



CITY OF KIRKLAND

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MEMORANDUM

To: Planning Commission

From: Angela Ruggeri, AICP, Senior Planner
Eric Shields, AICP, Planning Director

Date: April 15, 2010

Subject: TOUCHSTONE (PARKPLACE) SUPPLEMENTAL EIS (ZON07-00016)

RECOMMENDATION

Receive update from staff and EIS consultant on the status of the Supplemental Environmental Impact Statement for Parkplace.

BACKGROUND DISCUSSION

There is a petition before the Central Puget Sound Growth Management Hearings Board relating to the proposed Parkplace project. The petitioners, Davidson Serles and Continental Plaza, sought review of Ordinance Nos. 4170 and 4171 which amended the Comprehensive Plan and Zoning Code in association with the private amendment request for the Parkplace project. The Ordinances were passed in December 2008. The petitioners challenged the ordinances on a number of grounds: lack of compliance with the State Environmental Policy Act; inadequate service by transportation and other public facilities; lack of financing plans for capital improvements; intensity of development inconsistent with the County-wide Planning Policies for King County; and inadequate public facilities.

The Hearings Board issued its decision in October 2009. While it upheld the ordinances with respect to a number of the petitioners' objections, the Hearings Board found that: 1) the Final Environmental Impact Statement failed to include reasonable alternatives to the Touchstone proposal, including offsite alternatives; and 2) the Comprehensive Plan requires amendments to its Capital Facilities and Transportation Elements to include all necessary capital improvements and a multi-year financing plan based on the ten-year transportation needs identified in the Comprehensive Plan. The Hearings Board did not invalidate the ordinances; rather it remanded them to the City for the purpose of correcting the issues identified by the Hearings Board. The Hearings Board established April 5, 2010, as the deadline for the City to take appropriate legislative action to comply with the Hearings Board's Order.

City staff recently went to the Hearings Board and requested an additional six months for compliance. The request for the time extension was based on information from the City's environmental consultant (ICF International) that, because of the amount of work required, it was unlikely that the City Council would be able to consider the proposed legislative amendments until October 5, 2010. The Hearings Board granted the City's request. In preparing the Supplemental Environmental Impact Statement (SEIS), the City basically needs to replicate the original Environmental Impact Statement (EIS) process and level of analysis. The original EIS process took approximately 15 months and we are estimating approximately 12 months to complete the SEIS.

SUPPLEMENTAL EIS CONTENT

In response to a private amendment request by Touchstone, the City considered Comprehensive Plan amendments, zoning amendments, and a rezone to allow for greater retail, office, and entertainment uses on the current 11.5 acre Parkplace site. In 2008, the City adopted ordinances to approve the Touchstone request with revisions to help ensure design quality and compatibility.

The City previously studied alternative city-wide growth patterns in 2004 and a range of on-site alternatives for the Parkplace site in 2008. The City is again considering alternatives to the Parkplace site to comply with the Growth Management Hearings Board decision relating to the State Environmental Policy Act Rules, which require consideration of off-site alternatives for legislative actions and private rezones in some situations.¹

A draft of the preliminary Commercial Growth Alternatives Site Selection Study is attached. It identifies options for off-site alternatives to the Touchstone (Parkplace) proposal that will be evaluated in the Supplemental Environmental Impact Statement. The objective of the study is to identify one or more alternative sites where the City could locate an additional approximately 954,000 square feet of commercial space, which is the estimated amount of additional floor area allowed under the Comprehensive Plan and zoning amendments for the Parkplace site in 2008.

This study presents the criteria, supporting maps, and array of sites considered including those that may be eliminated from further consideration. Proposed off-site alternatives to carry forward in the SEIS are provided. A new on-site alternative is also identified.

The City's environmental consultant will be at the Planning Commission meeting to explain the study and answer any questions the Commission may have.

SCHEDULE

Draft SEIS issue date – May 14

Planning Commission Public Hearing – date to be announced (probably May 27 or June 10)

End of 30-day comment period for DEIS – June 14

¹ See WAC 197-11-440 (5)(d), as well as Central Puget Sound Growth Management Hearings Board Case, *Davidson Serles v. City of Kirkland* (October 5, 2009), Case No. 09-3-0007c.

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Final SEIS issue date – August 11

Planning Commission Study Session – August 12 and/or August 19

Planning Commission Action – August 26

City Council Study Session – September 14

City Council Action – October 5

Attachment: SEIS Appendix: Commercial Growth Alternatives Site Selection Study

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COMMERCIAL GROWTH ALTERNATIVES SITE SELECTION STUDY

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April 2010



Draft

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Acronyms and Abbreviations

C	Commercial
CBD	Central Business District
CBD-5	Central Business District 5
City	City of Kirkland
FARs	floor area ratios
FEIS	Final Environmental Impact Statement
GMA	Growth Management Act
I	Interstate
PMP	parking management plan
PSE	Puget Sound Energy
SEIS	Supplemental Environmental Impact Statement
SEPA	State Environmental Policy Act
TMP	transportation management plan
WAC	Washington Administrative Code

I. Introduction and Study Purpose

In response to a private amendment request by Touchstone, the City of Kirkland (City) has considered comprehensive plan amendments, zoning amendments, and a rezone to allow for greater retail, office, and entertainment uses on the current 11.5-acre Parkplace shopping center site located in Downtown (also called the Central Business District [CBD]). In 2008, the City adopted ordinances to approve the Touchstone request with revisions to help ensure design quality and compatibility.

The City previously studied alternative city-wide growth patterns in 2004, and a range of on-site alternatives on the Parkplace site in 2008. However, the City is again considering alternatives to growth on the Parkplace site to comply with the State Environmental Policy Act (SEPA) Rules, which requires consideration of off-site alternatives for legislative actions and private rezones in some situations.¹ The purpose of this Commercial Growth Alternatives Site Selection Study is to identify options for off-site alternatives to the Touchstone (Parkplace) proposal that will be evaluated in a Supplemental Environmental Impact Statement (SEIS). The objective is to identify one or more sites where an additional approximately 954,000 square feet of commercial space could be located beyond the allowance of the City's Comprehensive Plan. Once the City has considered additional alternatives, it may choose to re-adopt the 2008 ordinances, amend the 2008 ordinances, or approve a different alternative.

This study presents the criteria, supporting maps, and array of sites considered including those that may be eliminated from further consideration. Recommendations for off-site alternatives to carry forward in a SEIS are provided. A new on-site alternative is also identified. Specifically, the report includes the following sections:

- i. Introduction and Study Purpose
- ii. Prior Alternatives Considered
- iii. Site Selection Methodology
- iv. Step 1: Broad Site Identification and Evaluation
- v. Step 2: Central Business District Site Identification
- vi. Step 3: Central Business District Sites – Focused Evaluation
- vii. SEPA Reasonable Alternatives
- viii. Recommendations of Off-site and On-site Alternatives for Further Consideration

II. Prior Alternatives Considered

Parkplace is located on an 11.5-acre parcel containing seven buildings with a mixture of office and retail uses. Most of the shopping center was developed in the early 1980s and is characterized by buildings separated by surface parking, though some on-site parking is in the form of a structured garage. The property was previously zoned Central Business District 5 (CBD-5) until 2008 when the City rezoned the property to CBD-5A. Building heights range from 1 to 6 stories. Comprehensive

¹ See WAC 197-11-440 (5)(d), as well as Central Puget Sound Growth Management Hearings Board Case, *Davidson Serles v. City of Kirkland* (October 5, 2009), Case No. 09-3-0007c.

plan and zoning amendments would allow for similar commercial uses, but a greater level of building square footage (intensity) and height.

The Touchstone (Parkplace) proposal was considered in a 2008 Final Environmental Impact Statement (FEIS), which addressed three alternatives: No Action, Proposed Action, and FEIS Review Alternative. The alternatives are described below:

- **No Action (2008 Comprehensive Plan and Zoning).** Redevelopment and growth would be limited to what is allowed under the 2008 Comprehensive Plan and Zoning Code. The No Action alternative assumes an increased level of office and retail development that city staff estimated could occur within the existing land use regulations of the CBD-5 zone. The CBD-5 zone allows for a mixture of office, retail, and residential uses supporting Downtown Kirkland². The CBD-5 zone allows buildings of 3 to 5 stories above average building elevation, subject to specific conditions and requirements. This zone requires a 20-foot front setback with no required side and rear setbacks. There is a special requirement for building adjacent to Peter Kirk Park, which has a minimum required setback of 10 feet that may be reduced to 0 feet for those portions of buildings with continuous retail or restaurant uses at street level. Development in this zone must be physically integrated both in area and building design. Area design must include installation of pedestrian linkages consistent with major pedestrian routes in the Downtown Plan chapter of the City of Kirkland Comprehensive Plan.
- **Proposed Action.** This Touchstone (Parkplace) private amendment request would allow redevelopment of the Parkplace retail and office complex located at 457 Central Way with as much as 1.8 million square feet of office, retail, and hotel use. This request would also increase permissible building height from the currently allowed maximum of 3 to 5 stories to a maximum of 4 to 8 stories, allow increases in height within 100 feet of Peter Kirk Park, reduce setbacks from 20 feet to 0 feet along Central Way and 6th Street, and reduce setbacks from 10 feet to 0 feet along Peter Kirk Park. Additional Zoning Code amendments associated with this request include revisions to lot coverage standards, parking requirements, and site planning requirements. Implementation of this request would result in a new zoning designation for this 11.5-acre area, CBD-5A.
- **FEIS Review Alternative.** The FEIS Review Alternative consisted of a modified on-site alternative that was within the range of the No Action and Proposed Action alternatives. The FEIS Review Alternative resulted in the adoption of amendments to the Comprehensive Plan, Zoning Code and zoning map to:
 - Allow for taller buildings (up to 8 stories) in a new zone called CBD-5A, but tie the additional height allowed to provision of interconnected public spaces, pedestrian-oriented development, retail streets, and sustainability measures.
 - Require that development comply with the Parkplace Master Plan and Design Guidelines.
 - Require that the amount of retail provided equal at least 25% of the office space provided in the development.
 - Allow other land uses including hotel, athletic club, and movie theaters subject to conditions.
 - Prohibit the following retail establishments from exceeding 70,000 square feet; at-grade drive-through facilities; and outdoor storage, sale, service and/or rental of motor vehicles, sailboats, motor boats, and recreational trailers.

² The zone allows for but does not require housing in a mixed use development. In 2004, the City studied retail, office, and housing on the Parkplace site. In 2008, the focus was on retail and office due to market conditions.

- Establish four height districts in CBD-5A with lower heights to the north and west and up to 115 feet maximum height, equivalent to the 8-story maximum height discussed in the Proposed Action.
- Require submittal of a study to justify parking less than required in the zoning code based on shared use and inclusion of a transportation management plan (TMP) and parking management plan (PMP) as part of the parking reduction study.
- Establish specific setback and upper-story setback requirements based on location which are either consistent with or more restrictive than those of the Proposed Action:
 - Central Way. No setbacks along Central Way and 6th Street,
 - Peter Kirk Park. A 55-foot minimum setback adjacent to the park, and
 - South/southeast boundary. A 20-foot minimum setback along the south portion of the area adjacent to the existing office and residential uses.
- Provide pedestrian connections as outlined in the existing Moss Bay Neighborhood Plan.

In December 2008, the City adopted ordinances approving the FEIS Review Alternative.

The range of building space and building heights considered in the FEIS alternatives is summarized in Table 1. Appendix A provides additional summary information comparing the alternatives.

Table 1. Touchstone (Parkplace) FEIS Alternatives

Alternative	Office SF	Retail SF	Total SF	Building Stories
Existing Conditions/ Current Uses	95,300	143,150	238,450	1-6 stories
No Action (Comprehensive Plan and Zoning in place prior to December 2008)	629,500	209,200	838,700	3 - 5 stories
Proposed Action	1,200,000	592,700	1,792,700	4 - 8 stories
FEIS Review Alternative (adopted December 2008)	1,200,000	592,700	1,792,700	Variable up to 8 stories [1]
Net change from No Action	570,500	383,500	954,000	+3 stories

[1] Standards are equivalent to the 8-story maximum height discussed in the Proposed Action, and varied near Peter Kirk Park and Central Way:

Up to 115 feet in CBD-5A zone with following exceptions:

Up to 60 feet in height within 100 feet of Peter Kirk Park,

Transitional height area of up to 100 feet between 100 feet and 120 feet of Peter Kirk Park; and

Up to 100 feet within 100 feet of Central Way.

SF = square feet

The approximate net increase in growth between the No Action and Proposed Action for the Touchstone (Parkplace) site is 954,000 square feet. The FEIS Review Alternative included the same square footage but designed with different height and setbacks in relation to Peter Kirk Park and Central Way. Appendix A further summarizes the alternatives considered in the 2008 FEIS.

III. Site Selection Methodology

The commercial growth alternatives site selection process used in this study is iterative and comprises three steps that are intended to identify and screen sites using a successive application of

criteria relating to size and development capacity, City land use policies, environmental constraints, defined objectives, and other criteria. The steps in the process include:

1. **Broad Site Identification and Evaluation.** This step involves reviewing properties citywide for their site size/development capacity, major environmental constraints, compatibility with comprehensive plan vision and policies, and extent of prior neighborhood studies. Results show that the site(s) compatible with the criteria are located in or near the CBD.
2. **CBD Site Identification.** Considering the results of the broad site identification in Step 1, Step 2 identifies an array of potential sites for additional employment growth in and near the CBD. Sites are reviewed for their size, environmental, and other constraints. Results of Step 2 identify five sites that can be evaluated against objectives defined for the proposal.
3. **CBD Sites – Focused Evaluation.** Step 3 reviews the CBD sites identified in Step 2 against defined objectives regarding their capacity for employment, opportunity for successful retail, ability to create amenities due to size or common ownership, neighborhood compatibility, and location in proximity to transit. Using the evaluation in Step 3, recommendations are made about which alternatives should be studied further in a SEIS.

IV. Step 1: Broad Site Identification and Evaluation

Step 1 reviews properties citywide for the following characteristics:

- **Size and capacity for employment growth.** A single large site under common ownership is anticipated to be more feasible to accommodate the 954,000 square feet of additional commercial uses. Common ownership generally provides a significant advantage for site planning and development. Sites currently designated and zoned for commercial and office uses have been previously identified and evaluated as suitable for employment uses, and are, therefore, considered less likely to generate significant land use conflicts to adjacent uses.
- **Consistency with the City's Comprehensive Plan vision and growth policies.** City policies identify priority areas for employment growth and promote infill development.
- **Major environmental constraints.** Sites located in areas with large amounts of critical areas are less likely to be able to accommodate large employment increases.
- **Extent of prior land use studies.** Some areas have been previously well studied and can offer direction about employment sites.

Each criterion is evaluated below. A summary of the screening results and sites recommended for further review in Step 2 are provided.

a. Site Size and Employment Capacity

To accommodate an additional 954,000 square feet of commercial uses, large commercial sites in common ownership are most desirable. A site of approximately 10+ acres would be desirable to avoid extremely high floor area ratios (FARs) and to provide a comparison to the Parkplace site. Figure 1 presents sites containing over 10 acres that are in common ownership (outlined in blue boundaries). Figure 2 shows current zoning with large sites outlined in dark blue boundaries.

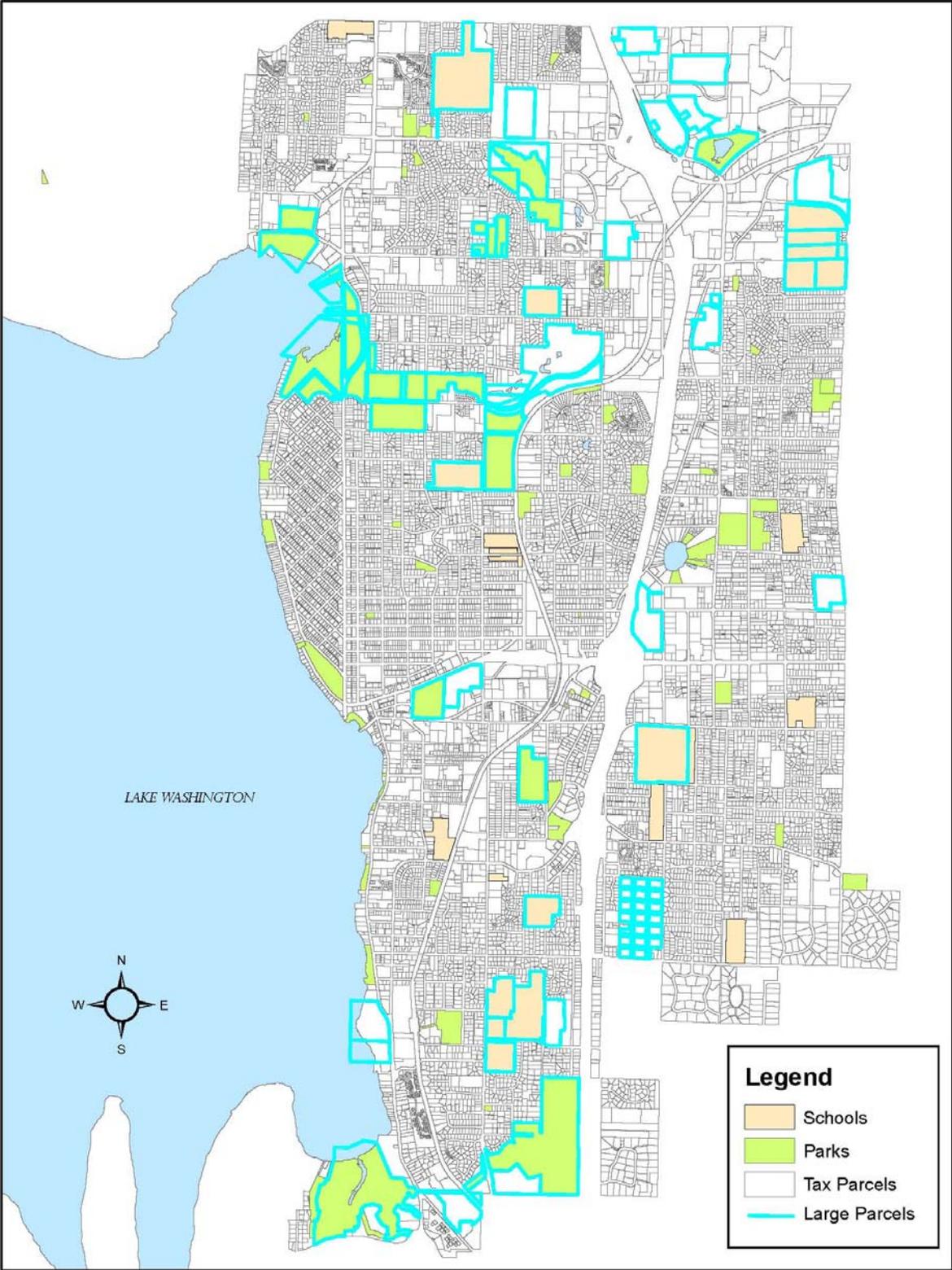


Figure 1. Large Properties (Outlined in Blue) in Common Ownership

Most of the large sites identified in the City are institutional properties such as parks, schools, a hospital, university, or a landfill. Such sites are not considered feasible alternatives for commercial or office development because the existing uses are generally public or quasi-public in nature and displacement of such uses would cause a significant loss of an amenity or a valuable service. The remaining non-institutional sites are zoned either for residential, office, or commercial purposes. Displacement of existing residential uses is likely to be viewed as a significant impact and, in addition, is not considered practical. Commercial or office zoning was selected as an indication of general consistency with City policy for employment location at a citywide level (see Citywide Vision and Growth below). Of the large sites identified, only five are commercially or office zoned, as described on Table 2. These five sites are already developed with commercial or institutional uses.

Table 2. Large Commercially Zoned Parcels

Site	Size (acres)	Zoning
Totem Lake Shopping Center	25.67	Commercial
Christ Church of Kirkland	12.25	Office
Costco	15.19	Commercial
Parkplace	11.5	Commercial
Carillon Point	15.63	Commercial

Source: Kirkland Planning Department; King County Assessor

b. Citywide Vision and Growth

In addition to site size and commercial/office zoning, it is important to consider whether the sites are located in identified priority areas for growth. The Kirkland Comprehensive Plan Vision Statement calls out two areas as focal points for growth in the community, the Downtown Activity Area and the Totem Lake Urban Center:

“Downtown Kirkland is a vibrant focal point of our hometown with a rich mix of commercial, residential, civic, and cultural activities in a unique waterfront location. Our Downtown maintains a human scale through carefully planned pedestrian and transit-oriented development. Many residents and visitors come to enjoy our parks, festivals, open markets and community events.

Totem Lake Urban Center is an economic and employment center with a wide range of retail, office, industrial and light manufacturing uses as well as a regional medical center surrounded by related services. It is a compact mixed-use urban village with extensive pedestrian- and transit-oriented amenities, higher intensity residential development, public gathering places and cultural activities.”

The City’s vision emphasizing focal points for growth—including Downtown as an Activity Area and Totem Lake as an Urban Center—is reflected on Figure 3.

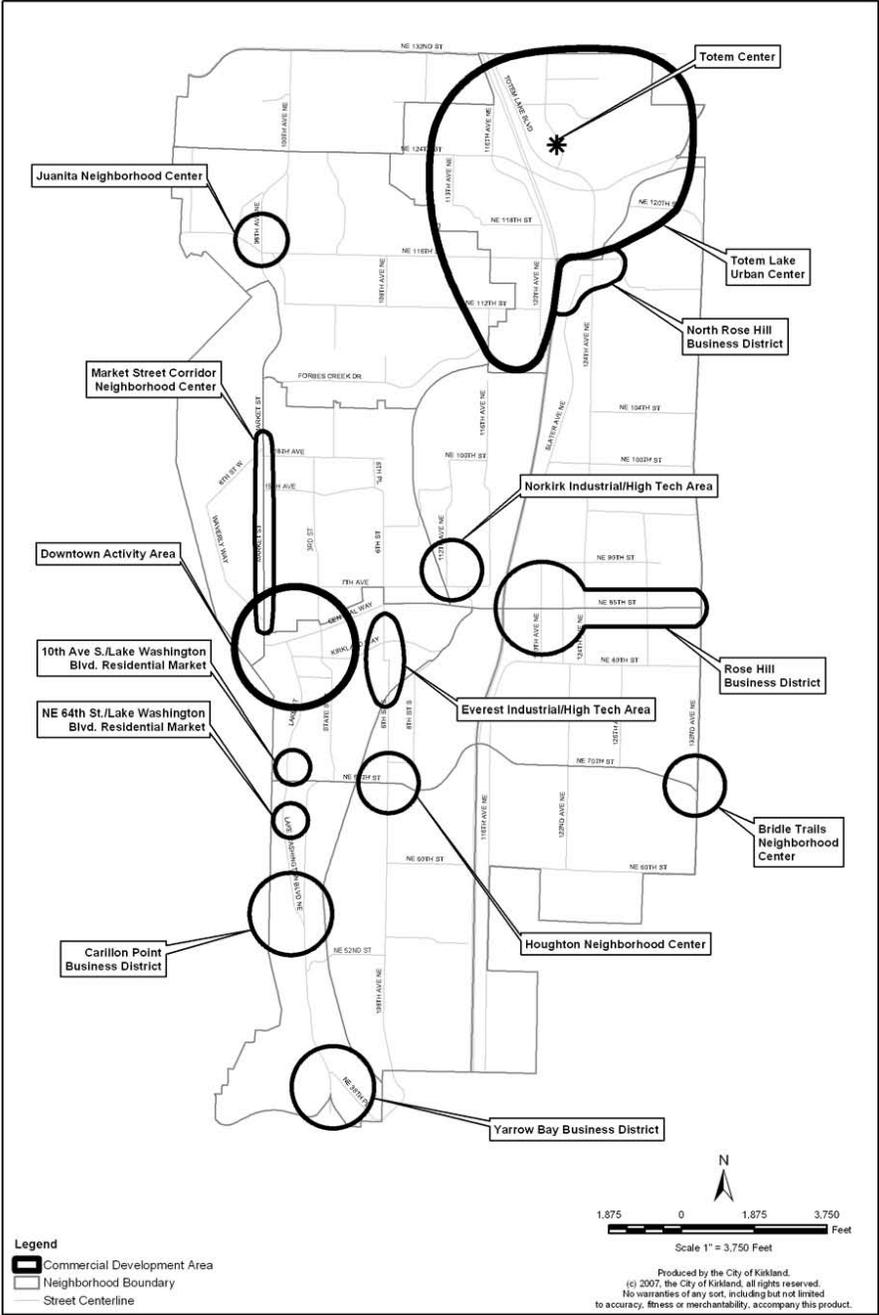


Figure LU-2: Commercial Areas

Figure 3. Hierarchy of Commercial Centers in Kirkland

The focus on Downtown and Totem Lake is also reflected in the Comprehensive Plan's Land Use Concept which is described below:

The fundamental goal of the Land Use Element is to maintain a balanced and complete community by retaining the community's character and quality of life, while accommodating growth and minimizing traffic congestion and service delivery costs. To accomplish this, the Element:

- Seeks a balanced and complete community with shops, services and employment close to home; numerous civic activities and entertainment options; high-quality educational facilities; numerous parks; and a variety of housing choices.
- Identifies the values which must be weighed in managing growth. Goals and policies promote a land use pattern that is orderly, compact, well-designed, and responsive both to the natural and physical environment.
- Proposes a land use pattern that supports a multimodal transportation system and results in more efficient service delivery. Placing urban neighborhoods around commercial areas – called “centers” or “villages” in other communities – allows residents to walk or bicycle to corner stores or neighborhood centers, and then connect by transit to other commercial areas. High-capacity transit could connect and serve larger commercial areas, both inside and outside of the community.
- Protects existing residential neighborhoods. Goals and policies support a stable nucleus of single-family housing and more housing options. Higher-density residential areas continue to be located near commercial centers and transportation hubs.
- Supports a range of employment opportunities in the City and sets out standards for vibrant commercial areas. Opportunities for new growth are provided in the Totem Lake Center and Downtown Kirkland. Other existing commercial areas in the City are maintained and strengthened. While not encouraging heavy industry, goals and policies work to preserve opportunities for higher-paying jobs to locate in the City.
- Encourages preservation of an open space network, including environmentally sensitive areas, recreational facilities, and the shoreline; and
- Acknowledges the City's regional role in working with other jurisdictions and the County to site regional facilities.

The comprehensive plan notes that Downtown, also called the CBD “...has historically been the center of commercial activity in Kirkland... and has the most dominant role in contributing to the City's identity.” A key land use policy for Downtown follows:

Policy LU-5.3: Maintain and enhance Kirkland's Central Business District (CBD) as a regional Activity Area, reflecting the following principles in development standards and land use plans:

- *Create a compact area to support a transit center and promote pedestrian activity.*
- *Promote a mix of uses, including retail, office and housing.*
- *Encourage uses that will provide both daytime and evening activities.*
- *Support civic, cultural, and entertainment activities.*
- *Provide sufficient public open space and recreational opportunities.*
- *Enhance, and provide access to, the waterfront.*

The Comprehensive Plan describes Totem Lake as “a major center of employment and trade for the City” which has the “...most land devoted to commercial, industrial and office uses in the City, and

the second-highest residential densities per residentially developed acre.” An important land use policy is stated below:

Policy LU-5.4: Support Totem Lake’s development as an Urban Center with a diverse pattern of land uses.

- Recognize Totem Center, the area around Totem Lake Mall and Evergreen Healthcare Medical Center, as the “core” district where the highest densities and intensities of land use are focused.
- Create a compact area to support the planned transit center and promote pedestrian activity.
- Encourage uses which will provide both daytime and evening activities.
- Provide sufficient public open space and recreational opportunities.
- Enhance the natural condition and function of Totem Lake.
- Affirm or create a “sense of identity” for the Totem Lake Urban Center.
- Provide an interconnected street system for pedestrian and vehicular access.

Further, City policies state that infill development – concentrating growth in existing areas instead of expanding the boundaries of commercial districts – is preferred:

Policy LU-5.2: Maintain and strengthen existing commercial areas by focusing economic development within them and establishing development guidelines.

The intent of this policy is that future economic development be concentrated in existing commercial areas. This concentration can help to maintain and strengthen these areas and also promote orderly and efficient growth that minimizes impacts and service expansion costs. Concentration also allows businesses to benefit from proximity to each other. Intensification, rather than expansion of the boundaries of existing commercial areas into surrounding residential neighborhoods, is desirable. Infilling is preferred, particularly when it would create a denser pattern of development that is focused less on the private automobile and more on the opportunity for multiple transportation modes. Redevelopment may also provide new opportunities, especially in commercial areas where the community vision has changed over time.

Key employment policies are consistent with the Land Use Concept by promoting strong employment areas with new growth or redevelopment and infill:

Policy ED-3.1: Promote economic success within Kirkland’s commercial areas.

The Land Use Element sets forth the general land use development pattern for Kirkland’s commercial areas. Consistent with each Neighborhood Plan there will be opportunities to strengthen commercial areas in the types of businesses provided and redevelopment opportunities....

Policy ED-3.3: Encourage infill and redevelopment of existing commercial areas consistent with the role of each commercial area.

Kirkland’s commercial areas have the potential for increasing economic activity by infilling underutilized land or redeveloping without expanding district boundaries. Consistent with the Land Use Element and Neighborhood Plans, commercial areas are encouraged to be intensified where it will result in superior redevelopment. Expansion of commercial area boundaries should be discouraged and considered only when adequate transitional uses or buffer issues can be resolved to reduce potential adverse impacts. To maintain the land use capacity to support

the local economy, it will be necessary to encourage full utilization of planned development potential within employment centers, monitor commercial development activity, and maintain efficient infrastructure systems.

In summary, at a citywide scale, the City's policies focus growth around centers, in particular at the Downtown Activity Area and Totem Lake Urban Center, and within these centers, prefer infill development to expanding centers in order to protect the character of established residential neighborhoods.

Of the five large sites in common ownership and with commercial or office zoning, three are located in priority locations for growth – two are in Totem Lake Urban Center and one is in the CBD as shown in Table 3. Results show:

- Two sites—Totem Lake Shopping Center and Parkplace—are the highest rated sites due to their location in mixed use areas with nearby services and amenities, compact development standards, proximity to transit centers, distance from single-family residential areas, lack of major environmental constraints, and focus of jobs in priority centers.
- The Christ Church of Kirkland occupies a former warehouse on a steep and forested property, and is rated lower than the Totem Lake Shopping Center and Parkplace site, due to presence of environmental conditions, and distance from transit centers, as well as zoning that currently precludes retail.
- The Costco and Carillon Point sites are located outside of priority locations for growth, and are distant from centrally located services, transit centers, and other features. In addition, the Carillon Point site is located along the Lake Washington shoreline and in the vicinity of lower density residential development.

Table 3. Large Commercially Zoned Parcels—Land Use Concept Evaluation

Location	Site	Size (acres)	Land Use Concept					
			Balanced & complete: variety of uses, services, amenities	Orderly, compact	Supports multiple modes and efficient services	Protects single-family residential areas	Job growth/ focus in Totem Center and Downtown	Preserve open space, recreation, and shoreline
Totem Lake Urban Center	Totem Lake Shopping Center	25.67	●	●	●	●	●	●
Totem Lake Urban Center	Christ Church of Kirkland	10.55	○	○	○	●	●	○
Rose Hill	Costco	15.19	○	○	○	●	○	●
Downtown / CBD	Parkplace	11.5	●	●	●	●	●	●
Lakeview	Carillon Point	15.63	○	○	○	○	○	○

High: ● - Site is located in an area strongly exhibiting characteristics of land use concept

Medium: ○ - Site located in an area moderately exhibiting characteristics of land use concept

Low: ○ - Site located in an area not meeting characteristics

c. Major Environmental Constraints

Sites with large amounts of environmental constraints, such as large or complex wetlands, intact streams, floodplains, and geologic hazards would be more difficult to develop with large employment uses. Commercial or office-designated sites tend to be in already-developed areas with fewer constraints than other areas of the City. The five large commercial-zoned sites have minor to moderate constraints as described in Table 4 and shown in Figures 4 and 5.

Table 4. Large Commercially Zoned Parcels—Environmental Constraints

Site	Environmental Constraints
Totem Lake Shopping Center	Seismic hazard (soil liquefaction). High landslide hazard area immediately to the north of Totem Lake Mall.
Christ Church of Kirkland	Medium landslide hazard. Due to location of steep slopes and forested areas, redevelopment may be more difficult.
Costco	Piped stream along periphery. Seismic hazard (soil liquefaction).
Parkplace	Piped stream along periphery. Adjacent to medium landslide hazard area.
Carillon Point	Lake Washington shoreline. Carillon Creek. Seismic hazard (soil liquefaction).

Source: City of Kirkland; ICF International

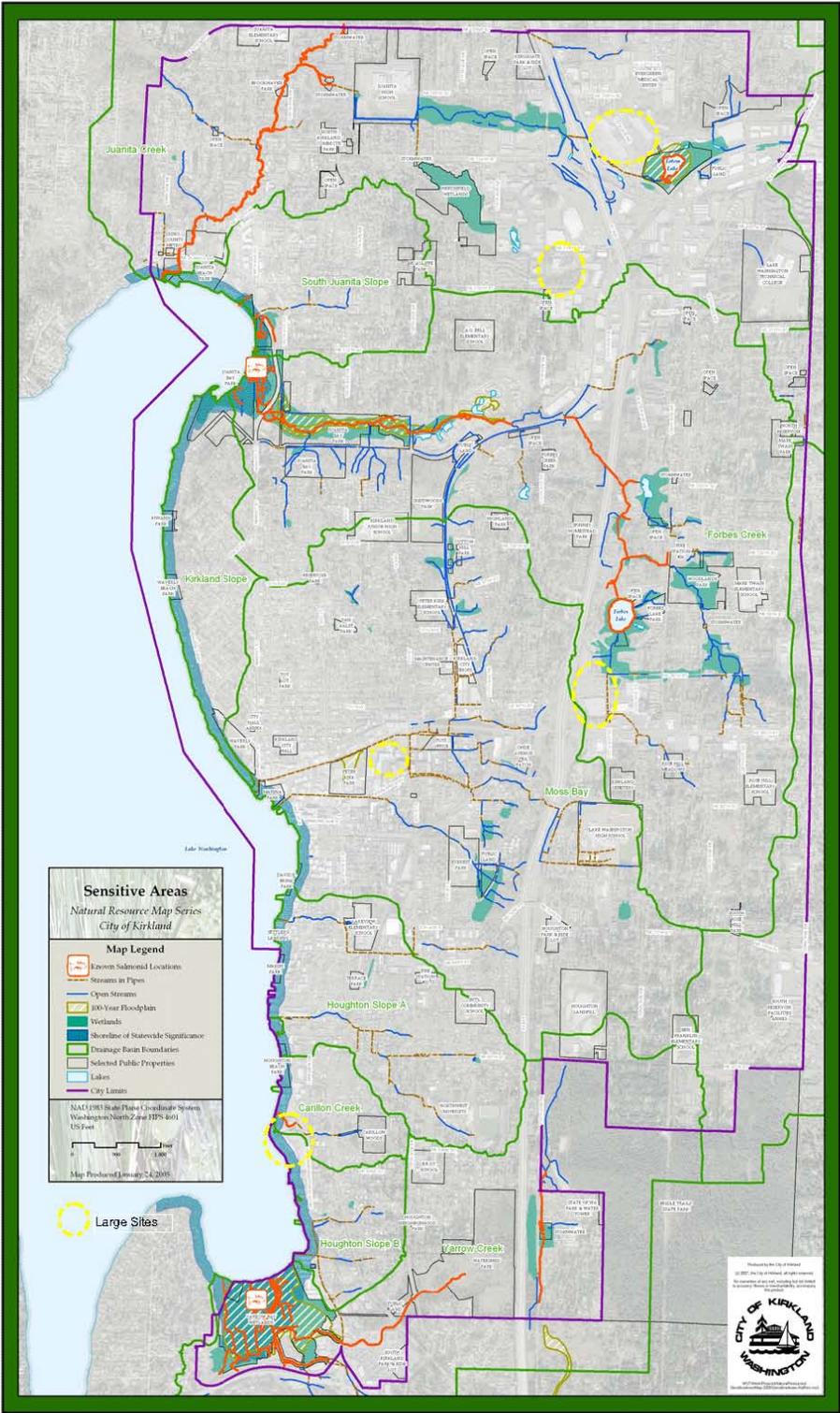
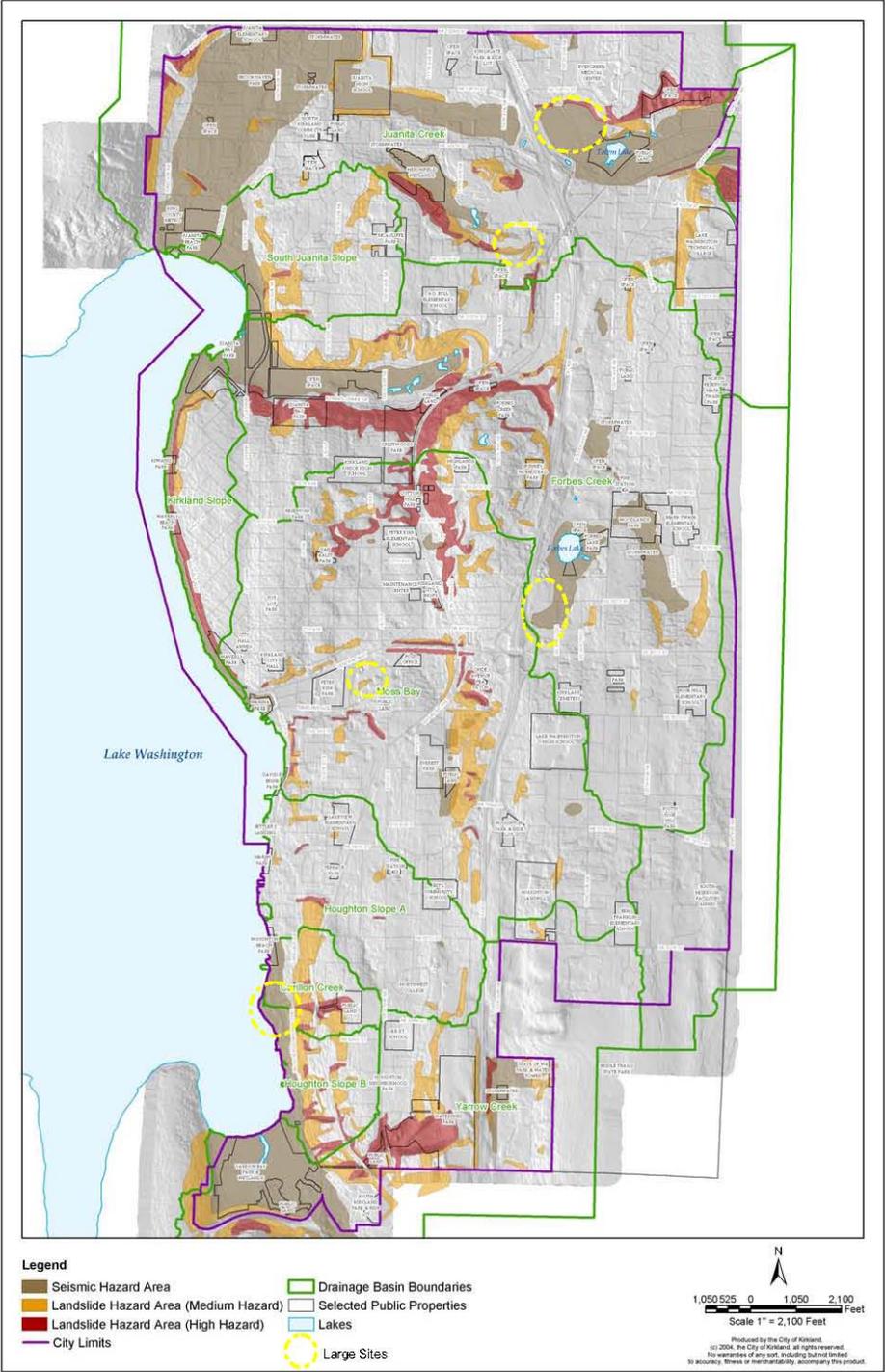


Figure 4. Sensitive Areas (Large Sites Outlined in Yellow)



2004 City of Kirkland Comprehensive Plan EIS
Figure 3-2: Landslide and Seismic Hazard Areas

Figure 5. Geologic Hazards (Large Sites Outlined in Yellow)

The City protects sensitive areas through its Critical Areas Regulations, which prescribe studies and protective measures such as buffers or development techniques to reduce the risk of potential impacts to ecological functions and human safety.

d. Prior Land Use Studies – Downtown and Totem Center

The Comprehensive Plan contains neighborhood plans for all neighborhoods in the City. The five large sites in common ownership are addressed by different neighborhood plans:

- Totem Lake Neighborhood Plan: Totem Lake Shopping Center Site and Christ Church of Kirkland
- North Rose Hill Neighborhood Plan: Costco Site
- Moss Bay Neighborhood Plan: Parkplace Site
- Lakeview Neighborhood Plan: Carillon Point Site

Each plan was developed with public participation, detailed planning analysis, and SEPA review. Some areas have been studied to greater degrees, such as the Totem Lake Neighborhood.

In 2004, the City adopted the tallest heights in the City in Totem Center—at up to 160 feet. The zoning amendments for Totem Center were analyzed through an EIS Addendum dated February 2004. In the City's studies, building heights of up to 180 feet were considered, but ultimately building heights of 160 feet were approved through the consideration of shade/shadow and neighborhood compatibility effects.

Also in 2004, the City prepared and completed an EIS for its comprehensive plan update. The focus of the 2004 EIS was the City's Growth Management Act (GMA)-required comprehensive plan update and the City's 2022 growth targets and land capacity. The 2004 EIS studied the spread of growth across neighborhoods from a citywide perspective. In addition, Totem Center's development capacity was evaluated in greater detail³. Properties were studied for heights up to between 135 and 160 feet (or approximately 9 to 13 stories assuming 12 to 15 feet per floor).

Tables 5 and 6 present the growth assumptions for the various neighborhoods in the 2004 EIS. Moss Bay (including Downtown) and Totem Lake neighborhoods were slated to take more growth than other neighborhoods including North Rose Hill and Lakeview.

Downtown (Moss Bay) as of 2004 was expected to contain 12% of the City's total housing and 15% of the City's total employment by the year 2022. In terms of net growth citywide, the Downtown share was 13% residential and 18% employment. When converted to square feet⁴, Moss Bay employees would be housed in 2,013,992 square feet of office and commercial space in 2022.

The 2004 Comprehensive Plan expected that 11% of the City's total housing and 42% of the City's total employment will have occurred within the Totem Lake neighborhood by 2022. In terms of net growth citywide, Totem Lake's share was 23% residential and 55% employment. See Tables 5 and 6. Totem Lake employees would be housed in approximately 6,305,132 square feet of office and commercial space in 2022 using assumptions similar to those calculated for Moss Bay above.

³ Studied to support a categorical exemption for new residential and mixed-use development per RCW 43.21C.229.

⁴ Approximately 250 square feet per office employee, and 500 square feet per commercial employee, consistent with 2008 FEIS assumptions for Parkplace.

Table 5. Employment by Neighborhood

Neighborhood	2003 Employees	2003% Share	2022 Employees	2022% of Total	2003-2022 Net Employees	2022 Net% of Total
Lakeview	8,152	23	8,306	20	150	3
Moss Bay	5,243	15	6,253	15	1,066	18
Houghton	494	1	586	1	33	1
Bridle Trails	604	2	604	1	0	0
Everest	2,132	6	2,379	6	244	4
South Rose Hill	259	1	497	1	238	4
North Rose Hill	1,947	6	2,609	6	549	9
Market	838	2	955	2	135	2
Norkirk	933	3	1,126	3	121	2
Highlands	0	0	0	0	0	0
South Juanita	1,047	3	1,099	3	74	1
North Juanita	9	0	91	0	80	1
Totem Lake	13,227	38	17,396	42	3,257	55
Sum	34,885	100	41,902	100	5,947	100

Source: Final Environmental Impact Statement for Proposed City of Kirkland Comprehensive Plan, issued October 15, 2004

Table 6. Proposed Action—Housing by Neighborhood

Neighborhood	2003 Dwellings	2003% Share	2022 Dwellings	2022% Share	2003-2022 Net Dwellings	2022 Net% Share
Lakeview	1,617	7	1,717	6	100	2
Moss Bay	2,469	11	3,178	12	709	13
Houghton	1,383	6	1,649	6	266	5
Bridle Trails	858	4	1,024	4	166	3
Everest	635	3	769	3	134	2
South Rose Hill	1,106	5	1,621	6	515	10
North Rose Hill	3,154	14	4,140	15	986	18
Market	935	4	1,002	4	67	1
Norkirk	1,512	7	1,700	6	188	3
Highlands	974	4	1,130	4	156	3
South Juanita	3,777	17	4,515	16	738	14
North Juanita	1,812	8	1,938	7	126	2
Totem Lake	1,888	9	3,141	11	1,253	23
Sum	22,120	100	27,524	100	5,404	100

Source: Final Environmental Impact Statement for Proposed City of Kirkland Comprehensive Plan, issued October 15, 2004

Since the time the environmental review was conducted in Totem Center, the City has entered into a development agreement with the Totem Lake Shopping Center owners. The development agreement approved by the City Council addresses the redevelopment of the mall including substantial

demolition of existing buildings, new construction of buildings for residential, retail, and office purposes, parking structures, a public plaza, and realignment of 120th Avenue NE.

In summary, both Downtown and Totem Lake Urban Center are planned to receive the bulk of growth in the City, particularly employment. Further, more than one-half of the employment growth has been planned to occur in Totem Lake, and the area's zoning already reflects a higher intensity pattern with buildings up to 135 to 160 feet, the tallest allowed in the City.

e. Summary Broad Site Identification and Evaluation

In Step 1, five sites were shown to be sufficiently large, in common ownership, and commercial or office designated. Table 7 shows the four sites and evaluates them according to broad criteria including citywide vision and growth, major environmental constraints, and prior studies.

Table 7. Large Commercially Zoned Parcels—Summary Evaluation

Location	Site	Size (acres)	Broad Site Evaluation Criteria		
			Citywide Vision and Growth	Major Environmental Constraints	Prior Studies
Totem Lake Urban Center	Totem Lake Shopping Center	25.67	In priority employment growth area	Moderate	Part of Citywide review. Detailed study for growth and height in neighborhood. Detailed development agreement to redevelop center.
Totem Lake Urban Center	Christ Church of Kirkland	12.25	In priority employment growth area	Moderate	Part of Citywide review. Detailed study for growth and height in neighborhood. Zoning currently precludes retail.
Rose Hill	Costco	15.19	Outside of priority employment growth area	Minor	Part of citywide review. Already developed.
Downtown/ CBD	Parkplace	11.5	In priority employment growth area	Minor	Part of Citywide review. Undergoing detailed review.
Lakeview	Carillon Point	15.63	Outside of priority employment growth area	Moderate	Part of citywide review. Already developed.

Source: Kirkland Planning Department; King County Assessor; ICF International

The City has considered extensive growth in the Totem Lake Urban Center and Totem Lake Neighborhood, which has:

- an existing and recently updated neighborhood plan (2004),

City of Kirkland

- the most land devoted to commercial, industrial and office uses in the City,
- the tallest building heights in the City, studied in 2004,
- capacity for 55% of the City's employment growth through 2022, and
- a detailed development agreement for the redevelopment of Totem Lake Shopping Center.

Due to the extensive study of Totem Lake Neighborhood, the already significant heights in this area, and the detailed development plans for the Totem Lake Shopping Center, carrying forward this site as an alternative location for growth in place of growth in Downtown is not recommended. As a practical matter, the existing development agreement and sub-area plan preclude locating significant additional development on the site, and it is not considered to be a reasonable off-site alternative.

The Christ Church of Kirkland property is located in the Totem Lake Neighborhood, which has already been studied for significant growth. The current use of the site for religious purposes and the presence of steep slopes and forested conditions make it unlikely that the site will convert to more intensive commercial uses. The present zoning would require an amendment to allow retail. This site is not recommended to be carried forward.

The Costco site is already developed with a successful auto-oriented commercial use, and it is located outside of priority areas for employment growth in Downtown or Totem Lake Neighborhood. The Costco area is located along Interstate (I)-405 and away from the CBD where the City has made extensive investments in transit, pedestrian orientation, and other amenities. This site is not recommended to be carried forward.

The Touchstone (Parkplace) proposal allows for infill development in an existing commercial center, Downtown. The proposal may signal a greater market for commercial development Downtown, at scales not previously studied. The Parkplace site was evaluated in a prior EIS. Other sites within the Downtown area should be evaluated further for a potential off-site alternative.

The Carillon Point site is already developed with a relatively dense waterfront commercial and residential complex. The site is located much further from the concentrated services and amenities in Downtown. The site is adjacent to residential neighborhoods and the shorelines of Lake Washington, and substantial intensification would likely result in significant land use conflicts and shoreline impacts. This site is not recommended to be carried forward.

In summary, the Totem Lake Shopping Center, Christ Church of Kirkland, Costco, and Carillon Point sites are not recommended for further study for different reasons.

Although large sites are not available in the Totem Lake Neighborhood or the Downtown/CBD, aggregations of smaller parcels could also be considered. However, the Totem Lake Neighborhood is currently planned to take more than 50% of the City's employment growth, and the City has already studied the tallest heights in the City in this neighborhood. Therefore, locating additional growth in the Totem Lake Center is not recommended for further evaluation. The Parkplace redevelopment is considered to be an indication of market interest in the Downtown/CBD, which is a designated Activity Area. Thus, alternatives to the Touchstone (Parkplace) proposal that are recommended to be studied further are those located in or near the CBD, which is a priority location for employment growth. Due to the lack of large parcels in common ownership, aggregations of smaller commercial parcels in or near the CBD are considered further in Step 2.

V. Step 2: Central Business District Site Identification

In Step 1 the CBD was found to be a priority location for employment growth and appropriate for additional study for potential sites. However, no large properties of 10+ acres, designated for commercial uses in single ownership, are available in the CBD aside from Parkplace. Thus, the next step in the site identification study considers aggregations of smaller commercial, office, or industrial parcels in the CBD. While such sites are not consistent with the criteria established in Step 1, this study will further evaluate their feasibility for employment or commercial growth to see if they are suitable for consideration as an off-site alternative.

Similar to the broad site identification and evaluation in Step 1, City staff considered the following factors to identify sites in the Downtown vicinity that may have additional capacity for growth beyond that addressed in the 2004 Comprehensive Plan:

- location in the CBD,
- fronting on/access from principal arterial,
- large site (preferably 10 acres or more) which is in common ownership,
- absence of significant environmental constraints,
- land use adjacency and conflicts, scale and compatibility,
- other constraints (such as need to rezone for commercial use; sewer and water availability), and
- development capacity of approximately 954,000 square feet.

The City reviewed maps and development conditions and then identified five sites in or adjacent to the CBD for further evaluation. The sites considered are shown on Figure 6 and include:

- The Superblock
- The Substation Block
- The Post Office Block⁵
- CBD 7 & PLA 7B Blocks
- CBD 1B Core Block

Table 8 provides a summary of how each site fares against each of the factors listed above. “Factor a” identifies the block’s CBD location, an area where the City has planned additional mixed use growth, infrastructure, and amenities. “Factor b” identifies whether the site fronts on or takes access from a principal arterial, important for visibility and circulation in employment and retail areas. “Factor c” identifies the site size, reflecting the ability of the area to accommodate greater development levels. “Factor d” indicates if there are environmental constraints which may affect the feasibility or cost of redevelopment. “Factor e” indicates if there are any other constraints such as regulatory or water/sewer infrastructure conditions. “Factor f” presents how much development capacity each block may have under different assumptions.

⁵ A recent news article indicates that the Post Office site may be put up for sale (www.nwcn.com/PugetSound-Post-Office_Locations0for-sale-899). However, the Post Office may lease back these sites for continued use as a post office facility. While the site may not remain in public ownership, it may continue as a public use. The availability and viability of the Post Office site is, therefore, uncertain.

The results of the initial screening in Table 8 show the following:

- The sites are located in or adjacent to the CBD.
- The sites front or take access from a principal arterial directly or indirectly (via minor arterial or collectors).
- The blocks range in size. Blocks contain less than 10 acres, except for the Superblock, which is greater than 10 acres. The sites contain parcels with multiple owners.
- All reviewed sites have minor to moderate critical areas that would require further evaluation and compliance with City critical areas regulations.
- All sites would require some kind of zoning change, though to different degrees. The Superblock, CBD-1B, and CBD-7 blocks would maintain primary uses of retail and/or office, as is presently allowed in zoning, though the intensity of the use including height and bulk would change. The Substation, Post Office, and PLA-7B blocks would require rezones since retail is not a primary use in these areas. On these latter blocks, the current uses and future use would change to more commercial/retail and office uses, replacing industrial, smaller scale office, or residential uses, respectively. In addition, the intensity of use would increase substantially. Generally, land use conflicts/incompatibility would need additional study to determine the significance of the impacts and any mitigation measures.
- Some blocks or portions of blocks were studied in the 2008 FEIS, and water/sewer results are similar to those findings. Some properties may require future review at the permit stage regarding fire flow. In general, this is considered to be a minor constraint that can be addressed through facility upgrades. See Appendix B.
- The Superblock is the largest block and has the capacity for additional growth. The capacity of other blocks varies, but is less than the Superblock.

Each site is carried forward for a more detailed evaluation against defined objectives in Section VI.

Table 8. Short List of Sites—Factors Considered

a. CBD location	b. Arterial location	c. Site Size	d. Environmental Constraints	e. Other Constraints	f. Development Capacity (Square Feet)		
					No Action [1]	CBD-5A Stds [2]	+954,000 SF on block [3]
Superblock – in CBD (CBD5 & CBD5A)	Fronts primary arterial (Central) and minor arterial (Kirkland Way)	17.5 acres multiple owners	Piped stream in right of way. Potential medium landslide hazard in center.	Designated for retail and office uses. Would require modifying height and bulk standards on the whole block. Water and sewer results similar to 2008 FEIS.	1,052,226	2,723,856	2,007,120
Substation Block – Adjacent to CBD	Access from primary arterial (NE 85th) via collector (6th). Also fronts 7th Avenue, a collector.	4.0 acres multiple owners	Open stream along frontage. Adjacent to medium landslide hazard.	Area designated for light industrial; rezone required. Adjacent to but outside CBD. Substation limits change. Sewer results similar to 2008 FEIS. Fire flow would need to be investigated further at the permit level.	113,227	613,946	1,067,733
Post Office Block – Adjacent to CBD	Access from primary arterial (NE 85th) via minor arterial (6th); block has one access which could be a bottleneck. [4]	7.6 acres multiple owners	Piped and open streams along periphery of lots. Adjacent to high landslide hazard.	Area designated for office; rezone required. Adjacent to but outside CBD. Availability uncertain. Altom property (part of this location) was recently studied. Water and sewer results similar to 2008 FEIS.	154,491	1,186,614	1,163,298

a. CBD location	b. Arterial location	c. Site Size	d. Environmental Constraints	e. Other Constraints	f. Development Capacity (Square Feet)		
					No Action [1]	CBD-5A Stds [2]	+954,000 SF on block [3]
CBD 7 & PLA 7B Blocks – In and adjacent to CBD	Fronts primary arterial (Central)	5.7 acres multiple owners	Piped stream in right of way.	PLA 7B designated for residential use, which may result in conflicts. Recent development limits redevelopment potential. Sewer results similar to 2008 FEIS. Fire flow adequate in Central Way.	55,905	888,651	1,010,794
CBD 1B Core Block	Fronts primary arterial (Central) and minor arterial (3rd)	2.3 acres multiple owners	Piped stream in right of way	Small site. Subject of recent height, development & density restrictions. Sewer results similar to 2008 FEIS. Fire flow would need to be investigated further at the permit level.	34,847	359,637	989,633

Sources: Kirkland Community Development Department; ICF International

[1] No Action refers to the development assumed in the City’s plans based on zoning, pending permits, and growth targets to 2022.

[2] Shows theoretical growth level if the standards of the CBD-5A zone were applied to full block instead of current zoning. CBD-5A zoning was proposed with the 2008 FEIS Review Alternative for the Parkplace site.

[3] The amount of square feet that would need to be added to the block to achieve a net growth of 954,000 square feet on that block alone above the No Action growth assumptions– would require new zoning standards in most cases.

[4] Interior block sites which are larger (such as the Post Office property) take access from a local access road.

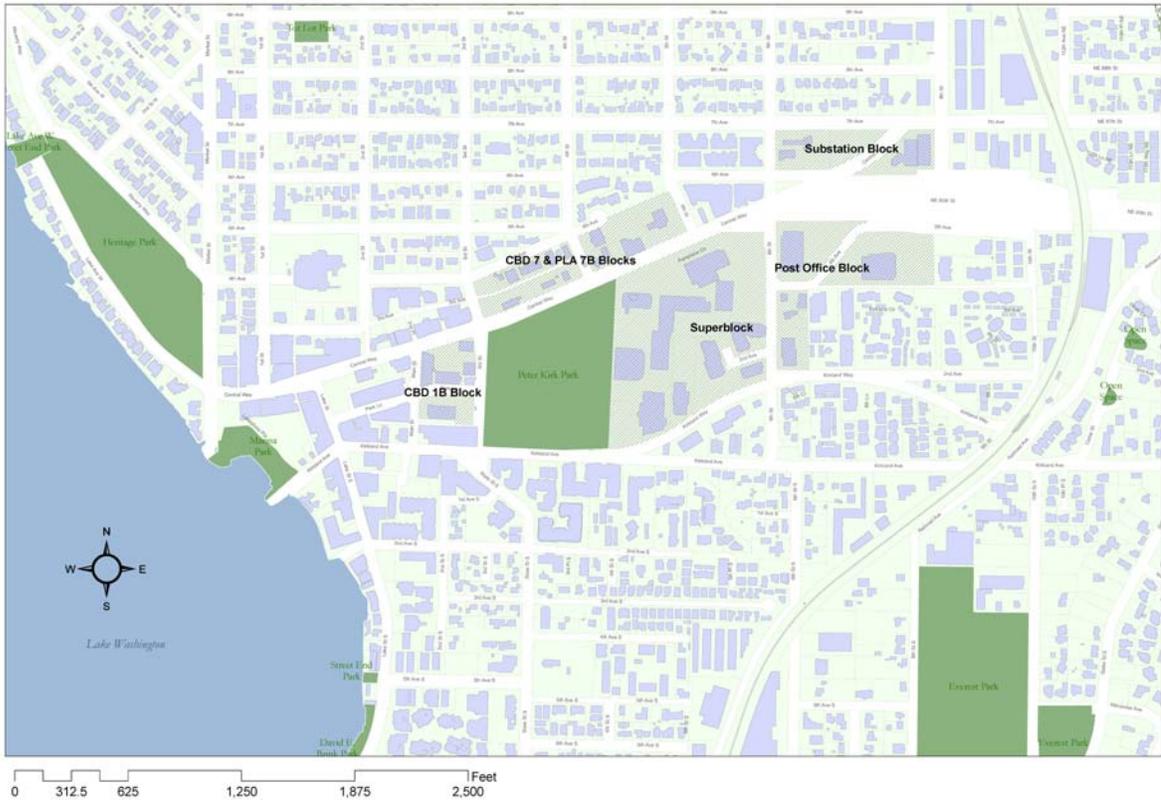
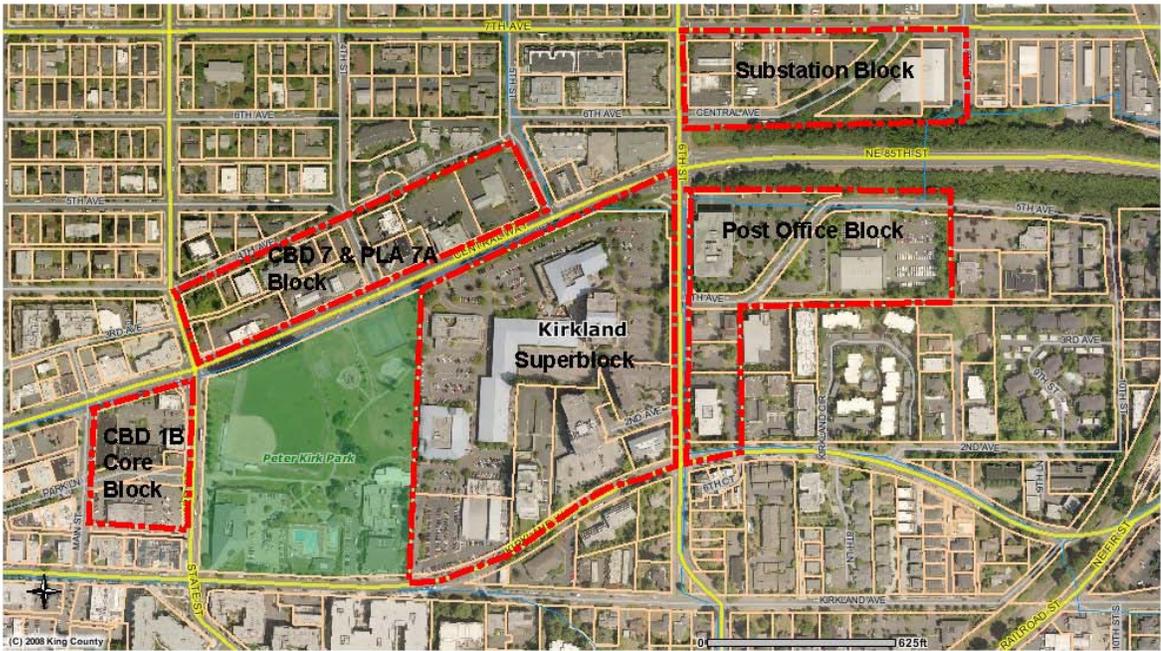


Figure 6. Downtown Study Sites—Aerial and Parcel Map

VI. Step 3: Central Business District Sites – Focused Evaluation

The Downtown Area Planned Action Ordinance FEIS identified the following objectives of the proposal:

Area A, Touchstone Corporation (Parkplace). The applicant's objective for this amendment request is to redevelop Parkplace to create an employment, shopping, and entertainment center that is pedestrian-friendly, is oriented toward Peter Kirk Park, ties the Downtown and eastern cores of the City, and allows for modification of parking and other requirements to create a new urban mixed-use center at this location. The office portions of the center will include large floor plate dimensions that meet high technology needs.

The City's planning process also implicitly addressed the following objectives as part of the Planning Commission's review of the Touchstone (Parkplace) request:⁶

- Provide destination retail and community-serving retail in the Downtown
- Catalyze Downtown redevelopment
- Provide safe and fun places for teens
- More "third place" opportunities for gathering and entertainment
- Economic boost for Downtown business
- Generation of retail sales tax
- Green building design and open space
- Creating a north-south street across the super-block

For the purposes of identifying reasonable alternatives to the Touchstone (Parkplace) proposal, the following objectives reflect information in the Comprehensive Plan and recommendations by the Planning Commission. The objectives and sites are reviewed in Table 9:

A. **Capacity for Employment:** Develop a vital Downtown employment base and concentrate jobs in an appropriate urban environment. Significantly increase office square footage adjacent to the Downtown core as a way to enhance the core area for retail and service businesses. Encourage office as a part of mixed use development to promote a more compact and sustainable land use pattern.

(Supporting Comprehensive Plan goals and policies LU-5.3, LU-6, LU-6.2, ED-1, ED-1.2, ED-3, ED-3.1, ED-3.3, ED-3.5)

B. **Create Opportunities for Successful Retail Uses:** Create a vibrant destination retail development in Downtown. Encourage neighborhood convenience retail that will give residents the option of shopping in Kirkland. Create enhanced retail activity and increased retail sales tax for the City.

(Supporting Comprehensive Plan goals and policies LU-5.3, LU-6, LU-6.2, ED-1, ED-1.2, ED-3, ED-3.1, ED-3.3, ED-3.5)

⁶ See *Davidson Serles v. City of Kirkland* (October 5, 2009), Case No. 09-3-0007. Objectives are not required but are recommended. The Board discerned the objectives from Planning Commission recommendations to the City Council:

C. Site Size and Configuration that Encourages Amenities: Size and configuration of site allows the creation of high quality public open spaces. Create more “third places” where residents can go to gather, be entertained, and socialize in a variety of indoor and outdoor settings. Create safe and fun places for Kirkland’s youth to go and meet their friends. Activate open space edges with ground floor retail uses.

(Supporting Comprehensive Plan goals and policies LU-5.3)

D. Pedestrian Orientation: Strengthen existing pedestrian connections and create new pedestrian connections. Create new north-south street that breaks up the “Superblock” and provides additional pedestrian and vehicular connections.

(Supporting Comprehensive Plan goals and policies LU-3.1, LU-3.6, LU-5.1, LU-5.3, and T-2. T-2.1)

E. Neighborhood Compatibility: Ensure that intensive mixed use development is sited to reduce land use conflicts with existing residential neighborhoods.

(Supporting Comprehensive Plan goals and policies LU-1.3 and LU-4)

F. Transit-Oriented Development: Locate additional employment close to existing Downtown transit center and existing Downtown shops and services to reduce dependence on single occupant vehicle use. Support existing Downtown transit center by locating new jobs in close proximity to increase transit ridership and foster improved transit service for the Downtown.

(Supporting Comprehensive Plan goals and policies LU-3.3, LU-5.1, LU-5.3)

In summary, the focused evaluation against these defined objectives shows the following results:

- The Superblock location more closely meets the objectives of employment, retail, pedestrian orientation, and transit-oriented development than the other four sites.
- The Substation block has some capacity for employment, though it lacks visibility, which limits retail and pedestrian activity and; it is also far from the CBD and transit center. The area has seen interest in office development. It is located in an area identified for employment growth though light industrial predominantly.
- The Post Office block has already been zoned and studied for new employment development; the Altom site was previously studied in 2008 for increased employment and building heights of 60 feet, as was the adjacent Orni site. Greater FAR would need to be allowed to achieve additional office and retail. Piped and open streams could also limit the ability to achieve maximum FARs. The block has less visibility for retail and related pedestrian activity. It has long-term residential uses located to the southeast which may affect compatibility. Access to larger interior sites is from a local access road. The site is located furthest from the Transit Center.
- The CBD-7 and PLA -7B block meets some objectives for retail and transit orientation, but has more potential for neighborhood compatibility conflicts and is located across an arterial from the Transit Center.
- The CBD-1B core block is well located for retail and transit-orientation, though by itself would not accommodate a large amount of new employment.

The analysis shows that some change to development regulations to accommodate the magnitude of development being evaluated would need to occur for all sites.

Table 9. Criteria Evaluation—Selected Downtown Sites

CBD Location	Capacity for Employment	Create Opportunities for Successful Retail Uses	Site Size and Configuration that Encourages Amenities:	Pedestrian Orientation	Neighborhood Compatibility	Transit-Oriented Development	Regulatory Actions Required
Superblock	Employment capacity would be the same as for the Touchstone proposal, but spread out to Superblock. It is unlikely that the southeastern portion of the Superblock could be redeveloped given some buildings are relatively new.	Area south of Parkplace is less conducive to retail given distance from Central Way and proximity to residential neighborhoods. The most likely places for retail are at Parkplace and the southwest corner of block near Peter Kirk Park.	Parkplace is the primary opportunity for open space given its site size. If developing sites under multiple ownership, open space may be smaller and more dispersed. Organizing theme for open spaces would be on pedestrian spines. There is a second pedestrian spine which goes from east to west on southern part of the Superblock. Less opportunity to coordinate open space with retail on southern part of the block due to smaller parcel sizes.	Similar to Proposed Action. North/south connection adjacent to Peter Kirk Park may be improved (on the south end) by adding the rest of the Superblock. The connection across the Davidson property may be improved, though it is not a major connection.	This alternative spreads additional development intensity towards residential neighborhoods to the south. Current comprehensive plan and zoning include measures that limit building height and increase step backs in response to neighborhood compatibility. To achieve the greater building space of nearly 1 million square feet, height and setback limits in place now would require amendment.	Good location with density close to transit center. (approximately 0.25 mile)	Zoning amendments to achieve greater growth in full block. Green building (e.g., LEED) requirements would need to be extended to southern portion of the block (extending Parkplace requirements). Additionally open space, retail percentage FAR and transit requirements would need to be extended.
Substation Block	Limited employment capacity. Places growth in light industrial area. Substation could be relocated. To achieve additional employment, would have to develop at taller than 8 stories, considering the block by itself.	Zoning amendments needed to require retail. Given location and adjacent topography limiting visibility, the site is not well oriented for retail.	Site configuration due to relatively less depth from 6 th Avenue and lesser ability for retail may mean a less successful open space.	The site is relatively far from the Downtown core. Less pedestrian attraction because retail opportunity is more limited. Site does not benefit from Downtown pedestrian opportunities. No north-south pedestrian connection.	Neighborhood compatibility is satisfactory on the south (hill with connection to 85th), east (commercial property), and west (mixed use), but less satisfactory on north due to moderate-density residential although the area is planned for light industrial. A rezone would reduce the planned industrial area.	Transit Center is relatively far away, and across an arterial (approximately 0.46 mile).	Rezone to CBD or commercial zone would be needed in place of light industrial. Green building (e.g., LEED) requirements would need to be added to City development regulations. Additionally CBD-5A open space, retail percentage FAR and transit requirements would need to be applied.
Post Office Block	Adjacent to CBD. To achieve additional employment, greater FAR and height allowances would be required than presently allowed, considering the block by itself. Piped and open streams could limit the ability to achieve maximum FARs. Some buildings are relatively new and may not redevelop. Altom site has already been studied. Orni site studied on adjacent property.	Zoning amendments needed to require retail. Location and adjacent topography limit visibility. The site is not well oriented for retail.	Site configuration and lesser ability for retail may mean a less successful open space. Site is not part of Downtown core and does not benefit from neighborhood pedestrian opportunities.	Pedestrian orientation is moderate; site can have pedestrian connections, but is far from the Downtown core. Due to limitations on successful retail, pedestrian activity may be limited. Site doesn't address north/south street objective in Proposed Action. However, site does have an east/west connection to the Downtown.	Neighborhood compatibility is satisfactory on the north (hill with connection to 85th) and on the west being adjacent to commercial uses, but compatibility is less satisfactory on south and east due to residential uses.	Transit Center is significantly further away (approximately 0.53 mile).	Zoning amendments to achieve greater growth required. Green building (e.g., LEED) requirements would need to be added to City development regulations. Additionally CBD-5A open space, retail percentage FAR and transit requirements would need to be applied.

CBD Location	Capacity for Employment	Create Opportunities for Successful Retail Uses	Site Size and Configuration that Encourages Amenities:	Pedestrian Orientation	Neighborhood Compatibility	Transit-Oriented Development	Regulatory Actions Required
CBD 7 & PLA 7B Blocks	Due to less land area the FAR would need to increase to have comparable employment to the Proposed Action. To achieve additional employment, would have to build taller than 8 stories considering the block by itself. Will lose planned residential in order to get enough office. One building is relatively new and may not redevelop.	Good location for retail, but retail is already required on ground floor facing Central Way. New retail would face into neighborhoods and result in compatibility issues.	Due to depth from Central Way and multiple ownerships, there is little room for significant open space – locating space would be a challenge.	Buildings would be designed to orient to the street. Central Way location is good, but is not a new benefit.	Compatibility is a concern to the north given residential uses. Current zoning requires 1 story within 20 feet of Central Way plus upper floor step back. This is to keep an open feeling along Central Way and when approaching the Downtown and the water.	Close (approximately 0.16 mile) but across an arterial.	Zoning amendments to achieve greater growth in full block. Green building (e.g. LEED) requirements would need to be added to City development regulations. Additionally Parkplace open space, retail percentage FAR and transit requirements would need to be applied.
CBD 1B Core Block	The Downtown Strategic Plan emphasized residential in this location. Employment would displace residential opportunity. To achieve additional employment, FAR would increase, and buildings would have to be taller than 8 stories considering the block by itself. The market has shown residential is more likely to occur here. Due to limited space for parking (structured and below grade would be needed) and smaller lots, the ability to achieve significant office space may be in question.	There is already ground floor retail requirement. Additional retail opportunities would be limited.	There may be opportunities for smaller scale open space on pedestrian streets. To achieve significant open space, buildings would have to be taller.	Current location in Downtown Core and along Central Way allows for good pedestrian activity; The ability to increase north-south connections is limited.	The site is located in the center of Downtown and far away from residential, The history of building heights in Downtown has been very contentious. The Council and community want a certain scale in the core area; considered important to community as a whole. The City Council just revisited this site in January 2009, and imposed additional restrictions on building height and mass.	Access is good given adjacent site (approximately 0.04 mile).	Zoning amendments to achieve greater growth. Green building (e.g. LEED) requirements would need to be added to City development regulations. Additionally CBD-5A open space, retail percentage FAR and transit requirements would need to be applied.

Sources: Kirkland Community Development Department; ICF; Google Maps Walking Directions (length from Transit Center)

VII. SEPA Reasonable Alternatives

SEPA requires that alternatives to a proposal be considered including a no action alternative, reasonable alternatives, and mitigation measures (Washington Administrative Code [WAC] 197-11-792). The 2008 FEIS considered the No Action, Proposed Action, and FEIS Review Alternative (summarized in Table 1), and provided mitigation measures. Through this Commercial Growth Alternatives process, sample sites have been reviewed to see if they could be reasonable off-site alternatives.

According to the SEPA Rules at WAC 197-11-786, a reasonable alternative is defined as follows:

“Reasonable alternative’ means an action that could feasibly attain or approximate a proposal’s objectives, but at a lower environmental cost or decreased level of environmental degradation. Reasonable alternatives may be those over which an agency with jurisdiction has authority to control impacts, either directly or indirectly, through requirement of mitigation measures.”

No alternative site studied in this report fully meets all the objectives considered, though some sites meet more objectives than others (e.g., the Superblock and CBD-1B Block). In addition, no alternative site is likely to have lower environmental impacts, based on the evaluation in this report, because of site size, adjacent uses, and potential land use incompatibilities or conflicts. Finally, none of the off-site alternatives would achieve the objective of redeveloping and intensifying an existing commercial center. Current and future land use patterns would change to lesser or greater degrees on the alternative sites leading to potential incompatibilities. These sites are not, therefore, considered reasonable alternatives individually.

VIII. Proposed Off-site and On-site Alternatives for Further Consideration

The EIS should study one on-site alternative (i.e., the full Superblock), and one off-site alternative to the original FEIS alternatives for Touchstone (Parkplace). These alternatives would evaluate the amount and location of the additional 954,000 square feet of development above current City plans.

Although no single off-site alternative is considered reasonable in the context of SEPA, the SEIS should evaluate an alternative site that combines multiple blocks. This would meet the requirement of the Growth Management Hearings Board in *Davidson Serles v. City of Kirkland*.

a. On-site Alternative

To allow the City to consider different implications for land use, aesthetics, and circulation/access, the City should study the Superblock⁷ located between 3rd and 6th Street. This alternative would distribute some of the development proposed on the Parkplace site to the rest of the “Superblock”.

⁷ The Board suggested such an alternative in Central Puget Sound Growth Management Hearings Board Case, *Davidson Serles v. City of Kirkland* (October 5, 2009), Case No. 09-3-0007c. The Board’s description included: “Touchstone’s Park Place property takes up the northeast corner and midsection of a superblock that includes Peter Kirk Park on the west. The Petitioners and others own properties in the south and east portions of the Superblock.”

The Growth Management Hearing Board’s decision in *Davidson Serles v. City of Kirkland* lacks clarity because it references consideration of the Superblock under the SEPA authority requiring inclusion of an off-site alternative. Even though the Superblock is not part of Touchstone’s proposal and consists of parcels under multiple ownerships, for purposes of the SEIS, the Superblock is considered an on-site alternative, which also includes some off-site development.

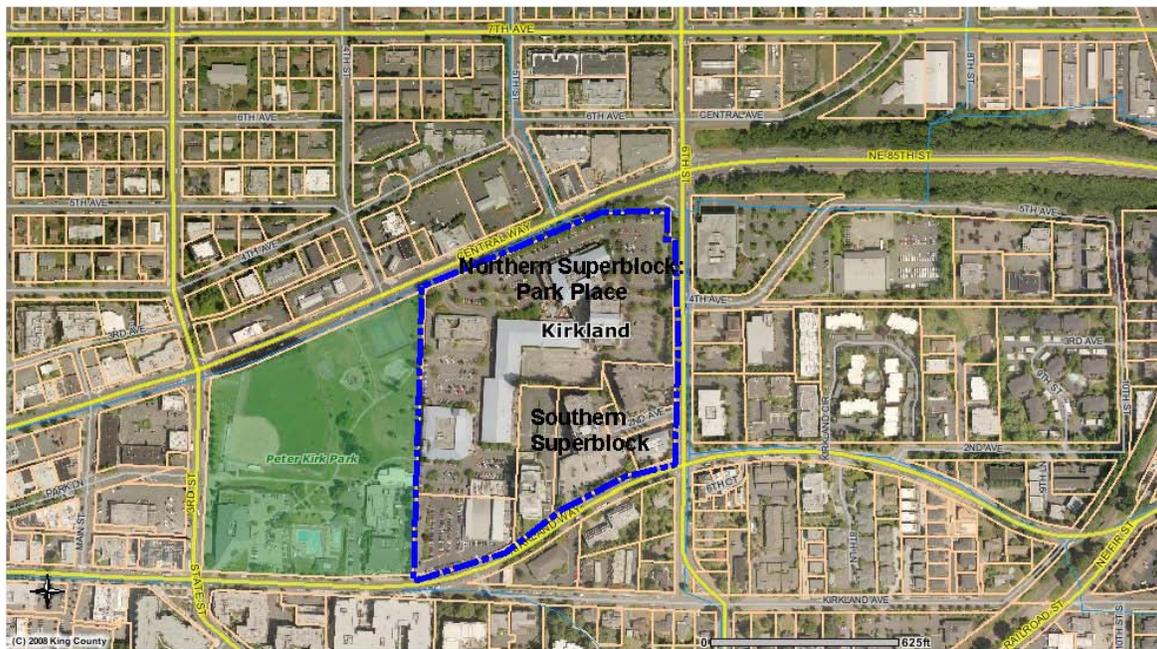
The Superblock (including Parkplace) is slated to take more growth by the year 2022 than other blocks considered in the Downtown area. Since most growth has been planned for Parkplace, spreading growth on the rest of the block has the effect of lowering the FAR, height and bulk on Parkplace compared with the Proposed Action or FEIS Review Alternative. Table 10 shows the statistics for the Superblock Alternative, and Figure 7 shows the boundaries. Appendix C provides additional details about the Superblock statistics.

Table 10 presents capacity of the Superblock under different assumptions. Column “a” lists the total area of existing lots on the block. Column “b” shows the square footage of existing building space on the block. Column “c” represents the No Action growth assumptions to the year 2022. The City’s No Action assumptions reflect its current plans, regional growth targets, and estimated locations for growth. For comparison, the effective FAR achieved by the year 2022 is compared to the FAR allowed by the zoning district. Column “d” identifies the possible square footage if applying zoning proposed for Parkplace—CBD-5A to the whole Superblock. Column “e” identifies the different floor area assumptions and resulting building space that would be required to achieve 954,000 square feet on the whole block. To spread the 954,000 across the Superblock would result in a FAR of 2.63. The capacity of the block would equal over 2 million square feet of commercial and office space, double the capacity of the No Action assumptions. Column “f” shows the net increase in development above the No Action alternative assuming a FAR of 2.63. If No Action assumptions are subtracted from Alternative Zoning assumptions, there would be an increase in development across the whole block of approximately 954,894 square feet. The growth on Parkplace alone would still increase above the No Action alternative, but the increase would be less at approximately 482,282 square feet instead of 954,000.

Environmental review limited to Touchstone’s on-site proposal has the effect of isolating the other properties and perhaps intensifying environmental negative impacts. An alternative which considered all of CBD-5A might address the city’s objectives differently, for example, assessing pedestrian linkages differently, finding additional “third place” or “green infrastructure” opportunities, proposing coordinated parking mitigation strategies, ensuring coordinated traffic ingress and egress management, and enhancing future redevelopment potential for the southeast properties.”

Table 10. Superblock Alternative

a. Lot Area in Square Feet	b. Current Building Area in Square Feet	c. No Action Growth Assumptions 2022 Square Feet (Effective FAR / Zoned FAR)	d. CBD-5A Standards Applied Square Feet (FAR)	e. 954,000 SF on Single Block Square Feet (FAR)	f. Net Increase above No Action Growth Assumptions
764,035	451,976 (0.59)	1,052,226 (1.38/1.67)	2,723,856 (3.565)	2,007,120 (2.63)	Parkplace net: 482,282 Non-Parkplace net 472,612 Total net increase: 954,894



Superblock Alternative - - -

Figure 7. Superblock Alternative Boundaries

b. Off-site Alternative

An off-site alternative would evaluate growth on blocks in the Downtown other than Parkplace. On the Parkplace site, only growth consistent with prior plans (CBD-5 zoning) would occur, consistent with No Action assumptions.

Two options for an off-site alternative are identified:

- Select one site and assume increased height and bulk to achieve the 954,000 increased growth at that location.
- Distribute the 954,000 square feet increase over multiple sites. This scenario would assume that the growth proposed for Parkplace would instead occur in a dispersed manner in the Downtown area rather than as a single site.

Table 11 compares No Action FARs with CBD-5A FARs, and with those FARs that would achieve 954,000 square feet on a single block. Column “a” identifies the name of the block under study. Column “b” lists the total area of existing lots on the block. Column “c” shows the square footage of existing building space on the block. Column “d” represents the No Action growth assumptions to the year 2022. The City’s No Action assumptions reflect its current plans, regional growth targets, and estimated locations for growth. For comparison, the effective FAR achieved by the year 2022 is compared to the FAR allowed by the zoning district. Column “e” identifies the possible square feet if applying zoning proposed for Parkplace, CBD-5A. Lastly, Column “f” identifies the different floor area assumptions and resulting building space that would be required to achieve 954,000 square feet on a single block.

Table 11. Comparison of Growth Assumptions by Block

a. Block	b. Lot Area in Square Feet	c. Current Building Area in Square Feet	d. No Action Growth Assumptions 2022 Square Feet (Effective FAR/ Zoned FAR)	e. CBD-5A Standards Applied Square Feet (FAR)	f. 954,000 SF on Single Block Square Feet (FAR)
Substation	172,215	43,085	113,227 (0.65/1.81)	613,946 (3.57)	1,067,733 (6.2)
Post Office [1]	332,851	136,495	154,491 (0.46/2.88)	1,186,614 (3.57)	1,163,298 (2.88 to 3.57)
CBD 7/ PLA 7B	249,271	55,905	55,905 (0.22/0.77 to 2.25)	888,651 (3.57)	1,010,794 (4.055)
CBD 1B Core	100,880	34,847	34,847 (0.35/2.25)	359,637 (3.57)	989,633 (9.81)

[1] Holds constant the growth studied in 2008 for the Altom sites, and provides for growth on the rest of the block to achieve the net 954,000 square foot increase.

Results are presented by block below:

- The **Substation block** is projected to double the current building square feet by the Year 2022 under the No Action assumptions. This is largely due to a recently approved development, Parkplace North, which will provide office space. Greater development than planned at Parkplace North is unlikely since building permits have been approved. The full block includes the Puget Sound Energy (PSE) substation, which is unlikely to develop and should be removed from consideration for redevelopment. If the full increase in growth on the Parkplace site were instead placed on the Substation block, the FAR would more than triple the current FAR. Though the block is zoned for light industrial uses, some portions of the area are commercial.
- The **Post Office block** is planned for some growth by the year 2022. The site is zoned for office purposes. Uncertainty regarding availability and viability of the post office site itself has been

noted previously. The Altom private amendment request site approved in 2008 is included on this block and was studied for heights of up to 6 stories (maximum 60 feet). The block is adjacent to the Orni site also approved in 2008 for mixed office/residential growth at heights up to 6 stories (maximum 60 feet). For the purposes of this analysis, the capacity of the entire block at different FAR assumptions was determined (Appendix C). The broad analysis shows that the FAR would need to be increased over present zoning to accommodate additional employment. Setbacks and the location of open and piped streams could also limit the achievable square footage. The block is adjacent to residentially designated property located to the southeast which may affect compatibility. Access to larger interior sites is from a local access road. The site is located furthest from the Transit Center and has limited visibility.

- The **CBD 7/PLA 7B block** is characterized by relatively small and some relatively new buildings. The City has planned for little growth on these blocks by the year 2022. Expanding commercial growth on this block, such as added retail and office, could change the character of the block to the north which is designated residential, and significant commercial growth along Central Way could result in compatibility concerns. If the full growth of Parkplace were placed on this block, the current zoning FAR would nearly double.
- The **CBD 1B Core block** is not planned for additional commercial growth by the year 2022 but does have capacity under present zoning and under alternative standards. If locating all of the Parkplace 954,000 square feet on that single site, the FAR would more than quadruple.

If an additional 954,000 square feet were developed on any single block the FAR and building heights would be, greater than what is possible under No Action growth assumptions, and greater than surrounding blocks which could cause land use incompatibilities.

While no site individually meets the siting criteria, another approach to identifying an off-site alternative to Parkplace would be to spread and disperse the desired 954,000 square feet of retail and office development to multiple sites in and near the CBD. Assuming FARs similar to the Parkplace CBD-5A zoning, the resulting increases in intensity and height would be more moderate.

It is recommended that an off-site alternative be evaluated that disperses the 954,000 square feet on three of the five blocks under consideration: CBD-1B Core, CBD-7, and Substation blocks. This approach:

- tests more moderate increases in FAR than if considering only increases on one block,
- excludes Parkplace and the Superblock, which would develop according to No Action assumptions,
- excludes areas with little development potential due to public or quasi-public use or ownership (e.g. PSE Substation lot), and
- excludes areas with significant land use compatibility issues (i.e., removes PLA 7B), which would likely result in great environmental impacts than Parkplace.

Table 12 summarizes features of the recommended alternative. Appendix C provides details regarding the development capacity of the off-site alternative. Figure 8 illustrates the boundaries of the combined off-site alternative.

Table 12. Recommended Off-site Alternatives

Feature	Description
Location	Disperse additional development capacity on three other blocks: Substation, CBD 7, and CBD 1B Core. Exclude PLA 7B. Assume PSE Substation does not redevelop. Assume Parkplace North office develops according to approved permit. Assume 11.5 acre Parkplace develops based on No Action assumptions only.
Lot Area Square Feet	465,777
Current Building Square Feet	110,539
No Action Alternative Capacity: 2022 on alternative blocks	180,681
Effective FAR as of 2022	0.39
Current Zoning FAR	FAR Range 1.81 to 2.25
Capacity with Alternative Zoning	1,135,164
Proposed Zoning FAR	FAR Range 0.87-3.3 (Whole area 2.44)
FAR by Block	Substation Block: 0.87 to 3.3 CBD-3 Block: 2.5 CBD-1B Block: 2.8
Alternative Zoning Capacity minus No Action	954,483
Source: ICF International	



Offsite Alternative (Combined) - - -

Figure 8. Recommended Off-site Alternative for Further Review

Appendix A: FEIS Alternatives – Touchstone

Draft

Table A-13. Downtown Area EIS Alternatives—Touchstone (Parkplace)

Features	Area A (Touchstone [Parkplace])
Area Size/Location	11.5 acres of property at 457 Central Way
Existing Conditions/Current Uses	238,450 square feet of office and retail use with 742 on-site parking stalls (95,300 square feet of office, and 143,150 square feet of commercial uses).
No Action Alternative	629,500 square feet of office use and 209,200 square feet of commercial uses.
Proposed Action	<p>1.2 million square feet of office use and 592,700 square feet of commercial (including a mixture of retail, restaurant, supermarket, movie theater, hotel, and athletic club).</p> <p>Proposed Action would provide approximately 3,500 parking spaces.</p> <p>The Proposed Action would include development of a new zoning designation that:</p> <ul style="list-style-type: none"> • allows increases in height from a range of 3 to 5 stories to 4 to 8 stories; • allows setbacks to be reduced to 0 feet on Central Way, 6th Street, and Peter Kirk Park; • allows buildings taller than 3 stories within 100 feet of Peter Kirk Park; • increases the allowed lot coverage to 100%; and • allows a reduction in required on-site parking over that required in existing Zoning Code in the area.
FEIS Review Alternative	<p>As described for the Proposed Action, with the following exceptions:</p> <ul style="list-style-type: none"> • Create a new CBD 5A zone. • Require that development in Area A comply with the Parkplace Master Plan and Design Guidelines contained in Kirkland Municipal Code 3.30 (see Kirkland Municipal Code amendments below). • Require that the amount of retail provided equal at least 25% of the office space provided in the development, consistent with the mix of uses discussed in the Proposed Action. • Establish other land uses, including hotel, athletic club, and movie theater as allowed uses subject to conditions. These uses are consistent with the uses considered in the Proposed Action. • Prohibit retail uses from exceeding 70,000 square feet in size, and drive-through facilities, among others. • Establish maximum height limits as described below: • Four height districts with lower heights in north and west and up to 115 feet (see Figure 2-5), equivalent to the 8-story maximum height discussed in the Proposed Action and No Action alternatives.: • Maximum building height measurement points within the CBD 5A zone as shown in Figure 2-6, and

Features	Area A (Touchstone [Parkplace])
	<ul style="list-style-type: none"> • An exceedance in rooftop appurtenance height by 16 feet if covering less than 25% of the rooftop. • Require submittal of a study to justify parking less than required in the zoning code based on shared use and inclusion of a TMP and PMP as part of the parking reduction study, consistent with provisions of the Proposed Action. • Establish specific setback and stepback requirements based on location which are either consistent with or more restrictive than setbacks and stepbacks considered under the Proposed Action, see Figure 2-7: • Central Way. No setbacks along Central Way and 6th Street if there is a relationship between the building and the pedestrian level of development (such as retail uses). Otherwise, provide a building setback. • Peter Kirk Park. A 55-foot minimum setback adjacent to the park. • South/southeast boundary. A 20-foot minimum setback along the south portion of the area adjacent to the existing office and residential uses. • Provide pedestrian connections as outlined in the existing Moss Bay Neighborhood Plan. • Establish a network of streets, sidewalks, and open spaces in Area A and connecting Area A with adjoining streets and developments. • Provide a large central open space. • Building(s) south of the central open space must be terraced to allow for sun to reach 50% of the open space at 2:00 pm on March 21 and September 21.
FEIS Review, Required Comprehensive Plan Map Amendment	Remains Commercial Comprehensive Plan designation, but applies new zoning designation (called CBD 5A for purposes of this FEIS) and map that designation at Area A (see below for new zoning designation).
FEIS Review, Required Zoning Map Amendment	Create a new zoning designation (called CBD 5A for purposes of this FEIS) and map that designation at Area A (see below for new zoning designation).
FEIS Review, Required Comprehensive Plan Text Amendment	<p>The FEIS Review alternative includes the following Comprehensive Plan text amendments that are consistent with the Proposed Action but were not specified as part of the Proposed Action in the DEIS:</p> <ul style="list-style-type: none"> • Amend the Moss Bay Neighborhood Plan consistent with mitigation measures identified in the DEIS to allow for taller buildings (up to 8 stories) in CBD 5A and tie the additional height allowed to provision of interconnected public spaces, pedestrian-oriented development, retail streets, and sustainability measures in CBD 5A; • Replace the view corridor identified in the Moss Bay Neighborhood Plan at the corner of Central Way and 6th Street with the view corridor at NE 85th Street just west of Interstate 405; • Include a description of how development in Area A is

Features	Area A (Touchstone [Parkplace])
FEIS Review, Required Zoning Code and Kirkland Municipal Code Amendments	<p data-bbox="743 233 1406 296">subject to design guidelines of the Master Plan and Design Guidelines for Kirkland Parkplace booklet.</p> <ul data-bbox="695 302 1370 655" style="list-style-type: none"> <li data-bbox="695 302 1370 365">• Update the City’s employment capacity numbers in the Introduction and Land Use chapters. <li data-bbox="695 371 1370 491">• Create a new zoning designation (called CBD 5A for purposes of this FEIS) that differs from current CBD 5 zoning as described under the FEIS Review alternative above. <li data-bbox="695 497 1370 655">• Amend the Kirkland Municipal Code to add a document entitled “Kirkland Parkplace Mixed Use Development Master Plan and Design Guidelines” which regulates the design of development in Area A as described under the FEIS Review alternative above.

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Appendix B: Water and Sewer Conditions

Draft



CITY OF KIRKLAND
 Department of Public Works
 123 Fifth Avenue, Kirkland, WA 98033 425.587.3800
 www.ci.kirkland.wa.us

MEMORANDUM

To: Angela Ruggeri, AICP, Senior Planner
 Lisa Grueter, AICP, Senior Planner, ICF International

From: Rob Jammerman, Development Engineering Manager

Date: March 18, 2010

Subject: Water and Sewer Availability for Park Place Alternative Sites

The Public Works Development Engineering Division has been asked to comment on the water and sewer availability for several alternative sites in conjunction with the Park Place Supplemental EIS. The sites that are being analyzed are as follows:

1. Superblock Alternative – Spread 954,000 sq. ft. of growth from the Park Place site to the southern part of the same block between Kirkland Ave. and Central Way.
2. Offsite Alternatives (spread the same increment of growth from Park Place to three different blocks). This includes:
 - A) Substation Block – a.k.a. Big O Tires
 - B) CBD-7 Block – a.k.a. Wendy's Block
 - C) CBD-1B Block – a.k.a. Antique Mall block

Water System

Based on available information for the alternate sites, the following can be concluded:

1. The leading factor that triggers water system improvements is required fire flow. All of the sites have adequate domestic water supplies. During the development process, the applicant can sometimes reduce their fire flow requirements by proposing alternate types of construction (wood vs. concrete as an example).
2. All of the sites could be developed to the proposed densities, but some water system improvements will be necessary. The required water system improvements will be defined by a water system analysis that will be required prior to the application of any development permit. This process is the standard method that the City uses for any development that occurs within the City, i.e., a development project is proposed, a water system analysis is completed by the City's Engineering consultant, and the required water improvements are a condition of the proposed project.
 - A) Superblock Alternative – This alternative will likely trigger similar water extension/replacement conditions to the Park Place Project such as a 12-inch water main loop extension from Kirkland Avenue to 6th Street. In addition, it may be necessary to increase in the water main sizes within Kirkland Way from 6th Street to Kirkland Avenue and within 6th Street from Kirkland Avenue to Central Way. If this

Memorandum to Angela Ruggeri and Lisa Grueter
 March 18th, 2010
 Page 2

site is redeveloped as an alternative to the Park Place site, the required water system improvements will be roughly proportional to the system improvements that are required with Park Place.

- B) Offsite Alternatives – The water system improvements needed for these alternatives will need to be analyzed prior to submittal of a development project, but the following can be concluded :
- a. Due to recent City funded water system improvements projects along Central Way, there is approximately 5000 gpm available fire flow for projects along this street. These improvements benefit all three Blocks, but specifically benefit the CBD-7 Block which may not trigger any required water system improvements.
 - b. The current available fire flow in the vicinity of the CBD-1B Block is approximately 2,300 gpm. Depending on the final density and the type of construction, some water system improvements may be necessary such as a water main loop extension between Kirkland Ave and Central Way along Main Street or 3rd Street.
 - c. The current available fire flow near the Substation Block is approximately 2500 gpm. There may need to be water main extensions/replacements along 6th Street and 7th Avenue depending on the final density and type of construction.
 - d. If all three sites were developed as an alternative to the Park Place redevelopment, the required water system improvements will be roughly proportional to the system improvements that are required with Park Place.

A condition of development approval or a provision of the Planed Action Ordinance could acknowledge the mitigation that the City will impose based on its adopted code requirements. These same requirements would apply to any development proposal under any Supplemental EIS alternative.

Sanitary Sewer System

The sanitary sewer system that provides service to the alternative sites is in the same sanitary sewer basin as the Park Place property; all of the sanitary sewer is conveyed via the City sewer system to the King County Sewer Pump Station at 3rd Street and Main Street. The King County pump station improvements, identified in the Park Place analysis, are currently underway and will be able to adequately serve the alternative sites.

If the Superblock Alternative is chosen, most of the sanitary sewer will be conveyed west along the sewer system in Kirkland Avenue. There are no known deficiencies with the system in Kirkland Way, but a sewer capacity analysis will need to be completed prior to development permit submittal and any identified deficiencies will need to be corrected as condition of development.

Appendix C: Development Capacity Details

Draft

ALTERNATIVE SITES - FULL BLOCK CAPACITY:

Illustrates No Action Growth - i.e. the City's current plans, regional growth targets, and estimated locations for growth by the Year 2022. See Page 4
Identifies possible Alternative development levels based on uniform application of amended floor are ratios across whole sites and blocks.

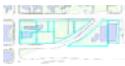
SUPERBLOCK



FID	Site	PIN	Lot Size	Existing Buildings*	Existing FAR	No Action Alternative	Build-out with CBD SA Zoning (FAR 3.565)	Build-out at 954,000 Spread (FAR 2.63)**
172	Emerald	0525059017	59,706	47,623	0.80	47,623	212,857	156,848
182	Bungie	0525059063	73,681	21,258	0.29	21,258	262,680	193,560
4189	Parkplace	1248700051	502,848	238,450	0.47	838,700	1,792,700	1,320,982
4190	Watermark	1248700115	35,438	57,192	1.61	57,192	126,340	93,096
4191	Continental	1248700135	74,267	75,753	1.02	75,753	264,769	195,099
4192	570	1248700160	18,095	11,700	0.65	11,700	64,510	47,536
			764,035	451,976		1,052,226	2,723,856	2,007,120
Difference Build-out Single Block - No Action								954,894

Legend:
*Net building area from KCA, Parkplace from EIS
**Distributes Touchstone 954,000 increase equally across CBD 5 and SA "superblock"
Notes:
CBD5 zone FAR is approximately 1.67.
CBD5A zone requires retail at 25% of office sf

SUBSTATION BLOCK



FID	Site	PIN	Lot Size	Existing Buildings	Existing FAR	No Action Alternative	Build-out with CBD SA Zoning (FAR 3.565)	Build-out at 954,000 Additional (FAR 6.2)**
	Car Wash	3885807515	16,509	3,168	0.19	3,168	58,855	102,356
	Big O	3885807530	16,509	3,644	0.22	3,644	58,855	102,356
	Parkplace N (Primeau)	3885807500	32,976	990	0.03	59,687	117,559	204,451
	PSE	3885807481	30,662	0	0.00		109,310	190,104
	Parking lot	3885807470	10,405	0	0.00	11,446	37,094	64,511
	Parkade	3886901360	43,602	23,383	0.54	23,383	155,441	270,332
	Warehouse	3886901325	21,552	11,900	0.55	11,900	76,833	133,622
			172,215	43,085		113,227	613,946	1,067,733
Difference Build-out Single Block - No Action								954,506

Legend:
*FAR based on approved Parkplace North Office building permit
**Distributes Touchstone 954,000 increase to substation block
Note: Based on Parkplplace North, current zone FAR assumed to be 1.81.

POST OFFICE BLOCK



FID	Site	PIN	Lot Size	Existing Buildings	Existing FAR	No Action Alternative	Build-out with CBD SA Zoning (FAR 3.565)	Build-out at 954,000 Additional (FAR 2.88 to 3.57)*
2284	620	1238900090	40,067	19,800	0.49	19,800	142,839	143,039
2285	Altom Plaza	1238900110	18,798	2,056	0.11	2,056	67,015	54,061
2286	Altom Hart	1238900115	17,191	1,416	0.08	19,412	61,286	49,439
10535	File Net	5172700010	106,887	92,794	0.87	92,794	381,052	381,587
10536	Post office	5172700030	149,908	20,429	0.14	20,429	534,422	535,172
			332,851	136,495		154,491	1,186,614	1,163,298
Difference Build-out Single Block - No Action Minus Altom Site Previously Studied								1,008,807
								954,746

Legend:
*Distributes Touchstone 954,000 increase to Post office block. Holds Altom sites to 2008 FEIS increase of 103,500
Notes:
2008 EIS studied Altom sites at 2.88 FAR (Area C).
620, File Net & Post office @ 3.57. FAR.

CBD 7 & PLA 7B BLOCKS



FID	Site	PIN	Lot Size	Existing Buildings	Existing FAR	No Action Alternative	Build-out with CBD SA Zoning (FAR 3.565)	Build-out at 954,000 Additional (FAR 4.055)**
4492 *	Central Pl Condos	1496300000	15,016	8,700	0.58	8,700	53,532	60,890
9392 *	Camwest	3900101160	11,588	0	0.00	0	41,311	46,989
9393 *	Single family	3900101185	5,000	740	0.15	740	17,825	20,275
9394 *	343 Apts	3900101240	7,500	5,460	0.73	5,460	26,738	30,413
9395 *	Single family	3900101255	5,001	1,070	0.21	1,070	17,829	20,279
9396 *	Young office	3900101265	5,000	1,536	0.31	1,536	17,825	20,275
9397	White Swan	3900101275	27,499	1,288	0.05	1,288	98,034	111,508
9398	Wendy's	3900101330	26,471	3,236	0.12	3,236	94,369	107,340
9399	Wendy's	3900101380	5,319	0	0.00	0	18,962	21,569
9400	Elk Partners	3900101390	14,316	8,116	0.57	8,116	51,037	58,051
9401	Wells Fargo	3900101460	50,894	5,130	0.10	5,130	181,437	206,375
9402	Crab Cracker	3900101510	48,504	8,535	0.18	8,535	172,917	196,684
9603	Them Vuong	3900101575	5,400	4,502	0.83	4,502	19,251	21,897
9604	Shell	3900101585	14,279	1,800	0.13	1,800	50,905	57,901
12494 *	4th Ave Condo	8634300000	7,484	5,792	0.77	5,792	26,680	30,348
			249,271	55,905		55,905	888,651	1,010,794
Difference Build-out Single Block - No Action								954,889

Legend:
*PLA 7B zones
**Distributes Touchstone 954,000 increase to CBD 3 & PLA 7B block:
Note: Current Zone FAR is 0.77 for PLA 7B and 2.25 for CBD 3 (the latter based on capacity model)

CBD 1B CORE BLOCKS



FID	Site	PIN	Lot Size	Existing Buildings	Existing FAR	No Action Alternative	Build-out with CBD SA Zoning (FAR 3.565)	Build-out at 954,000 Additional (FAR 4.81)*
	Antique Mall	1244500330	38,465	9,261	0.24	9,261	137,128	377,342
	Peter Kirk Square	1244500435	62,415	25,586	0.41	25,586	222,509	612,291
			100,880	34,847		34,847	359,637	989,633
Difference Build-out Single Block - No Action								954,786

Legend:
**Distributes Touchstone 954,000 increase to CBD 1B block:
Note: Current Zone FAR is 2.25 based on capacity model.

SEIS ALTERNATIVE SITES: Superblock Alternative

SUPERBLOCK



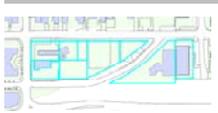
FID	Site	PIN	Lot Size	Existing Buildings*	Existing FAR	No Action Alternative	Build-out with CBD 5A Zoning (FAR 3.565)	Build-out at 954,000 Spread (FAR 2.63)**	Difference 2.63 FAR Minus No Action
172	Emerald	0525059017	59,706	47,623	0.80	47,623	212,857	156,848	109,225
182	Bungie	0525059063	73,681	21,258	0.29	21,258	262,680	193,560	172,302
4189	Parkplace	1248700051	502,848	238,450	0.47	838,700	1,792,700	1,320,982	482,282
4190	Watermark	1248700115	35,438	57,192	1.61	57,192	126,340	93,096	35,904
4191	Continental	1248700135	74,267	75,753	1.02	75,753	264,769	195,099	119,346
4192	570	1248700160	18,095	11,700	0.65	11,700	64,510	47,536	35,836
			764,035	451,976		1,052,226	2,723,856	2,007,120	954,894

*Net building area from KCA, Parkplace from EIS
 **Distributes Touchstone 954,000 increase equally across CBD 5 and 5A "superblock."
 Note: CBD5A zone requires retail at 25% of office sf

Total Onsite	1,320,982
Net Onsite above No Action	482,282
Total South Superblock	686,138
Net South Superblock above No Action	472,612
Net sum	954,894
Target SF Increase:	954,000
Difference	894

SEIS ALTERNATIVE SITES: Combined Offsite Alternative

SUBSTATION BLOCK



Site	Lot Size	Existing Buildings	No Action Alternative	Offsite Alternative (FAR 0.87 to 2.2)	Difference
Car Wash	16,509	3,168	3,168	46,720	43,552
Big O	16,509	3,644	3,644	46,720	43,076
Parkplace N (Primeau)*	32,976	990	59,687	59,687	0
PSE: Substation	30,662	0	0	0	0
Parking lot	10,405	0	11,446	9,100	-2,346
Parkade	43,602	23,383	23,383	133,567	110,184
Warehouse	21,552	11,900	11,900	71,165	59,265
Subtotal	172,215	43,085	113,227	366,960	253,732

*Assumes FAR consistent with building permit - 1.81

**Due to unusual shape and proposed zoning setbacks, maximum size assumed is 9,100 square feet instead of 29,446 square feet if applying FAR of 2.8. Square footage re-distributed to lots associated with the parking lot, including the Parkade and Warehouse.

CBD-7 BLOCK



Site	Lot Size	Existing Buildings	No Action Alternative	Offsite Alternative (FAR 2.5)	Difference
White Swan	27,499	1,288	1,288	68,748	67,460
Wendy's	26,471	3,236	3,236	66,178	62,942
Wendy's	5,319	0	0	13,298	13,298
Elk Partners	14,316	8,116	8,116	35,790	27,674
Wells Fargo	50,894	5,130	5,130	127,235	122,105
Crab Cracker	48,504	8,535	8,535	121,260	112,725
Them Vuong	5,400	4,502	4,502	13,500	8,998
Shell	14,279	1,800	1,800	35,698	33,898
Subtotal	192,682	32,607	32,607	481,705	449,098

CBD 1B CORE BLOCKS



Site	Lot Size	Existing Buildings	No Action Alternative	Offsite Alternative (FAR 2.8)	Difference
Antique Mall	38,465	9,261	9,261	109,241	99,980
Peter Kirk Square	62,415	25,586	25,586	177,259	151,673
Subtotal	100,880	34,847	34,847	286,499	251,652

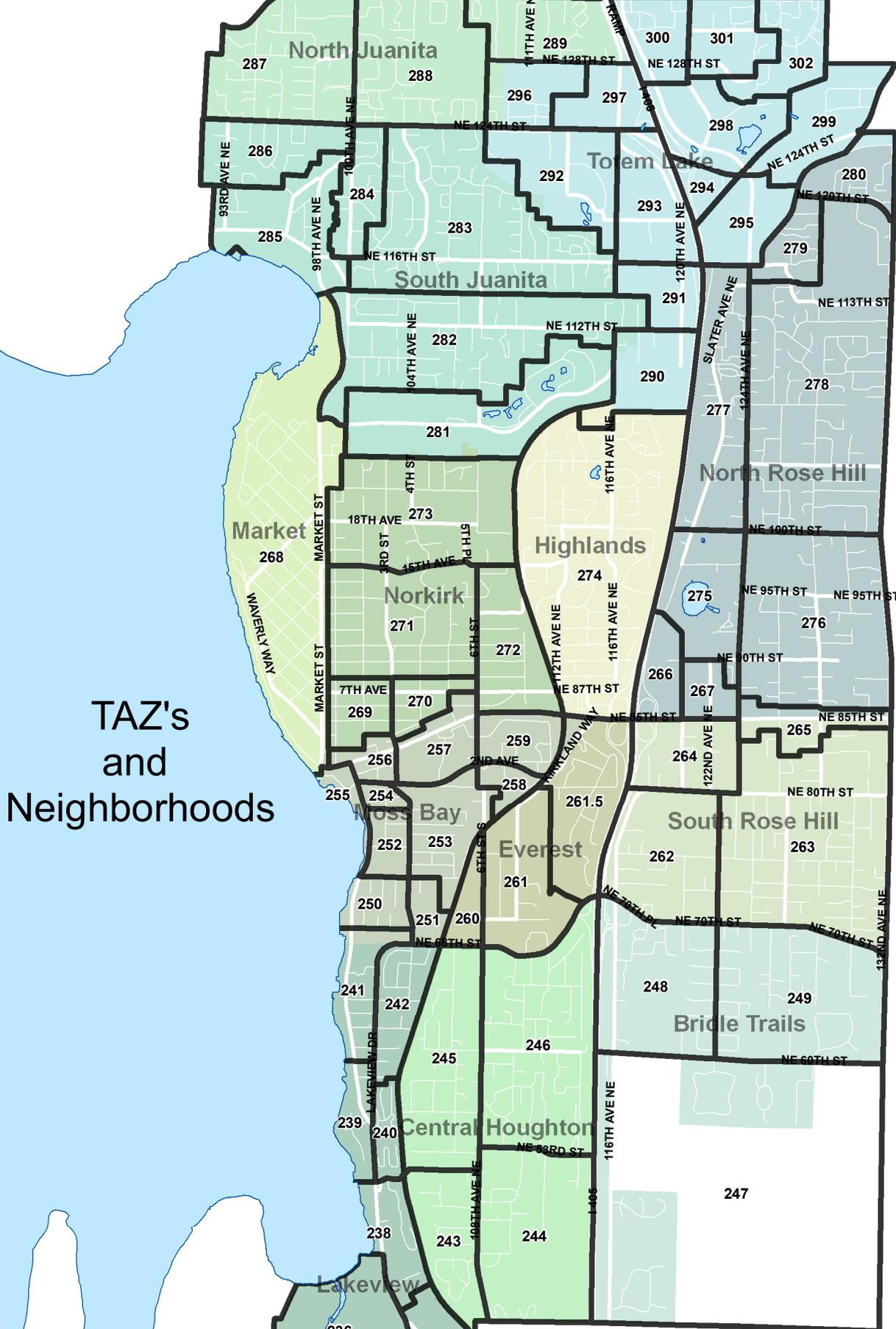
TOTAL ALL BLOCKS	465,777	110,539	180,681	1,135,164	954,483
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TRANSPORTATION ANALYSIS ZONE: LAND USE ASSUMPTIONS - NO ACTION

Based on 2008 Downtown Area Planned Action EIS Transportation Analysis Assumptions.

Neighborhood	Site	TAZ	Existing Square Feet or Units *				No Action Square Feet or Units				Net Change Square Feet or Units				Notes
			Commer	Office	MF	SF	Commer	Office	MF	SF	Commer	Office	MF	SF	
Moss Bay	Superblock, CBD3	257	310,239	225,139	353	0	362,302	759,339	401	0	52,063	534,200	48	0	All Employment Growth on Parkplace
Norkirk	Substation	272	0	35,878	0	104	0	105,936	0	107	0	70,058	0	3	Given Parkplace North Permit, assume office on Substation Block
Moss Bay	Post Office	259	0	263,927	362	4	0	281,923	367	5	0	17,996	5	1	Minimal change in square footage due to Altom Site
Norkirk	PLA 7B	270	0	0	182	72	0	0	192	74	0	0	10	2	Minimal growth in TAZ. Block is residential.
Moss Bay	CBD 1B Core Block	256	0	10,935	296	0	0	5,435	358	0	0	-5,500	62	0	Office reduced in favor of residential.

* Existing totals may not equal actual building statistics. The citywide model is calibrated to counts and development inputs modified so the model reflects actual observed results. The model tests differences in growth; net change is most important to consider



TAZ's and Neighborhoods



