

1 Summary

1.1 Purpose of the Proposal

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 addition, the proposal includes related Zoning Code amendments and map changes, and consideration of Private Amendment Requests in two areas of the City,

In general, the proposed update is intended to revise and refine 1995 GMA Comprehensive Plan policy direction, rather than significantly depart from the original Plan vision.

The purpose of this Final EIS is to respond to comments on the Draft EIS and provide additional information on the updated proposal.

1.2 Updated Proposed Action

The No Action Alternative is described in the Draft EIS. No changes to the No Action Alternative have been proposed and it is not discussed further in this Final EIS.

The Proposed Action includes the following elements:

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 as required by GMA or the 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;
- Map changes to the City Wide Land Use Maps to re-designate RS5.0 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 proposed to implement the proposed revisions to the text in Comprehensive Plan Appendix H (text is revised and moved to the Land Use Element).
- 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

Some elements of the Proposed Action have been refined and updated subsequent to issuance of the Draft EIS in July 2004. Please refer to Chapter 2 of this Final EIS for a complete description of updated elements of the Proposed Action.

This EIS also includes a 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 Neighborhood Plan and implemented by the Kirkland Zoning Code. This EIS 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 of the City's comprehensive plan, provided the plan was previously subjected to environmental analysis through an EIS. This analysis provides the necessary environmental analysis to apply the categorical exemption under RCW 43.21C.229. Updated Totem Center land use forecasts and analysis are contained in Chapter 2 of this Final EIS.

1.3 Significant Impacts

The updated Comprehensive Plan would direct land use, services, and capital resources for the next 20-year period, but the Plan alone would not have direct impacts on the environment. The Comprehensive Plan would have indirect impacts by establishing the mix of land uses and overall land use patterns, levels of public services, and focus of future public capital

improvements. Significant impacts of the Proposed Action are described in the Draft EIS. An updated analysis of potential impacts to the Population, Employment and Housing; and the Transportation elements of the environment is included in Chapter 2 of this Final EIS.

1.4 Proposed Mitigation Measures

At a programmatic, non-project level, future Comprehensive Plan policies and existing or proposed development regulations that implement the Comprehensive Plan may serve as mitigation measures. Programmatic mitigation measures described under each element of the environment that was analyzed in the Draft EIS is included in Section 1.6 of this Chapter. Section 1.6 is essentially a reprint of the summary table from the Draft EIS with updated information in the Population, Employment and Housing and Transportation elements of the environment (shown in *italics*).

For a complete discussion of potential impacts and mitigating measures for all elements of the environment, please refer to the Draft EIS.

1.5 Significant Unavoidable Impacts

Conclusions as to whether an impact would be considered adverse, significant and unavoidable are found in the Summary Matrix located in Section 1.6. This information is unchanged from the Draft EIS.

1.6 Summary Matrix of Impacts and Mitigation Measures

Summary statements presented in the Summary Matrix (Table 1-1) on the following pages are abbreviated from the full discussion in the Draft EIS and Chapter 2 of this Final EIS. This table is essentially a reprint of the summary table provided in the Draft EIS, with updated information (shown in *italics*) in the Population, Employment and Housing and Transportation sections.

Readers are encouraged to review the more comprehensive discussion of issues of interest in the Draft and Final EIS.

Table 1 - 1 Summary Matrix of Impacts and Mitigation Measures

Impacts Common to All Alternatives	Distinguishing Impacts of Alternatives
Natural Environment	
<p>Earth. Removal or modification of vegetative cover, soil disturbance and erosion impacts would be expected as a result of future development. Soils in developed areas are subject to compaction, disruption, and contamination. In developed areas, impervious surfaces seal the soil surface, altering soil drainage and precluding other uses for the soil. Development could occur in areas that are at some risk of landslide and earthquake.</p> <p>Water Resources. Surface water resources could be indirectly impacted by removal of vegetation and creation of impervious surfaces. Impacts could include increases in peak flow and quantity of runoff, decreases in time required to deliver runoff to the receiving surface water body. Flooding in mapped flood hazard areas could be exacerbated to a small degree. Increased sedimentation to wetlands and lakes could result from development.</p> <p>Plants and Animals. Vegetation impacts could include physical removal and decreased viability due to increased peak flows and runoff volume. Ongoing development activities could reduce the amount of wildlife habitat in the City. Development of currently vacant or under-developed parcels could lead to fragmentation of wildlife habitat. Indirect impacts could include a reduction in wildlife habitat quality and function due to increased human disturbance. Introduction of non-native plant species could lead to a decrease in biodiversity and habitat. Future development would result in a reduction in the quality and quantity of aquatic habitat in the City over time. Development impacts could include higher water temperatures, sedimentation, increased peak flows, reduced low flows, reduced groundwater, erosion, scour, pollution, stream bank armoring, channelization, and reduced riparian and wetland areas.</p>	<p>No Action.</p> <p>Earth – Densification within the City would result in expansion of impervious surfaces, modification of soil structure, and accidental or chronic contamination. Clearing and grading activities would increase erosion potential. Potential for soil erosion is greatest in neighborhoods with greatest development potential, including Totem Lake, North Rose Hill and South Juanita. Seismic hazards are primarily located in South Juanita, Totem Lake, North Rose Hill and Lakeview neighborhoods.</p> <p>Water Resources – Potential impacts are in proportion to the area of the drainage basin relative to impervious surface in the basin. Potential impacts include altered surface water flows, increased stormwater quantities, localized flooding impacts, and generation of non-point source pollution to local surface waters. Stream and lake water quality is expected to decline gradually with increasing development. South Juanita, Totem Lake and North Rose Hill have important surface water resources including Juanita Creek, Totem Lake and surrounding wetlands, Forbes Creek and Forbes Lake that would be subject to highest risk of adverse impacts.</p> <p>Plants and Animals – Increased population, employment, traffic, impervious surface and human activity could result in additional use of open space areas that are currently priority habitats. Increased surface water runoff could result in water pollution, erosion, and sedimentation that can significantly impact plant and animal species.</p>

Impacts Common to All Alternatives	Distinguishing Impacts of Alternatives
	<p>Proposed Action</p> <p>Earth – On a Citywide basis, impacts would be similar to those described for the No Action Alternative. Continuation of development through 2022 would result in additional soil disturbances, especially in high growth neighborhoods. In the Totem Center Study Area, increased development would increase the risk of soil erosion. No significant impacts are anticipated in the Private Amendment Study areas.</p> <p>Water Resources -- On a Citywide basis, impacts would be similar to those described for the No Action Alternative. Continuation of development through 2022 would result in additional impervious surfaces and increased stormwater runoff from new construction, especially in high growth neighborhoods. In the Totem Center Study Area, increased development could result in adverse surface water quality and quantity impacts to the open stream segment between NE 132nd Street and NE 128th Street or the open stream segment bordering the study area to the west. Additional development could also impact the wetlands in the vicinity of Totem Lake. No significant impacts are anticipated in the Private Amendment Study Area A. In Private Amendment Study Area B, increased development may result in indirect surface water impacts to the piped stream border the study area to the east via the stormwater drainage collection system.</p> <p>Plants and Animals -- On a Citywide basis, impacts would be similar to those described for the No Action Alternative. Continuation of development through 2022 would result in additional habitat fragmentation and reduction of open space areas, especially in high growth neighborhoods. Because the Totem Center Study Area and Private Amendment Study areas are urbanized, no significant impacts are anticipated.</p>

Mitigation Measures

Citywide

- The City of Kirkland is in the process of developing a revised Surface Water Management Plan. Additional mitigation measures to protect and/or restore surface water bodies, including streams, lakes, and wetlands, may be included in this document.
- The City also will be developing a revised Shoreline Master Program (SMP). Pursuant to Washington state requirements, Kirkland's SMP will be updated by December 1, 2009.

Totem Center Study Area

Due to local seismic and landslide hazards in the study area, it is recommended that a geotechnical consultant develop soil suitability studies done for each project specific review to ensure that proposed development in the area is feasible.

Private Amendment Study Areas

No proposed mitigation is recommended other than compliance with the City's critical areas regulations.

Significant Unavoidable Adverse Impacts

Earth

Both Alternatives would result in increased urbanization in the City. An unavoidable consequence will include a corresponding increase in erosion and sedimentation. Sediment reaching lakes, wetlands, and streams could have adverse impacts on the nutrient balances and other water quality indicators in these receiving waters. A greater population could also be at risk from the adverse impacts of damage to buildings and infrastructure should an earthquake or landslides occur.

Water Resources

Direct impacts would be minimized with implementation of federal, state, and City regulations, including critical area regulations. Adverse impacts to water resources that may occur despite attempts to mitigate them include:

Decreases in vegetative cover, resulting in accelerated runoff and erosion processes, elevated water temperatures, and increased stress on aquatic organisms;

Increases in impervious surfaces, resulting in accelerated runoff, increased volumes of runoff, decreased water quality, and decreased groundwater recharge;

Erosion and sedimentation of streams, lakes, and wetlands due to increased flow rates and volumes, resulting in the decline of nutrient balances, substrate quality, and habitat availability;

Decline and eventual loss of some wetland functions for hydrology, water quality, and habitat; and

Increase in pollutants from stormwater runoff to streams, wetlands and Lake Washington.

The extent to which these indirect and/or cumulative impacts could be reduced or offset will depend on implementation and enforcement of adopted City plans and codes, and the effectiveness of pending City Surface Water Management Plan Update, the effectiveness of WRIA plans, as well as City restoration plans for fish and wildlife habitat that may be associated with its Shoreline Master Program update. The level of

significance of impacts would be more precisely determined through project-specific environmental review.

Plant and Animal Resources

Potential indirect impacts include the loss and reduced function of vegetation communities as a result of population growth and development within the City under both Alternatives. A reduction in the amount of vegetation communities would reduce habitat for wildlife. Additional development under any Alternative would result in loss of larger tracts of native vegetation. Vegetation diversity (i.e., number of different native plant species and structure) would decline as the larger tracts of vegetation are developed.

Wildlife habitat could be lost and reduced in function and value as a result of population growth and development within the City under all Alternatives. The reduction in habitat values for some species of wildlife would result in an increase in populations of those species adapted to more urban habitats. Over time, some re-growth of native vegetation would occur within the City as residential areas mature. With this re-growth would be an incremental improvement in habitat values for some wildlife species, primarily songbirds and small mammals.

Fish habitat could be lost or reduced in function and value as a result of population growth and development within the City under all Alternatives. Over time, changes in land use and development patterns would likely result in increased risk of impacts on fish habitat and species. Overall, greater human activity, culvert replacements, increased storm runoff, modified hydrology, and lowered water quality from commercial and roadway traffic sources could result from these Alternatives, all of which would negatively impact fisheries and aquatic habitat.

The extent to which these indirect and/or cumulative impacts could be reduced or offset will depend on implementation and enforcement of adopted City plans and codes, and the effectiveness of pending City Surface Water Management Plan Update, the effectiveness of WRIA plans, as well as City restoration plans that may be associated with its Shoreline Master Program update. The level of significance of impacts would be more precisely determined through project-specific environmental review.

Impacts Common to All Alternatives	Distinguishing Impacts of Alternatives
Land Use Patterns	
<p>Land Use Patterns and Activity Levels. Future land uses will maintain the predominance of residential uses in the City. Land use patterns will not be significantly altered. Existing land use patterns will be intensified relative to current conditions. Intensification will be greatest in areas with capacity for additional growth, including Totem Center Urban Center of the Totem Lake Neighborhood, Downtown Kirkland, and, to a lesser degree, the Rose Hill Business District along NE 85th Street and the North Rose Hill Business District.</p> <p>Land committed to housing and employment will increase. As new development is occupied, it will result in higher activity levels in the surrounding area. Increased activity levels may be incompatible with activity levels of adjacent residential or commercial neighborhoods.</p>	<p>No Action Alternative</p> <p>Land Use Patterns and Activity Levels – Potential impacts would be similar to those described under Impacts Common to All Alternatives.</p> <p>Land Use Compatibility – Potential impacts would be similar to those described under Impacts Common to All Alternatives.</p> <p>Capability of Land to Absorb Densities – Under the current Comprehensive Plan, the City has adequate capacity to absorb the planned density and intensity of land uses through 2012.</p> <p>Proposed Action</p> <p>Land Use Patterns and Activity Levels – Potential impacts would be similar to those described under Impacts Common to All Alternatives,</p>

Impacts Common to All Alternatives	Distinguishing Impacts of Alternatives
<p>Areas that are currently vacant would be developed with urban uses over time. Neighborhoods with the greatest amount of vacant and partially vacant lands include Totem Lake, North Rose Hill and South Juanita.</p> <p>Over time, the Totem Center Study area would experience an increase in high-density housing, office and commercial uses. Existing residential development may be displaced as development occurs.</p> <p>In the Private Amendment Study areas, the mix of uses may change. However, both areas would continue to include office and employment opportunities. Expanded residential opportunities would occur in Study Area A, and a continued, but decreased, capacity for industrial development would occur in Study Area B as office or residential uses are added.</p> <p>Land Use Compatibility</p> <p>New development could result in compatibility impacts if adjacent development is of lower scale or less urban in character. Environmentally sensitive areas could experience direct and indirect consequences of development.</p> <p>In the area to the north of the Totem Center Study Area, compatibility impacts may be experienced by the existing low-density residential development north of NE 132nd Street. This area is zoned for residential development at 6 to 8 dwelling units per acre and is designated by the King County Comprehensive Plan as Urban Residential Medium (4 to 12 dwelling units per acre). Impacts could be associated with increased traffic, noise, glare, pedestrian activity, and shadowing.</p> <p>In the Private Amendment areas, changes to the mix of residential, office, and industrial uses could increase the potential for land use conflicts at the edges between less intensive and more intensive uses. The magnitude of these impacts will depend on the design compatibility of different uses relative to building height, bulk and scale.</p>	<p>but would be extended through the updated Comprehensive Plan horizon of 2022.</p> <p>Land Use Compatibility – Potential impacts would be similar to those described under Impacts Common to All Alternatives but would be extended through the updated Comprehensive Plan horizon of 2022.</p> <p>Capability of Land to Absorb Densities – Under the proposed Comprehensive Plan update, the City has adequate capacity to absorb the planned density and intensity of land uses through 2022. Within the smaller study areas of the Totem Center Study Area and Private Amendment Study areas, there would also be sufficient capacity to accommodate proposed land use designations.</p>

<p>Mitigation Measure</p> <p>To achieve planned densities and use land efficiently, use this EIS review of the Totem Center Study Area. This advanced environmental review would allow for application of the categorical exemption for new residential and mixed-use development per RCW 43.21C.229.</p>
<p>Significant Unavoidable Adverse Impacts</p> <p>Over time, implementation of either the No Action or Action Alternatives could irreversibly convert vacant, partially developed, and redeveloped properties to additional or new single-family, multifamily, office, commercial, and industrial uses. Due to densification and intensification of uses, the City will also continue to add to its urban character.</p>

Impacts Common to All Alternatives	Distinguishing Impacts of Alternatives
Relationship to Plans and Policies	
<p>As required by GMA, both Alternatives must demonstrate that the land use element, capital facilities element and financing plan are consistent.</p> <p>The alternatives do not differ in consistency with Shoreline Management Act requirements. The City is scheduled to update their Shoreline Master Program consistent with the state required timeline.</p> <p>Both alternatives are generally consistent with regional plans, including Vision 2020 and the King County Countywide Planning Policies.</p> <p>Both alternatives are generally consistent with the comprehensive plans for surrounding jurisdictions, including the cities of Bellevue and Redmond and King County.</p> <p>Proposed development in the Totem Center Study Area is consistent with and would implement adopted City policies for this area under either alternative.</p> <p>In the Totem Center Study Area, the adjacent King County Comprehensive Plan designation of Urban Residential Medium and zoning for 6 to 8 dwelling units per acre on the north side of NE 132nd Street could be inconsistent with the higher intensity uses planned for the Totem Center Study Area. However, adopted development standards may minimize this impact. Please refer to the Aesthetics</p>	<p>No Action Alternative</p> <p>The adopted Comprehensive Plan met the requirements of GMA in 1995, but does not include some of the changes to GMA that have occurred since 1995.</p> <p>Overall, the continued use of outdated information in the current Comprehensive Plan would likely result in internal inconsistencies within the Comprehensive Plan and with other plans used by the City.</p> <p>Proposed Action</p> <p>The Proposed Action is consistent with the broad requirements of GMA and changes to GMA since 1995. Proposed amendments are based, in part, on City review of GMA requirements in comparison to the City’s existing Comprehensive Plan (see Appendix F). This review helped establish the scope of work for this Comprehensive Plan Update project.</p> <p>Proposed amendments are consistent with existing City direction and are not expected to result in any consistency impacts to the City’s Comprehensive Plan.</p> <p>Proposed development in the Private Amendment Study Areas would be consistent with surrounding uses and overall City policy direction.</p>

Impacts Common to All Alternatives	Distinguishing Impacts of Alternatives
section for additional discussion.	

<p>Mitigation Measures No mitigating measures beyond incorporated plan features and applicable regulations and commitment are proposed or required.</p> <p>Significant Unavoidable Adverse Impacts No significant unavoidable adverse impacts are anticipated.</p>
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Impacts Common to All Alternatives	Distinguishing Impacts of Alternatives
Population, Employment and Housing	
<p>Population, employment and housing will increase under any of the Alternatives reviewed, to different degrees. Additional population growth will increase the demand for housing.</p> <p>Secondary, indirect impacts of growth would likely include potential encroachment near natural environmental resources, increases in demand for facilities, infrastructure, and other effects. These secondary impacts are described in other sections of the Draft EIS and the SEPA Checklist in Appendix A to the Draft EIS.</p>	<p>No Action</p> <p>In 2012, population and household levels would increase over current households. Plan capacity would accommodate 2012 targets particularly considering ranges. The City has already exceeded its Year 2012 target employment, although there is greater capacity for employment according to capacity estimates.</p> <p>The No Action would not meet the requirement to plan for a succeeding 20-year period, and at 2012 would not result in achievement of the year 2022 housing target assigned through the Countywide Planning Policies for King County. In addition, the No Action would not result in meeting the City's affordable housing targets.</p> <p>Proposed Action</p> <p>The Proposed Action Alternative accommodates growth to the year 2022. In 2022, population, household, and employment levels would increase over current households. <i>The updated Proposal described in this Final EIS would allocate proportionately more growth in the Totem Lake neighborhood, compared to the Proposed Action described in the Draft EIS.</i> There is sufficient capacity to accommodate growth targets.</p>

Impacts Common to All Alternatives	Distinguishing Impacts of Alternatives
	<p>The Proposed Action would meet GMA requirements to plan for the next 20-year horizon to the year 2022. The Proposed Action would provide enough capacity to meet target levels of growth and the level of growth assumed in land use and capital planning would be consistent with the target level of growth established in the Countywide Planning Policies for King County. In addition, the Proposed Action includes additional policies and regulatory incentives to encourage affordable housing. However, the City may still not meet its affordable housing targets.</p>

<p>Mitigation Measures</p> <p>Since the City’s growth capacity exceeds the 2022 housing and employment target levels, the City could monitor growth levels and determine if adjustments to the Comprehensive Plan, capital facility and service plans, or other supporting plans or regulations are warranted to ensure that all Comprehensive Plan Elements and implementing plans and regulations are consistent and in balance. GMA and City regulations allow for annual review and amendment of City plans as appropriate.</p> <p>The City could take further action to meet its affordable housing targets by providing additional affordable housing incentives beyond what the City adopted in May 2004 and by supporting affordable housing programs through ARCH and/or other local and regional housing agencies.</p> <p>Significant Unavoidable Adverse</p> <p>Population, employment and housing will increase under any of the Alternatives reviewed, to different degrees. Additional population growth will increase the demand for housing. The need for affordable housing will increase as well. Additional population, housing, and employment growth will result in secondary impacts to the natural and built environment and to the demand for public services, and is addressed in the appropriate sections of the Draft EIS or SEPA Checklist in Appendix A to the Draft EIS.</p>
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Impacts Common to All Alternatives	Distinguishing Impacts of Alternatives
Aesthetics	
<p>Impacts associated with either alternative include incompatibility of height, bulk and scale between existing and new development; increase in shade and shadows resulting from intensification; increased lighting levels and glare; reduced open space; and loss of vegetation.</p> <p>Most impacts would be concentrated in designated activity areas or</p>	<p>No Action Alternative</p> <p>Impacts of the No Action Alternative would be as described under Impacts Common to All Alternatives.</p> <p>Shade impacts of development in the Totem Center Study Area would not be expected to reach the residential area north of NE 132nd Street. Shade and shadows from development could result in a continuous</p>

Impacts Common to All Alternatives	Distinguishing Impacts of Alternatives
<p>commercial centers. Neighborhoods such as Totem Lake, North Rose Hill and South Juanita may experience the greatest change, since these neighborhoods have the greatest potential for future development.</p>	<p>shadow along the NE 132nd Street frontage for longer periods of time during the day.</p> <p>Proposed Action</p> <p>At a Citywide level, potential impacts would be as described under Impacts Common to All Alternatives.</p> <p>In the Totem Center Study Area, increased high-density residential, office and commercial development could result in aesthetic impacts. Potential height, bulk and scale impacts could result primarily between new development in the Study Area and the existing low-density (6 to 8 dwelling units per acre) residential development immediately north of NE 132nd Street in unincorporated King County.</p> <p>Potential shade and shadow impacts could also be experienced in this area. A shade analysis conducted for this EIS indicates that most of the shade impacts would be internal to the Study Area. However, the residential area north of NE 132nd Street would likely experience temporary shading impacts, particularly during the winter months. The location and duration of the shadow on any particular lot will change throughout the day. In the morning, more shadows will be cast in a northwesterly direction and in the evenings shadows will be cast to the northeast.</p> <p>Aesthetic impacts associated with potential development in the Private Amendment Request study areas would be similar to those described under Impacts Common to All Alternatives. If a Planned Area designation is used in Amendment Study Area B, building heights may be increased and may not be compatible with building heights in the surrounding area.</p>

<p>Mitigation Measures</p> <p>If a Planned Area designation is established for Private Amendment Area B, design standards should be included to ensure that the maximum allowable building height in the new designation is compatible with allowable building heights in the surrounding area.</p>
<p>Significant Unavoidable Adverse Impacts</p> <p>Growth levels will increase between existing conditions and 2022, committing land to allowed uses and activities. The extent of visual impacts is subjective and will depend on the values and preferences of those viewing the change; the quality of architectural and urban design features incorporated into the development; and how well the image presented by the overall scale and form of the development incorporates features of the local setting.</p>

Impacts Common to All Alternatives	Distinguishing Impacts of Alternatives
Transportation	
<p>Traffic is expected to increase under all alternatives.</p>	<p>No Action</p> <p>Four system intersections are projected to exceed the adopted single intersection V/C threshold of 1.40, and five additional intersections are expected to approach the threshold.</p> <p>Proposed Action</p> <p><u>Citywide</u></p> <p><i>Two system intersections are projected to exceed a V/C of 1.30 by 2022 (24th Avenue NE/Totem Lake Boulevard/NE 124th Street and 132nd Avenue NE/NE 85th Street). All sub-area average V/Cs are expected to be lower than the averages under the No Action Alternative.</i></p> <p><u>Totem Lake</u></p> <p><i>V/C analysis indicates that with the recommended 2022 transportation improvements in place, densification of the Totem Center Study Area by 2022 will not cause LOS in the subarea to exceed LOS standards, but may impact the intersection of 24th Avenue NE/Totem Lake Boulevard/NE 124th Street. In addition, the table shows six system intersections located near Totem Center (in the Northeast Subarea) are expected to experience congested conditions (V/C greater than 1.0)</i></p>

Impacts Common to All Alternatives	Distinguishing Impacts of Alternatives
	<p>during the PM peak hour. Five additional intersections are expected to approach congested conditions (V/C between 0.9 and 1.0). In order to ensure adequate traffic flow in the area under future conditions, these potential choke points should be carefully considered when designing to accommodate the new development.</p> <p><u>Private Amendments</u></p> <p>V/C analysis indicates that with the recommended 2022 transportation improvements in place, potential development in the Private Amendment Study Areas will not cause LOS in the Subarea to exceed LOS standards. However, while LOS standards are not expected to be violated, the table shows four system intersections located near the Private Amendment Study Area (in the Southwest Subarea) are expected to experience congested conditions (V/C greater than 1.0) during the PM peak hour. In order to ensure adequate traffic flow in the area under future conditions, these potential choke points should be carefully considered when designing to accommodate the new development. When site-specific developments are proposed, they should be compared to the Comprehensive Plan/EIS land use and transportation analysis assumptions. Additional traffic analysis may be required.</p>

Mitigation Measures

Citywide

- Construct the recommended transportation improvements for the 2012 No Action and 2022 Action Alternatives to maintain the adopted LOS and to reduce traffic congestion that would occur without the improvements. In addition, construct the recommended transportation improvements needed to lower the V/C threshold for individual intersections from 1.40 to 1.30 if financially feasible. If construction of the recommended improvements is not feasible, a reduction of the V/C threshold from 1.30 to 1.40 should be evaluated.
- Review annually the traffic model, LOS standards and needed transportation improvements to ensure that the City is meeting the adopted LOS.
- Implement the Non-Motorized Transportation Plan to meet the new goal of 65% SOV and 35% HOV and help maintain the adopted LOS. This functional plan provides a detailed examination of the existing pedestrian, bicycle, and equestrian systems, criteria for prioritizing improvement, and suggested improvements as shown in the amended bicycle and pedestrian system .
- Provide programs and improvements to meet the new goal of 65% SOV and 35% HOV.
- Implement the following programmatic mitigation:
 - Application of street design standards appropriate for neighborhoods
 - Emphasis of street connections in Citywide system.
 - Continuance of the Neighborhood Traffic Control Program to address safety, speed, and/or volume issues
 - Support of Transportation Demand Management (TDM) Strategies
- *As part of its commitment to the consistent application of concurrency regulations, the City will monitor system intersections each year as part of the annual review of the network LOS and road concurrency, as described in the Implementation Strategies Element of the Comprehensive Plan. The annual review will place particular focus on intersections that have been identified as having higher risk of exceeding the adopted standards. If the measured V/C approaches the 1.3 standard for individual intersections, the City could take one or more of the following actions:*
 1. *Implement additional improvement projects to improve the LOS; or*
 2. *Limit, phase or deny development that affects the intersection; or*
 3. *Refine the LOS methodology or standard at some or all intersections.*

Totem Lake

When new site-specific development is proposed in the Totem Center Study Area, the following additional measures are required as part of development application: land use and trip generation information to ensure that it is consistent with the ranges used for the Comprehensive

Plan analysis; parking plan; access and circulation plan; site specific Transportation Demand Management strategies; possible provision of dedication and right-of-way improvements for one or both of two new streets if the proposed development is adjacent to these future streets; impact analysis for nearby intersections that are expected to experience congestion within the six-year planning horizon.

Private Amendments

Any the proposed development within the Private Amendment study areas should provide the following additional information prior to development approval: land use and trip generation information to ensure that it is consistent with the ranges used for the Comprehensive Plan analysis; parking plan; access and circulation plan; site specific Transportation Demand Management strategies; impact analysis for nearby intersections that are expected to experience congestion within the six-year planning horizon.

Significant Unavoidable Adverse Impacts:

Increases in future development will results in increased traffic volumes. Although congestion can be addressed through the mitigation measures presented in this document, the increase in traffic itself is considered a significant unavoidable impact.