August 16, 2010

Subject: Comprehensive Plan Land Use, Capital Facility, and Transportation Amendments and Zoning and Municipal Code Amendments Final Supplemental Planned Action Environmental Impact Statement (Final SEIS)

Dear Interested Citizen:

On October 16, 2008, the City of Kirkland (City) completed the Downtown Area Planned Action Final Environmental Impact Statement (FEIS) addressing Parkplace and two other properties in its vicinity. This Final Supplemental Planned Action Environmental Impact Statement (Final SEIS) is a supplement to that 2008 FEIS.

The City is considering alternative locations for accommodating additional commercial growth in or near Downtown Kirkland (Downtown). The City previously studied additional employment growth and adopted ordinances approving the Touchstone (Parkplace) Private Amendment Request in 2008. Following the issuance of the Draft SEIS on May 27, 2010, this Final SEIS responds to comments and completes the environmental analysis of alternatives for growth to comply with a Central Puget Sound Growth Management Hearings Board order to consider off-site alternatives for comprehensive plan and zoning amendments.¹

Using the additional information provided in this Final SEIS, the City is reevaluating its previous approval of the Touchstone (Parkplace) Comprehensive Plan and Zoning and Municipal Code amendments. The City is also considering additional amendments to the Transportation and Capital Facilities Elements of the Comprehensive Plan, and techniques that can be used to impose mitigation requirements on project applicants. Following consideration of this new information, the City Council may decide to reaffirm or modify its prior decision. Specifically, the Proposal studied in the Final SEIS includes the following actions:

- Amend the City of Kirkland Comprehensive Plan and Kirkland Zoning and Municipal Codes to allow for up to 954,000 additional square feet of retail and office uses on the Parkplace site and/or on other sites evaluated in the Final SEIS in or near Downtown.
- Amend the City of Kirkland Capital Facilities and Transportation Elements of the Comprehensive Plan to include all necessary capital improvements and a multi-year financing plan based on the 10-year transportation needs identified in the Comprehensive Plan, including those supporting Downtown growth.
- Approve a Planned Action Ordinance to facilitate future environmental review of selected properties in Downtown.

¹ See WAC 197-11-440 (5)(d), as well as Central Puget Sound Growth Management Hearings Board Case, Davidson Series v. City of Kirkland (October 5, 2009), Case No. 09-3-0007c.
The City will also consider other implementing tools to ensure financing of transportation improvements. Such tools may take the form of a development agreement with one or more property owners consistent with RCW 36.70B.170, or a similar technique.

The SEIS alternatives would vary in location of additional growth in Downtown. The SEIS Alternatives are additional options to those considered in the 2008 FEIS. The SEIS alternatives not previously studied in the 2008 FEIS include a Superblock Alternative, Unified Ownership Alternative, and Off-Site Alternative. In addition, the SEIS compares the three new alternatives to the same No Action Alternative studied in 2008. It should be noted that the new alternatives do not constitute specific development proposals. No new applications have been submitted for Comprehensive Plan or Zoning amendments, and the new alternatives do not presume to reflect the intentions of individual property owners or the availability of specific properties. Rather, the new alternatives hypothesize how additional office and retail growth could possibly be located in and near Downtown.

After publication of the Draft SEIS on May 27, 2010, the City established a 30-day comment period that closed on June 28, 2010. A Planning Commission public hearing was held on June 24, 2010. This Final SEIS responds to comments received on the Draft SEIS during the comment period and at the hearing. In particular, this Final SEIS provides information regarding the following elements of the SEIS Alternatives:

- Clarification of the level of development on the Parkplace site compared with other sites/portions of the alternatives, showing how all the Draft SEIS alternatives plan for lower growth on Parkplace.
- Using the Draft SEIS results, identification of how and where the alternatives result in lower, similar, and/or greater impacts than 2008 FEIS alternatives on the Parkplace site as well as the alternatives cumulatively.
- Identification of how the alternatives present a reasonable range of scenarios and development "bookends", and how decision makers could select alternative features and/or mitigation measures to reduce impacts.

The City intends to hold public meetings with the Planning Commission and City Council regarding its previous approval of the Touchstone (Parkplace) Comprehensive Plan and Zoning and Municipal Code amendments. Please review the City’s website for more information, [www.ci.kirkland.wa.us](http://www.ci.kirkland.wa.us).

Should you have questions, please contact Angela Ruggeri at the address above or by phone at (425) 587-3256.

Sincerely,

[Signature]

Eric Shields, AICP, Director  
Department of Planning and Community Development  
SEPA Responsible Official
COMPREHENSIVE PLAN LAND USE, CAPITAL FACILITY, AND TRANSPORTATION AMENDMENTS AND ZONING AND MUNICIPAL CODE AMENDMENTS

FINAL SUPPLEMENTAL PLANNED ACTION ENVIRONMENTAL IMPACT STATEMENT

PREPARED FOR:

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August 2010
Fact Sheet

Project Title


Proposal and Alternatives

The City of Kirkland (City) is considering alternative locations for accommodating additional commercial growth in or near Downtown Kirkland (Downtown). The City previously studied additional employment growth in connection with a project proposal and adopted ordinances approving the Touchstone (Parkplace) Private Amendment Request in 2008. This SEIS has been prepared to review additional on-site and off-site alternatives to comply with a Central Puget Sound Growth Management Hearings Board order.¹

Using the additional information provided in this Final SEIS, the City is reevaluating its previous approval of the Touchstone (Parkplace) Comprehensive Plan and Zoning and Municipal Code amendments using the additional information provided in this Final SEIS. The City is also considering additional amendments to the Transportation and Capital elements of the Comprehensive Plan, and techniques that can be used to impose mitigation requirements on project applicants. Following consideration of this new information, the City may decide to reaffirm or modify its prior decision. Specifically, the Proposal studied in this Final SEIS includes the following actions:

- Amend the City of Kirkland Comprehensive Plan (regarding land capacity) and Zoning and Municipal codes (including design guidelines) to allow up to 954,000 additional square feet of retail and office uses on the Parkplace site and/or on other sites evaluated in the Final SEIS in or near Downtown.

- Amend the City of Kirkland Capital Facilities and Transportation Elements of the Comprehensive Plan to include all necessary capital improvements and a multi-year financing plan based on the 10-year transportation needs identified in the Comprehensive Plan, including those supporting Downtown growth.

- Approve a planned action ordinance to facilitate future environmental review of selected properties in Downtown.

The City will also consider other implementing tools to ensure financing of transportation improvements. Such tools may take the form of a development agreement with one or more property owners consistent with Revised Code of Washington (RCW) 36.70B.170, or a similar technique.

The SEIS alternatives would vary the location of additional growth in Downtown. The location of the alternative would, in turn, determine the type of Comprehensive Plan, Land Use, Zoning, and other plan and regulatory amendments that may be required. The SEIS alternatives are additional options

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

The SEIS alternatives not previously studied in the 2008 FEIS include two on-site alternatives—the Superblock Alternative and Unified Ownership Alternative—and the Off-Site Alternative. Additionally, the Final SEIS compares the three new alternatives to the same No Action Alternative studied in 2008. The new alternatives were identified through a site selection study conducted by the City in May 2010.

Superblock Alternative

This reduced-intensity alternative would distribute development throughout the “Superblock” located between Central Way, 6th Street, Kirkland Way, and Peter Kirk Park, including Parkplace. This alternative is considered an on-site alternative and would also reduce height and bulk on the Parkplace site compared to 2008 FEIS Alternatives. Growth on the Parkplace site alone would increase to 482,000 square feet above the No Action Alternative, and 472,000 square feet would be distributed to the area on the Superblock south of Parkplace. This alternative would designate the block as a Planned Action.

Unified Ownership Alternative

This on-site alternative would locate additional growth on the Parkplace site (482,000 square feet) and Post Office site (472,000 square feet). Both sites are under a single ownership which would allow a greater ability to master plan uses and amenities. The level of growth on the Parkplace site is similar to that in the Superblock Alternative. Development height and bulk would be reduced on the Parkplace site compared to 2008 FEIS Alternatives. The Post Office site would redevelop with office and retail uses at a level above the No Action Alternative. This alternative would designate the Parkplace portion of the alternative as a Planned Action.

Off-Site Alternative

This alternative would allow Parkplace to develop consistent with the No Action Alternative and would allot the 954,000 square feet increase to other blocks in and near Downtown including two blocks north of Parkplace across Central Way and one block west of Peter Kirk Park. This alternative would not designate the site(s) as a Planned Action.

No Action Alternative

For purposes of comparison, the No Action Alternative assumes growth consistent with the 2008 Comprehensive Plan and Zoning Code for the blocks under study to the year 2022. It is the same No Action Alternative considered in 2008, with the information provided by study block to match the action alternatives studied in this SEIS.

It should be noted that the new alternatives do not constitute specific development proposals. No new applications have been submitted for Comprehensive Plan or Zoning amendments, and the new alternatives do not presume to reflect the intentions of individual property owners or the availability of specific properties. Rather, the new alternatives hypothesize how additional office and retail growth could be located in and near Downtown.
Location

The **Superblock Alternative** is bounded by Central Way on the north, 6th Street on the east, Kirkland Way on the south, and Peter Kirk Park on the west.

The **Unified Ownership Alternative** consists of two separate properties south of Central Way, the Parkplace site at 457 Central Way, and the Post Office site located at 721 4th Avenue.

The **Off-Site Alternative** would distribute the additional commercial growth to multiple other sites in and near Downtown including the Substation Block, CBD-7 Block, and CBD-1B Core Block. These blocks are located as follows:

- **Substation Block** is located northeast of the Superblock. The Substation Block is bounded by 7th Avenue on the north, 8th Street on the east, NE 85th Street on the south, and 6th Street on the west.
- **CBD-7 Block** is located generally northwest of the Superblock. The CBD-7 Block is bounded by an alley between Central Way and 4th Avenue on the north, 5th Street on the east, Central Way on the south, and 3rd Street on the west.
- **CBD-1B Core Block** is located west of Peter Kirk Park and the Superblock. The CBD-1B Block is bounded by Central Way to the north, 3rd Street to the east, the alley dividing the block between Park Lane and Kirkland Avenue on the south, and Main Street on the west.

Proponent

City of Kirkland

Lead Agency

City of Kirkland

Responsible Official

Eric Shields, AICP, Director
Department of Planning and Community Development
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123 Fifth Avenue
Kirkland, WA 98033
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Contact Person

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(425) 587-3256
Required Approvals

Once the City has considered the SEIS alternatives, it may choose to re-adopt the 2008 ordinances approving Parkplace, amend the 2008 ordinances, or approve a different alternative. For legislative actions, the Kirkland Planning Commission has authority to make recommendations on re-adoptions or amendments or alternative courses of action. The City Council has the authority to approve re-adopted, amended, or new ordinances. The following types of legislation may be considered for re-adoption, amendment, or new action:

- amendments to the City of Kirkland Comprehensive Plan elements and land use map,
- amendments to City of Kirkland Zoning Code and Zoning Map, and
- amendments to the design guidelines in the Kirkland Municipal Code.

As well, the City may re-adopt, amend, or adopt a new planned action ordinance for a selected alternative. The City may also consider other implementing tools such as a development agreement.

In addition, the State of Washington Department of Commerce reviews proposed comprehensive plan and development regulation amendments during a 60-day period prior to adoption. The Puget Sound Regional Council reviews transportation element amendments for consistency with regional plans.

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(Transportation model)

**Date of Final SEIS Issuance**

August 16, 2010
Prior Public Comment

Affected agencies, tribes, and members of the public were invited to comment on the Draft SEIS during a comment period extending from May 27 to June 28, 2010. A public hearing before the Planning Commission was also held on June 24, 2010. This Final SEIS responds to written and oral comments received during the comment period.

Date of Implementation

The date of anticipated implementation of the Comprehensive Plan, Zoning and other regulatory changes is October 2010. Phased development on individual sites would follow necessary permit approvals.

Previous Environmental Documents and Adoption

On October 16, 2008, the City completed the Downtown Area Planned Action FEIS addressing Parkplace and two other properties in its vicinity. This Final SEIS is a supplement to that 2008 FEIS.

On October 15, 2004, the City issued an FEIS for the proposed City of Kirkland Comprehensive Plan. That document addresses future growth throughout the City and its planning area, including Downtown—which is the focus of this SEIS—as well as Totem Center, which is referenced in proposed amendments to the City’s capital facilities and transportation elements. Subsequent State Environmental Policy Act (SEPA) addenda and checklists relevant to redevelopment of the Totem Lake Mall in the Totem Center area include:

- Zoning Code, Zoning Map and Municipal Code Amendments, EIS Addendum, for TL 4-TL 11 Zones (not including TL 9), issued on October 24, 2004, File ZON04-00020,
- Hart Private Amendment Request issued on January 17, 2008, File ZON06-00019,
- TL 9 Zoning Implementation issued on January 17, 2008, File ZON07-00023,
- Zoning Code amendments to the TL 6A zone for affordable housing, issued on May 13, 2009, File ZON09-00006, and

Other SEPA environmental addenda and checklists for non-project actions since issuance of the 2008 FEIS have addressed the following:

- Commute Trip Reduction Plan, issued on July 11, 2008,
- Active Transportation Plan, issued on February 4, 2009,
- LSM and Cottage Housing Zoning and Municipal Code Amendments, issued on July 14, 2008, File No. ZON08-00007,
- Costco Wholesale Private Amendment Request to RH 1B zone issued on September 29, 2008, File ZON07-00017,
- South Kirkland Park and Ride – City-Initiated Amendments to support Transit-Oriented-Development (TOD), issued on October 22, 2008, File ZON08-00002,
- CBD Amendments (upper story stepbacks, superior retail, building heights, etc.) – City Council initiated, issued on January 14, 2009, File ZON08-00019,
- Fast Track Zoning Code Amendments, issued on March 9, 2009, File ZON09-00002,
- Stormwater code amendments to KMC Section 15.04 and new stormwater design manual proposed by Public Works. Implements Stormwater Master Plan adopted in 2005, issued on May 12, 2009,
- Shoreline Master Program update (goals, policies and regulations), issued on July 15, 2009, File ZON06-00017, and
- Update to KZC Chapter 95 Tree Regulations, issued on October 19, 2009, File ZON08-00016.

Where appropriate, prior environmental review was assessed in the course of preparing this Final SEIS. Additionally, for purposes of the Comprehensive Plan amendments addressing the Totem Center vicinity, the City adopts the 2004 EIS and associated addenda and determinations of non-significance.

**Location of Background Information**

City of Kirkland, Planning and Community Development Department. See Lead Agency and Responsible Official Address listed above.

**Final SEIS Purchase Price**

The purchase price of a copy of the Final SEIS is based on reproduction costs of printed documents or compact discs. Hard copies of the Final SEIS are available for review at the Planning Department at City Hall, 123-5th Ave and at the downtown Kirkland Library, 308 Kirkland Ave. The document is posted on the City's Web site at http://www.ci.kirkland.wa.us/.
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<th>Acronym</th>
<th>Full Form</th>
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<tr>
<td>City</td>
<td>City of Kirkland</td>
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<tr>
<td>Downtown</td>
<td>Downtown Kirkland</td>
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<td>IND</td>
<td>Industrial</td>
</tr>
<tr>
<td>FAR</td>
<td>floor area ratio</td>
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<tr>
<td>FEIS</td>
<td>Final Environmental Impact Statement</td>
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<td>Final SEIS</td>
<td>Final Supplemental Planned Action Environmental Impact Statement</td>
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<tr>
<td>GHG</td>
<td>greenhouse gas</td>
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<td>GMA</td>
<td>Growth Management Act</td>
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<td>LOS</td>
<td>level of service</td>
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<td>PAR</td>
<td>Private Amendment Request</td>
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<td>PH</td>
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<td>RCW</td>
<td>Revised Code of Washington</td>
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<td>SEPA</td>
<td>State Environmental Policy Act</td>
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<tr>
<td>TIA</td>
<td>Traffic Impact Analysis</td>
</tr>
<tr>
<td>TOD</td>
<td>Transit-Oriented-Development</td>
</tr>
<tr>
<td>WAC</td>
<td>Washington Administrative Code</td>
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Chapter 1

Summary

1.1 Purpose

This Final Supplemental Planned Action Environmental Impact Statement (Final SEIS) is intended to assist City of Kirkland (City) decision makers to consider alternative locations for accommodating additional commercial growth in or near Downtown Kirkland (Downtown). Consistent with State Environmental Policy Act (SEPA) Rules (Washington Administrative Code [WAC] 197-11-560), this Final SEIS responds to public comments made on the Draft SEIS issued in May 2010 and provides corrections to the Draft SEIS analysis as needed. Prior to acting on the proposal, the Final SEIS will be considered by City decision makers for a minimum of seven days before taking final action.

1.2 Proposal

The City previously studied a proposal to accommodate additional employment growth on the Parkplace site and adopted ordinances approving the Touchstone (Parkplace) Private Amendment Request in 2008. The SEIS, now completed with this Final SEIS, reviews alternatives to growth on the Parkplace site to comply with a Central Puget Sound Growth Management Hearings Board order and its interpretation of the SEPA Rules, which require consideration of an off-site alternative for legislative actions and private rezone requests in some situations.1

The Proposal studied in this Final SEIS includes the following actions:

- Amend the City of Kirkland Comprehensive Plan (regarding land capacity) and Kirkland Zoning and Municipal Codes (including design guidelines) to allow up to 954,000 additional square feet of retail and office uses on the Parkplace site and/or on other sites evaluated in the Final SEIS in Downtown.
- Amend the City of Kirkland Capital Facilities and Transportation Elements of the Comprehensive Plan to include all necessary capital improvements and a multi-year financing plan based on the 10-year transportation needs identified in the Comprehensive Plan, including those supporting Downtown growth.
- Approve a planned action ordinance to facilitate future environmental review of selected properties in Downtown.

The City will also consider other implementing tools to ensure financing of transportation improvements. Such tools may take the form of a development agreement with one or more property owners consistent with Revised Code of Washington (RCW) 36.70B.170, or a similar technique.

Once the City has considered the additional alternatives addressed in the Final SEIS, it may choose to re-adopt the 2008 ordinances, amend the 2008 ordinances, or approve a different alternative.

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

This section provides a summary of alternatives considered in 2008 and in 2010. For additional details, please refer to the Draft SEIS, dated May 27, 2010.

Downtown Area Planned Action FEIS Alternatives—2008

In 2008, the City's prior EIS studied placing new growth in Downtown on Parkplace, an 11.5-acre site located at 457 Central Way. The site is currently developed with a mix of retail and office uses. The City completed the Downtown Area Planned Action Final Environmental Impact Statement (FEIS) for the Parkplace site in October 2008. The 2008 FEIS alternatives included the following alternatives:

- **Proposed Action (2008 Touchstone Private Amendment Request [PAR]).** Approve a private amendment request by Touchstone to amend the City of Kirkland Comprehensive Plan policies, Zoning Code, and Zoning Map, allowing redevelopment of the Parkplace retail and office complex with approximately 1.8 million square feet of office, retail, and hotel use. To achieve the redevelopment, increased building heights, reduced setbacks, parking requirement reductions, and other related code amendments were considered. The approximate net increase in growth between the No Action (below) and Proposed Action for the Parkplace site was 954,000 square feet.

- **FEIS Review Alternative (2008 Approved).** Develop the same 954,000 square feet of employment uses on the Parkplace retail and office complex as the Proposed Action but design future development with different heights and setbacks in relation to Peter Kirk Park and Central Way, and apply new design guidelines. This alternative was approved by the City in 2008 through Comprehensive Plan, Zoning, and Planned Action ordinances.

- **No Action (2008 Parkplace site).** Continue growth under the applicable Comprehensive Plan and Zoning Code, in place prior to approval of the FEIS Review Alternative, on the Parkplace site and elsewhere in the City; this alternative would permit a total of 838,700 square feet of retail and office uses on the Parkplace site. This alternative results in a net increase in growth over the current site conditions of 600,250 square feet of office and retail space.

Draft SEIS Alternatives—2010

Because the City is considering legislative amendments to the Comprehensive Plan and Zoning Code, a broader review of appropriate locations for growth, including an off-site alternative, is being undertaken in this SEIS. The City is considering alternative sites, or combinations of multiple sites, in or near Downtown where an additional 954,000 square feet of retail and office could locate. The SEIS, as completed by this Final SEIS, analyzes additional alternatives to the Touchstone proposal not previously studied in the 2008 Downtown Area Planned Action FEIS. No other specific proposals are before the City at this time apart from Parkplace described above.

The SEIS on-site and off-site alternatives were identified with the aid of the Commercial Growth Alternatives Site Selection Study (Draft SEIS Appendix A) conducted in May 2010. The study identifies the policy and land use concepts guiding commercial growth in the City, location of large properties, environmental constraints, location of transit and other infrastructure, development capacity, and the ability to meet planning objectives for a range of properties citywide and in the...
Downtown vicinity. As a result of the study, three alternatives were selected for detailed review in the Draft SEIS including the Superblock Alternative, Unified Ownership Alternative, and the Off-Site Alternative made up of three blocks in or near Downtown. These alternatives can be compared to the Draft SEIS No Action Alternative as well as to the prior 2008 FEIS Alternatives.

It should be noted that the new alternatives do not constitute specific development proposals. No new applications have been submitted for Comprehensive Plan or Zoning amendments, and the new alternatives do not presume to reflect the intentions of individual property owners or the availability of specific properties. Rather, the new alternatives hypothesize how additional office and retail growth could possibly be located in and near Downtown and provide a means for comparing impacts.

The Draft SEIS alternatives are described as follows:

- **Superblock Alternative.** This alternative would distribute 954,000 square feet of office and retail development throughout the “Superblock” located between Central Way, 6th Street, Kirkland Way, and Peter Kirk Park. This is considered an on-site alternative since development amount, intensity, height, and bulk would be reduced on the Parkplace site compared to 2008 FEIS Alternatives. The growth on the Parkplace site alone would be approximately 482,000 square feet. An additional 472,000 square feet of development would be allotted to the area on the Superblock south of Parkplace. This alternative would designate the block as a Planned Action.

- **Unified Ownership Alternative.** This alternative would locate 954,000 square feet of office and retail development on the Parkplace and Post Office sites. For purposes of the SEIS, the Unified Ownership Alternative is considered an on-site alternative, which would also include some off-site development. The level of growth on Parkplace is the same as the Superblock Alternative (482,000 square feet) and less than the 2008 FEIS Alternatives. Development intensity, height, and bulk would also be reduced on the Parkplace site compared to 2008 FEIS alternatives. The Post Office site would redevelop to contain 472,000 square feet of office and retail uses above the No Action Alternative. Each site is in single ownership, which would make it easier to coordinate master planning and amenities on the two sites. This alternative would designate the Parkplace portion of the alternative as a Planned Action.

- **Off-Site Alternative.** This alternative would allow Parkplace to develop consistent with the No Action Alternative and would distribute an additional 954,000 square feet of office and retail development to other blocks in and near the Central Business District including two blocks north of Parkplace across Central Way and one block west of Peter Kirk Park. This alternative would not designate the site(s) as a Planned Action because of the dispersed configuration of the properties.

- **No Action Alternative (2008 All Blocks).** For purposes of comparison, the No Action Alternative assumes growth consistent with the 2008 Comprehensive Plan and Zoning Code for the blocks under study to the year 2022. It is the same No Action Alternative considered in 2008, prior to action on Parkplace and two other PARs, with the information provided by study block to match the action alternatives studied in the 2010 SEIS.
Comparison of Alternatives

Each of the alternatives considered in 2008 and those under consideration in 2010 are listed below with their size, configuration, growth, floor area ratio (FAR), and building heights.

Table 1-1. Alternatives Comparison

<table>
<thead>
<tr>
<th>Alternative</th>
<th>Acres</th>
<th>Configuration</th>
<th>Total Building (SF)</th>
<th>Net SF² Growth above No Action</th>
<th>Maximum FAR</th>
<th>Maximum Building Height</th>
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</thead>
<tbody>
<tr>
<td>Proposed Action (2008 Touchstone PAR)</td>
<td>11.5</td>
<td>Single site and owner</td>
<td>1,792,700</td>
<td>954,000</td>
<td>3.57¹</td>
<td>4–8</td>
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<tr>
<td>FEIS Review (2008 Approved)</td>
<td>11.5</td>
<td>Same</td>
<td>1,792,700</td>
<td>954,000</td>
<td>3.57¹</td>
<td>4–8</td>
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<tr>
<td>Superblock</td>
<td>17.54</td>
<td>One block, multiple owners</td>
<td>2,007,120</td>
<td>954,894</td>
<td>2.63</td>
<td>4–6</td>
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<tr>
<td>Parkplace site alone</td>
<td>11.5</td>
<td>One owner</td>
<td>1,320,982</td>
<td>482,282</td>
<td>2.63</td>
<td>4</td>
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<td>Unified Ownership (2008)</td>
<td>10.69</td>
<td>Three blocks, multiple owners</td>
<td>1,813,429</td>
<td>954,300</td>
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<tr>
<td>Parkplace site alone</td>
<td>11.5</td>
<td>One owner</td>
<td>1,320,982</td>
<td>482,282</td>
<td>2.63</td>
<td>4</td>
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<tr>
<td>Off-Site</td>
<td>14.99</td>
<td>Two sites, two indiv. owners</td>
<td>1,135,164</td>
<td>954,483</td>
<td>2.44</td>
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<td>Parkplace site alone</td>
<td>11.5</td>
<td>One owner</td>
<td>838,700</td>
<td>0</td>
<td>1.67</td>
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<table>
<thead>
<tr>
<th>No Action (2008)</th>
<th>Acres</th>
<th>Configuration</th>
<th>Total Building SF²</th>
<th>Net SF² Growth Above Existing</th>
<th>Maximum FAR</th>
<th>Maximum Building Height</th>
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<tr>
<td>Parkplace site alone</td>
<td>11.5</td>
<td>Single site and owner</td>
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<td>600,250</td>
<td>1.67</td>
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<td>All study blocks</td>
<td>31.67</td>
<td>All blocks and sites above, multiple owners</td>
<td>1,253,336</td>
<td>670,392</td>
<td>0.91</td>
<td>3–5</td>
</tr>
</tbody>
</table>

Source: ICF International 2010.

¹ The 2008 FEIS identified a FAR of 3.25 for the three sites studied at the time—Parkplace, Altom, and Orni. However, the figure of 3.57 is based on total building volume and parcel area for Parkplace alone.

SF = square feet
1.4 Summary of Potential Impacts and Mitigation Measures

Table 1-2 summarizes the environmental impacts for each SEIS Alternative by environmental topic evaluated in the Draft SEIS (refer to Draft SEIS Chapter 3 for a complete discussion of alternatives). Additionally, Table 1-2 summarizes “Potential Mitigation Measures” (see Draft SEIS Chapter 3 for Applicable Regulations and Commitments). For comparison, the environmental impacts of the 2008 FEIS Alternatives are highlighted. Table 1-2 also presents impacts of the alternatives as a whole. Please see Chapter 3 of this Final SEIS for a discussion of impacts related to the Parkplace site alone.

1.5 Major Issues to Be Resolved

Adoption of a planned action ordinance and concurrent City of Kirkland Comprehensive Plan Land Use Map, Zoning Map, and Zoning/Municipal Code amendments to allow increased structure heights and reduced setbacks in and near Downtown would support development and redevelopment of the area to a more intensive mixed-use character and support employment growth in Downtown consistent with the vision of the Comprehensive Plan. The key environmental issues facing decision makers are the alternative distribution of traffic trips, adequate parking in the area, transit service and facilities to meet demand, potential land use conflicts, changes to visual character resulting from increased building heights, impact of increased building heights on public view corridors, and mitigating measures to address all such impacts.
### Table 1-2: Summary of Potential Impacts of All Alternatives

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<tbody>
<tr>
<td>Impacts Common to All Alternatives (Land Use Patterns)</td>
<td>Under all alternatives, the Parkplace property will redevelop into a more intense mix of office and commercial uses with more parking in structures rather than in the form of surface parking lots. In addition, the approved Parkplace North (Primeau) site on the Substation Block and a nearby parking lot are also anticipated to redevelop under both alternatives, in accordance with approved building permits.</td>
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<td></td>
<td>Overall redevelopment in the study area surrounding the blocks being analyzed will continue to increase office, retail, and multifamily mix of uses found in Downtown and its perimeter area. The few existing single-family residential uses are expected to decrease in the land use pattern study area as single-family structures located in multifamily and commercial zones redevelop.</td>
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<td></td>
<td>All Alternatives are expected to substantially increase office and to a lesser extent increase retail uses found in the Downtown vicinity.</td>
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<td></td>
<td>Redevelopment would cause the temporary or permanent displacement of some existing uses. These uses could relocate within downtown Kirkland, to other areas of the City, or some might choose to relocate outside the City.</td>
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</table>

### Land Use Patterns

**Under the No Action Alternative**
- Land use patterns would change on the Parkplace portion of the Superblock and on the Parkplace North (Primeau) and nearby parking lot on the Substation Block.

  - The Parkplace site would redevelop to a more land-efficient office and commercial development complex than currently exists. Although surface parking is expected to remain, there would be more structured parking. Buildings are expected to be approximately 5 stories in height in place of the 1 to 6 stories in place currently.

  - The Parkplace North (Primeau) site and adjoinning parking lot on the Substation Block would redevelop to a more land-efficient 3-story office building development with associated parking consistent with approved permits.

  - The remaining portions of Downtown would not be redeveloped consistent with the No Action Alternative.

**Under the Proposed Action,** the Parkplace site would redevelop according to the private amendment requested by the property owner with taller buildings between 4 and 8 stories. Redevelopment would make more efficient use of existing buildable land, including the option of using structured parking over more land-consumentive surface parking.

  - The Parkplace site's redevelopment to more intensive office and commercial uses will increase the amount of area covered by buildings and plazas or other pedestrian-oriented gathering places and it would reduce the amount of surface parking. The level of redevelopement is greater than the No Action Alternative, with more area in buildings and less in surface parking. It will be a focal point of Downtown employment.

  - The remaining portions of Downtown would redevelop consistent with the No Action Alternative.

**Development under the FEIS Review Alternative** would result in a land use pattern that is very comparable to that anticipated under the Proposed Action. Specific changes that are now incorporated into the FEIS Review Alternative that would not occur under the Proposed Action.

  - Reduced height limits and increased setback requirements along Central Way and within 100 feet of Peter Kirk Park.

  - Increased setback requirements along the south portion of the Parkplace site, adjacent to the office and residential uses.

  - Include a requirement for a central open space as part of future development.

  - Require a minimum of 25% of future development area in retail use.

**Development under the FEIS Review Alternative** would require a minimum of 25% of future development area in retail use.

**Growth would be similar to the other action alternatives but would occur on two sites rather than the single Superblock location or the three blocks of the Off-Site Alternative.**

The spread of the remainder of employment to the Post Office site on the perimeter of Downtown would provide less of a concentration of employment than the single contiguous area found under the Superblock Alternative. Growth would be more focused than the Off-Site Alternative.

**Land Use Patterns**

Under this alternative, the entire Superblock would redevelop to a more uniform development pattern of commercial and office uses at between 4 and 6 stories. The level of intensity on the Parkplace portion of the Superblock would be greater than the No Action Alternative and less than the Proposed Action Alternative. Instead some of the growth considered under the Proposed Action and FEIS Review Alternative for Parkplace would be spread to the southern portion of the Superblock.

Redevelopment will increase the amount of area covered by buildings and plazas. Redevelopment will reduce the amount of surface parking more so than under the Proposed Action Alternative, as larger areas currently covered by surface parking would be converted to primary uses and structured parking. Open space and pedestrian connections would be made, and would require design guidelines to ensure a coordinated approach across the multiple properties.

Similar to the Proposed Action Alternative, the amount and intensity of development on the Superblock will make it a focal point of Downtown employment, more so than under the No Action Alternative.

**Compared to the No Action alternative, land use patterns under the Superblock**

**Land Use Patterns**

Under this alternative, more office and retail growth would be allocated north of Central Way and west of Peter Kirk Park, with an increase on Parkplace occurring similar to the No Action Alternative. This would expand the CBD and reduce potential industrial uses planned to the east.

Under the Off-Site Alternative, all properties on the CBD-7 and CBD-1B Core blocks and most of the properties on the Substation Block would be redeveloped with taller buildings than found under the No Action Alternative. However, maximum building heights in the land use study area would be lower (between 3 and 6 stories) than anticipated under the Proposed Action Alternative. Similar to the Proposed Action and Superblock Alternatives, redevelopment would make more efficient use of existing buildable land, including the option of using structured parking over more land-consumentive surface parking.

Pedestrian connections and open space would be required, but given the dispersed growth and smaller sites, would occur in smaller pockets and in a less coordinated fashion.

New employment being created as a result of this Alternative is spread along the Central Way corridor, and does not create a focal point for Downtown development that the...
### Land Use Compatibility

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<tr>
<td>Redevelopment would occur in areas identified for commercial and office uses. Nearby properties are also designated for such uses. Building heights of redevelopment on the Parkside site would be similar to existing development on the site, although there would be more buildings constructed to existing maximum height limit of the CBD-5 zone. Similarly, the Parkside North (Primeau) site would redevelop to a multi-story building of 2-3 stories, which would be taller than all but the 2-story Parkside office building on this block. A parking lot would also develop and have increased development scale compared to current conditions. In general the scale of the No Action Alternative would be compatible with surrounding blocks.</td>
<td>The redevelopment anticipated under the Proposed Action would change the Parkside site from a primarily commercial and retail area with some office space, to a large office center with some retail and service uses, thereby switching the type of employment concentration in this area and increasing the employment magnitude. Building heights are expected to increase from a maximum height of 5 stories above average building elevation on the Parkside site under existing conditions and the No Action alternative to 8 stories above adjacent streets under the Proposed Action. This height would be taller than any nearby building. Residential uses are expected to decrease in the land use pattern study area as single-family structures located in multifamily and commercial zones redevelop. The Proposed Action is expected to increase the office portion and to a lesser extent the commercial portion of the mixture of uses found in the land use pattern study area.</td>
<td>The FEIS Review alternative would generally result in similar or fewer land use compatibility impacts compared to those described for the Proposed Action. Compared to the Proposed Action, maximum building heights on the Parkside site would be decreased along Central Way, within 100 feet of Peter Kirk Park and along the south edge of the site. This decrease allows for greater compatibility with the Park, nearby residential uses, and surrounding buildings of lower height and smaller scale than the Proposed Action.</td>
<td>Alternative will intensify in the Superblock as a whole. Although development would be spread across the Superblock, there is still more intense development found on the Parkside site under the Superblock Alternative than found under the No Action Alternative. Outside of the Superblock, the remaining portions of Downtown would redevelop consistent with the No Action Alternative.</td>
<td>The potential impacts of redevelopment on the Parkside site are similar to Superblock Alternative. Building heights on the Parkside site are expected to be similar to that found in the Superblock Alternative, but would be an increase in comparison to the Off-Site Alternative and No Action Alternative.</td>
<td>The Off-Site Alternative is expected to result in increased building heights compared to existing conditions on each of the Off-site blocks as follows: - Substation Block. Increase from 3 to 5 stories. - CBD-7 Block. Increase from 3 to 6 stories. - CBD-1B Core Block. The CBD-1B Core Block would not require an increase in height above the 55 feet allowed to accommodate the anticipated 3 to 4 story buildings. Although upper story office uses are allowed in the CBD-1B zone, this alternative would substitute a lower story office in place of the City’s stated preference of upper story residential found within the Moss Bay Neighborhood Plan. Increases in building height and intensities of uses under the Off-Site Alternative have a higher likelihood of affecting residential uses located north of the CBD-7 Block east of 3rd Street, and north of the Substation Block on the northwestern end of that block. Changing the mix of uses and intensity of uses on the Substation block under the Off-Site Alternative could increase pressure to rezone and redevelop industrial/warehouse uses located to the north of the Substation Block to a...</td>
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### Employment and Housing Mix

<table>
<thead>
<tr>
<th>Alternative</th>
<th>Description</th>
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<tr>
<td>No Action Alternative (2008 All Blocks)</td>
<td>Under the No Action alternative, over 2,500 jobs (employees) would be added to the land use analysis area. This is less than half of the job growth compared to any other alternative. Most of the jobs would be on the Parkplace site and fewer would be located on the Parkplace North site on the Substation Block. This is in comparison to the estimated 4,000 employees that currently work in Downtown (City of Kirkland 2007).</td>
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<tr>
<td>Proposed Action (2008 Touchstone PAR)</td>
<td>The Proposed Action is not anticipated to result in any new housing. Development under the Proposed Action would result in a substantial increase in employees over current conditions. The addition of approximately 1.1 million square feet of new office space and 449,600 square feet of new commercial space over existing conditions on the Parkplace site would result in over 5,300 new employees, creating a new employment focal point in Downtown.</td>
</tr>
<tr>
<td>FEIS Review Alternative (2008 Approved)</td>
<td>The FEIS Review Alternative included elements that would eliminate or reduce the need for some of the mitigation measures identified in the 2008 DEIS. Specifically, measures addressing building heights, setbacks, and building step backs became inapplicable because these measures were incorporated into the FEIS Review Alternative. No new or additional mitigation measures would be required.</td>
</tr>
<tr>
<td>Superblock Alternative</td>
<td>The new CBD-5A zoning designation if applied to the full Superblock Alternative should create districts that could include enhanced upper story setbacks, setbacks and/or landscape buffering requirements for development abutting any existing multifamily development. To reduce potential changes in activity</td>
</tr>
<tr>
<td>Unified Ownership Alternative</td>
<td>The new CBD-5A zoning designation if applied to the full Superblock Alternative should create districts that could include enhanced upper story setbacks, setbacks and/or landscape buffering requirements for development abutting any existing multifamily development. To reduce potential changes in activity</td>
</tr>
<tr>
<td>Off-Site Alternative</td>
<td>Development under the Off-Site Alternative would provide a similar amount of employment as the other action alternatives. These would be located in Downtown and its periphery on three separate sites. However, employment would be spread more widely under the Off-Site Alternative than any other alternative considered, creating less of a focal point than other alternatives.</td>
</tr>
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</table>

### Potential Mitigation Measures (Land Use Patterns)

<table>
<thead>
<tr>
<th>Site</th>
<th>Mitigation Measures</th>
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<tbody>
<tr>
<td>Parkplace site</td>
<td>Adherence to setbacks and buffer requirements for development abutting existing multifamily residential buildings within the Superblock that may not choose to redevelop, the revised regulations could include enhanced upper story setbacks, setbacks and/or landscape buffering requirements for development abutting any existing multifamily development. To reduce potential changes in activity</td>
</tr>
<tr>
<td>Superblock</td>
<td>Mitigation measures for the Parkplace portion of the alternative would be similar to the Superblock Alternative. Regarding the Post Office site, the City could:</td>
</tr>
<tr>
<td>Post Office site</td>
<td>• Apply design standards for buildings over 2 stories in height to mitigate for impacts of taller buildings at 70 feet anticipated on the property.</td>
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<tr>
<td>Kirkland Way</td>
<td>• Limit floor area ratios to reduce the scale and intensity of employment structures in proximity to existing residential development.</td>
</tr>
<tr>
<td>Substation Block</td>
<td>• Limit potential types of commercial uses that could increase activity levels in proximity to residential uses such</td>
</tr>
</tbody>
</table>

### Summary

- **No Action Alternative (2008 All Blocks)**
- **Proposed Action (2008 Touchstone PAR)**
- **FEIS Review Alternative (2008 Approved)**
- **Superblock Alternative**
- **Unified Ownership Alternative**
- **Off-Site Alternative**
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<td>buildings away from the park, (as outlined in more detail in FEIS Section 3.3, Aesthetics); o Adopt height limits within a defined proximity of the park; o Modulate facades with defined widths and depths.</td>
<td>levels due to retail uses along Kirkland Way, the City could require a smaller amount of retail use than in other block faces (less than 25%), allow a smaller range of retail uses that would not result in activity levels when residential dwellings are occupied, and/or allow only standalone office uses.</td>
<td>as: require a smaller amount of retail use than in other blocks (less than 25%), allow a smaller range of retail uses that would not result in activity levels when residential dwellings are occupied, and/or allow only standalone office uses.</td>
<td>than 25% retail applied elsewhere), or allow stand-alone office on Substation Block.</td>
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<tr>
<td>In order to minimize land use conflicts with the multifamily residential buildings abutting the southeast corner of the area, the revised regulations could include enhanced setbacks and/or landscape buffering requirements in this area.</td>
<td></td>
<td></td>
<td>Apply design standards for buildings over two stories in height to mitigate for impacts of taller buildings anticipated on Substation Block and to help soften transition with nearby single-family uses.</td>
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CBD-7 Block
In order to retain the sense of open space for Peter Kirk Park and the boulevard effect along Central Way described in Moss Bay Neighborhood Plan, revised regulations could limit FAR, retain or enhance building setbacks from Central Way, and step back taller portions of buildings away from Central Way as described in Design District 7. In order to minimize land use conflicts with existing multifamily residential buildings proximate to CBD-7 Block, the revised CBD-5A regulations could include enhanced setbacks and/or landscape buffering for development abutting any existing residential development. Floor area ratio reductions, building modulation, upper storey setbacks, minimum parcel area requirements (lot consolidations), and/or other similar measures could be applied to reduce the scale and intensity of employment structures in proximity to existing residential development.

CBD-1B Block
In order to maintain pedestrian-oriented streetscape, step back portions of buildings above 2nd story on 3rd Street and on Kirkland Avenue, and step back portions of buildings above the 3rd story along Central Way as described in Design District 1 in Moss Bay Neighborhood Plan.
<table>
<thead>
<tr>
<th>Impacts Common to All Alternatives (Plans and Policies)</th>
<th>Regional Policies</th>
</tr>
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<tbody>
<tr>
<td>All alternatives considered are consistent with King County Countywide Planning Policies that provide the framework for planning in the City. Redevelopment under all alternatives would provide more concentrated development of office and commercial uses in the urban areas where public services are available; produce economic growth and development in an urban activity area; and allow development in an area well served by public transportation and nonmotorized transportation networks, allowing for multimodal transportation to the redeveloped employment area. Under all alternatives, the study area is anticipated to experience growth and redevelopment that will add a large number of new jobs in the City, particularly in the study area. Job growth due to redevelopment under all alternatives considered is expected to help the City exceed its 2001–2022 employment target of 8,800 jobs expressed in the 2008 King County Countywide Planning Policies. However, jurisdictions are only required to show that they can meet the employment targets in the countywide planning policies. The targets are not intended to act as a limitation on development potential.2</td>
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<tr>
<th>Capital Facility and Transportation Elements Amendments</th>
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<tr>
<td>The Proposal described in Chapter 2 includes amendments to the City’s Capital Facility and Transportation Elements to provide for a 10-year list of projects and to identify potential financing for those projects. The City’s existing plans already account for a 6-year and 20-year projects necessary to meet roadway concurrency standards and that require use of public funds to construct. The proposed amendments would expand the list of improvements to include developer-financed improvements that have already been reviewed in the 2008 Downtown Area Planned Action FEIS, included in the planned action ordinance for Parkplace, and included in a developer agreement for the Totem Lake Mall redevelopment. The Capital Facility and Transportation Elements amendments do not identify new projects that those have previously been analyzed and reviewed through the planning process and associated SEPA review. The amendments included in Appendix B focus on the FEIS Review Alternative. Should the City desire to approve the Superblock, Unified Ownership, Off-Site, or No Action Alternatives, the proposed amendments would need to reflect the transportation findings in Section 3.3 of the Draft SEIS. The Comprehensive Plan amendments are considered housekeeping in nature, and no impacts are anticipated.</td>
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<thead>
<tr>
<th>Plans and Policies</th>
<th>City of Kirkland Comprehensive Plan</th>
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<tbody>
<tr>
<td>The No Action Alternative is consistent with the City’s vision of Downtown. The No Action Alternative provides additional economic development on the Parkplace portion of the Superblock and the Parkplace North (Primea) site and an adjacent parking lot on the Substation Block. However, there is a lesser degree of economic growth expected under the No Action Alternative in comparison to all other alternatives. Based on the analysis contained in 2008 FEIS Section 3.4, Transportation, the No Action Alternative will add to the concentration of employees in proximity to the Kirkland Transit Center, thus helping facilitate a transportation system which allows the mobility of people and goods.</td>
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<thead>
<tr>
<th>Plans and Policies</th>
<th>City of Kirkland Comprehensive Plan</th>
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<tr>
<td>The Proposed Action is generally consistent with the City’s vision for Downtown. However, the addition of some of the tallest buildings in Downtown (up to 8 stories) to the Parkplace site will make achieving a human scale environment more challenging. The Proposed Action is consistent with Land Use and Economic Development Goals and Policies for a complete community that allows for greater jobs and customers in Downtown. Based upon the analysis contained in the Transportation section of the 2008 DEIS, the Proposed Action would create a concentration of employment that would support transit and other modes of transportation. With mitigation measures identified in the Transportation section, including shared parking and Transportation Demand Management (TDM) measures, the Proposed Action would support a transportation system which allows the mobility of people by providing a variety of transportation modes, the concentration of employment and shopping provided by the Superblock Alternative is also consistent with the City’s policy direction to add to the economic vitality of Downtown. Additional employment would also be consistent with City goals and policies related to providing employment in proximity to the Kirkland Transit Center.</td>
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<thead>
<tr>
<th>Plans and Policies</th>
<th>City of Kirkland Comprehensive Plan</th>
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<tbody>
<tr>
<td>The relationship of the FEIS Review Alternative to applicable policies and regulations of the City of Kirkland is consistent with the Proposed Action. Plans and Policies</td>
<td>City of Kirkland Comprehensive Plan</td>
</tr>
<tr>
<td>Similar to the Proposed Action, the Superblock Alternative is generally consistent with the City’s vision for Downtown. The additional of taller buildings to the Superblock site would make achieving a pedestrian-friendly scale more challenging. However, maximum building heights are expected to be greater than the CBD-5 zone at 5 stories, and lower than the proposed CBD-SA zone maximums which allows up to 8 stories. Similar to the Proposed Action Alternative, the Superblock Alternative is also consistent with Land Use and Economic Development goals for a complete community that allow for greater jobs and customers in Downtown. The concentration of employment and shopping provided by the Superblock Alternative is also consistent with the City’s policy direction to add to the economic vitality of Downtown. Additional employment would also be consistent with City goals and policies related to providing employment in proximity to the Kirkland Transit Center.</td>
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<tr>
<th>Plans and Policies</th>
<th>City of Kirkland Comprehensive Plan</th>
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<tbody>
<tr>
<td>Land Use Map amendments would be needed for the Post office site located in the CBD-5 zone at 5 stories, and lower than the proposed CBD-SA zone maximums which allows up to 8 stories. Similar to the Proposed Action Alternative, the Superblock Alternative is also consistent with Land Use and Economic Development goals for a complete community that allow for greater jobs and customers in Downtown. The concentration of employment and shopping provided by the Superblock Alternative is also consistent with the City’s policy direction to add to the economic vitality of Downtown. Additional employment would also be consistent with City goals and policies related to providing employment in proximity to the Kirkland Transit Center.</td>
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2 At the time that this DEIS was written, cities within King County were in the process of ratifying updated growth targets to be included in updates to Policies LU-25c and LU-25d (Telephone communication with Harry Reintert, King County DDES, March 30, 2010). The amended growth targets would amend the planning period to 2006–2031. The City would have its growth targets amended to be 7,200 dwelling units (plus 1,370 dwelling units in the Potential Annexation Area), and 20,200 jobs (plus 750 jobs in the Potential Annexation Area) (Growth Management Planning Council Motion 09-2). If ratified by King County cities, the City would have until 2014 to amend its Comprehensive Plan for consistency.
The No Action Alternative would be consistent with the vision and policies in the Moss Bay Neighborhood Plan. In comparison to the 2008 Comprehensive Plan, redevelopment of the Parkplace site under the Proposed Action would be inconsistent with the Design District 5 policy statement that building heights of 2 to 5 stories are appropriate in this design district. The Proposed Action contemplates building heights as tall as 8 stories in this design district. Therefore, the Proposed Action would require a Comprehensive Plan amendment to that policy in the Moss Bay Neighborhood Plan.

The Superblock Alternative is also consistent with the East Core Frame policy and narrative because it provides large, intensively developed mixed-use projects that emphasize office redevelopment in the area of the East Core Frame between Central Way and Kirkland Way.

Similar to the Proposed Action Alternative, redevelopment under the Superblock Alternative provides large, intensively developed mixed-use projects that emphasize office redevelopment in the area of the East Core Frame between Central Way and Kirkland Way. The Superblock Alternative would be inconsistent with the 2008 Comprehensive Plan’s Vision Statement since it focuses on office and commercial space.

The Superblock Alternative is consistent with the 2008 Comprehensive Plan’s Vision Statement since it focuses on office and commercial space. The Superblock Alternative is also consistent with the Parkplace Site Policy Statement that the Parkplace Site provides large, intensively developed mixed-use projects that emphasize office redevelopment in the area of the East Core Frame between Central Way and Kirkland Way.

Creating transitions on smaller blocks, particularly in cases where the blocks are adjacent to or near residential uses would be difficult and less consistent with transition goal and policy language found in the Land Use element. The Off-Site Alternative is generally consistent with transportation goals and policies promoting nonmotorized access to employment and shopping; however, fewer of the jobs provided under this Alternative are provided in proximity to the Transit Center, making the Off-Site Alternative less consistent than the Proposed Action and Superblock Alternatives with that aspect of transportation goals and policies.
### Plans and Policies

**Norkirk Neighborhood Plan**

The No Action Alternative is consistent with the Norkirk Neighborhood Plan. No amendments would be required.

The Proposed Action is consistent with the Norkirk Neighborhood Plan. No amendments would be required.

The FEIS Review Alternative is consistent with the Norkirk Neighborhood Plan. No amendments would be required.

The Superblock Alternative is inconsistent with the Norkirk Neighborhood Plan. No amendments would be required.

The Unified Ownership Alternative is consistent with the Norkirk Neighborhood Plan. No amendments would be required.

The Off-Site Alternative is inconsistent with Norkirk Policy N-7.1 because it includes retail uses on the Substation block that are not envisioned for this part of the Norkirk Neighborhood and may draw traffic into this area which is meant as a transition to Downtown. In addition, the Off-Site Alternative would require building heights of 5 stories, which are taller than the 3 stories described in Policy N-7.1 of the Norkirk Neighborhood Plan.

**Norkirk Neighborhood Plan**

The No Action Alternative is consistent with the Norkirk Neighborhood Plan. No amendments would be required.

The Proposed Action is consistent with the Norkirk Neighborhood Plan. No amendments would be required.

The FEIS Review Alternative is consistent with the Norkirk Neighborhood Plan. No amendments would be required.

The Superblock Alternative is inconsistent with the Norkirk Neighborhood Plan. No amendments would be required.

The Unified Ownership Alternative is consistent with the Norkirk Neighborhood Plan. No amendments would be required.

The Off-Site Alternative is inconsistent with Norkirk Policy N-7.1 because it includes retail uses on the Substation block that are not envisioned for this part of the Norkirk Neighborhood and may draw traffic into this area which is meant as a transition to Downtown. In addition, the Off-Site Alternative would require building heights of 5 stories, which are taller than the 3 stories described in Policy N-7.1 of the Norkirk Neighborhood Plan.
### Plans and Policies

**Zoning and Development Standards**

No amendments to zoning or development standards would be required for the No Action Alternative.

**Plans and Policies**

- **Zoning and Development Standards**
  - The Proposed Action would require amendments to the 2008 Zoning Code, including rezoning the Parkplace site from CBD-5 zone to a new CBD-5A zone to achieve the taller buildings required on the Parkplace site.

**Potential Mitigation Measures (Plans and Policies)**

There are no mitigation measures identified for the No Action Alternative.

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<tr>
<td>No amendments to zoning or development standards would be required for the No Action Alternative.</td>
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<td>Norkirk Neighborhood Plan.</td>
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<td>However, the additional employment capacity provided on the Substation Block provides an opportunity for additional service and office uses which are anticipated in the Norkirk Neighborhood Plan Vision Statement. Additional employment also provides an opportunity to create a predominantly office transition between the Norkirk Neighborhood (on the Substation Block) and Downtown envisioned in Policy N-7.1.</td>
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### Comprehensive Plan Land Use Map Amendments

- The Superblock Alternative would include the following Comprehensive Plan Land Use Map Amendments:
  - Amend the text of the Norkirk Neighborhood Plan’s Policy N-7.1 to allow a transition area between Downtown and the Norkirk Neighborhood at Substation Block that includes allowing office and commercial uses, along with the Mixed Use (MU) district, which includes mixed retail, office, and commercial uses. This amendment would also provide an opportunity to create a predominantly office transition between the Norkirk Neighborhood (on the Substation Block) and Downtown envisioned in Policy N-7.1.
Summary


August 2010

ICF 00182.10

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<td>2008 CBD 5 zone that could be retained or enhanced as mitigation measures under the new CBD-5A zoning regulations:</td>
<td>Limit heights of buildings and/or setbacks for upper stories of buildings located adjacent to Peter Kirk Park.</td>
<td>would replace the 2008 CBD 5 zone with the CBD-5A zone proposal as described in the FEIS and Proposals Review Alternatives except expanded to the entire Superblock. See Table 3.1.4. Policy and Zoning Mitigation in Section 3.1 of the Draft SEIS.</td>
<td>Kirkland Municipal Code Amendments: Include amendments to the Kirkland Municipal Code similar to those found in the FEIS Review Alternative. These amendments would add a document similar to that described in the FEIS Review Alternative that would regulate design of development on the Superblock.</td>
<td>allowance for commercial uses within this geographic area.</td>
<td>Commercial mixed uses, as well as buildings as increasing maximum building height from 3 stories to 5 stories, and makes corresponding amendments for consistency with the Norkirk Neighborhood Vision statement.</td>
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<td>Locate pedestrian-oriented activities on façades facing Peter Kirk Park.</td>
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<td>Amend Perimeter Areas language for Planned Area 5's North C Subarea to allow commercial as part of the mix of uses allowed within this Subarea, and to indicate that the Post Office parcel is designated Commercial (C).</td>
<td>Modify Moss Bay Neighborhood Plan’s Northeast Core Frame language to allow taller buildings (of 5-6 stories rather than 1-3 stories) abutting Central Way, allow for higher overall lot coverage, and to delete description of building setbacks that create a green face to Central Way, to accommodate building square footage and heights assumed.</td>
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<td>Apply setbacks for upper stories of buildings facing Central Way.</td>
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<td>The Unified Ownership Alternative would include additional Comprehensive Plan amendments, similar to those identified in the Proposed Action and FEIS Review Alternatives. See Table 3.1.4. Policy and Zoning Mitigation in Section 3.1 of the Draft SEIS.</td>
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<td>Zoning Map Amendments: Amend the City’s Zoning Map to apply the CBD-5A zone to the Post Office site as well as the Parkplace site.</td>
<td>Modify Moss Bay Neighborhood Plan’s Design District 1 language to delete description of upper story residential, and/or reduce the number of stories where residential is required in order to obtain the additional fifth building story in order to accommodate the anticipated commercial square footage.</td>
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<td>Zoning Text Amendments: The Unified Ownership Alternative would include zoning text amendments that would allow 70-foot-tall buildings on the Post Office site. The zoning would also include features described as part of the Proposed Action and FEIS Review Alternatives. See Table 3.1.4. Policy and Zoning Mitigation in Section 3.1 of the Draft SEIS.</td>
<td>Modify Moss Bay Neighborhood Plan’s Design District 7 language to allow for building heights of 5-6 stories, reduction of or elimination of the 20 foot minimum front yard setback, and lot coverage of close to 100%.</td>
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### Zoning Map Amendments

The Off-Site Alternative would include the following Zoning Map Amendments:

- Application of a new CBD-5A or similar Zone to the CBD-1B, CBD-7, and Substation Blocks.
- The Zoning Map Amendments would create consistency with the Comprehensive Plan Land Use Map and the amendment noted above.

### Zoning Text Amendments

The Off-Site Alternative would apply a new zoning designation called CBD-5A that has the following basic zoning features and will:

- Allow the same or similar land uses as allowed under CBD 5A with a minimum commercial requirement of 25% of overall development applied to the CBD-1B and CBD-7 blocks.
- Allow for distinct building height districts including building heights of a maximum of 4 stories in height on the CBD-1B block, 5-6 stories in height on the CBD-7 Block, and 5 stories in height for the Substation block.
- Reduce or eliminate required street setbacks.
- Increase lot coverage over the maximum amount allowed under the underlying zones.
- Prohibit 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. This prohibition of uses is consistent with assumptions contained within the FEIS Review Alternative.
- 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.

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### Aesthetics

#### Impacts Common to All Alternatives

All alternatives, including No Action, would result in increased building heights and lot coverage on the Parkplace property, which would make development more visually prominent. The increased visual mass could create a more intensive character along street frontages and property boundaries that may affect pedestrian comfort levels.

#### Views

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<th>Recreational Users</th>
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<tr>
<td>Recreational users going to the park for a picnic or to relax on a park bench may be more visually sensitive to their surroundings than recreational users participating in sports and spectators.</td>
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About the Development


Nearby Residents and Business Occupants

Due to the highly developed nature of the analysis area, the view for nearby residents and business occupants is typically filtered by buildings and vegetation in the foreground. Additionally, Policy CC-4.5 of the City's Comprehensive Plan indicates that private views are not protected.

Motorists along Local Roadways

One of the largest viewer groups in the analysis area comprises motorists traveling along local roadways. Motorists who travel the roadway generally possess low visual sensitivity to their surroundings and their attention is typically not focused on the passing views. However, motorists are one of the viewer groups that is most affected by the changes to View Corridor 1 looking southwest toward Downtown and Lake Washington from the intersection of Central Way and 6th Street. The larger visual mass of buildings under all alternatives would block views to portions of the sky visible from this intersection.

Temporary Visual Changes Resulting from Construction

Construction under all alternatives would create temporary changes in views of the analysis area. Construction activities would introduce heavy equipment into the surrounding public roadways, and residential and commercial properties. Safety and directional signage would also be visible. Viewer groups in the analysis area and vicinity may not be accustomed to seeing construction activities and equipment; their sensitivity to such impacts is expected to be moderate. However, since these activities are short term, temporary impacts on viewers are not expected to be significant.

Light and Glare

Development under all alternatives has the potential to increase ambient light and glare throughout the analysis area, primarily through the increased presence of exterior building illumination and increased vehicular traffic. Impacts under each alternative differ in degree and are discussed in more detail below.

Shading Conditions

All alternatives are likely to generate increased shading conditions on surrounding properties and streets due to increased building heights. During certain winter periods, the portion of Central Way adjacent to Parkplace could be in perpetual shadow under any of the alternatives.

Visual Character

No changes to height limits or setbacks would occur. Only lot coverage is expected to increase as a result of development under the No Action Alternative.

Visual Character

The reduction in setbacks further increases the visual prominence of buildings under the Proposed Action and links them to the street and its associated pedestrian traffic. The increased building height, in excess of that allowed under the No Action alternative, would further intensify the visual prominence of buildings in the area and may affect the comfort of pedestrians, dependent upon application of design guidelines.

Under the Proposed Action, height restrictions on buildings within 100 feet of Peter Kirk Park would also be raised above the current limit of 3 stories. The park is a major visual landmark for this part of the City, and the increased visual bulk could adversely affect the park and reduce the impression of openness that currently exists.

Visual Character

The FEIS Review Alternative includes both a building setback and upper-story setbacks along the Parkplace site's boundary with Peter Kirk Park, resulting in less height and bulk adjacent to this important community landmark. Upper-story setbacks along Central Way would also act to reduce the visual bulk of the property when viewed from the street and from properties across Central Way to the north. As such, impacts on visual character are expected to be less than under the Proposed Action.

Visual Character

The Superblock Alternative would add 954,000 square feet of office and commercial development to the Superblock, which would increase building heights and lot coverages over both existing conditions and the No Action Alternative.

The Superblock Alternative would result in building heights ranging from 4 to 6 stories. Development on the Parkplace site would be at a scale more consistent with the No Action Alternative at 4-5 stories, reducing bulk next to the park compared to the Proposed Action.

The tallest buildings would be located at the Bungie and Emerald properties along Kirkland Way. These properties would also experience the greatest increase in height over current conditions.

While the Superblock Alternative

Visual Character

Both the Parkplace and Post Office sites would experience large increases in building heights and lot coverages compared to existing conditions with the addition of 954,000 square feet. Implementation of design guidelines would be necessary to reduce impacts to adjacent development and the pedestrian realm.

As under the Superblock Alternative, development on the Parkplace site located so close to the street could negatively influence the pedestrian experience along 6th Street if design guidelines are not implemented.

Though the building height of 5 stories on the Post Office site are consistent with City policies, the actual height required to achieve the development is 70 feet, greater than the maximum 60 feet in the applicable zone. A code amendment would be required as described in the Plans and Policies.

Visual Character

The Off-Site Alternative would add the same amount of commercial square footage to the analysis area as the Proposed Action, FEIS Review Alternative, Superblock and Unified Ownership alternatives but distribute it between the CBD-1B Block, CBD-7 Block, and Substation Block. The addition of development to these sites would result in increased building heights and lot coverages over both existing conditions and the No Action Alternative. Under the Off-Site Alternative, the Parkplace site is assumed to develop under No Action Alternative conditions. Projected heights under the Off-Site Alternative represent at least a 2-story increase over existing conditions on every lot and would result in development inconsistent with design district height regulations on the CBD-7 Block, which is currently limited to 4 stories. The Substation block is located outside of the CBD, and is not located...

City of Kirkland

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<td>would only represent a moderate increase in visual intensity for those properties at the corner of 6th Street and Kirkland Way, the Bungie, and Emerald properties would see a dramatic increase in building heights and coverages. Buildings on the Superblock would be located closer to the sidewalk than current development. The presence of these buildings so close to the street could influence the pedestrian experience on Kirkland Way and 6th Street. Development on the southern portion of the Superblock would be inconsistent with the 5-story height limit of Design District 5 if buildings on the Bungie and Emerald properties develop to the projected 6 stories assumed under this Alternative.</td>
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<tr>
<td>Pedestrians and Bicyclists</td>
<td>New development under the No Action Alternative would be more expansive than existing conditions and would create a visual impact.</td>
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<td>Territorial Views</td>
<td>Three territorial views identified in the Comprehensive Plan look directly to the waterfront and Lake Washington along the south side of the view corridor. Existing buildings and vegetation (even during winter months) screen views of the waterfront and Lake Washington along the south side of the view. The portion of the view with the highest visual quality, the view of Lake Washington, would not be affected due to new development. However, the encroachment of activities associated with the Proposed Action would still impact views by blocking view of the sky from this vantage point.</td>
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<tr>
<td>Pedestrians and Bicyclists</td>
<td>New development under the Proposed Action will occur closer to the sidewalk and roadway than currently exists, thus encroaching on the visual environment of pedestrians and bicyclists, and creating visual impact.</td>
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<tr>
<td>Territorial Views View Corridor 1</td>
<td>The Proposed Action would allow for development to encroach further into the periphery of View Corridor 1, acting as a dominant visual element on the south side of the view corridor. Existing buildings and vegetation (even during winter months) screen views of the waterfront and Lake Washington along the south side of the view. The portion of the view with the highest visual quality, the view of Lake Washington, would not be affected due to new development. However, the encroachment of activities associated with the Proposed Action would still impact views by blocking view of the sky from this vantage point.</td>
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<td>Territorial Views View Corridor 2</td>
<td>FEIS Review Alternative impacts on View Corridor 2 are expected to be</td>
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<td>Territorial Views View Corridor 1</td>
<td>Under the FEIS Review Alternative the effect of an imposing visual element along the south side of the view corridor would be reduced by the increased setbacks of upper floors along Central Way.</td>
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<td>Territorial Views View Corridor 2</td>
<td>FEIS Review Alternative impacts on View Corridor 2 are expected to be</td>
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<td>Territorial Views View Corridor 1</td>
<td>The Superblock Alternative would allow for development on the Parkade site to encroach further into the periphery of View Corridor 1, creating an imposing visual element on the south side of the view corridor, though to a lesser extent than the Proposed Action and the FEIS Review Alternative. Existing buildings and vegetation screen views of the waterfront and Lake Washington along the south side of this view, and the portion of the view with the highest visual quality would not be directly affected. However, new development under the Superblock Alternative could still potentially block views of portions</td>
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<td>Territorial Views View Corridor 1</td>
<td>Under the Unified Ownership Alternative, development on the Parkade site would develop to the same level as projected under the Superblock Alternative. This level of development would result in a visual encroachment on the south side of</td>
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<td>Territorial Views View Corridor 1</td>
<td>Development on the Parkplace site will be similar to the Superblock with the same consequences to the visual environment for pedestrians and bicyclists.</td>
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<td>Views Pedestrians and Bicyclists</td>
<td>Development on the Post Office site, in particular, would greatly increase lot coverage over existing conditions, but building design would be more oriented toward the pedestrian than the car, as is currently the case. Though not presently required, if design standards are applied to the Post Office site, pedestrians and bicyclists would not be significantly affected under the Unified Ownership Alternative.</td>
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<td>Views Pedestrians and Bicyclists</td>
<td>Development on the Off-Site Alternative, new development would occur closer to the sidewalk and roadway than currently exists along Central Way, 3rd Street, and 6th Avenue/Central Avenue, thus encroaching on the visual environment of pedestrians and bicyclists and creating a visual impact. However, with the exception of the Substation Block, the analyzing area is highly urbanized and local roadways and sidewalks are already flanked by large commercial, office, and residential buildings and vehicular traffic is a regular visual component of the analysis area. In the Substation Block, current development is much less urban in character; therefore, new development under the Off-Site Alternative would create a greater visual impact on pedestrian and bicyclists than in other parts of the analysis area. In addition, development on the Substation Block is not currently subject to design review. To minimize effects on pedestrians and bicyclists, it would be necessary to conduct design review and apply</td>
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No Action Alternative

**View Corridor 2 (intersection of NE 85th Street and Kirkland Way)**

No Action Alternative development would be a visible middle ground element from View Corridor 2. However, due to the elevation of the roadway at this vantage point, the top of the new development would be below the lake and mountains in the visual line of sight.

The new development under the No Action Alternative would tend to blend into the portion of the middle ground that acts as the footing to frame the high visual quality associated with the background view. During the winter, existing vegetation would tend to filter much of the new development, so that it would be only partially visible in the middle ground. Summer views of the new development would almost entirely be screened by existing deciduous vegetation.

**View Corridor 3 (southwest on Kirkland Way)**

No impacts are anticipated as development is not projected along Kirkland Way.

Proposed Action

**View Corridor 2**

Development associated with the Proposed Action would be a visible middle ground element from View Corridor 2. However, due to the elevation of the roadway at this vantage point, the top of the new development at 8 stories would be below the lake and mountains in the visual line of sight.

Thus, the new development would tend to blend into the portion of the middle ground that acts as the footing to frame the high visual quality associated with the background view. During the winter, existing vegetation would tend to filter much of the new development. Therefore, no significant impacts on View Corridor 2 are anticipated under the Superblock Alternative.

**View Corridor 3**

No impacts are anticipated as development is not projected along Kirkland Way.

FEIS Review Alternative

**View Corridor 2**

Development associated with the Proposed Action would be a visible middle ground element from View Corridor 2. However, due to the elevation of the roadway at this vantage point, the top of the new development at 8 stories would be below the lake and mountains in the visual line of sight.

**View Corridor 3**

No impacts are anticipated as development is not projected along Kirkland Way.

Superblock Alternative

**View Corridor 2**

Development associated with the Superblock Alternative would be a visible middle ground element from View Corridor 2, but would be below the line of sight to the lake and mountains and would not obstruct views to these elements. Also, the presence of existing vegetation between the vantage point and the Superblock is likely to screen most new development from view. Therefore, no significant impacts on View Corridor 2 are anticipated under the Superblock Alternative.

**View Corridor 3**

Development under the Superblock Alternative would directly affect View Corridor 3, creating a large visual encroachment on the north side of Kirkland Way. Although the view corridor possesses low visual unity and only moderate visual quality, the introduction of 5 to 6-story office buildings directly adjacent to the street would be in stark contrast to the large amount of vegetation observed currently on the south side of Kirkland Way, narrowing the view corridor and reducing the sense of openness. However, as views from this location are already heavily obstructed, development under the Superblock Alternative is not anticipated to adversely affect View Corridor 3, provided that design review is applied to future projects along Kirkland Way to enhance pedestrian orientation in the building location, bulk, and interface with the streetscape.

Unified Ownership Alternative

**View Corridor 1, and associated impacts are anticipated to be the same as under the Superblock Alternative.**

The Post Office site is located east of the vantage point for View Corridor 1 and would not be visible to potential viewers. As such, no impacts associated with the Post Office property are anticipated to View Corridor 1.

**View Corridor 2**

The impacts of development on the Parkside site would be similar to the Superblock Alternative. The 5-story development on the Parkside site would be closer to the viewer and at a slightly higher elevation than the Parkplace site, making it more visually prominent, though much of the site would be screened from view by the roadway embankment. Development on the Post Office property would partially block views to Lake Washington, though this view is already partially obstructed by existing vegetation along the south side of the road. The presence of this vegetation is likely to screen most new development from view, particularly during summer months. Therefore, no significant impacts on View Corridor 2 are anticipated under the Unified Ownership Alternative.

**View Corridor 3**

Development under the Unified Ownership Alternative would not be visible from View Corridor 3. As such, no impacts are anticipated.

Off-Site Alternative

**View Corridor 2**

Development associated with the Off-Site Alternative would result in increased encroachment on the visual landscape by taller buildings on both the north and south sides of Central Way. The Off-Site Alternative would introduce 4- to 6-story buildings on both sides of the view corridor, which would partially obstruct views of Lake Washington, the horizon, and the sky. The CBD-1B Core Block would also encroach on the view corridor, though most building in this location would be screened from view by development on the Parkplace site. Development in the Substation Block would have no effect on this view, as it is located behind the vantage point.

While the portion of the view with the highest visual quality would not be directly affected, development along Central Way would encroach on the edges of the view corridor, narrowing it and reducing the feeling of openness and expansiveness.

**View Corridor 3**

Development associated with the Off-Site Alternative would be a partially visible middle ground element from View Corridor 2. Most off-site development would be screened from view by vegetation, topography, or other development, though buildings in the CBD-7 Block would be visible from the vantage point. However, the projected building heights of 4 to 6 stories would be below the line of sight to the lake and mountains, and much of the development on the Park Place site would be screened from view by existing vegetation, particularly during summer months. Therefore, no
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<td>The No Action Alternative represents an increase in shading conditions over the No Action alternative during winter months, as well as summer morning and afternoon hours. Development in the Parkplace area has the potential to reduce the potential to cause significant winter shading impacts on properties to the north side of Central Way, since an apartment complex on the northwest corner of the Central Way would receive slightly less shading in winter (morning and afternoon). Summer morning shading of Central Way would occur on summer mornings, and parcels north of Central Way would receive slightly less shading in winter (morning and afternoon). Noticeably less shading of Central Way and Peter Kirk Park would occur on summer mornings and parcels north of Central Way would receive slightly less shading in winter (morning and afternoon). Summer morning shading of Central Way would receive slightly less shading in winter (morning and afternoon).</td>
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<td>The FEIS Review Alternative are anticipated to be less than those under the Proposed Action. Noticeably less shading of Central Way and Peter Kirk Park would occur on summer mornings, and parcels north of Central Way would receive slightly less shading in winter (morning and afternoon). Summer morning shading of Central Way would occur on summer mornings, and parcels north of Central Way would receive slightly less shading in winter (morning and afternoon). Noticeably less shading of Central Way and Peter Kirk Park would occur on summer mornings and parcels north of Central Way would receive slightly less shading in winter (morning and afternoon).</td>
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<td>The Superblock Alternative would result in taller buildings that currently exist on the site; therefore, shading conditions are anticipated to increase, since taller buildings cast longer shadows and have a higher potential to shade adjacent buildings or neighboring properties though less than the Proposed Action or FEIS Review Alternatives. The Superblock Alternative would result in taller buildings that currently exist on the site; therefore, shading conditions are anticipated to increase, since taller buildings cast longer shadows and have a higher potential to shade adjacent buildings or neighboring properties though less than the Proposed Action or FEIS Review Alternatives.</td>
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<td>The Parkplace Alternative has the potential to increase ambient light and glare, primarily through the increase of reduced impacts on Peter Kirk Park as a result of the Park setback included in the FEIS Review Alternative. The Parkplace Alternative has the potential to increase ambient light and glare, primarily through the increase of reduced impacts on Peter Kirk Park as a result of the Park setback included in the FEIS Review Alternative.</td>
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**August 2010**

ICF 00182.10
### No Action Alternative (2008 All Blocks)

- 6th Street and Central Way intersection, as well as lesser impacts on properties southeast and east of the area. The Proposed Action would also increase shading of the far eastern portion of Peter Kirk Park during morning hours over the No Action alternative.

### Proposed Action (2008 Touchstone PAR)

- Way and Peter Kirk Park would also be reduced. Shading impacts resulting from the Superblock Alternative are anticipated to be most pronounced in the interior of the site, between buildings. Simulated shading conditions indicate that the space between the new 5 and 6-story buildings south of the Parkplace site is the area likely to see the greatest increase in shadows, particularly during winter morning and evening hours. Development on the Parksite is also anticipated to shade 6th Street and Central Way.

### FEIS Review Alternative (2008 Approved)

- Shading impacts of the Off-Site Alternative would affect mostly internal spaces.

### Superblock Alternative

- the potential to shade the parking area of the office building across 4th Avenue, as well as the office properties to the east.

### Unified Ownership Alternative

- summer months. However, lower winter sun angles could result in the shading of adjacent properties in the CBD-7 Block, and the CBD-1B Block and Substation Block have a high potential to shade adjacent streets during winter morning and afternoon hours. Compared to the Superblock Alternative, shading impacts of the Off-Site Alternative are more outwardly directed, affecting adjacent properties and public areas such as streets and sidewalks, while the Superblock Alternative would affect mostly internal spaces.

### Off-Site Alternative

- Shading impacts resulting from the Superblock Alternative are anticipated to be most pronounced in the interior of the site, between buildings. Simulated shading conditions indicate that the space between the new 5 and 6-story buildings south of the Parkplace site is the area likely to see the greatest increase in shadows, particularly during winter morning and evening hours. Development on the Parksite is also anticipated to shade 6th Street and Central Way.

### Potential Mitigation Measures

#### No mitigation measures are applied to the No Action Alternative.

- In addition to the City’s design guidelines, the following mitigation measures could be incorporated to reduce aesthetic impacts.
  - Require setbacks, step backs of upper stories of taller buildings, and/or limits to maximum building heights in areas of the site determined to be more aesthetically significant.
  - Locate the tallest structures, to the greatest extent feasible, in the central or southeastern portions of the area, in order to reduce shading of and visual encroachment on Peter Kirk Park, Central Way, development on the north side of Central Way, and View Corridor 1.
  - Incorporate a pedestrian plaza, installation, or distinctive landscaping feature to identify the intersection of 6th Street and Central Way as a significant gateway into Downtown and to provide view corridors and an aesthetically pleasing visual environment.
  - Use vegetation to soften and screen built features.
  - Shield light fixtures to minimize glare and up-lighting. Lights could be screened and directed away from residences to the highest

#### Proposed Action (2008 Touchstone PAR)

- Many of the Proposed Action mitigation measures are incorporated into the FEIS Review Alternative.

#### FEIS Review Alternative (2008 Approved)

- In addition to the City’s design guidelines, the following mitigation measures should be incorporated to reduce aesthetic impacts.
  - Require setbacks, step backs of upper stories of taller buildings, and/or limits to maximum building heights in specific areas of each lot determined to be more aesthetically significant.
  - Locate the tallest structures in the central portions of the Superblock, so as to reduce shading of and visual encroachment on Peter Kirk Park, Central Way, development on the north side of Central Way, and View Corridors 1 and 3.
  - Incorporate pedestrian plazas, installation, or distinctive landscaping feature to identify the intersection of 6th Street and Central Way as a significant gateway into Downtown and to provide view corridors and an aesthetically pleasing visual environment.
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#### Superblock Alternative

- In addition to the City’s design guidelines, the following mitigation measures should be incorporated to reduce aesthetic impacts.
  - Require setbacks, step backs of upper stories of taller buildings, and/or limits to maximum building heights in specific areas of each lot determined to be more aesthetically significant.
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#### Unified Ownership Alternative

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  - Incorporate pedestrian plazas, installation, or distinctive landscaping feature to identify the intersection of 6th Street and Central Way as a significant gateway into Downtown and to provide view corridors and an aesthetically pleasing visual environment.
  - Use vegetation to soften and screen built features.
  - Shield light fixtures to minimize glare and up-lighting. Lights should be screened and directed away from residences to the highest

#### Off-Site Alternative

- Shading impacts of the Off-Site Alternative would affect mostly internal spaces.

### Summary

- Shading impacts resulting from the Superblock Alternative are anticipated to be most pronounced in the interior of the site, between buildings. Simulated shading conditions indicate that the space between the new 5 and 6-story buildings south of the Parkplace site is the area likely to see the greatest increase in shadows, particularly during winter morning and evening hours. Development on the Parksite is also anticipated to shade 6th Street and Central Way.
### No Action Alternative (2008 All Blocks)

- **Degree possible.** Lighting restrictions could be adopted to control façade illumination and excessive lighting. The number of nighttime lights installed could be minimized to the greatest degree possible. Light fixtures and poles could be painted; no reflective surfaces are proposed that will contribute to reflective daytime glare.
  - Use low-sheen and non-reflective surface materials to the greatest extent possible to reduce potential for glare; the finish could be matte and roughened.

### Proposed Action (2008 Touchstone PAR)

- **Construction During construction the following measures could be taken to minimize temporary visual impacts:**
  - Screen storage and staging areas and locate them in areas that minimize visual prominence to the greatest extent possible in order to reduce the temporary visual effects during construction.
  - Address light and glare effects associated with possible nighttime construction activities by using downcast lighting sources and shielding roadway lighting.

### FEIS Review Alternative (2008 Approved)

- Control façade illumination and excessive lighting. The number of nighttime lights installed should be minimized to the greatest degree possible. Light fixtures and poles should be painted; reflective surfaces should be avoided to minimize reflective daytime glare.
  - Low-sheen and non-reflective surface materials will be used to minimize reflective daytime glare. The finish should be matte and roughened.

### Superblock Alternative

- During construction the following measures should be taken to minimize temporary visual impacts:
  - Screen storage and staging areas and locate in areas that minimize visual prominence to the greatest extent possible to reduce the temporary visual effects during construction.
  - Use downcast lighting sources and shield roadway lighting to minimize light and glare effects associated with possible nighttime construction activities.

### Unified Ownership Alternative

See also Section 3.1.3 of the Draft SEIS regarding mitigation measures necessary to ensure consistency of the alternative with the City’s Comprehensive Plan and Zoning Code.

### Off-Site Alternative

City Council in 2004, could be applied to the Substation Block, particularly the portions closer to 6th Street that are more visible. Measures regarding construction and Comprehensive Plan and code consistency are the same as for the Superblock.

### Transportation

**Impacts Common to All Alternatives**

See description of impacts identified under No Action Alternative for transportation impacts common to all alternatives.

#### Construction Traffic

During development of the alternatives, construction activities will disrupt vehicular and pedestrian traffic. Construction traffic will be particularly disruptive during earth excavation and concrete pours as these activities will generate the largest construction traffic volumes. This increase in traffic is mitigated by the demolition of existing buildings and the loss of existing vehicular trips to each area prior to commencement of construction. Street closures are unlikely; however, closure of traffic and/or parking lanes may be required.

All building permits issued by the City are reviewed and conditioned to mitigate construction traffic impacts by the Public Works director. When a permit is issued, the applicant is required to develop and submit a traffic control plan and a contractor parking plan. The Public Works traffic engineer reviews each building permit and requires special construction traffic conditions depending on the scope and nature of the permit and the timing of the project in relation to other project permits. These permits may include the following measures:

- Provide on-site or nearby parking for construction workers.
- Restrict major removal and delivery of material to and from the site to the Central Avenue corridor east of 6th Street.
- Provide flaggers to direct traffic when appropriate.
- Provide on-site loading areas for removal and delivery of materials.
- Prohibit truck movements to the site during the PM traffic peak hours.
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<td>Provide temporary sidewalks when existing sidewalks are blocked.</td>
<td>Adjust traffic signal phasing and timing to reduce traffic congestion.</td>
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**Roadway Operations Traffic Impact Analysis**

Based upon the City’s Transportation Impact Analysis guidelines, an adverse LOS impact is identified at the following three intersections by 2014:
- Central Way/Parkplace Driveway
- NE 85th Street/114th Avenue NE
- Central Way/4th Street

**FEIS Review Alternative**

The FEIS Review Alternative would generally result in similar or lesser transportation impacts compared to those described for the Proposed Action.

**Adverse LOS impacts are identified at the following 13 intersections:**
- Central Way/Parkplace Driveway
- Kirkland Way / Parkplace Driveway
- Central Way/6th Street
- NE 85th Street/114th Avenue NE
- 6th Street/4th Avenue
- Kirkland Way/6th Street
- Central Way/5th Street
- Central Way/4th Street
- 6th Street/7th Avenue
- Market Street/15th Avenue
- NE 85th Street/124th Avenue NE

See Table 3.3-11 in the Transportation Section of the Draft SEIS for more detail.

**Roadway Operations Traffic Impact Analysis**

Adverse LOS impacts are identified at the following 14 intersections:
- Central Way/Parkplace Driveway
- Kirkland Way/Parkplace Driveway
- Central Way/6th Street
- NE 85th Street/114th Avenue NE
- 6th Street/4th Avenue
- Kirkland Avenue/3rd Street
- Kirkland Way/6th Street
- Kirkland Avenue / 6th Street
- Central Way/5th Street
- Central Way/4th Street
- 6th Street/7th Avenue
- Kirkland Way / Kirkland Avenue
- Market Street/15th Avenue
- NE 85th Street/124th Avenue NE

See Table 3.3-11 in the Transportation Section of the Draft SEIS for more detail.
### No Action Alternative (2008 All Blocks)

<table>
<thead>
<tr>
<th>Concurrency V/C Impacts</th>
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<tbody>
<tr>
<td>Based upon the City's concurrency guidelines the following adverse operational impacts are identified by 2014 and 2022.</td>
</tr>
</tbody>
</table>

2014
All concurrency intersections and subarea averages are expected to remain below thresholds under the No Action Alternative scenario for 2014.

2022
Two intersections located in the southwest subarea are expected to exceed the concurrency threshold of 1.40:
- Lake Washington Boulevard/NE 38th Place
- 114th Ave NE/NE 85th Street

In addition, the subarea average for the southwest subarea is expected to exceed its threshold of 0.92.

One intersection in the northwest subarea is expected to exceed the concurrency threshold of 1.40:
- 116th Way NE/NE 132nd Street

The subarea average for the northwest subarea is expected to exceed its threshold of 1.01.

Two intersections in the northeast subarea are expected to exceed the concurrency threshold of 1.40:
- 124th Avenue NE/NE 132nd Street
- Totem Lake Boulevard/NE 132nd Street

However, the subarea average V/C is expected to remain under its threshold.

### Proposed Action (2008 Touchstone PAR)

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2014
One intersection located in the southwest region is expected to exceed the concurrency threshold of 1.40 in 2014:
- 114th Ave NE/NE 85th Street

In addition, the subarea average for the southwest subarea is expected to exceed the threshold by 0.01.

2022
Three intersections located in the southwest region are expected to exceed the concurrency threshold of 1.40:
- Lake Washington Boulevard/NE 38th Place
- 6th Street/Central Way
- 114th Ave NE/NE 85th Street

In addition, the subarea average for the southwest subarea is expected to exceed its threshold of 0.92.

One intersection in the northwest subarea is expected to exceed the concurrency threshold of 1.40:
- 116th Way NE/NE 132nd Street

The subarea average for the northwest subarea is expected to exceed its threshold of 1.01.

Two intersections in the northeast subarea are expected to exceed the concurrency threshold of 1.40:
- 124th Avenue NE/NE 132nd Street
- Totem Lake Boulevard/NE 132nd Street

However, the subarea average V/C is expected to remain under its threshold.

### FEIS Review Alternative (2008 Approved)

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### Superblock Alternative

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2014
One intersection located in the southwest region, (109) 114th Ave NE/NE 85th Street, is expected to exceed the concurrency threshold of 1.40. In addition, the subarea average for the southwest subarea is projected to exceed the threshold.

2022
Deficiencies are projected at the same locations as the No Action Alternative, though some of the V/C values are slightly different.

See No Action Alternative for a description of which intersections and subarea averages exceed concurrency thresholds.

### Unified Ownership Alternative

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2014 deficiencies are the same as those identified for the Superblock Alternative.

2022
Deficiencies are projected at the same locations as the No Action Alternative, though some of the V/C values are slightly different.

See No Action Alternative for a description of which intersections and subarea averages exceed concurrency thresholds.

### Off-Site Alternative

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2014 deficiencies are the same as those identified for the Superblock Alternative.

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Deficiencies are projected at the same locations as the No Action Alternative, though some of the V/C values are slightly different.

See No Action Alternative for a description of which intersections and subarea averages exceed concurrency thresholds.
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<td>Parking demand would be less under the No Action Alternative than would be expected under the Proposed Action, because the intensity of land use would be less. As no specific development proposal is under evaluation under the No Action Alternative, it is not known if proposed parking would comply with current zoning requirements, or if alternative parking plans would also be proposed under this scenario.</td>
<td>Parking for development proposed on the Parkplace site, the spaces that would be required by the City's Zoning Code are much higher—approximately 5,157—than the approximately 3,500 spaces that are being proposed. Note, the total that would be required under City code also includes parking that would be required for No Action. The amount of parking required over No Action is expected to be similar to the other SEIS alternatives. The differences in standard code parking requirements and the proposed parking supply are due to expected shared parking and proposed measures to reduce parking demand. A parking management program, which encourages use of alternative modes and efficient use of the available parking, will be needed to ensure that parking supply is adequate to meet demand. Otherwise, there is potential for parking to spill out into the surrounding neighborhoods, which would be considered a significant impact.</td>
<td>Parking compared to the Proposed Action, the amount of required commercial parking for the FEIS Review Alternative would increase by 150 parking stalls. The increase will provide a buffer during peak commercial parking periods to reduce the amount of circulation by vehicles looking for parking.</td>
<td>Parking since specific development proposals have not been made for the Superblock alternative, the summary represents a conservative estimate based upon requirements for general office and retail uses in City code, over the parking that would also be needed for No Action. Given a similar growth, the total parking stalls that could be required are the same for the Superblock and Offsite Alternatives, but would be distributed differently. It is estimated that the Superblock Alternative would require 2,726 parking spaces over No Action to accommodate the amount of office and commercial considered under this Alternative.</td>
<td>Parking since specific development proposals have not been made for the Unified Ownership alternative, the summary represents a conservative estimate based upon requirements for general office and retail uses in City code, over the parking that would also be needed for No Action. Given a similar growth, the total parking stalls that could be required are the same for the Superblock and Offsite Alternatives, but would be distributed differently. The Off-Site Alternative is estimated to require the same amount of parking (2,726 parking spaces over No Action) as the Superblock Alternative.</td>
<td>Parking since specific development proposals have not been made for the Off-Site alternative, the summary represents a conservative estimate based upon requirements for general office and retail uses in City code, over the parking that would also be needed for No Action. Given a similar growth, the total parking stalls that could be required are the same for the Superblock and Offsite Alternatives, but would be distributed differently. The Off-Site Alternative would distribute new development on three sites in the Downtown area. Because the development would be more spread out, it would likely be less efficient use of land, with likely fewer site amenities that provide non-motorized connectivity, landscaping, and gathering spaces, compared to the single-site alternatives. However, since it would still result in a higher level density, this alternative would be more conducive to pedestrian and bicycle mobility, and likely support the City's non-motorized policies to a greater degree than the No Action Alternative.</td>
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<td>Lower square footages for retail and commercial uses and a potentially less efficient use of land could be less conducive to pedestrian and bicycle mobility and less supportive of the City's non-motorized policies than the Proposed Action. However, there is a greater potential for improved pedestrian and bicycle mobility compared with current conditions.</td>
<td>With the Proposed Action's potential for a master planned redevelopment more site amenities are likely to be provided in terms of non-motorized connectivity, landscaping, and gathering spaces. With these features, the Proposed Action would be more conducive to pedestrian and bicycle mobility, and would support the City's non-motorized policies.</td>
<td>Same as those described for the Proposed Action.</td>
<td>The Superblock Alternative would concentrate new development on several sites on one large block in the Downtown area, providing more opportunity for structured parking and efficient use of land, site amenities that provide non-motorized connectivity, landscaping, and gathering spaces. With these features, this alternative would be more conducive to pedestrian and bicycle mobility, and would likely support the City's non-motorized policies to a greater degree than the No Action Alternative.</td>
<td>The Unified Ownership Alternative would distribute new development on two sites in the Downtown area. Because the development would be more spread out, it would be less efficient use of land, with likely fewer site amenities that provide non-motorized connectivity, landscaping, and gathering spaces, compared to the single-site alternatives. However, since it would still result in a higher level density, this alternative would be more conducive to pedestrian and bicycle mobility, and would likely support the City's non-motorized policies to a greater degree than the No Action Alternative.</td>
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<td>Mitigation Measures</td>
<td>Capacity Improvements</td>
<td>TIA Results with Mitigation</td>
<td>Concurrency Results with Mitigation</td>
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<td>Three capacity improvements are identified by 2014; and four capacity improvements are identified by 2022.</td>
<td>Table 3.4-15 in the DSEIS presents the capacity improvement projects that have been developed to address the LOS and concurrency impacts. The mitigation measures identified under the Superblock Alternative are additional mitigation measures needed to resolve traffic impacts caused by the incremental increase in development above the No Action. The table shows an additional 11 capacity improvements in addition to the three No Action improvements by 2014; and two capacity improvements in addition to the four No Action improvements by 2022.</td>
<td>The resulting LOS with mitigation for all intersections except one would be LOS E or better. The intersection that would remain at LOS F, NE 85th Street / 114th Avenue NE, would be improved to operate at better conditions (note, this intersection is operating at LOS F under existing conditions).</td>
<td>All concurrency intersections and subarea averages are expected to remain below thresholds under this scenario.</td>
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<td>The Proposed Action would require seven capacity improvements over No Action (for a total of 10) by 2014; and one capacity improvement over No Action (for a total of 5) by 2022.</td>
<td>Table 3.4-15 in the DSEIS presents the capacity improvement projects that have been developed to address the LOS and concurrency impacts. The mitigation measures identified under the Superblock Alternative are additional mitigation measures needed to resolve traffic impacts caused by the incremental increase in development above the No Action. The table shows an additional 11 capacity improvements in addition to the three No Action improvements by 2014; and two capacity improvements in addition to the four No Action improvements by 2022.</td>
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<tr>
<td>No mitigation measures identified for the No Action Alternative.</td>
<td>Potential Mitigation Measures Transportation Demand Management The cumulative parking demand estimates for the office use require that some of the trips to and from Parkplace would occur by modes of travel other than SOV. To encourage use of other modes, the project proposes to implement a Transportation Management Plan (TMP) for the office tenants. The following elements are proposed: 1. Provide a transportation coordinator to manage and promote the program. 2. Provide transit pass subsidy. 3. Charge for daily parking. 4. Offer a part-time parking pass option. 5. Provide ride-match information. 6. Provide free parking for vanpools. 7. Provide reserved parking spaces for vanpools. 8. Provide shower and locker facilities. 9. Provide bike storage. 10. Provide parking for a car-sharing program (e.g., Zipcar). 11. Offer guaranteed ride home to employees who commute by alternative modes. 12. Install electronic kiosk(s) that provides up-to-date information about transportation services. 13. Monitor success of the TDM program. 14. Join transportation management association. A TDM program should be implemented with specific measures defined in the case mode split targets.</td>
<td>Potential Mitigation Measures Transportation Demand Management The Transportation Demand strategies described in the DEIS were refined for the FEIS Review Alternative and made a requirement of development within the Planned Action area. They are included in Appendix E of the FEIS. Parking Management The Parking Management mitigation measures described in the DEIS were refined for the FEIS Review Alternative and are included as Appendix F of the FEIS. These measures will also be a requirement of the City's Zoning Code parking requirements if a developer chooses to apply for a reduction in the required number of parking stalls. Permitted Parking in Neighborhoods See Proposed Action. Construction Mitigation Measures See Proposed Action. Measures to Reduce Greenhouse Gas Emissions See Proposed Action. Policy and Land Use Measures See Proposed Action.</td>
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<td>2022 Conditions Analysis that all concurrency intersections and subarea averages are expected to remain below thresholds under this scenario.</td>
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Potential Mitigation Measures

- Transportation Demand Management
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  1. Provide a transportation coordinator to manage and promote the program.
  2. Provide transit pass subsidy.
  3. Charge for daily parking.
  4. Offer a part-time parking pass option.
  5. Provide ride-match information.
  6. Provide free parking for vanpools.
  7. Provide reserved parking spaces for vanpools.
  8. Provide shower and locker facilities.
  9. Provide bike storage.
  10. Provide parking for a car-sharing program (e.g., Zipcar).
  11. Offer guaranteed ride home to employees who commute by alternative modes.
  12. Install electronic kiosk(s) that provides up-to-date information about transportation services.

A TDM program should be implemented with specific measures defined in the case mode split targets.
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<td>are not met.</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

**Parking Management**

The following parking management measures are proposed:

- Charge for all daytime parking.
- Validate customer and visitor parking.
- Use internal gates and controls to divide the garage into sections that are reserved for specific uses at different times of the day.
- Reserve areas of the garage for short-term parking by customers and visitors.
- Reserve parking for hotel.
- Share office parking on weeknights and weekends.
- Do not reserve individual spaces for office parking. No parking space in the garage would be reserved for an individual user. This allows all office parking to be shared by employees.
- Monitor garage use and adjust allocation or implement additional management measures, if needed.
- Monitor public parking. The City may require a parking management program be implemented as a condition of development approval, with specific measures defined in the case that tenants do not meet parking demand targets.

**Permitted Parking in Neighborhoods**

If, over the long-term, monitoring indicates that even with the parking management measure described above in place, that parking supply is not adequate to meet typical demand, and overflow traffic is parking in neighborhoods, the City may consider establishing permitted parking in neighborhoods. This would allow residents to park long-term in their neighborhoods at no charge, but would restrict visitors to an established maximum.
### Construction Mitigation Measures

Construction mitigation may include the following measures tied to a permit application.

- Provide on-site or nearby parking for construction workers.
- Restrict major removal and delivery of materials to and from the site to the Central Avenue corridor east of 6th Street.
- Provide flaggers to direct traffic when appropriate.
- Provide on-site loading areas for removal and delivery of materials.
- Prohibit truck movements to the site during the PM traffic peak hours.
- Provide temporary sidewalks when existing sidewalks are blocked.
- Adjust traffic signal phasing and timing to reduce traffic congestion.

### Measures to Reduce Greenhouse Gas Emissions

- In addition to trip reduction measures such as transit, carpooling, and walking, there are several other ways that future developers in the analysis area could reduce GHG emissions. The 2008 EIS lists a variety of additional mitigation measures that could reduce GHG emissions caused by building construction, space heating, and vehicle usage.

### Policy and Land Use Measures

- In the case that revenue is not available to address all identified capacity needs, or if TDM measures do not produce adequate reduction to reduce needed capacity improvements, the Growth Management Act (GMA) allows the City to achieve the needed balance between land use and the transportation system through policy or land use measures. Land use measures may include reducing the level of development at certain locations to reduce the number

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<table>
<thead>
<tr>
<th></th>
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<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction Mitigation Measures</td>
<td>Provide on-site or nearby parking for construction workers.</td>
<td>Restrict major removal and delivery of materials to and from the site to the Central Avenue corridor east of 6th Street.</td>
<td>Provide flaggers to direct traffic when appropriate.</td>
<td>Provide on-site loading areas for removal and delivery of materials.</td>
<td>Prohibit truck movements to the site during the PM traffic peak hours.</td>
</tr>
</tbody>
</table>
of trips in the transportation system. Policy measures can include refining LOS and concurrency standards to allow more congestion at certain locations.

|----------------------------------------|---------------------------------------|----------------------------------------|------------------------|-------------------------------|----------------------|
1.6 Significant Unavoidable Adverse Impacts

This section summarizes the potential significant unavoidable adverse impacts associated with the SEIS alternatives. The results are similar to those identified for the 2008 FEIS Alternatives.

1.6.1 Land Use Patterns and Plans and Policies

The Superblock Alternative, Unified Ownership Alternative, and Off-Site Alternative would result in a greater intensity of land use and greater employment in the land use analysis area. Changes to land use have the potential to create land use conflicts in some locations, but impacts can be mitigated through the proposed mitigation measures. With mitigation measures, the changes to land use patterns would generally conform to the Comprehensive Plan vision for Downtown and the Norkirk neighborhood.

1.6.2 Aesthetics

The overall character, significance, or magnitude of visual impacts on the analysis area depends largely on the quality of the architectural and urban design features incorporated into the development, the degree to which the overall scale and form of the development incorporates features of the local setting, and the values and preferences of those viewing the change. However, even with mitigation incorporated, the amount of development anticipated occurring under the Superblock, Unified Ownership, and Off-Site alternatives would introduce building heights that would be inconsistent with height limits set forth in the City’s Comprehensive Plan, as well as have a high potential to alter the visual character and shading conditions of the analysis area’s pedestrian environment.

1.6.3 Transportation

Implementation of the No Action Alternative, Superblock Alternative, Off-Site Alternative, or Unified Ownership Alternative would result in increased traffic volumes and congestion in the City. Although the effects of additional vehicles on traffic congestion can be mitigated to varying degrees through the proposed transportation improvements, the actual increase in traffic volume may be considered a significant unavoidable adverse impact. A significant adverse impact could also result if one or more mitigation measures that have been identified to address expected impacts are not implemented. The combination of recommended roadway improvements that the City selects will reflect a balance between desired improvement in traffic operations, policy decisions, and available revenue.

1.7 Contents of the Final SEIS

This Final SEIS contains the following chapters:

- Chapter 1, Summary. Chapter 1 describes the purpose of the Final SEIS and a summary of impacts and mitigation measures.
- **Chapter 2, Errata.** Chapter 2 contains corrections to the Draft SEIS.
- **Chapter 3, Reponses to Comments.** Chapter 3 responds to comments received on the Draft SEIS.
- **Chapter 4, Distribution List.** Chapter 4 identifies agencies and citizens who received notification or copies of the Final SEIS.

A detailed analysis of the 2010 alternatives is contained in the May 2010 Draft SEIS and is not repeated in this Final SEIS.
Chapter 2
Errata

This chapter includes only Draft SEIS clarifications or corrections based on responses to comments presented in Chapter 3 of this Final SEIS or based on city staff review of the Draft SEIS information. The clarifications or corrections are organized in the same order as the Draft SEIS sections and by page numbers. Text that has been inserted or deleted since the Draft SEIS is shown in cross-out or underline format.

2.1 Revisions to Draft SEIS Page 1-5, Environmental Summary

Corrected a typographic error in the first paragraph under Section 1.4:

Table 1-2 summarizes the environmental impacts for each DSEIS Alternative by environmental topic evaluated in Chapter 3. For a complete discussion refer to DSEIS Chapter 3. In addition, Table 1-2 summarizes “Potential Mitigation Measures” only. Applicable Regulations and Commitments are discussed in DSEIS Chapter 3. For comparison, the environmental impacts of the 2008 FEIS Alternatives are highlighted, but complete discussions are found in the 2008 FEIS.

Made clarifications and corrected a typographic error in the paragraph on page 1-5, a bullet item titled Plans and Policies.

- **Plans and Policies:** The 2008 FEIS Alternatives required evaluated Comprehensive Plan and Zoning amendments for the Parkplace site, increase allowable heights while at the same time require greater protection for Peter Kirk Park and greater pedestrian amenities. With unified ownership it is anticipated that parking management, coordinated open space, green building design, and other features required in the amended plans and codes would be easier to achieve compared to the multiple site with multiple ownerships involved in the 2010 DSEIS Alternatives. The Unified Ownership Alternative is the closest to the 2008 FEIS Alternatives in terms of the ability to achieve a master planned approach to development. The Unified Ownership Alternative and Off-Site Alternative would require more-additional plan and zoning amendments to address the change in status from perimeter blocks to Central Business District blocks allowing for office uses to allowing retail uses.
### 2.2 Revision to Title of Draft SEIS Table 3.3-9

Revised the table title of Table 3.3-9 on page 3.3-24 of the Draft SEIS to reflect the Unified Ownership Alternative.

**Table 3.3-9. Land Use Assumptions for Superblock, Off-Site, and Unified Ownership Alternatives**

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Office (square feet)</th>
<th>Commercial (square feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Superblock Alternative</strong></td>
<td>570,500</td>
<td>383,550</td>
</tr>
<tr>
<td><strong>Off-Site Alternative</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Substation Block</td>
<td>151,657</td>
<td>101,960</td>
</tr>
<tr>
<td>CBD-7 Block</td>
<td>268,428</td>
<td>180,466</td>
</tr>
<tr>
<td>CBD-1 Core Block</td>
<td>150,414</td>
<td>101,124</td>
</tr>
<tr>
<td>Total</td>
<td>570,500</td>
<td>383,550</td>
</tr>
<tr>
<td><strong>Unified Ownership Alternative</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parkplace Site</td>
<td>288,318</td>
<td>193,837</td>
</tr>
<tr>
<td>Post Office Site</td>
<td>282,182</td>
<td>189,713</td>
</tr>
<tr>
<td>Total</td>
<td>570,500</td>
<td>383,550</td>
</tr>
</tbody>
</table>

1. Development under the Superblock, Off-Site, and Unified Ownership alternatives is assumed to occur by 2014 – so the level of development in these areas is the same under the 2014 and 2022 scenarios.
2.3 Revision to Title of Draft SEIS Table 3.3-10

Revised the table title of Table 3.3-10 on page 3.3-24 of the Draft SEIS to reflect the Unified Ownership Alternative.

Table 3.3-10. PM Peak Hour Vehicle Trip Projections for Superblock, and Off-Site, and Unified Ownership Alternatives

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Estimated Trips Over No Action Alternative in 2014 and 2022&lt;sup&gt;1,2&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Trips Entering Site</td>
</tr>
<tr>
<td>Superblock Alternative</td>
<td>928</td>
</tr>
<tr>
<td>Off-Site Alternative</td>
<td></td>
</tr>
<tr>
<td>Substation Block</td>
<td>250</td>
</tr>
<tr>
<td>CBD-7  Block</td>
<td>437</td>
</tr>
<tr>
<td>CBD-1 Core Block</td>
<td>241</td>
</tr>
<tr>
<td>Total</td>
<td>928</td>
</tr>
<tr>
<td>Unified Ownership Alternative</td>
<td></td>
</tr>
<tr>
<td>Parkplace Site</td>
<td>473</td>
</tr>
<tr>
<td>Post Office Site</td>
<td>455</td>
</tr>
<tr>
<td>Total</td>
<td>928</td>
</tr>
</tbody>
</table>

<sup>1</sup> Trip generation for No Action Alternative derived from the BKR model.

<sup>2</sup> Development under the Superblock, Off-Site and Unified Ownership alternatives is assumed to occur by 2014 so the level of development in these areas is the same under the 2014 and 2022 scenarios.

<sup>3</sup> Vehicle trips were estimated using trip generation rates provided in the Trip Generation Manual (Institute of Transportation Engineers 2003). Adjustments to vehicle trips were made, assuming pedestrian and bicycle modes would make up 3.5% of retail trips and 4% of office trips, and 6% of total trips would be made via transit. These mode split assumptions were based on local census data and CTR data for the City.

2.4 Correction to Draft SEIS Page 3.3-28, Table 3.3-11

Corrected intersection 109 percent of impact.

Table 2.4-1. TIA Assessment - 2014 PM Peak Hour LOS

<table>
<thead>
<tr>
<th>ID</th>
<th>Intersection</th>
<th>Traffic Control&lt;sup&gt;1&lt;/sup&gt;</th>
<th>No Action</th>
<th>Superblock</th>
<th>Off-Site</th>
<th>Unified Ownership</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>LOS</td>
<td>Avg. Delay (sec)</td>
<td>% Impact</td>
<td>LOS</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>LOS</td>
<td>Avg. Delay (sec)</td>
<td>% Impact</td>
<td>LOS</td>
</tr>
<tr>
<td>109</td>
<td>Southwest Subarea</td>
<td>Signal</td>
<td>F 132.1</td>
<td>5.3</td>
<td>Y</td>
<td>F 227.9</td>
</tr>
</tbody>
</table>
2.5 Correction to Draft SEIS Page 5-3, Government Agencies

Corrected the agency name on page 5-3.

*Washington State Department of CTEDCommerce, Growth Management Services
Chapter 3
Responses to Comments

This chapter of the Final SEIS contains written and verbal comments provided on the Draft SEIS during the comment period that extended from May 27 to June 28, 2010. Written comments during the 31-day comment period and verbal comments received at the Planning Commission public hearing held on June 24, 2010, are included in this chapter. Responses to comments follow the comments section.

3.1 Written Comments

3.1.1 Introduction

During the 31-day comment period, 21 individuals prepared 22 letters. A list of the commenters in alphabetical order by last name is provided in Table 3-1.

Table 3-1. Public Comment Letters Received during the Comment Period

<table>
<thead>
<tr>
<th>DEIS Comment Letters</th>
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</thead>
<tbody>
<tr>
<td>Letter Number</td>
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<tr>
<td>---------------</td>
</tr>
<tr>
<td>1</td>
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<tr>
<td>2</td>
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<tr>
<td>3a</td>
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<tr>
<td>3b</td>
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<td>4</td>
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<td>5</td>
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<td>16</td>
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<tr>
<td>17</td>
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<tr>
<td>18</td>
</tr>
</tbody>
</table>
Actual comment letters are provided at the end of this chapter in Section 3.3.

### 3.1.2 SEIS Alternatives and Degree of Impacts

Several commenters expressed a desire for the City to study a smaller alternative on the Parkplace site and vicinity which could result in lesser environmental impacts, or to evaluate a smaller amount of Downtown commercial growth overall. This portion of Chapter 3 is intended to provide a single response to those comments, including the following information:

- Clarify the level of development on the Parkplace site compared with other sites/portsions of the alternatives, showing how all the SEIS alternatives plan for lower growth on Parkplace.
- Using the SEIS results, identify how and where the alternatives result in lower, similar, and/or greater impacts than 2008 FEIS alternatives on the Parkplace site as well as the alternatives cumulatively.
- Identify how the alternatives present a reasonable range of scenarios and development “bookends”, and how decision makers could select alternative features and/or mitigation measures to reduce impacts.

### Alternatives Clarified and Described

The purpose of the 2010 SEIS alternatives is to consider alternate locations for accommodating additional commercial growth in or near Downtown. The 2010 SEIS alternatives consider an increase of 954,000 square feet of retail and office development beyond that allowed by the City's Comprehensive Plan. The 954,000-square-foot amount is based on the Touchstone (Parkplace) proposal (2008 Proposed Action), and also corresponds to the amount of new development proposed beyond what is permitted under the No Action Alternative. The Parkplace redevelopment is generally considered to be an indication of market interest in that amount of additional growth; a detailed market analysis is not required by SEPA to evaluate this amount of growth in a programmatic EIS (Washington Administrative Code [WAC] 197-11-448). More so, studying the same amount of growth distributed differently in the alternatives, allows an “apples-to-apples” comparison between the 2010 SEIS alternatives and the 2008 FEIS Alternatives. Last, because the proposal is a legislative action that considers potential growth occurring over a 20-year period, the City is not limited or mandated to study a particular growth level and has the discretion to consider that level of growth in its Downtown.

The City developed alternatives for the SEIS based on direction from the Central Puget Sound Growth Management Hearings Board in the Case of Davidson Serles v. City of Kirkland (No. 09-3-0007c). In addition, a site selection study was prepared in May 2010 and is included in the Draft SEIS Appendix A. The Growth Management Hearing Board decision identified the Superblock as a...
potential alternative that the City could elect to study\(^1\). As defined through the site selection study, the Superblock Alternative would reduce growth on the Parkplace site to half of that studied in the 2008 FEIS Alternatives, and would redistribute the remaining growth to the rest of the Superblock. Similarly, the Unified Ownership Alternative would reduce development on the Parkplace site (to one-half of the 2008 FEIS Alternatives), and would locate additional growth on the Post Office site. To respond to the Growth Management Hearing Board’s direction to study an off-site alternative, the SEIS includes the Offsite Alternative, which would reduce growth on Parkplace to the same level as the No Action Alternative and would locate additional commercial growth on other blocks Downtown.

**Differences in Impacts**

The SEIS indicates the environmental consequences and differences between land use, aesthetic, and traffic impacts associated with locating an identified increment of commercial growth on different sites, or combinations of sites, within Downtown. In general, redistributing growth from Parkplace to other locations Downtown would result in lower impacts in some cases, greater impacts in a few cases, and similar impacts in other cases. Looking solely at the amount of development occurring on the Parkplace site in the SEIS alternatives, it would be reduced in every case and would reduce impacts at that location compared to the 2008 FEIS Review Alternative that was the basis for the City’s action in December 2008 (Table 3-2). This provides decision makers with information that highlights trade-offs between alternative courses of action, and satisfies SEPA’s requirement that an EIS study at least one reasonable alternative that meets project objectives and has lower impacts. The No Action Alternative (studied in 2008 and 2010) similarly provides information on a lower level of development and reduced impacts on the Parkplace site. SEPA does not prescribe a reduction in the overall size of a proposal as the exclusive means of reducing impacts. All SEIS alternatives would reduce building height and floor area ratios (FARs) significantly on the Parkplace site, which would reduce potential land use and aesthetic impacts on that site. The Superblock would have lesser to similar land use impacts and aesthetic impacts as the 2008 FEIS Alternatives. Aesthetic impacts would be reduced overall by the Unified Ownership Alternative compared to any of the 2010 or 2008 action alternatives.

At a cumulative concurrency plan level, transportation impacts are similar across all alternatives. When considering the 2014 SEPA Traffic Impact Analysis (TIA) intersections, however, the location of impacts would shift slightly between alternatives, and would tend to be more concentrated nearer the specific access points to the different sites. This is illustrated by the concurrency analysis, which shows similar results for the 2008 and 2010 action alternatives, whereas the 2014 SEPA TIA intersection analysis differs.

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\(^1\) The Growth Management Hearings 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. 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.”
For the purposes of this Final SEIS, a review of the 2014 TIA intersections is presented comparing the Parkplace only portion of each alternative, and the resulting difference in 2014 TIA intersection results. For example, the Parkplace site growth portion under the Unified Ownership Alternative is approximately half of the growth of the Unified Ownership Alternative and 2008 FEIS Review Alternative as a whole. In analyzing the 2014 PM Peak Hour level of service (LOS) (Table 3-3), the traffic impacts from Parkplace are proportional to its land use growth as compared to the overall land use growth of the Unified Ownership Alternative and the 2008 FEIS Review Alternative. Whereas the overall Unified Ownership Alternative would require mitigation at 14 intersections, the Parkplace site alone would require mitigation at eight intersections as follows:

- Central Way/Parkplace Driveway,
- Kirkland Way/Parkplace Driveway,
- NE 85th Street/114th Avenue NE,
- Kirkland Way/6th Street,
- Kirkland Avenue/6th Street,
- Central Way/5th Street
- Central Way/4th Street, and
- Market Street/15th Avenue

The traffic impacts from the Unified Ownership Alternative as a whole would require mitigation at six additional intersections as follows:

- Central Way/6th Street,
- 6th Street/4th Avenue,
- Kirkland Ave/3rd Street,
- 6th Street/7th Avenue,
- Kirkland Way/Kirkland Avenue, and
- NE 85th Street/124th Avenue NE

In comparison, the 2008 Proposed Action Alternative requires mitigation at ten intersections in 2014, two more intersections than the Parkplace site alone in the Unified Ownership Alternative.

Because the land use assumptions are the same for the “Parkplace only” portion of the Superblock Alternative the resulting traffic impacts are similar. Likewise, the land use assumptions are the same for the “Parkplace only” portion of the No Action and Offsite alternatives, and the resulting traffic impacts are similar.
Table 3-2: SEIS Alternatives Comparison of Impacts to Final SEIS Review Alternative

<table>
<thead>
<tr>
<th>Features/Topics</th>
<th>Superblock Alternative</th>
<th>Unified Ownership Alternative</th>
<th>Offsite Alternative</th>
<th>FEIS Review Alternative</th>
<th>No Action Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Whole</td>
<td>Parkplace</td>
<td>Whole</td>
<td>Parkplace</td>
<td>Whole</td>
</tr>
<tr>
<td>Building SF: Net above Existing</td>
<td>1,555,144</td>
<td>1,082,532</td>
<td>1,554,550</td>
<td>1,082,532</td>
<td>1,624,875</td>
</tr>
<tr>
<td>Building SF: Net above No Action</td>
<td>954,894</td>
<td>482,282</td>
<td>954,300</td>
<td>482,282</td>
<td>954,483</td>
</tr>
<tr>
<td>Height: Maximum stories</td>
<td>4.6</td>
<td>4</td>
<td>4.5</td>
<td>4</td>
<td>4.4</td>
</tr>
<tr>
<td>FAR</td>
<td>2.63</td>
<td>2.63</td>
<td>2.79</td>
<td>2.63</td>
<td>2.44</td>
</tr>
</tbody>
</table>

**Land Use**

- Similar to the 2008 FEIS Alternative but distributes that focus from primarily Central Way to Kirkland Way.

- Disperses the employment focus to the perimeter of Downtown taking what are Downtown buffer or transitional areas and making them a focus for growth.

- The level of intensity on the Parkplace portion of the Superblock would be greater than the No Action FEIS Review Alternative and less than the FEIS Review Alternative.

- Disperses the employment focus to the perimeter of Downtown taking what are Downtown buffer or transitional areas and instead making them a focus for growth.

- Increase on Parkplace no greater than the No Action Alternative.

- Places the full increase in employment growth 954,000 square feet on the Parkplace site. This provides a single intense focal point.

- Places the full increase in employment growth 600,250 square feet on the Parkplace site. This provides a single intense focal point, but less intense than the FEIS Review Alternative.

**Aesthetics**

- Represents a moderate increase in visual intensity for those properties at the corner of 6th Street and Kirkland Way, though inconsistent with the 5-story height limit of Design District.

- Development on the Parkplace site would be at a scale similar to the No Action Alternative at 4-5 stories, reducing bulk next to the park.

- Results in the least visual impacts of the 2010 SEIS alternatives and may slightly reduce visual impacts along Central Way in comparison to the 2008 FEIS alternatives. This is due to the four-story level on Central Way at Parkplace and the location of the Post Office site below the 85th Street grade which limits impacts to view corridors.

- Increased encroachment on visual landscape by 4- to 6-story buildings on both sides of the view corridor, partially obstructing views of Lake Washington, the horizon, and the sky.

- The Parkplace site is assumed to develop under No Action Alternative conditions.

- Under the FEIS Review Alternative the effect of an imposing visual element along the south side of the view corridor would be reduced by the increased setbacks of upper floors along Central Way.

- No changes to height limits or setbacks would occur. Only lot coverage is expected to increase as a result of development. New development would encroach on the view corridor along Central Way, though less than the FEIS Review and Superblock Alternatives, and more than the Unified Ownership Alternative. On the Parkplace site itself, the visual effects would be similar to the Offsite Alternative.

**Transportation**

<table>
<thead>
<tr>
<th>2014 TIA Intersections</th>
<th>2014 Concurrency Intersections</th>
</tr>
</thead>
<tbody>
<tr>
<td>2022 Concurrency Intersections</td>
<td>2022 Concurrency Seed Management</td>
</tr>
<tr>
<td>Parking and transportation demand management</td>
<td>Unified site ownership more conducive to parking and transportation demand management. Close to transit center.</td>
</tr>
</tbody>
</table>

- Responses to Comments

August 2010

ICF 00182.10
### Table 3-3. TIA Assessment—2014 PM Peak Hour LOS at Selected Intersections

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
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<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>LOS Delay</td>
<td>Impact Mit</td>
<td>LOS Delay</td>
<td>Impact Mit</td>
<td>LOS Delay</td>
<td>Impact Mit</td>
<td>LOS Delay</td>
<td>Impact Mit</td>
</tr>
<tr>
<td></td>
<td>%</td>
<td>%</td>
<td>%</td>
<td>%</td>
<td>%</td>
<td>%</td>
<td>%</td>
<td>%</td>
</tr>
<tr>
<td>4</td>
<td>Central Way/Parkplace Drive</td>
<td>TWS</td>
<td>F &lt;300 &lt;5% N</td>
<td>F &lt;300 &lt;5% N</td>
<td>F &lt;300 &lt;5% N</td>
<td>F &lt;300 &lt;5% N</td>
<td>F &lt;300 &lt;5% N</td>
<td>F &lt;300 &lt;5% N</td>
</tr>
<tr>
<td>7</td>
<td>Kirkland Way/Parkplace Drive</td>
<td>TWS</td>
<td>E 42.4 &lt;15% N</td>
<td>D 28.8 &lt;15% N</td>
<td>F &lt;300 &lt;36% Y</td>
<td>E 47.4 3% N</td>
<td>F &lt;300 &lt;28% Y</td>
<td>F &lt;300 &lt;28% Y</td>
</tr>
<tr>
<td>105</td>
<td>Central Way/4th Street</td>
<td>Signal</td>
<td>C 34.5 5% N</td>
<td>F &lt;86.3 &lt;16% Y</td>
<td>F &lt;86.3 &lt;16% Y</td>
<td>F &lt;109.9 &lt;2% Y</td>
<td>F &lt;109.9 &lt;2% Y</td>
<td>F &lt;109.9 &lt;2% Y</td>
</tr>
<tr>
<td>109</td>
<td>NE 85th Street/114th Avenue NE</td>
<td>Signal</td>
<td>F 132.1 5% Y</td>
<td>F &lt;277.9 &lt;34% Y</td>
<td>F &lt;277.9 &lt;34% Y</td>
<td>F &lt;277.9 &lt;34% Y</td>
<td>F &lt;277.9 &lt;34% Y</td>
<td>F &lt;277.9 &lt;34% Y</td>
</tr>
<tr>
<td>110</td>
<td>6th Street/4th Avenue</td>
<td>Signal</td>
<td>B 17.5 4.5% N</td>
<td>E 75.1 32% Y</td>
<td>D 52.6 32% N</td>
<td>C 21.5 24% Y</td>
<td>E 57.4 24% Y</td>
<td>C 23.8 23% Y</td>
</tr>
<tr>
<td>111</td>
<td>Kirkland Avenue/3rd Street</td>
<td>AWS</td>
<td>D 27.7 16% N</td>
<td>E 37.9 10% N</td>
<td>F &lt;77 &lt;22% Y</td>
<td>F &lt;50.5 11% Y</td>
<td>F &lt;66.2 &lt;19% Y</td>
<td>E 48.7 &lt;13% N</td>
</tr>
<tr>
<td>112</td>
<td>Kirkland Way/6th Street</td>
<td>AWS</td>
<td>F 149.6 1% N</td>
<td>F &lt;231 &lt;11% Y</td>
<td>F &lt;250.8 &lt;29% Y</td>
<td>F &lt;267.4 &lt;29% Y</td>
<td>F &lt;267.4 &lt;29% Y</td>
<td>F &lt;267.4 &lt;29% Y</td>
</tr>
<tr>
<td>113</td>
<td>Kirkland Avenue/6th Street</td>
<td>TWS</td>
<td>D 27.1 0% N</td>
<td>E 43.8 1% N</td>
<td>F &lt;82.7 &lt;29% Y</td>
<td>E 45 &lt;18% Y</td>
<td>F &lt;60.8 &lt;25% Y</td>
<td>E 44.8 &lt;18% Y</td>
</tr>
<tr>
<td>128</td>
<td>Central Way/5th Street</td>
<td>TWS</td>
<td>F 103.5 &lt;5% N</td>
<td>E 66.2 15% Y</td>
<td>F &lt;300 31% Y</td>
<td>F &lt;300 31% Y</td>
<td>F &lt;300 31% Y</td>
<td>F &lt;300 31% Y</td>
</tr>
<tr>
<td>129</td>
<td>Central Way/4th Street</td>
<td>TWS</td>
<td>F 82.4 6% Y</td>
<td>F 119 &lt;5% Y</td>
<td>F &lt;83.9 &lt;28% Y</td>
<td>F &lt;174.7 &lt;1% Y</td>
<td>F &lt;95.8 &lt;1% Y</td>
<td>F &lt;95.8 &lt;1% Y</td>
</tr>
<tr>
<td>169</td>
<td>6th Street/7th Avenue</td>
<td>AWS</td>
<td>F 87.8 &lt;15% N</td>
<td>F &lt;86.7 &lt;5% N</td>
<td>F &lt;67 &lt;7% Y</td>
<td>F &lt;90 &lt;14% Y</td>
<td>F &lt;98.5 &lt;14% Y</td>
<td>F 56.7 &lt;4% N</td>
</tr>
<tr>
<td>179</td>
<td>Kirkland Way/Kirkland Avenue</td>
<td>TWS</td>
<td>C 21.2 &lt;5% N</td>
<td>C 17.9 &lt;5% N</td>
<td>F &lt;50.8 &lt;28% Y</td>
<td>C 22.9 4% N</td>
<td>E 38.9 &lt;24% Y</td>
<td>D 30.7 &lt;23% N</td>
</tr>
<tr>
<td>211</td>
<td>Market Street/15th Avenue</td>
<td>TWS</td>
<td>F 70.1 &gt;1% N</td>
<td>F &lt;153 &lt;10% Y</td>
<td>F 153.3 10% Y</td>
<td>F 153.3 10% Y</td>
<td>F 153.3 10% Y</td>
<td>F 153.3 10% Y</td>
</tr>
<tr>
<td>402</td>
<td>NE 85th Street/124th Avenue NE</td>
<td>Signal</td>
<td>E 74.2 1.4% N</td>
<td>F &lt;81.0 &lt;9.1% Y</td>
<td>F &lt;81.0 &lt;9.1% Y</td>
<td>F &lt;81.0 &lt;9.1% Y</td>
<td>F &lt;81.0 &lt;9.1% Y</td>
<td>E 78 &lt;5% N</td>
</tr>
</tbody>
</table>

1. AWS = All Way Stop; TWS = Two Way Stop (LOS/Delay shown for the worst movement at TWS)
2. Mit = Mitigation; Y = mitigation is needed, based upon city standards – If LOS = E and Project accounts for > 15% of traffic through intersection; or if LOD = F and project accounts for > 5% of traffic through intersection.
3. Shaded cells = mitigation is needed.
**Alternatives are Bookends and Provide a Reasonable Range**

Per WAC 197-11-655, “the range of alternative courses of action considered by decision makers shall be within the range of alternatives discussed in the relevant environmental documents.” The 2008 FEIS Alternatives and the 2010 SEIS alternatives present a wide range of retail and office building square footage and building heights in different locations and configurations. The alternatives demark the boundaries of environmental analysis and serve as “bookends” for decision makers, allowing for consideration of a number of options between the bookends. From the perspective of SEPA, the City’s non-project decision could fall anywhere within the range of alternatives and is not necessarily limited to one or another specific alternative.

For example, using the information in the SEIS, decision-makers could choose to locate growth on a single site such as Parkplace, or spread it in various ways among five different blocks in Downtown analyzed in the SEIS. The sites incorporated into the SEIS alternatives have different FAR and height implications: the maximum height required to accommodate growth ranged from 3 to 8 stories, with lesser heights assumed in alternatives that spread growth to multiple locations (e.g., Superblock Alternative [4-6 stories]; Offsite Alternative [3-6 stories]; Unified Ownership Alternative [4-5 stories]; 2008 Proposed Action/FEIS Review Alternative [4-8 stories]). Considering the Parkplace site alone, the range is as follows:


- Building Square footage increases above existing conditions on the Parkplace site: 600,250 square feet for the No Action and Offsite alternatives, 1,082,532 square feet for the Superblock and Unified Ownership alternatives, and 1,554,250 square feet for the 2008 Proposed Action and FEIS Review alternatives.

Decision makers could also modify SEIS alternatives by applying mitigation measures to reduce identified impacts. As an example Draft SEIS Section 3.1.3, addressing land use pattern impacts of the Post Office portion of the Unified Ownership Alternative, identifies the following:

- Apply design standards for buildings over 2 stories to mitigate for impacts of taller buildings at 70 feet anticipated on the property.

- Limit FARs to reduce the scale and intensity of employment structures in proximity to existing residential development.

- Limit potential types of commercial uses that could increase activity levels in proximity to residential uses such as require a smaller amount of retail use than in other blocks (less than 25%), allow a smaller range of retail uses that would not result in activity levels when residential dwellings are occupied, and/or allow only standalone office uses.

There are similar potential mitigation measures for the Superblock and Offsite alternatives. See Final SEIS Chapter 1 for a summary.
3.1.3 Individual Responses to Comments

Responses to written comments are provided in Table 3-4. Distinct comments are numbered in the margins with responses corresponding to the numbered comment. Comments that state an opinion or preference are acknowledged with a response that indicates the comment is noted and forwarded to the appropriate decision makers. Comments that ask questions, request clarifications or corrections, or are related to the Draft SEIS analysis are provided a response which explains the SEIS approach, or offers corrections, or provides other appropriate replies.

Table 3-4. Response to Comment Letters

<table>
<thead>
<tr>
<th>Comment Letters</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Letter 1: Bradley, Carol Hurd, A. (Cam)</td>
<td>1-1 The three SEIS alternatives include less growth on Parkplace than the 2008 FEIS alternatives. The alternatives also show the effects of locating a similar cumulative amount of growth on other sites in Downtown, in combination with Parkplace. See Final SEIS Section 3.1.2.</td>
</tr>
<tr>
<td>1-2</td>
<td>Your comments are noted.</td>
</tr>
<tr>
<td>1-3</td>
<td>The City has followed the direction provided by the Central Puget Sound Growth Management Hearings Board and SEPA rules. It has developed additional alternatives through an extensive site selection analysis, contained in the Commercial Growth Alternatives Site Selection Study (Draft SEIS Appendix A), and evaluated those alternatives in a detailed SEIS. The alternatives reduce growth on the Parkplace site, in some cases to about one-half of what was studied in the 2008 EIS. See the discussion of alternative “bookends” in Final SEIS Section 3.1.2. While some might prefer a different range of alternatives or lesser growth, the City has used its discretion to identify a reasonable range of on-site and off-site alternatives.</td>
</tr>
<tr>
<td>Letter 2: Darling, Elaine J.</td>
<td>2-1 Your comments are noted.</td>
</tr>
<tr>
<td>2-2</td>
<td>Your comments are noted. SEPA is focused on environmental impacts and does not require a market analysis or feasibility study (See WAC 197-11-726). The proposal for which the previous (2008) EIS was prepared was initiated by a private applicant that requested the amount of additional development analyzed. A similar total amount of new development was analyzed in different locations for the SEIS to facilitate the comparison of environmental trade-offs, which is the objective of EIS alternatives. Reduced growth was considered on the Parkplace site itself.</td>
</tr>
<tr>
<td>Letter 3a: Davidson, Kenneth H.</td>
<td>3a-1 The purpose of the EIS is to compare environmental impacts of alternatives. The alternatives cumulatively study a similar growth level of 954,000 square feet above what is already allowed by City plans and regulations to facilitate an apples-to-apples comparison, as described in Final SEIS Section 3.1.2. However, two of the three alternatives study additional growth of about 482,000 above what is already allowed, which is nearly one-half of that studied in 2008. An EIS is focused on environmental impacts, and discussions of economic conditions and competition are not required to be discussed See WAC 197-11-448</td>
</tr>
</tbody>
</table>
**Comment Letters**

<table>
<thead>
<tr>
<th>Comment Number</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>3a-2</td>
<td>The Central Puget Sound Growth Management Hearings Board decision did not require that the City examine any particular amount of growth. The City has the discretion to examine any amount of growth it chooses in a planning context. The board did indicate that an offsite alternative should be considered. As explained in Section 3.1.2 of the Final SEIS, the SEIS alternatives do result in reduced impacts for some elements of the environment, and greater or similar impacts for others. SEPA does not require that one alternative be “smaller” than another in terms of square feet, only that impacts be reduced. Nevertheless, the SEIS on-site alternatives do examine reduced growth on the Parkplace site, in combination with development on adjacent sites. Similarly, the off-site alternative reduces the amount of growth on the Parkplace site.</td>
</tr>
<tr>
<td>3a-3</td>
<td>By definition, an “off-site” alternative locates growth or a development proposal on a different site. The on-site alternatives split growth between Parkplace (in reduced amount) and adjacent locations. Also see the Response to Comment 3a-2.</td>
</tr>
<tr>
<td>3a-4</td>
<td>See Response to Comment 3a-2. The SEIS evaluates different locations for commercial growth in Downtown at a programmatic level. SEPA does not require that a “need” for a proposal be demonstrated. The alternatives also examine differing amounts of growth for various sites or portions of sites.</td>
</tr>
</tbody>
</table>

**Letter 3b: Davidson, Kenneth H.**

<table>
<thead>
<tr>
<th>Number</th>
<th>Response</th>
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</thead>
<tbody>
<tr>
<td>3b-1</td>
<td>Your comments are noted.</td>
</tr>
<tr>
<td>3b-2</td>
<td>See Response to Comments 3a-2 and 3a-3.</td>
</tr>
</tbody>
</table>

**Letter 4: DeRoche, Jill**

<table>
<thead>
<tr>
<th>Number</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>4-1</td>
<td>Your comments are noted.</td>
</tr>
<tr>
<td>4-2</td>
<td>Your comments are noted.</td>
</tr>
<tr>
<td>4-3</td>
<td>See the Response to Comment 3a-1.</td>
</tr>
</tbody>
</table>

**Letter 5: Dolan, Barbara**

<table>
<thead>
<tr>
<th>Number</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>5-1</td>
<td>Your comments are noted.</td>
</tr>
</tbody>
</table>

**Letter 6: Drabble, Peter**

<table>
<thead>
<tr>
<th>Number</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>6-1</td>
<td>Your comments are noted.</td>
</tr>
</tbody>
</table>

**Letter 7: Etchevers, Shawn**

<table>
<thead>
<tr>
<th>Number</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>7-1</td>
<td>Building height and shade and shadow effects are addressed in Section 3.2, Aesthetics, of the Draft SEIS.</td>
</tr>
</tbody>
</table>

**Letter 8: Eustis, Jeffrey M.**

<table>
<thead>
<tr>
<th>Number</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>8-1</td>
<td>See Response to Comments 3a-2 and 3a-3.</td>
</tr>
</tbody>
</table>
| 8-2    | As required by the Central Puget Sound Growth Management Hearings Board order, the City is considering what action to take on its prior decision in 2008 to amend the Comprehensive Plan, and Zoning Map and text in connection with Parkplace (Touchstone), and will use the information in the SEIS to determine a course of action. The following types of legislation could be considered in the context of re-adoption, amendment, or new action, based on the information in the SEIS:  
  - Amendments to several elements of the City of Kirkland Comprehensive Plan (including Land Use, Transportation and Capital Facilities elements and neighborhood plans) and the land use map.  
  - Amendments to City of Kirkland Zoning Code and Zoning Map. |
### Comment Letters

<table>
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<tr>
<th>Comment Number</th>
<th>Response</th>
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</thead>
</table>
|                | - Amendments to the design guidelines in the Kirkland Municipal Code.  
|                | - Planned action ordinance amendments.  
|                | The specific form of action the City will take, and the ordinances that may need to be repealed, revised or proposed, will depend on the alternative that the City decides to pursue, based on the information in the SEIS. For example, if the City were to select either the Superblock Alternative or Unified Ownership Alternative, the City could repeal and readopt or amend the prior Ordinance 4175 to make it apply to additional properties and to modify the amount and configuration of growth on each site.  
|                | Whether the City would repeal the prior ordinance, adopt a new ordinance, or amend the existing ordinance would be determined when the City Council gives direction on its preferred alternative. Similarly, the elements of the ordinances that would need to be amended or supplemented would depend on the City’s preferred alternative. For example, the Offsite Alternative is not a Planned Action, so the adopted Planned Action Ordinance could be repealed in this scenario if this alternative were selected.  
| 8-3            | The purpose of this SEIS is to determine alternative locations for increased employment growth in Downtown. Table 3.1-4 of the Draft SEIS describes what planning and code amendments would be needed for each of the new alternatives. The SEIS alternatives are independent of and not limited by the design review process. Whether a Design Review Board (DRB) action will need to be incorporated into a future decision will depend on the DRB recommendation and the alternative decided upon. Such contingencies are unknown at this time.  
|                | The SEIS does not assume development of the Touchstone proposal – that was already considered in the 2008 FEIS Alternatives. Rather, the SEIS alternatives hypothesize that growth would be reduced on Parkplace and redistributed to other sited Downtown. In some cases, growth on Parkplace is comparable to No Action (e.g., Offsite Alternative); while in other cases it is within the range of No Action and the 2008 FEIS alternatives (i.e. approximately 482,000 square foot growth under the Superblock Alternative and Unified Ownership Alternative).  
|                | The Central Puget Sound Growth Management Hearings Board did not invalidate the prior ordinances approved for the Touchstone application. The nonproject EIS addresses legislative/non-project alternatives and not site-specific development proposals. Whether the City would rescind the prior ordinance, apply a new ordinance or prepare a supplemental ordinance would be determined when the City Council gives direction on its preferred alternative. See Response to Comment 8-2.  
| 8-4            | SEPA encourages but does not require that non-project proposals be described in terms of objectives (WAC 197-11-442(2)). The City’s non-project SEIS considers how a potential amount of commercial growth could be located Downtown. The City is not required or limited to study a particular growth level and may include in its stated objectives or its analysis whatever level of growth it desires; SEPA does not require any further justification The Central Puget Sound Growth Management Hearings Board did not prescribe a level of growth to consider in its alternatives. The comments preference for a different amount of growth is noted.  
|                | Discussions of economic conditions and competition are not required to be discussed in EISs, per WAC 197-11-448.  
|                | The SEIS alternatives are non-project in nature and do not reflect specific development proposals. The alternatives identify a reasonable range of options and provide bookends that the City can consider in determining a course of action, including mitigation measures that can be applied to reduce impacts. See Final SEIS Section 3.1.2.  
| 8-5            | See Response to Comments 3a-2 and 3a-3, and Final SEIS Section 3.1.2.  

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August 2010  
ICF 00182.10
### Comment Letters

<table>
<thead>
<tr>
<th>Comment Number</th>
<th>Response</th>
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<tbody>
<tr>
<td>8-6</td>
<td>See Response to Comments 31-2 and 3a-3, and Final SEIS Section 3.1.2. Considering the Parkplace site alone the SEIS range of alternatives, height and building square feet would be reduced as follows:</td>
</tr>
<tr>
<td></td>
<td>- Building Square footage increases above existing conditions on Parkplace site: 600,250 square feet for the No Action and Offsite alternatives to 1,082,532 square feet for the Superblock and Unified Ownership alternatives to 1,554,250 square feet for the 2008 Proposed Action and FEIS Review alternatives.</td>
</tr>
<tr>
<td></td>
<td>As indicated in Final SEIS Section 3.1.2, the alternatives do generally indicate lower or comparable impacts.</td>
</tr>
<tr>
<td>8-7</td>
<td>See Response to Comments 8-1 to 8-6. The alternatives provide a wide range of development scenarios that the City can consider to identify a preferred alternative, including features which could be combined into a new alternative. The SEIS also identifies mitigation measures that the City could apply to reduce impacts. See Section 3.1.2.</td>
</tr>
<tr>
<td>9-1</td>
<td>Your comments are noted.</td>
</tr>
<tr>
<td>9-2</td>
<td>The traffic impacts of the alternatives were addressed in Section 3.3 of the Draft SEIS and mitigation measures recommended to reduce impacts.</td>
</tr>
<tr>
<td>9-3</td>
<td>The impacts on parking of the different alternatives were addressed in Section 3.3 of the Draft SEIS. In particular, see pages 3.3-4 and 3.3-45. Future development would need to comply with parking standards and a parking management plan.</td>
</tr>
<tr>
<td>9-4</td>
<td>As stated in the Draft SEIS, a full greenhouse gas (GHG) emissions analysis was prepared for the 2008 DEIS. GHG emissions were described both locally and regionally, addressing building construction, space heating, and vehicle use. When considering GHGs regionally, the Proposal with trip reduction mitigation provides the smallest increase in GHGs. When looking only at the local area near the three proposals considered in the 2008 DEIS, the No Action Alternative provides the least increase in GHGs. See Appendix D of the 2008 DEIS for more information.</td>
</tr>
<tr>
<td>9-5</td>
<td>As described in Section 3.1.1, Land Use Patterns of the Draft SEIS, the area being analyzed is a mostly built environment with large amounts of hardscape in the form of buildings, parking areas, and walkways. Future development will need to comply with all of the City's stormwater standards (2008 DEIS Appendix B – SEPA Checklist).</td>
</tr>
<tr>
<td>9-6</td>
<td>The 2010 Draft SEIS Appendix A identifies water and sewer improvements applicable to the new alternatives, similar to the 2008 FEIS alternatives. Given similar growth levels as the 2008 FEIS Alternatives, the 2008 FEIS analysis of parks, police, and fire services is applicable to the 2010 SEIS alternatives.</td>
</tr>
<tr>
<td>9-7</td>
<td>Mitigation measures are proposed for the impacts identified in the SEIS. See Final SEIS Chapter 1 for a summary and Draft SEIS Chapter 3 for additional specifics. Mitigation measures were also identified for the 2008 FEIS Alternatives in that FEIS.</td>
</tr>
</tbody>
</table>
## Comment Letters

<table>
<thead>
<tr>
<th>Comment Number</th>
<th>Response</th>
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<tbody>
<tr>
<td>Letter 10: Grimes, Rick, AIA, CSI</td>
<td></td>
</tr>
<tr>
<td>10-1</td>
<td>As described on page 1-3 of the Draft SEIS (and this Final SEIS), both the Superblock Alternative and the Unified Ownership Alternative are considered on-site alternatives since development amount, intensity, height, and bulk would also be commensurately reduced on the Parkplace site compared to 2008 FEIS Alternatives. In both cases, development on the Parkplace site itself is reduced to approximately 482,000 square feet compared to the 954,000 square feet studied in the 2008 DEIS Proposal and FEIS Review Alternative. The alternatives provide a range of options that the City can consider further as well as mitigation measures it can apply to reduce impacts. See Response to Comments 3a-3, 8-6, and Section 3.1.2.</td>
</tr>
<tr>
<td>10-2</td>
<td>The SEIS alternatives studied lesser growth on the Parkplace site which would reduce impacts at that location compared to 2008 FEIS Alternatives. Where SEIS alternatives redistributed growth from Parkplace to other locations, in some cases impacts were lower, in some cases they were greater, and in some cases they were similar to the 2008 FEIS Alternatives. See Final SEIS Table 3-2 for a comparison. Also see Response to Comments 3a-3, 8-6, and Final SEIS Section 3.1.2 regarding alternatives.</td>
</tr>
</tbody>
</table>

| Letter 11: Helgeson, Sandy |
| 11-1 | Your comments are noted. |

| Letter 12: Hill, G. Richard |
| 12-1 | Your comments are noted. See also Final SEIS Section 3.1.2 regarding the development of the alternatives and differences in impacts. |

| Letter 13: Hurd, A. P. |
| 13-1 | The Central Puget Sound Growth Management Hearings Board decision did not specify what growth the City should target. The board indicated that an off-site alternative should be considered, and also provided an example of an on-site alternative (Superblock). Studying the same amount of growth, even when distributed differently in the alternatives, allows an “apples-to-apples” comparison to the 2008 action alternatives. See Section 3.1.2 |

| Letter 14: Knight, Ronald W., M.D. |
| 14-1 | Your comments are noted. |
| 14-2 | See response 4-3. Impacts on traffic and parking have been addressed in Section 3.3 of the Draft SEIS and Section 3.4 of the 2008 EIS. |
| 14-3 | Implementation of design standards is addressed in the Draft SEIS; please see Draft SEIS Section 3.2 Aesthetics. |
| 14-4 | Your comments are noted. |

| Letter 15: Mann, David S. |
| 15-1 | See Responses to Comments 31-2, 3a-3 and 8-6, and Final SEIS Section 3.1.2. |

| Letter 16: Ridley, Jeff |
| 16-1 | Your comments are noted. |

<p>| Letter 17: Rogers, Carol and Stewart |
| 17-1 | Your comments are noted. |</p>
<table>
<thead>
<tr>
<th>Comment Number</th>
<th>Response</th>
</tr>
</thead>
</table>
| Letter 18: Schmidt, Glenda | 18-1 Your comments are noted.  
18-2 Your comments are noted. To clarify, the design review process is separate from the environmental review being conducted in this SEIS and the preceding 2008 FEIS. However, both EIS documents provided some impact analysis that included recommended mitigation measures relating to design standards that would be applied in a design review context. In particular, see Section 3.2, Aesthetics of the Draft SEIS for more information.  
18-3 The Draft SEIS assumes a similar increase in office and retail to that described in the 2008 FEIS Alternatives. Your other comments are noted.                                                                                                                                 |
| Letter 19: Schor, Heidi | 19-1 A range of alternatives is under consideration. See Response to Comment 3a-3 and Section 3.1.2.  
19-2 See Response to Comment 18-2.                                                                                                                                                                                                                                                                                                      |
| Letter 20: Smith, Cynthia | 20-1 Your comments are noted.  
20-2 Although an increase of approximately 954,000 square feet is being considered overall in the SEIS, there are two on-site alternatives that only provide an increase of 482,000 square feet on the Parkplace site, and an Off-Site Alternative that provides no increase on the Parkplace site compared to the No Action Alternative. See Response to Comment 3a-3 and Section 3.1.2.  
20-3 Your comments are noted.                                                                                                                                                                                                                                                                                                        |
| Letter 21: Thorpe, Robert W., AICP | 21-1 Please see Table 3-2 in the Final SEIS. To clarify, the 954,000 square feet addition is in addition to the total square footage considered on Parkplace site under the No Action Alternative (838,700 square feet). This is the estimated floor area that could be built under then existing regulations. The existing conditions square footage is 238,450, as identified on Table 2-1 of the Draft SEIS. See Table 2-1 of the 2008 DEIS for details on the amount of square footage under existing conditions, the No Action and the Proposed Action.  
21-2 Touchstone has proposed that the City allow an additional 954,000 square feet of floor area (in addition to the amount already allowed) on the Parkplace site. The three alternatives described in the SEIS would each distribute some future growth to other Downtown locations. The SEIS includes two on-site alternatives (Superblock and Unified Ownership) with a lesser increase (+482,000 square feet) on the Parkplace site, and an Off-Site Alternative with no increase on the Parkplace site above the No Action Alternative.  
21-3 See Response to Comments 3a-2, 3a-3 and 8-4.  
21-4 With respect to views, the City does not regulate or protect private views. The view corridors analyzed in the Draft SEIS (Section 3.2) are public view corridors identified in the City's Comprehensive Plan. Also see response 21-2 as well as Section 3.1.2 which describes the reduced heights on Parkplace when considering lesser growth and distributing it elsewhere. |
Comment Letters

<table>
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<tr>
<th>Comment Number</th>
<th>Response</th>
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<tbody>
<tr>
<td>21-5</td>
<td>The SEIS does provide alternatives that consider less development on the Parkplace Site. Both on-site alternatives (Superblock and Unified Ownership) provide an increase of 482,000 square feet instead of 954,000 square feet on that particular site. A range of alternatives is under consideration. See Response to Comments 3a-2, 3a-3 and 8-6. There is no established legal/ bright line requirement to study alternatives that result in a particular percentage reduction in the amount of development, nor is such a reduction the exclusive means to arrive at alternatives that have lower environmental costs. Design alternatives (i.e., varying the height, bulk and/or location of buildings) can also reduce impacts, and are commonly evaluated in EISs as was the case for the 2008 FEIS Review Alternative. The Barrie v. Kitsap decision cited in the comment did require consideration of an off-site alternative, but the decision was silent regarding the size or other content of such alternative. A more relevant case is the 1999 state Supreme Court decision in King County v. CPSGMHR, 138 Wn.2d 161, which involved the Blakely Ridge master planned development. The Court concluded that an alternative which had greater impacts in some areas and lower impacts in others, satisfied SEPA's requirement for lower environmental cost. See Final SEIS Section 3.1.2 for a description of the range of alternatives and differences in impacts. The other examples cited in the comment appear to be instances where an agency approved a reduced scale project as a means to mitigate impacts. The City of Kirkland could decide to pursue such an option in the present situation.</td>
</tr>
</tbody>
</table>

| 21-6           | Your comments are noted. |

3.2 Public Hearing Comments

Table 3-5 below provides a list of people who provided verbal comments at the June 24, 2010 Public Hearing and a summary of the public comment that was made divided by comment subject. Detailed comments may be reviewed by listening to a recording available at: http://www.ci.kirkland.wa.us/depart/Planning/Planning_Commission/Planning_Commission_Meetings_Online.htm.

Table 3-5. Meeting Public Comment Received during the Comment Period

<table>
<thead>
<tr>
<th>Meeting Comment Number</th>
<th>Name</th>
<th>Summary of Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>PH-1-1</td>
<td>Darling, Elaine</td>
<td>Ms. Darling mentioned that she submitted a letter into the record. She read the letter submitted into the record (see Letter 2 listed in Table 3-1).</td>
</tr>
<tr>
<td>PH-2-1</td>
<td>Grimes, Rick, AIA, CSI</td>
<td>See Section 3.3 for the presentation that accompanied Mr. Grimes’ comments. The prior proposal for Parkplace was illustrated as a reasonably tall and fully textured building with large open spaces. The prior proposal for Parkplace maintained view corridors and had stepbacks and setbacks that addressed building mass. The new proposal has buildings on it with</td>
</tr>
</tbody>
</table>
### Draft SEIS Public Hearing (PH) Comments—June 24, 2010

<table>
<thead>
<tr>
<th>Meeting Comment Number</th>
<th>Name</th>
<th>Summary of Comment</th>
</tr>
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<tbody>
<tr>
<td></td>
<td></td>
<td>block floor plates as big as a football field. Multiply this by five and put it in Downtown close to smaller and more finely textured existing buildings and that is the current proposal. Is this the City’s vision? Mr. Grimes believes the Commission previously approved a design large in scale but similar in mass with texture and setbacks incorporated to achieve this. With buildings as tall as seven stories, the current proposal loses two primary view corridors. The current proposal for Parkplace meets the quantitative setbacks but not the qualitative setbacks and stepbacks every other development proposal in Downtown must meet.</td>
</tr>
<tr>
<td>PH-2-2</td>
<td></td>
<td>Mr. Grimes requests that the Planning Commission consider an option with less than 954,000 square feet in it so that design elements that reduce building scale will be included.</td>
</tr>
<tr>
<td>PH-3-1</td>
<td>Thorpe, Robert W., AICP</td>
<td>Mr. Thorpe expressed his concern with the current proposal for Parkplace which he said would be a “camelback” in the center of Downtown Kirkland.</td>
</tr>
<tr>
<td>PH-3-2</td>
<td></td>
<td>Mr. Thorpe indicated a concern that the proposal for Parkplace occurs at a time when there are millions of square feet of empty office space with retail and office vacancy rates of 20%. Vacancy rates are expected to go up in the future. Mr. Thorpe says that any time a rezone is done, it needs to show demand.</td>
</tr>
<tr>
<td>PH-3-3</td>
<td></td>
<td>There should be an option that includes a substantial reduction in the amount of office space provided. Mr. Thorpe cited relevant past court cases showing a reduced option.</td>
</tr>
<tr>
<td>PH-4-1</td>
<td>Eustis, Jeff (on behalf of Davidson Serles)</td>
<td>Mr. Eustis stated that the City is going down the same path it went with the previous EIS relating to Parkplace. He said the original EIS was fatally flawed because it included only one alternative other than the No Action, which was the proposal requested by Touchstone.</td>
</tr>
<tr>
<td>PH-4-2</td>
<td></td>
<td>The Draft SEIS has other alternatives, which Mr. Eustis lists. However, all alternatives involve 954,000 square feet. Where does this number come from? There is no objective demand analysis for this amount of office space. Mr. Eustis lists out the objectives identified and said that meeting these objectives does not require 954,000 square feet.</td>
</tr>
<tr>
<td>PH-4-3</td>
<td></td>
<td>Mr. Eustis said that SEPA requires alternatives that achieve stated objectives, but at a lower environmental costs. He stated that numerous court cases show a need for an alternative with a reduced square footage.</td>
</tr>
<tr>
<td>PH-5-1</td>
<td>Smith, Cynthia</td>
<td>Ms. Smith cited portions of the Draft SEIS addressing views. The proposal for Area 5A (Parkplace) allows 8 stories of height and obliterates views. With the proposal, there</td>
</tr>
</tbody>
</table>
### Draft SEIS Public Hearing (PH) Comments—June 24, 2010

<table>
<thead>
<tr>
<th>Meeting Comment Number</th>
<th>Name</th>
<th>Summary of Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>PH-6-1</td>
<td>Mankowski, Mandy</td>
<td>Mr. Mankowski is a prior long-time Kirkland resident who now lives in Renton. He states the magnitude of the Parkplace proposal is out of scale with the remainder of the City. The new EIS does not do any better at addressing the proposal than the previous EIS which he says was fatally flawed. The Draft SEIS is fatally flawed and is setting the stage for a repeat performance before the Hearings Board.</td>
</tr>
<tr>
<td>PH-7-1</td>
<td>Howe, Douglas (representing Touchstone)</td>
<td>Mr. Howe described the 18+ month process that Touchstone went through on the past EIS, and the current long-term process that Touchstone is engaging with the City’s Design Review Board on the design of the Parkplace project. He says that Touchstone’s proposal is complying with City design guidelines.</td>
</tr>
<tr>
<td>PH-7-2</td>
<td></td>
<td>The Central Puget Sound Growth Management Hearings Board remanded the past EIS not on the issue of if the density could occur, but where that density could occur. The Draft SEIS looks at additional options of where density could occur, consistent with the Hearings Board remand. He makes reference to the letter provided by G. Richard Hill (Letter #12).</td>
</tr>
<tr>
<td>PH-8-1</td>
<td>Bradley, Cam</td>
<td>Ms. Bradley states that the Central Puget Sound Growth Management Hearings Board asked for an option with reduced environmental impact. There are three options presented that look like a lot of impact. She would like a fourth alternative that has less impact on the environment.</td>
</tr>
<tr>
<td>PH-8-2</td>
<td></td>
<td>What does less impact mean? She moved to Kirkland because it is walkable and has a small-town feel. The types of buildings being proposed for Parkplace don’t go with that feel. Instead it’s a lot like Bellevue. In addition, cities are trying to be more green and walkable. Buildings of the scale described in the Parkplace proposal are not as inviting.</td>
</tr>
<tr>
<td>PH-9-1</td>
<td>Mann, David (representing TR Continental Plaza)</td>
<td>Mr. Mann indicated that the City is going down the same path that led to appeal of the previous EIS with this Draft SEIS. He suggested that Commissioners educate themselves about reasonable alternatives at lower environmental costs.</td>
</tr>
<tr>
<td>PH-9-2</td>
<td></td>
<td>He said the Draft SEIS does a better job of identifying objectives (at page 2-5 of Draft SEIS), but that none of the objectives require 954,000 square feet. The City needs to look at alternatives with smaller square footage that still meet the stated objectives. He requests that the EIS include an alternative that meets objectives at less environmental impact.</td>
</tr>
</tbody>
</table>
Draft SEIS Public Hearing (PH) Comments—June 24, 2010

<table>
<thead>
<tr>
<th>Meeting Comment Number</th>
<th>Name</th>
<th>Summary of Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>PH-10-1</td>
<td>Kilpatrick, Dan</td>
<td>Mr. Kilpatrick has been in Kirkland for 30 years and he enjoys the ambience of the city. The proposal for Parkplace will dictate the look and feel of Kirkland for decades to come. He urged the Commission to consider an alternative with less impact.</td>
</tr>
<tr>
<td>PH-11-1</td>
<td>Feek, Jim</td>
<td>Mr. Feek said he is speaking on behalf of the Parkplace proposal. Kirkland is hurting financially. The City does not have the infrastructure to keep up. Now a company comes to Kirkland and puts up the money to get this project going. The proposal for Parkplace will bring more synergy to the City. He stated that you currently see nothing but high impact when you enter the City, citing a large number of condominium developments. The City needs to get more progressive. Nobody shops Downtown; instead they go to big-box Costco. The Commission needs to look beyond the “legalese” and see the community needs. He said that he thinks the Parkplace proposal will be a vibrant place. He knows what the pathways and other aspects of the development will look like. He originally comes from Kitsap County and you can see what Silverdale did in making Bremerton a ghost town.</td>
</tr>
</tbody>
</table>

Responses to public hearing comments appear in Table 3-6. Comments that state an opinion or preference are acknowledged with a response that indicates the comment is noted and forwarded to the appropriate decision makers. Comments that ask questions, request clarifications or corrections, or are related to the Draft SEIS analysis are provided a response which explains the EIS approach, or offers corrections, or provides other appropriate replies.
Table 3-6. Response to Public Hearing Comments

<table>
<thead>
<tr>
<th>Public Hearing Comments</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Comment Number</strong></td>
<td><strong>Response</strong></td>
</tr>
<tr>
<td>PH-1: Darling, Elaine</td>
<td>Please see Final SEIS Section 3.1.3 for responses to Letter 2.</td>
</tr>
<tr>
<td>PH 1-1</td>
<td>Your comments are noted. To clarify, the design review process is separate from the environmental review being conducted in this SEIS and the preceding 2008 FEIS. However, both EIS documents provided some impact analysis that included recommended mitigation measures relating to design standards that would be applied in a design review context. In particular, see Section 3.2, Aesthetics of the Draft SEIS for more information.</td>
</tr>
<tr>
<td>PH 2-1</td>
<td>See Final SEIS Section 3.1.2. The three alternatives described in the Draft SEIS and in this Final SEIS distribute future growth to other locations. The SEIS includes two on-site alternatives (Superblock and Unified Ownership) with a lesser increase (+482,000 square feet) on the Parkplace site, and an Off-Site Alternative with no increase on the Parkplace site when compared to the No Action Alternative.</td>
</tr>
<tr>
<td>PH-2: Grimes, Rick, AIA, CSI</td>
<td>Your comments are noted. To clarify, the design review process is separate from the environmental review being conducted in this SEIS and the preceding 2008 FEIS. However, both EIS documents provided some impact analysis that included recommended mitigation measures relating to design standards that would be applied in a design review context. In particular, see Section 3.2, Aesthetics of the Draft SEIS for more information.</td>
</tr>
<tr>
<td>PH 2-2</td>
<td>See Final SEIS Section 3.1.2. The three alternatives described in the Draft SEIS and in this Final SEIS distribute future growth to other locations. The SEIS includes two on-site alternatives (Superblock and Unified Ownership) with a lesser increase (+482,000 square feet) on the Parkplace site, and an Off-Site Alternative with no increase on the Parkplace site when compared to the No Action Alternative.</td>
</tr>
<tr>
<td>PH-3: Thorpe, Robert W., AICP</td>
<td>Your comments are noted.</td>
</tr>
<tr>
<td>PH 3-1</td>
<td>See Response to Comment 8-4.</td>
</tr>
<tr>
<td>PH 3-2</td>
<td>See Response to Comments 31-3, 3a-3 and 8-6, and Final SEIS Section 3.1.2.</td>
</tr>
<tr>
<td>PH 3-3</td>
<td>See Response to Comment 21-5.</td>
</tr>
<tr>
<td>PH-4: Eustis, Jeff (on behalf of Davidson, Serles)</td>
<td>Your comments are noted.</td>
</tr>
<tr>
<td>PH 4-1</td>
<td>See Responses to Comments 3a-2, 3a-3 and 8-6, and Final SEIS Section 3.1.2.</td>
</tr>
<tr>
<td>PH 4-2</td>
<td>See Response to Comment 8-4.</td>
</tr>
<tr>
<td>PH 4-3</td>
<td>See Response to Comments 3a-2, 3a-3 and 8-6, and Final SEIS Section 3.1.2.</td>
</tr>
<tr>
<td>PH-5 Smith, Cynthia</td>
<td>Your comments are noted.</td>
</tr>
<tr>
<td>PH 5-1</td>
<td>See Response to Comment PH 2-2.</td>
</tr>
<tr>
<td>PH-6 Mankowski, Mandy</td>
<td>Your comments are noted.</td>
</tr>
<tr>
<td>PH 6-1</td>
<td>See Responses to Comments 3a-2, 3a-3 and 8-6, and Final SEIS Section 3.1.2.</td>
</tr>
<tr>
<td>PH-7 Howe, Douglas (representing Touchstone)</td>
<td>Your comments are noted.</td>
</tr>
<tr>
<td>PH 7-1</td>
<td>See Responses to Letter 12.</td>
</tr>
<tr>
<td>PH-8 Bradley, Cam</td>
<td>Your comments are noted.</td>
</tr>
<tr>
<td>PH 8-1</td>
<td>See Responses to Comments 3a-2, 3a-3 and 8-6, and Final SEIS Section 3.1.2.</td>
</tr>
<tr>
<td>PH 8-2</td>
<td>See Responses to Comments 3a-2, 3a-3 and 8-6, and Final SEIS Section 3.1.2.</td>
</tr>
<tr>
<td>PH-9 Mann, David (representing TR Continental Plaza)</td>
<td>Your comments are noted.</td>
</tr>
<tr>
<td>PH 9-1</td>
<td>See Response to Comment 21-5.</td>
</tr>
<tr>
<td>PH 9-2</td>
<td>See Responses to Comments 3a-2, 3a-3 and 8-6, and Final SEIS Section 3.1.2.</td>
</tr>
<tr>
<td>PH-10 Kilpatrick, Dan</td>
<td>Your comments are noted.</td>
</tr>
<tr>
<td>PH 10-1</td>
<td>See Responses to Comments 3a-2, 3a-3 and 8-6, and Final SEIS Section 3.1.2.</td>
</tr>
<tr>
<td>PH-11 Feek, Jim</td>
<td>Your comments are noted.</td>
</tr>
</tbody>
</table>
3.3 Marked Comment Letters

Marked comment letters received and provided responses in Section 3.1 follow this page.
Date: June 23, 2010
Name: Carol A. (Cam) Bradley
Address: 921 Fifth Avenue WA 98033
Phone: 425 803-0457
Email: francescoandcam@hotmail.com

RE: Permit No. ZON07-00016 and support of an option with less environmental and community impact

TO: Eric R Shields, Planning Director and SEPA Responsible Official
City of Kirkland Planning Department
123 5th Avenue
Kirkland, WA 98033

I was very involved with trying to prevent the City of Kirkland from accepting what I considered a “Bellevuenising” of the Kirkland community in rezoning the Parkplace area. But the building design that Touchstone put forth then was at least more attractive and smaller than what I am seeing now on the Kirkland City web site. The three zoning options that would support those massive, and non-Kirkland style buildings must somehow be more extreme than even what the community saw before.

At a time when cities and towns are striving to be “greener” and to encourage walking for daily needs such as food, entertainment, and exercise, WHY are the City Commissioners and the Planing Commission who advises them trying to make us a traffic-laden, Bellevue-like place to live? The only answer that I can come up with is that those in power think that we will get more money in taxes and that they will look more successful and powerful if we get some BIG buildings in Kirkland.

My take on the Planning Commission’s considering alternate places for additional square feet of retail and office space in places around the proposed Touchstone Parkplace site is that you are “going through the motions” but not really addressing the spirit of the Central Puget Sound Growth Management Hearings Board order. The State Environmental Policy Act (SEPA) found that the city failed to consider alternatives that would have less impacts on the environment. The alternative #4, proposed by the KCRD, is a smaller-in-scale option. This is what I support.

Statement Submitted by: Carol A (Cam) Bradley

[Signature]
June 18th, 2010

Mr. C.R. Allshouse  
Kirkland Planning Commission  
Kirkland City Hall  
123-5th Avenue,  
Kirkland, WA 98033

Dear Mr. Aimshouse,  

I have just had a chance to review the drawings submitted to the DRB. The actual project differs dramatically from what Touchtone presented to the public at public meetings and presentations. Thus, I am very happy that the Growth Management Hearings Board ruled that the EIS upon which the new zoning regulations were based violated the State Environment Policy Act (SEPA).

Fortunately this mandate ordered the City to reconsider the rezone of Parkplace. I understand that it is extremely unusual for them to rule against a City. I am urging you and your fellow planning members to design a fourth alternative—one in which dramatically reduces the outlandish size of this project. Touchtones' project is completely out of character with other buildings in Kirkland i.e. inadequate setbacks, density scale and lack of modulations. Please look around Kirkland and see for yourself the scope of this pending project and its' impact on our beautiful City.

A couple of items Touchtone promised was a theatre and public square. There is ABSOLUTELY no room for a theatre and the public square is miniscule. What is clear is that Touchtone wants to maximize its profits based on density and lack of amenities. As a long time resident of Kirkland, (30+years), I along with many, many citizens are very upset that a project of this scale would be allowed in the heart of our beloved City.

I urge you to carefully study Touchtones' alternatives and come up with a fourth alternative that is reasonable for the citizens of this community and enhances our City. Please do not destroy the ambiance of Kirkland with this massive office complex. Do we really need that much office space? Has a feasibility study been done for this project?

I thank you for your time and effort regarding this urgent matter.

Very truly yours,

Elaine J. Darling

Cc: Planning Commission, City Council (file)
June 9, 2010

City of Kirkland
Kirkland Planning Commission
Kirkland City Hall
123 – 5th Avenue
Kirkland, WA 98033

Re: Draft Supplemental EIS for Parkplace proposal

Dear Planning Commission Members:

I would urge the Planning Commission to begin its review of the DEIS by examining an underlying assumption for the proposed new alternatives, namely that Kirkland needs to increase the capacity of its commercial zoning to accommodate an additional 954,000 square feet of retail and office space. There has never been a study which suggests that such additional capacity is needed in the planning horizon of Kirkland’s Comprehensive Plan, nor is there any evidence to suggest such a need exists. To the contrary, office vacancy rates in Kirkland and the rest of the Puget Sound region are at record highs—exceeding 25% in some markets. Office rents have dropped to levels not seen since 1995. One observer counted over 25 retail vacancies in the Kirkland CBD. Several retail spaces constructed in the last four years have never been occupied.

I have been told by property managers about several retail tenants who are behind on their rent and who they are looking to replace. It will take major economic growth in the region to bring office and retail markets up to a level of rents and vacancies which will justify new commercial development. When the economic conditions support new development, there is abundant capacity for commercial development in Kirkland under existing zoning. There are many tracts of undeveloped and under-developed land in the downtown area and Totem Lake where retail and office expansion can occur. So, why should every new alternative to the Parkplace proposal be based on the assumption that 954,000 square feet needs to be added to the commercial zoning capacity of the Kirkland downtown area?

One needs to remember that this process began with a private amendment request by a property owner who wanted to develop its property to twice the density current zoning would allow. It did not begin with any determination by the City that it needed to increase zoning capacity the CBD for 954,000 square feet of additional for office and retail development. In considering that private amendment request, SEPA requires that the City consider other alternatives in its EIS which cause less environmental impacts. The Growth Management Board
ruled that the EIS used in the initial process violated SEPA because of its lack of such alternatives. In the new DEIS, the alternatives identified as the Super Block and Unified Ownership alternatives both split the projected 954,000 square foot development between Parkplace and the other properties. In the Off-Site alternative, there is no such split of the 954,000 square feet. Why is this alternative treated differently? If the Off-Site alternative received only half the projected new zoning capacity, as is the case with the other new alternatives, would it not provide a better comparison?

Finally, since there is not a demonstrated need for an additional 954,000 square feet of retail and zoning capacity, why not consider an alternative using a lower increase in zoning capacity which is between the No-Action alternative and the Proposed Action? Such a lower level of increase could be considered as an on-site alternative and/or off-site alternatives. Such an alternative would produce lower environmental impacts in any event.

Sincerely yours,

Kenneth H. Davidson

KHD:aal
KHD/1748.14/CITY OF KIRKLAND: PLANNING COMMISSION LET 06.09.10.doc
June 16, 2010

VIA MESSENGER AND E-MAIL

City of Kirkland
Kirkland Planning Commission
Kirkland City Hall
123 – 5th Avenue
Kirkland, WA 98033

Re: Supplemental DEIS for Parkplace

Dear Planning Commission Members:

I live and work in Kirkland and have followed Touchstone’s proposal for Parkplace through the rezone and Design Review Board (DRB) processes. Now that the buildings being proposed can be seen in drawings submitted to the DRB, many will find the actual project differs dramatically from images created in word pictures and artist renderings during the rezoning process. Presentations to the DRB show five very large, block-like office buildings and a hotel packed tightly together. Buildings are mostly eight story with little modulation or architectural connection to the rest of Kirkland. If you and the public find this is the wrong project for Kirkland, then you have the opportunity to reconsider the zoning regulations which would permit it.

As you know, the Growth Management Hearings Board ruled that the EIS upon which the new zoning regulations were based violated the State Environmental Policy Act (SEPA) and ordered the City to reconsider the rezone of Parkplace based on an EIS which complies with SEPA. Unfortunately, the DEIS before you contains a fatal flaw and sets the stage for a repeat of the same mistake. One requirement of SEPA is that the EIS consider at least one alternative action which will have less environmental impact. The DEIS does not have such an alternative. It looks at alternatives which simply spread the environmental impact of increasing commercial zoning capacity by 954,000 square feet to different properties in a two block radius of Parkplace. Moving the site of 954,000 square feet of additional development a few hundred yards one way or the other does not materially decrease environmental impacts. Only an alternative that allows a lesser level of development will produce less environmental impact. Thus, I request that you direct staff and the consultant to add at least one alternative to the DEIS which assumes an increase in commercial zoning capacity to the downtown of 476,000 square feet, which is the
June 16, 2010
Page 2

mid-point between the Touchstone PAR and the No-Action alternative.

If a lesser alternative is considered in the EIS, then the public and the Council will have the opportunity to truly weigh an alternative with less environmental impacts. What could be the disadvantage of an EIS which allowed the public and the City Council the information on an alternative with less impacts? Including such information in the discussion about an action having substantial environmental impacts is, of course, the whole purpose of SEPA. Please take action to add a lesser alternative to the EIS to faithfully carry out SEPA and inform the public and its elected officials.

Sincerely yours,

Kenneth H. Davidson

KHD:aal
I’m assuming this is for the DSEIS.

The plans for making Parkplace into a town center sound exciting. I especially like the idea that we who live nearby will have more everyday shopping resources. I miss our drug and hardware stores. Hope we can keep the bookstore and Hallmark. The plans for a bigger QFC sound good. I'd love a garden shop that I can actually get to and inside of! I’d also like more outdoor garden space for meeting with friends and just enjoying sunny days. Most of the current Parkplace is not accessible for a person like me in a wheelchair. I expect that the new one will be—with washrooms, pathways, store aisles, restaurants. A comfortable pedestrian center would be ideal.

I don't know how much office space we really need in Kirkland, however. Eight-story buildings sound excessive. There are a lot of huge empty buildings on the Eastside—all over Redmond, for example. I wonder who will occupy the old Google building at 4th and 6th. Kirkland should avoid turning Parkplace into a big, empty business park.

Jill DeRoche
929 5th Ave. #2
Kirkland, WA 98033
Dear Angela,

I hope, as I said in the letter to the city last year, (that was published in the Kirkland Reporter) that Kirkland will not EVER become the nightmare that Bellevue has become. We love our small and intimate community just as it is...Progress and change must happen but it can happen while keeping our city a special place. We want to walk to a downtown area that has character. The new development will not give us that feel that is so Kirkland. My husband and I have lived here for 21 yrs and have been a part of the growth that has gone on so far. It has changed the feel but not to the extend it will with such a large and oversized development that has been proposed. Please consider the residents of Kirkland that oppose such a large and not very inviting change to our lovely city.

Sincerely,

Barbara and Perry Dolan

The New Busy is not the too busy. Combine all your e-mail accounts with Hotmail. Get busy.
From: Angela Ruggeri [ARuggeri@ci.kirkland.wa.us]  
Sent: Thursday, June 17, 2010 9:22 AM  
To: Grueter, Lisa  
Cc: Eric Shields; Paul Stewart; Jeremy McMahan; A-P Hurd  
Subject: FW: Park Place Development  
Categories: Red Category

From: Peter Drabble [mailto:drabble@wibv.com]  
Sent: Thursday, June 17, 2010 9:19 AM  
To: Angela Ruggeri  
Subject: Park Place Development

Dear Ms. Ruggeri,

If the large and tightly packed buildings that I have seen on the new designs for Kirkland ParkPlace come to pass, I am convinced it would be a huge mistake. Redevelopment is certainly good but this one is laughable it is so out of line with the character of the community.

Best regards,

Peter Drabble  
11108 NE 97th Street, Kirkland, Washington, 98033  
Tel: (425) 450-0801, Fax: (425) 605-4506  
URL: www.wibv.com, Email: drabble@wibv.com
Dear Kirkland Mayor and Council Members,

Whatever one may think of European ideas, one must admit that their cities offer a much friendlier human urban environment than U.S. cities.

One common thread running through most cities from Scandinavia and the Baltic countries to the Mediterranean is that dense mixed commercial and residential areas, not just in the old city cores but also in the newer developments, have most of their buildings no more than 4 to 6 stories high. This is curious given the different history, culture, climates, politics and economies of that continent.

So, the question is: what is it that THEY know that we don’t or that WE know that they don’t??

Cities with tall buildings, which create a dark and cold canyon effect, already abound in Puget Sound. If we want to keep Kirkland different and more inviting than all the other regional cities, we must keep it low, green and pedestrian friendly. Let us create buildings that fit our overall plan for the long term and not just the short-term needs of particular businesses.

Sincerely,

Shawn Etchevers
Kirkland
June 28, 2010

Angela Ruggeri, AICP
Senior Planner
Department of Planning and Community Development
City of Kirkland
123 – 5th Avenue
Kirkland WA 98033

Re: Draft Supplemental Planned Action Environmental Impact Statement

Dear Ms Ruggeri:

On behalf of Davidson Serles & Associates we submit these comments in response to the Draft Supplemental Planned Action Environmental Impact Statement dated May 27, 2010. Overall, the DSEIS suffers from the same defect as the prior EIS, the failure to consider a true range of alternatives.

The prior EIS failed to consider any alternatives to Touchstone’s project, which resulted in the GMHB’s finding of inadequacy. In principle, the DSEIS was prepared to cure that defect, but it doesn’t. Although the DSEIS identifies various alternatives (superblock, unified ownership and off-site), in fact they all are variations on a single proposal (an additional 954,000 square feet of retail and office space, above and beyond the 838,000 square feet theoretically possible under prior zoning, all distributed within a short radius of the Parkplace site). Consequently, they all present nearly identical impacts, which of course facilitates adherence to the status quo. The DSEIS fails to satisfy SEPA’s fundamental requirement that an EIS consider alternatives of lesser impact.

The Proposal

The scope of the proposal remains unclear. The DSEIS at 1-1 and 2-1 states that “[t]he City is reevaluating its previous approval of the Touchstone (Parkplace) Comprehensive Plan and Zoning and Municipal Code Amendments...” This description proceeds to identify three actions: the amendment to the comprehensive plan and zoning to allow 954,000 additional
square feet of retail and office space; amendment of the capital facilities and transportation elements of the comprehensive plan; and approval of a planned action ordinance for selected properties.

However, the DSEIS is unclear as to how these proposed actions relate to the actions already taken: *i.e.*, the adopted comprehensive plan amendment (Ordinance 4170); the zoning amendment (Ordinance 4171); the design review guidelines (Ordinance 4172); the amendments to PLA5B and 5C (Ordinance 4173); the Altom amendment (Ordinance 4174); and the planned action ordinance for the Parkplace and Altom sites (Ordinance 4175).

With respect to each of these six actions please identify through responses to the following questions what actions the City contemplates taking when it states its intent to reevaluate its previous approvals:

Does the proposed action to "[a]pprove a Planned Action Ordinance" apply to lands covered by the prior Planned Action Ordinance (Ordinance No. 4175) or does it apply to additional lands, and if so, which ones?

Does the City contemplate an amendment to the environmental thresholds within Ordinance 4175?

Does the City contemplate a supplemental planned action ordinance on top of the existing ordinance?

The DSEIS also fails to identify the relationship between the proposed actions (and their alternatives) and the pending proposal before the Design Review Board. On Thursday, June 24, 2010, the Planning Commission asked Planning Staff to address this very question, to which staff provided no clear response.

As the City is well aware, Touchstone has submitted an application for design review of a proposal under the previously approved comprehensive plan, zoning code and design review ordinances. The Design Review Board has been conducting review of Touchstone’s proposal under these ordinances for nearly a year and one-half, beginning with the conceptual design conference held on February 2, 2009.

The DSEIS presents three alternatives in addition to those reviewed in the prior 2008 FEIS. Each of these alternatives (superblock, unified ownership and off site) involves the redistribution to other properties within the downtown area of some portion of the additional 954,000 square feet of retail and office space proposed for the Parkplace site. The DSEIS fails to identify how any of these
alternatives might impact Touchstone's pending design review application. Accordingly, we request a response to the following questions and points:

Do any of the off-site alternatives require amendments to the plan, zoning and design review ordinances previously enacted, and if so, what would those amendments be?

Does the DSEIS assume the development of Touchstone's proposal?

If development of the Parkplace site is assumed, does the DSEIS regard the development of the additional properties covered by the three new alternatives as occurring in addition to the development of the Touchstone property?

If development of the additional properties in addition to Parkplace is assumed, the DSEIS should be further supplemented to consider the cumulative effects of development of the additional commercial properties.

If development of the additional properties in addition to Parkplace is not assumed, please identify the circumstances under which the area presently proposed for the Touchstone site would be freed for distribution to other sites.

Because the re-evaluation of prior actions may impact, or be limited by, the ongoing design review process, the EIS must fully discuss and disclose the relationship between its proposals and the pending design review application.

The Staff Report of June 17, 2010 to the Planning Commission identifies an “Option 2”, consisting of amendments to the existing ordinances, but fails to identify either the elements of those ordinances to which such amendments would apply or the potential range of such amendments. To further define and elaborate upon this Option 2, please identify the elements (e.g., building height, total floor area, ratio of retail to commercial space and area of public space) and provide a range of options for amendment to the existing ordinances.

Proposal Objectives

To facilitate the identification and comparison of alternatives, SEPA requires environmental review to describe non-project proposals in terms of objectives, rather than a preferred course of action. See WAC 197-11-060(3)(a)(iii). The DSEIS at 2-5 identifies six objectives of the proposal, the creation of: downtown employment; downtown retail development; public open
Master Plan and Design Guidelines
window patterns, articulation, building modulation

roof forms
a gateway building and public open space can together shape a welcoming gathering space at this important corner
breezeway between buildings

conceptual rendering of corner buildings on 6th and Central showing ground level setbacks and change of expression for upper levels
examples of varied step backs
Building "P" omitted for visibility.
3. West Side

Item A: West end of Building B is an important landmark

DRB comment:

The DRB was in agreement with major massing moves made to the west sides of Buildings B and C [vertical] and horizontal massing forms on corners. The DRB requested that LMN consider ways of making the vertical element on Building B more dominant, such as stepping back the northwest corner (similar to northwest step-back on Building C) or allowing the vertical element to extend all the way to the ground plane with the removal/penetration of the gasket.
DRB Comments from 1/4 Meeting

1. Street Between Buildings B & C

Item C: Massing should open up into plaza

DRB comment:

The DRB approved major massing moves by LMN, but would like to see the massing reinforced with intermediate modulation and articulation as the design moves forward.
Building "P" omitted for visibility
Ordinance # 4175 (see Attachment 3) is that Planned Action Ordinance that was also adopted in December of 2008 to facilitate future environmental review of the Parkplace site. This ordinance was not part of the appeal to the Growth Management Hearings Board. It is also still in effect and will not need to be re-adopted.

- **Option 2:** Recommend that changes be considered to the existing ordinances.
  - If the Council determines that a change should be considered to the existing ordinances, the ordinances will remain in place until the City goes through a new public process to review and adopt any proposed changes.

The Growth Management Hearings Board has required the City to comply with its order by October 5, 2010. If it is determined that changes are to be made to the ordinances, the City will need to go back to the Hearings Board with this decision and request additional time for completion of their requirements.

**Comprehensive Plan amendments relating to other issues:**

The Planning Commission will also be making a recommendation on the additional amendments to the Transportation and Capital Facilities Chapters of the Comprehensive Plan to include all necessary capital improvements and a multi-year financing plan based...
Chapter 4
Distribution List

The Final SEIS or a notice of availability were provided to the following agencies and individuals. Agencies indicated with an asterisk were provided with a compact disk or copy.

4.1 Government Agencies

Association of Washington Cities
Bellevue Regional Library
Burlington Northern Railroad
City of Bellevue Planning Department
City of Bothell, Planning and Community Development
City of Kenmore Planning Department
*City of Kirkland, City Manager
*City of Kirkland, Director of Planning and Community Development
City of Kirkland, Finance and Administration
City of Kirkland, Parks
*City of Kirkland, Planning
*City of Kirkland, Public Works
City of Kirkland, Assistant City Manager
City of Kirkland, Chief of Police
*City of Kirkland, City Attorney
City of Kirkland, City Clerk
City of Kirkland, Director of Fire and Building Services
City of Kirkland, Director of Information and Technology
City of Redmond
City of Woodinville Planning Department
Economic Development Council of Seattle and King County
King County Department of Development and Environmental Services
King County Department of Public Works, Solid Waste Division
King County Department of Transportation, Transportation Plan Section
King County Fire District 41, City of Kirkland Fire Department
King County Hospital District 2, Evergreen Healthcare
King County Metro Transit Environmental Plan
King County Natural Resources and Parks, Water and Land Resources Division
King County Office of Regional Policy and Planning
King County Parks and Recreation Department
King County Public Works, Surface Water Management
King County Wastewater Treatment Division
King County Conservation District
King County Library System, Kingsgate Branch
**Kirkland/King County Library
Lake Washington School District No. 414
Metro Transit
Lake Washington Technical College
Metro Water Pollution Control
Muckleshoot Indian Tribe, Environmental Division, Fisheries Department
Public Health Seattle and King County
Puget Sound Action Team
Puget Sound Air Pollution Control Agency
**Puget Sound Regional Council
Redmond/King County Library
Sound Transit
Tulalip Tribes
University of Washington Libraries
U.S. Army Corps of Engineers
U.S. Department of Housing and Urban Development
U.S. Department of Energy
U.S. Department of Fish and Wildlife
U.S. Department of Transportation
U.S. Department of Transportation, Federal Highway Administration
U.S. Environmental Protection Agency Region X
U.S. Soil Conservation Service
Washington State Department of Agriculture
*Washington State Department of Ecology
Washington State Department of Natural Resources
Washington State Department of Social and Health Services
*Washington State Department of Transportation
Washington State Environmental Council
Washington State Department of Archaeology and Historic Preservation
*Washington State Department of Commerce, Growth Management Services
Washington State Department of Fish and Wildlife
Washington State Department of Health, Drinking Water
Washington State Office of Financial Management
Washington State Office of the Governor
Washington State Superintendent of Public Instruction
Washington State Parks and Recreation Commission

* Received a copy of the 2008 FEIS and will receive a copy of the 2010 Final SEIS.
** Provided with a notice of availability for the 2008 FEIS. Recommended to receive a copy of the 2010 Final SEIS.

4.2 City Councils and Commissions

*Houghton Community Council
*Kirkland City Council
Kirkland Design Review Board
Kirkland Human Services Advisory Committee
*Kirkland Planning Commission
Kirkland Senior Council
*Kirkland Transportation Commission
Kirkland Youth Council
Park Board

4.3 Utilities

Cascade Water Alliance
Comcast
Northshore Utility District
Puget Sound Energy
Qwest
4.4 City Neighborhood and Business Associations

Arts and Cultural Council
Central Houghton Neighborhood
Denny Creek Neighborhood Alliance
Downtown Advisory Committee
Everest Neighborhood
Highlands Neighborhood
Kirkland Downtown Association, Executive Director
Kirkland Alliance of Neighborhoods
Kirkland Chamber of Commerce
Kirkland Economic Partnership
Kirkland Performance Center
Lakeview Neighborhood
Market Neighborhood
Moss Bay Neighborhood
Norkirk Neighborhood
North Juanita Neighborhood
North Rose Hill Neighborhood
S Rose Hill/Bt Neighborhood
South Juanita Neighborhood
Totem Lake Neighborhood

4.5 Community Organizations

ARCH, A Regional Coalition for Housing
Audubon Society, Eastside Chapter
Cascade Land Conservancy
Friends of Youth
Futurewise
Kirkland Heritage Society
Kirkland Interfaith Transitions in Housing
Liveable Communities Coalition
People for Puget Sound
4.6 Newspapers

Daily Journal of Commerce
Kirkland Courier Review
Seattle Post Intelligencer
Seattle Times

4.7 Applicants

Touchstone

4.8 Individuals and Businesses

Alex Hudspeth
Alexa Munoz
Barbara and Perry Dolan
Brian Granowitz
Carol A. (Cam) Bradley
Carol Davidek-Waller
Chris Conrad
Christopher Laing
Dan Kilpatrick
Dave Hawkins
David S. Mann
Donald Winter
Elaine J. Darling
Francesco Greco
Greg Schoer
Jan Signs
Jeffrey Hoyt
Jeff Ridley
Jill DeRoche
Jim Hitter
Jon Pascal
Kathy Shelby
Ken DeRoche
Alex Morse
A.P. Hurd
Bernie and Paige Krane
Capital Enhancement Group
Carol and Stewart Rogers
Cheryl Nichols
Chris and Mary K. Frost
Cynthia Smith
Danielle McClure
David Garland
Don and Betty Jo MacPhee
Douglas Howe
Ethan Yarborough
Glenda Schmidt
Heidi Schor
Jeff Griffis
Jeffrey M. Eustis
Jeremy Pemble
Jim Feek
Joe Castleberry
Karen Yu
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Lisa McConnell
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