CITY OF KIRKLAND
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DEPARTMENTS OF PUBLIC WORKS AND PLANNING AND COMMUNITY DEVELOPMENT MEMORANDUM

To: Interested Parties

From: Jim A. Arndt, P.E., Public Works Director
Eric Shields, SEPA Responsible Official

Date: February 2004

Subject: **Traffic Impact Analysis Guidelines**

I. Development Proposals Subject to SEPA and Road Concurrency

Development proposals that meet the threshold outlined below are subject to environmental review under the State Environmental Policy Act (SEPA) and to road concurrency evaluation under the City's Concurrency Management Ordinance.

The thresholds for SEPA and road concurrency review include meeting anyone of the following:

- Residential projects of 10 units or more;
- Non-residential buildings of more than 4,000 square feet with associated parking of more than 20 spaces;
- Parking lots for more than 20 vehicles; or
- Additions or modifications to, or replacement of, any building or facility if the proposal changes the character of the building or facility and/or the cumulative impacts make the total development no longer exempt.

II. Transportation Plans – Concurrency, LOS and City Project List

The City's adopted level of service standards (LOS) for road concurrency are found in the Comprehensive Plan. The City has a two part standard based on the ratio of traffic volume to intersection capacity (V/C) for system signalized intersections at PM peak hour:

Part 1. The average level of service (V/C ratio) of the impacted sub-area(s) is estimated and then compared to the adopted level of service standard from the Comprehensive Plan (see Figures 4a and 4b in the attached Traffic Impact Analysis Guidelines).

Part 2. All system intersections must have a V/C ratio lower than or equal to 1.4 .

The City has developed a long range transportation plan to maintain the adopted concurrency LOS. The long range transportation plan is composed of a 6-year and a 20-year transportation project list found in Table CF-10 of the Comprehensive Plan.

III. Road Impact Fees

The transportation projects that increase capacity are funded in part by road impact fees (see Title 27 of the Kirkland Municipal Code). Available capacity is reduced when new development generates more traffic in the transportation system. New development that generates traffic is required to pay its proportionate share to maintain the concurrency LOS through the payment of road impact fees.

In summary, the City's impact fees schedule (see Appendix A of the attached Traffic Impact Analysis Guidelines) was derived by taking the total cost of the transportation capacity projects needed to maintain the LOS, determining the expected land use growth within the city and adjacent areas outside of the city, converting the land use growth to traffic growth, deleting the pass-through traffic and then calculating the "cost per trip" by dividing the total growth costs in Kirkland cost by the number of new vehicle trips. The Institute of Transportation Engineers' (ITE) published trip generation rates were used to compute the magnitude of impact for various land use types.

IV. Road Concurrency Review

Concurrency review looks at a new development's impact on the *transportation network* as measured by the adopted level of service standards (LOS) for road concurrency found in the Comprehensive Plan.

All new development must pass the concurrency test before making an application for SEPA review, land use permits and building permits (see Title 24 of the Kirkland Municipal Code). The two part LOS standard note above must be met. The purpose of the test is to ensure that the proposed development will not result in the LOS falling below the adopted LOS. If concurrency is not passed, the applicant has options outlined in the attached Traffic Impact Analysis Guidelines.

V. SEPA Review

SEPA review looks at impacts on the *immediate and nearby vicinity*, such as vehicular access points, frontage right-of-way improvements and nearby intersections (see Kirkland Municipal Code, Title 24).

Review of transportation impacts is different for SEPA and concurrency. SEPA uses the "significance adverse environmental impact" standard and a LOS of A through F with a different calculation approach than road concurrency (see Table 1 in the attached Traffic Impact Analysis Guidelines). The intention of SEPA mitigation is to reduce a project's impact on a given intersection to attain the next better SEPA LOS. In addition, SEPA review looks at safety, specific access points, circulation needs, and impacts on neighborhoods, pedestrians and transit facilities.

Under SEPA, the applicant must incorporate mitigating measures into the proposal as identified in the SEPA review process that are needed to reduce the impacts below the "significance adverse environmental impact" threshold. If no mitigating measures are

needed or if mitigating measures are incorporated in the proposal, then the City will issue a Determination of Non-Significance and the applicant may obtain the necessary permits.

Some proposed developments may create a "significance adverse environmental impact" under SEPA to an intersection that is planned to be improved under the City's long range transportation plan. SEPA mitigation is considered met through the payment of the road impact fee for any impacted intersection that the City plans to improve and road impact fees are used to pay for the improvements. However, SEPA mitigation is not entirely met if the City's planned improvements for the impacted intersection do not include all of the improvements needed to fully mitigate impacts to the intersection based on the SEPA LOS.

For example, if the City's planned improvements for a particular intersection does not include a left-turn lane, but SEPA review determines that the left-turn lane is needed to reduce the development's impact below a "significant adverse environmental impact." The applicant would need to install the left turn-lane or provide funds to the City to cover the cost of the additional lane when the intersection improvements are made.

VI. Review Process

A. Timing of Concurrency and SEPA review

Concurrency must be passed *before* both the SEPA review process begins and before application for land use or building permit is submitted. The City uses the results of the concurrency test to determine what additional information may be needed in the Traffic Impact Analysis for SEPA review.

Within *90 calendar days* of passing the concurrency test, a complete SEPA submittal must be provided to the City, including a checklist, a Traffic Impact Analysis and any other required environmental studies. If this deadline is not met, the concurrency test expires and the applicant must reapply for concurrency.

Once the City has completed its review of all environmental documents, a determination of Non-Significance (DNS), a mitigated DNS, a determination of Significance (DS) and/or Concurrency Notice are issued. The SEPA review process must be complete, including the appeal process, before the City renders a final decision on a land use permit or issue a building permit.

B. Request for Reconsiderations for Concurrency Test Notice

If a concurrency test is not passed, an applicant may submit a request for reconsideration of that decision within *14 calendar days* of the decision. Refer to the Kirkland Municipal Code Title 25 to see what can be reconsidered.

C. Appeals of Concurrency Test Notice and SEPA Determinations

The Concurrency Test Notice and/or the SEPA determination may be appealed by the applicant or anyone directly affected by the proposed development. Appeals must be

filed within *14 calendar days* of the issuance of the SEPA Determination of Non-Significance (DNS), including those with mitigation, or within *7 calendar days* of publication of a Determination of Significance (DS). Appeals are heard at an open record hearing.

VII. Guidelines for Traffic Impact Analysis

Development proposals subject to SEPA and road concurrency require a traffic impact analysis to estimate impacts and mitigation and to determine if the development will result in the reduction of level of service below the adopted standards.

To assist applicants in the preparation of the information needed for the road concurrency test and traffic impact analysis for SEPA, the City has established the attached Traffic Impact Analysis Guidelines.

The goals of these guidelines are to:

- Assist in the determination of project compliance with road concurrency requirements and the State Environmental Policy Act (SEPA);
- Allow a thorough and complete review of potential traffic impacts; and
- Ensure that review and mitigation of all proposals occur in a consistent and equitable manner.

The attached guidelines are intended to cover a wide variety of situations and do not include special requirements that may apply to a specific proposal. To be sure that a specific traffic analysis contains the proper information, please review these guidelines with the Public Works Department's Transportation Engineer (425-8281243).