2 Citywide 2022 Housing and Employment Targets and Capacity

	2000	2003	Capacity of Proposed Plan⁵	2022 Target¹
Population^{1,4}	45,054	45,630	56,670	55,327
Housing Units²	21,831	22,120	27,974	27,311
Employment²	32,384 ³	34,843	53,128	41,184

¹Year 2000 and 2003 based on State Office of Financial Management. Year 2022 based on 2004 Comprehensive Plan Update Statistics. Capacity population applies same persons per household as 2022 target. ²2000--2022 net household target equals 5,480 households. Year 2000--2022 net employment target equals 8,800 jobs. ³Year 2000 employment based on City estimates. State Employment Security Department/PSRC estimates of employment were later found to have significant discrepancies. ⁴The City is assigned a household target as the method to accommodate the forecasted population. ⁵Capacity analysis prepared by the City in June 2003. Capacity may extend beyond 2022.

Totem Center Study Area

As of 2003, the Totem Center Study Area has 200 residential units, 308,888 square feet of office space, 329,587 sq. ft. of commercial space, and a total of approximately 1,895 employees (see Table 2-3). In 2022, development under proposed zoning regulations and consistent with growth forecasts for the Totem Center Study Area would result in approximately 590 additional dwelling units for a total of 790 units. This represents an increase in housing of 295% over current conditions. Office development would grow by 94,301 square feet over the 2003 conditions for a total of 403,189 square feet, or a 31% growth rate. Commercial square footage increases

would be moderate, with a growth rate of 10% for a total of 361,616 square feet. No industrial growth is anticipated. This intensification of land uses in the study area would result in an estimated 2,638 total employees in the study area, representing a 39% increase in employees over 2003 conditions. (Note: Employment and office space for Evergreen Healthcare Center is not included in Table 2-3 as it is not in the study area).

Table 2 - 3 Totem Center Study Area Land Use Forecasts

Land use	2003 Citywide	Totem Center Study Area			
		2003 Totem Center Study Area	No Action 2012 Forecast ¹	Proposed Action 2022 Forecast ¹	Capacity of Proposed Action ²
Dwelling Units	22,120	200	445	790	902
Office (sf)	4,969,448	308,888	351,732	403,189	575,712
Commercial (sf)	3,125,419	329,587	344,322	361,616	475,000
Industrial (sf)	3,325,049	0	0	0	0
Employment (Employees)	34,843	1,895	2,237	2,638	3,117

Source: City of Kirkland, Jones & Stokes, 2004

¹ Based on study area's estimated capacity compared to Citywide estimated capacity and then the percent applied to the city-wide targets to determine study area's general forecasted share of the Citywide targets. ² Capacity analysis prepared by the City in June 2003. Capacity may extend beyond 2022.

2.5.4.2 Policy Amendments

The proposed policy refinements consist primarily of editorial changes, text clarifications, and minor modifications for plan consistency. There are some substantive changes as well. In addition, some revisions have been made to achieve compliance with Growth Management Act updates and new State laws.

Updates are proposed to the following elements of the Comprehensive Plan:

- Introduction
- Vision/Framework Goals
- General
- Community Character
- Natural Environment
- Land Use
- Housing
- Economic Development
- Transportation
- Parks, Recreation, and Open Space
- Utilities
- Public Services
- Capital Facilities
- Implementation Strategies
- Appendices

In addition, a new Human Services Element has been prepared. A summary of the Comprehensive Plan amendments is provided in Table 2-4.

Table 2 - 4 Summary of Comprehensive Plan Update

Comprehensive Plan Element	Nature of Revision
Introduction	1) Plan Consistency-data/dates updated in Community Profile to reflect 2022 planning horizon; 2) Text revisions editorial changes and supplemental text to refine Historical Perspective & How the Plan was Prepared.
Vision/Framework Goals	1) Plan Consistency Data/dates updated in A Vision of Kirkland to reflect planning horizon through 2022; 2) Text revisions editorial changes and supplemental text to refine A Vision of Kirkland and Framework Goals; addition of four (4) new Framework Goals concerning sense of community, low impact development and sustainable building practices, public safety, and regional coordination.
General	1) Text revisions-editorial changes and supplemental text to refine language within Plan Applicability and Consistency & Plan Amendment; 2) GMA compliance-text revisions regarding language for an emergency amendment within item D. Plan Amendment.
Community Character	1) Text revisions- editorial changes and minor supplemental text; 2) Appendix C- Historic Resources and Community Landmarks is placed within the body of the element and is updated; 3) New policy on mitigating light, glare, noise and odor impacts.
Natural Environment	1) Plan text revised and new goals and policies added to ensure consistency with the City's Natural Resource Management Plan, adopted August 5, 2003 (see discussion below); 2) Add updated version of Kirkland's Sensitive Areas Map, which serves as a guide to approximate locations of known critical areas and drainage basins, Topography Map, Landslide and Seismic Hazard Map, Impervious Surfaces and Tree Canopy Map.
Land Use	1) Plan Consistency data/dates updated to reflect 2022 planning horizon; integrates Land Use from the Totem Lake Neighborhood Plan and the North Rose Hill Plan; 2) Text revisions-minor editorial changes and supplemental text; 3) A comparison of household units and employment for 2000 Existing, 2022 Growth Targets and Available Capacity are provided and discussed; 4) Appendix H- Residential Densities and Comparable Zones is placed within the body of the element and revised; 5) Revised policy on industrial areas; 6). Revised goal and policies on regional and community facilities to include the state law requirements for essential public facilities.
Housing	1) Plan Consistency-Data/dates updated to reflect 2022 planning horizon; 2) Text revisions-minor editorial changes and supplemental text; 3) Policy changes which reflect the Housing Strategy Plan.

Comprehensive Plan Element	Nature of Revision
Economic Development	1) Rewrite of the element using some of the existing goals and policies, but with some new goals and policies General intent the same, except change on industrial policy.
Transportation	1) Plan Consistency-Data/dates updated to reflect 2022 planning horizon; updated Table T-5: Transportation Project List; 2) Text revisions-minor editorial changes and supplemental text; 3) LOS revisions including Tables T-2 and T-3 LOS and Table T-4 Signalized Intersections Not System Intersections, see discussion below; 4) Proposed change from LOS 1.4 to LOS 1.3 for Individual System Intersections; 5) Revised Figure T-1, Street Functional Classifications and State Routes; 6) Policy refinement to reflect Non-Motorized Transportation Plan; 7) Section on State Transportation Plans and Policies in Appendix A is placed within the body of the element and is updated.
Parks, Recreation, & Open Space	1) Plan Consistency-Data/dates updated to reflect 2022 planning horizon; 2) Text revisions-minor editorial changes and supplemental text.
Utilities	1) GMA/State Law Compliance- revisions to existing policies ; 2) Plan Consistency-Data/dates updated in to reflect 2022 planning horizon; 3) Text revisions-minor editorial changes and supplemental text; 4) LOS revisions and refinements, see discussion below; 5) New goal and policies on telecommunications.
Public Services	1) Plan Consistency-data/dates updated in to reflect 2022 planning horizon; 2) Text revisions-minor editorial changes and supplemental text; 3) Solid waste section moved from Utilities to Public Services element; 4) LOS revisions and refinements, see discussion below.
Capital Facilities	1) Plan Consistency data/dates updated in to reflect 2022 planning horizon; 2) Text revisions-minor editorial changes and supplemental text; 3) LOS revisions and refinements including revisions to Tables CF-2 through CF-5 for LOS, see discussion below; 4) Update CF Tables to match capital improvement programs for year 2005-2009.
Human Services	New element to the Plan; see discussion below.
Implementation Strategies	Plan Consistency data/dates and implementation tasks revised to reflect Comprehensive Plan update and 2022 planning horizon.
Appendices	<ul style="list-style-type: none"> ▪ Appendix A - Plan Consistency is deleted with section on State Transportation Plans and Policies moved to the Transportation Element. ▪ Appendix B - Community Profile is deleted with some information placed within the Introduction Element. The City published a separate Community Profile document in 2003. ▪ Appendix C - Historic Resources and Community Landmarks is deleted, and text is placed in the Community Character Element and updated. ▪ Appendix D - Level of Service Methodology is revised and

Comprehensive Plan Element	Nature of Revision
	converts to Appendix A. <ul style="list-style-type: none"> ▪ Appendix E - The Public Process is deleted. ▪ Appendix F – Glossary is revised and converts to Appendix B. ▪ Appendix G – Has previously been repealed. ▪ Appendix H – Residential Densities and Comparable Zones is deleted, and text is placed in the Land Use Element and revised. ▪ Appendix I – Design Principles converts to Appendix C.

Natural Environment Element

Although the GMA does not require a comprehensive plan element for critical areas, Kirkland’s 1995 plan included the Natural Environment Element, which did provide goals and policies supporting the City’s critical areas designations and regulations. In early 2000, as part of an annual Comprehensive Plan Update, Kirkland updated the Natural Environment Element to more fully reflect GMA goals and requirements. Although further amendments were not needed to achieve compliance with the GMA, during 2004, minor changes to the Natural Environment Element have again been undertaken to further emphasize the City’s commitment to consideration of best available science and protection or enhancement of the habitat of anadromous fish and to incorporate some key concepts from the City’s Natural Resource Management Plan, which was adopted in August 2003. These amendments also include an updated version of Kirkland’s Sensitive Areas Map, which serves as a guide to approximate locations of known critical areas, streams and drainage basins.

Human Services Element

A new Human Services element has been added as a part of the Comprehensive Plan Update. This new element has been a goal of the City since the adoption of the 1995 Comprehensive Plan and is a priority task item listed in the Implementation Strategies chapter of the Plan. The new Human Services element incorporates existing City goals and policies addressing youth, seniors, and other human services needs that had not been placed in a formal document, but does not represent new city direction.

Updated Levels of Service

Within the Transportation, Public Services, Capital Facilities, and Utilities elements, level of service standards have been revised and/or refined. These changes could include the following:

- The level of service standard for roads would potentially change from a V/C ratio of 1.4 LOS to a maximum 1.3 V/C ratio for Individual System Intersections;
- The transit level of service would change to achieve a 65% SOV and 35% non-SOV level of work trips by 2022;
- The level of service standards for bicycle lanes would be modified from 41.5 miles to 46.2 miles;
- The level of service standards for pedestrian facilities would be amended from 105.7 miles to 118 miles;

- The level of service for fire and emergency medical services would change from a standard of one fire station per 14,200 persons to a standard based on response times. This is based upon a recommendation by the Fire Department and the City's Fire Safety Commission. A response time level of service is a more appropriate measure than the number of fire stations for the City;
- The City's 1995 Comprehensive Plan identifies a surface water management standard of 24-hour event, 100-year detention with 0.2 cubic feet per second per acre. The 2004 Comprehensive Plan Update would generalize the level of service to: convey, detain, and treat surface water to provide for the public safety and welfare and to protect the hydrologic regime and fish and wildlife habitat;
- The level of service standard for water distribution would change from 119 gallons/day/capita to 112 gallons/day/capita as a correction. This is consistent with the City of Kirkland Water System Plan;
- Levels of service standards have been added for solid waste collection and recycling (52% residential recycling rate/city wide average of 33 lbs maximum/household/week for garbage collection). The City adopted these standards in the past as part of the City's solid waste management program.

Policy Amendments and Environmental Analysis

The proposed policy revisions are analyzed in three respects in the environmental documentation: first, in terms of direct policy consistency and compatibility impacts, the policy refinements are addressed in Section 3.4 Relationship to Plans & Policies of this DEIS; second in terms of indirect impacts of future growth and transportation facilities, the transportation standards are applied in the Transportation section of this DEIS; third, indirect public service and utility impacts and mitigation are addressed in the SEPA Environmental Checklist and found insignificant at a programmatic level and are not further addressed in this DEIS (Appendix A).

2.5.4.3 Zoning Code Amendments

Proposed revisions to the City of Kirkland's Zoning Code include the following procedural changes:

- **Chapter 135 Zoning - Code Amendments.** Proposed revisions would include: adding an emergency amendment definition and process, adding a process to review amendments in response to court or Growth Management Hearing Board appeals or decisions, describing the current two step process for private amendment requests and establishing criteria for selecting which requests will be studied.
- **Chapter 140- Amendments to the Comprehensive Plan.** Proposed revisions would include: adding an emergency amendment definition and process, adding a process to review amendments in response to court or Growth Management Hearing Board appeals or decisions, describing the current two step process for private amendment requests, establishing criteria for selecting which requests will be studied, and revising the factors to consider and criteria for amending the Comprehensive Plan.
- **Chapter 160- Process IV.** Proposed revisions would describe the current two-step process for private amendment requests and make minor changes to the criteria for selecting requests to be studied.

As described above, the Natural Environment Element includes an updated version of Kirkland's Sensitive Areas Map, which serves as a guide to approximate locations of known critical areas and drainage basins. Corresponding Chapter 90 Zoning Code amendments include minor modifications to definitions of primary and secondary basins for purposes of stream regulations. The modification of the definitions are based on more accurate basin boundary mapping, and would not result in any areas being subject to less restrictive regulations.

2.5.4.4 Private Amendment Study Areas

The City has received two private amendment requests to change one or more of the following: the Comprehensive Plan's Land Use Map and text, the Zoning Map and/or the Zoning Code's applicable Use Zone text. The City has decided to expand the study to consider the changes for part or all of the surrounding zone to review similar issues for similarly situated properties. The proposed amendments are:

- Amendment A – Lakeshore Clinic/PLA6B Study Area. Correct the land use designation from Medium Density Residential to Office/Multi-Family and change the allowable residential density from 10-12 dwelling units per acre (RM 3.6) to 19-24 dwelling units per acre (RM 1.8) for the Planned Area 6B zone generally located north of 7th Ave S, south of 2nd Ave S, east of 2nd St S, and west of 3rd Pl S. In addition, several parcels in PLA6B have split zoning with the zoning boundary cutting across existing development. These split zoned parcels need to have the zoning boundary corrected to include the entire parcel in PLA 6B. Please refer to Section 2.5.4.6 for additional discussion of split zone parcels.
- Amendment B – Sedorco Partnership/6th Street South Study Area. Change the land use designation from Industrial to Office/Multifamily potentially up to 24 dwelling units per acre and rezone from LIT (Light Industrial Technology) potentially up to PR 1.8 for the area located east of the BNSF railroad tracks and west of 6th Street South). An alternative implementing zone could be a Planned Area (PLA) to establish area-specific standards.

Existing land use in the Amendment A study area includes 8 single-family residential units and 28,656 square feet of office. Office development in the study area provides 115 jobs. Under the No Action alternative (existing land use designation and zoning), housing and employment growth forecasts for the Amendment A study area are approximately 83 residential units, 34,674 sq. ft. of office space, and 118 employees. Under the Proposed Action, housing and employment growth forecasts for the study area are approximately 185 units 17,937 square feet of office space and 84 employees by 2022. See Table 2-5 Private Amendment Request A Growth Forecasts.

Table 2 - 5 Private Amendment Request A Growth Forecasts

Land use	2003 Citywide	Study Area A			
		2003 Study Area A	No Action 2012 Forecast	Proposed Action 2022 Forecast	Capacity of Proposed Action ¹
Dwelling Units	22,120	8	83	185	185
Office (sf)	4,969,448	28,656	34,674	17,937	28,656
Commercial (sf)	3,125,419	0	0	0	0
Industrial (sf)	3,325,049	0	0	0	0
Employment (Employees)	34,843	115	118	84	115

Source: City of Kirkland, Jones & Stokes. ¹For Study Area A, the City assumes 60% of the study area will redevelop in the future and 40% will see no change. Residential re-development would be at a density of 24 dwelling units per acre.

Existing land use in the Amendment B study area includes 7,244 square feet of office space and 262,937 square feet of industrial space. This equates to approximately 476 employees in the study area for 2003. Under the current land use and zoning (No Action), the area would be expected to develop with approximately 21,964 square feet of office space and 205,153 sq. ft of industrial development by the year 2012. Because office development would be expected to increase as industrial development decreases, overall employment would remain relatively stable, decreasing slightly from 476 employees in 2003 to 465 employees in 2012. Under the Proposed Action, the City assumes that only the Sedorco Partnership property would redevelop with a 50% residential/50% office ratio. Based on this assumption, the 2022 growth forecast for the study area would be 28 residential units at 12 dwelling units per acre, 45,529 square feet of office space, and 140,431 square feet of industrial development by 2022 for a total of 387 employees. This represents an increase in approximately 28 housing units and a reduction of 99 employees over current conditions. To accommodate this development, it is anticipated that approximately half of the existing industrial uses will be redeveloped to either residential or office development. See Table 2-6 Private Amendment Request B Growth Forecasts.

Table 2 - 6 Private Amendment Request B Growth Forecasts

Land use	2003 Citywide	Study Area B			
		2003 Study Area B	No Action 2012 Forecast	Proposed Action 2022 Forecast	Capacity of Proposed Action
Dwelling Units	22,120	0	0	28	43
Office (sf)	4,969,448	7,244	21,964	45,529	116,244
Commercial (sf)	3,125,419	0	0	0	0
Industrial (sf)	3,325,049	262,937	205,153	140,431	144,121
Employment (employees)	34,843	476	465	387	681

Source: City of Kirkland; Jones & Stokes. ¹For Study Area B, the City assumes one parcel redevelops; i.e. the Sedorco Partnership Property. The analysis assumes 50% of the site is developed at 12 du/acre and 50% is developed with office uses. If 100% of the site were developed at 12 du/acre then 86 to 87 units are possible. If the site is developed with 18 units per acre 65-130 units are possible depending on whether the site is developed at 50% or 100% residential. If the site is developed with 24 units per acre then 86-173 units are possible depending on whether 50% or 100% of the site is available for development. If the site were developed fully with office uses then 236,379 square feet would be possible.

2.5.4.5 Land Use and Zoning Map Corrections

The Comprehensive Plan’s Land Use Map was changed with the 1995 GMA update of the Plan. However, the Neighborhood Subarea Land Use Maps were not changed in 1995. Since 1995, the North Rose Hill Neighborhood and Totem Lake Neighborhood Subarea Plan Land Use maps and implementing Zoning Map corrections have been updated to be consistent with the 1995 GMA Citywide Land Use Map for all land use classifications and residential density.

The neighborhood subarea plan land use maps need to be updated to be consistent with the 1995 GMA Citywide Land Use Map. These consistency amendments have a negligible effect on growth capacity. Since the overall Citywide Land Use Plan controls, the land use vision has been implemented consistently. These Neighborhood Map Amendments serve to provide full internal plan consistency with regard to future land use.

The land use designation and zoning for several city park/open space parcels need to be changed to reflect their use as park/open space.

In addition, the City Wide Land Use Map needs to be revised to re-designate RD 5.0 parcels (8 to 9 dwelling units per acre) from medium to low density residential. The RS5.0 zones have always been regulated in the Zoning Code and shown on the Zoning Map as low density residential uses. This change would make consistent the Land Use Map and text, the Zoning Map and the development regulations. This change is also needed to implement the proposed revisions to the text in Comprehensive Plan Appendix H (text is revised and moved to the Land Use Element).

A detailed description of the map corrections is included as Appendix B.

2.5.4.6 Split Zone Parcels

There are currently parcels split by two or more zone classifications within the PLA6B study area. Minor boundary adjustments to the Comprehensive Plan Land Use Map and Zoning Map are proposed for five of the parcels and would have a negligible effect on capacity. The existing development on these five parcels bisected by the PLA 6B boundary. This housekeeping effort will address the nonconforming uses and inconsistent land use designations and zoning for these parcels.

A map depicting the affected parcels (#1875000190, 4070700165, 2120200005, 0825059009, and 7654900165) proposed for housekeeping edits is included as Appendix C. The boundary line for the sixth parcel (#7786600000) will not be changed since its split boundary problem was resolved using a planned unit development (PUD) process.

2.5.4.7 Comprehensive Plan Elements and Implementing Regulations Review and Evaluation

The Proposed Action amendments are based in part on a City review of GMA requirements in comparison to a review of its Comprehensive Plan and development regulations, as well as based upon the City's review of its own community vision and changes in conditions since the Comprehensive Plan was adopted. Regarding the GMA requirements in particular, the City prepared the "Review and Evaluation Report of Kirkland's Comprehensive Plan and Development Regulations for Compliance With GMA and New State Laws" dated September 2002. The report is available in Appendix F. The report was available for review by the public in the Spring 2002 and well before sending the report to the State in 2002. The City Council (Fall 2002) and Planning Commission (Spring 2002) reviewed the report at public meetings, as did the Houghton Community Council and Transportation Commission. The State accepted the findings in the City's report and the scope of work for the Comprehensive Plan/Zoning Code Update project.

As part of the Evaluation Report, the City determined what sections of the Comprehensive Plan and development regulations were and were not in compliance with GMA and new State Law. All sections of the Comprehensive Plan and development regulations were determined to be in compliance, except for adding definitions for an emergency plan amendment and essential government facility, adding a secured community facilities process, updating the State Transportation facilities list and updating the City's Shoreline Master Program and Surface Water Manual. Several "action items" in the Evaluation Report, including to add an emergency plan amendment process, to review the goals, policies and review process for essential public facilities, and to update the State Transportation lists, are addressed in the Proposed Action Alternative in this DEIS. The other key items identified for review and amendment including the City's Shoreline Master Program and Surface Water Manual, and these are the subject of separate work programs and environmental reviews outside of this DEIS.

In addition to identifying needed amendments to the Comprehensive Plan and development regulations to comply with GMA, the September 2002 Evaluation Report documented recent City actions that were conducted to meet GMA requirements passed since 1995. A GMA compliance action completed by the City in 2002 included adoption of critical area ordinance regulation amendments to meet GMA provisions to consider best available science in policies and regulations. The City conducted a lengthy public and agency review process and a separate environmental review process for the critical area regulation amendments, as documented in a March 26, 2004 memo “Compliance with State Requirement to Update Critical Area Policies and Regulations, Files and IV-02-1, #b and CC-95-104.” This memo is provided in Appendix F.

This DEIS evaluates the effect of growth at the new horizon level of 2022 on natural environment systems, and the effect of proposed minor Natural Environment policy amendments and associated maps described previously in this Chapter. The DEIS does not reevaluate the critical areas ordinance amendments passed in 2002 as this action has received separate environmental review, and has been completed and accepted by the City Council and the State.

2.5.5 Alternatives Eliminated From Consideration

SEPA encourages nonproject EIS documents to focus on alternative means of accomplishing objectives. It is clear that a range of alternatives should be evaluated in a nonproject EIS. However, a jurisdiction “. . . is not required under SEPA to examine all conceivable policies, designations, or implementation measures but should cover a range of such topics.” [WAC 197-11-442(4)]

The range of alternatives analyzed in this Draft EIS is intended to meet SEPA requirements, as well as test a range of choices considering the GMA planning framework and City objectives in Section 2.5.1. The GMA framework requires the City to accommodate state OFM 20-year population allocations in a manner that allows for urban level densities, reduces potential for sprawl, gives a range of housing choices and employment opportunities, protects natural/environmental resources, and allows for provision of public services within financial means.

It is likely that, as a result of additional evaluation by the City and community, the proposed action may be refined. City decision makers, weighing public comments on the No Action and Proposed Action, will decide whether refinements are necessary. This Draft EIS evaluates alternatives conceptualized as of Spring 2004 to analyze options that were fixed as of that time to allow the environmental review to help further refine Comprehensive Plan Amendment proposals. Future possible refinements will be evaluated as a part of the Final EIS.

2.5.6 Benefit and Disadvantages of Delaying the Proposed Action

SEPA requires a discussion of the benefits and disadvantages of reserving for some future time, the implementation of a proposal as compared with possible approval at this time. Particular attention should be given to the possibility of foreclosing future options by implementing the proposal.

The benefits of adopting a Comprehensive Plan include addressing new State population forecasts, which allows for:

- Coordinated planning;
- Updated capital facility plans that respond to future growth;
- Opportunity for grants and funding of needed projects and facilities; and
- Guidance of development and City resource allocations to meet forecast trends along with the community vision.

Delaying implementation will still allow for growth to occur on the basis of the current Comprehensive Plan and zoning regulations. The current GMA Comprehensive Plan land use plans would have the possibility of accommodating future growth as noted in the No Action discussion; however, the capital plans and development regulations assume a horizon year of 2012 and would not result in coordinated land use and capital planning. The current plans would also not provide an opportunity to consider more recent trends since the plan was adopted in 1995 and to fine-tune the long-range plan course. Delaying implementation would not meet GMA requirements to address the succeeding population and employment forecasts for the City and to make the Comprehensive Plan consistent with GMA legislation adopted since 1995.

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