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November 17, 2022

Attn: Janice Swenson
City of Kirkland, Planning and Building Department
123 Fifth Avenue
Kirkland, WA 98033

Re: Futurewise Comment on Kirkland SEIS Scoping

Dear City of Kirkland:

Thank you for the opportunity to comment on the scope of the supplemental environmental impact statement (“SEIS”) for the City of Kirkland’s (“Kirkland” or “the City”) 2044 Comprehensive Plan Update. We agree with the [Determination of Significance](#) on October 18, 2023 and the decision to prepare an SEIS pursuant to RCW [43.21C.030](#) (2)(c). As stated in the Determination of Significance, The SEIS will supplement the [2015 Comprehensive Plan Update & Totem Lake Planned Action - Final Environmental Impact Statement](#) (November 2015) and the [NE 85th Street Subarea Plan Final SEIS](#) (December 2021). ***We will share additional comments on the proposed SEIS scope below.***

Mission Statement

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters throughout Washington State, including in Kirkland.

Areas of Study

We are generally supportive of the proposed elements of study in the SEIS, as proposed on the [City of Kirkland website](#). These include:

- Air Quality/Greenhouse Gas Emissions,
- Land Use,
- Housing,
- Transportation,
- Public Services (police protection, fire and emergency medical services, parks, and schools), and
- Utilities (stormwater, water, and sewer).

We have additional comments related to the areas intended for analysis ([Potential Study Issues and Anticipated Policy Changes for Elements](#)), including mitigation measures.





Alternatives

According to the [City of Kirkland website](#), the SEIS will mostly likely study two growth alternatives including a a.) No Action Alternative (continuation of the current Comprehensive Plan) and b.) Likely Growth/Increased Capacity Action Alternative that include a change to growth levels and patterns, infrastructure investments, and service needs.

The SEIS must analyze how alternatives comply, or do not comply, with the Growth Management Act (GMA), Puget Sound Regional Council's VISION 2050, multicounty planning policies (MPPs), and countywide planning policies (CPPs). **Broadly speaking, we agree with an approach that focuses more housing growth in areas that have high quality transit serving employment centers and areas of planned employment growth than elsewhere.**

Given the high rate of growth likely in Kirkland, the existing public facilities and services, the continuing regional investments in bus rapid transit, and the environmental and climate benefits of accommodating this growth in Core cities connected by transit, **we support having the SEIS analyze higher levels of housing growth than those included in the Countywide Planning Policies and VISION 2050.**

- VISION 2050 in RGS-Action-8 provides that “Metropolitan and Core cities [like Kirkland] experiencing high job growth will take measures to provide additional housing capacity for a range of housing types and affordability levels to meet the needs of those workers as well as the needs of existing residents who may be at risk of displacement.”¹ Note that this provision uses mandatory language such as “provide additional capacity” and “will.” So, the City has the flexibility and requirement to analyze housing targets beyond those adopted by the Countywide Planning Policies and VISION 2050.
- Bellevue and Redmond, a Metropolitan and Core city respectively, are both considering residential capacity well above their growth targets already.
- We know that housing capacity is not equivalent with real housing growth due to many factors like funding availability for low-income housing, market conditions, underutilization of land, and the life-cycle stage of existing buildings on parcels.
- Considering a bold alternative for housing growth can help mitigate the housing-jobs imbalance we currently observe in Kirkland.

Land Use Element

We will share additional comments below on potential study issues in the Land Use Element. Some of these potential study issues overlap with issues in the Housing Element.

- Futurewise supports studying land use and policies that can **encourage and incentivize transit-oriented development.**
- Futurewise supports exploring **strategies for citywide affordable housing requirements, including potential for requirements in low-density zones.** As we


¹ Puget Sound Regional Council, *VISION 2050: A Plan for the Central Puget Sound Region* p. 44 MPP-CC-7 (Oct.2020) last accessed on Oct. 19, 2022, at: <https://www.psrc.org/planning-2050/vision-2050>.



stated through public letters to the Planning Commission as they considered inclusionary zoning (“IZ”) in the NE 85th Street Station Area Plan, ***the core question is how best to achieve the shared goal of providing more affordable housing effectively with this tool.*** If inclusionary requirements are set too low, they miss out on a valuable opportunity to capture value for affordability. If they are set too high, they can choke off development, leading to fewer affordable homes and fewer overall homes than a lower requirement.

- **Consider removing or reducing parking requirements for IZ (and MFTE)** projects to reduce project costs. This can increase the feasibility of projects broadly. It can also present an opportunity to achieve units with lower affordability levels.
- **Study flexible compliance options** to reduce the risk that programs will adversely impact housing growth (ex: fee-in-lieu, multiple AMI compliance options, pioneer provision, program variation by geography and by rental and ownership units, etc.)
- **Futurewise supports identifying and studying the impact of policies, code changes, and process improvements that can remove barriers to development and streamline the production of housing.** This can reduce housing development costs and help the City meet new requirements in [RCW 36.70A.070](#) to plan for and accommodate housing affordable to moderate, low, very low, and extremely low-income households; as well as emergency housing, emergency shelters, and permanent supportive housing. This can also help Kirkland comply with new state requirements from [SB 5290](#) and [HB 1293](#). This includes:
 - Reducing and/or eliminating parking requirements, especially in areas proximate to transit.
 - Identify and remove barriers that add cost and time to development posed by Design Review processes, other permitting and approval processes, and regulatory requirements.
 - Consolidating zones.
 - Reducing minimum lot size requirements in all low-density zones to as low as 1,400 square feet along with reasonable changes to building envelope regulations (height and floor area ratio (FAR) limits, setback requirements, etc.) to enable housing development on small parcels.
 - Mitigating restrictive covenants or homeowner association restrictions that may be contrary to City policies like encouraging ADUs and middle housing.
- **Futurewise supports studying “15-minute city / 10-minute city” concepts** (i.e. including complementary land uses not already present in local zoning districts, such as supermarkets, parks, schools, and services in residential neighborhoods.²) that can help the Kirkland reduce reliance on greenhouse gas emitting single-occupancy vehicles for daily needs. This also includes:
 - **Exploring more allowances for small-scale neighborhood commercial and mixed-use development throughout the city.**

² Matt Bucchin and Aaron Tuley, *Planning for Climate Mitigation and Adaption* p. 141 (American Planning Association, Planning Advisory Service (PAS) Report 601: July 2022).

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- Concepts to enable a **“Complete City”** (e.g., completing sidewalks, undergrounding overhead utilities, integrating arts into the community), that provide additional structural support to shift from car trips to carbon-neutral modes like walking, rolling, and bicycling.
 - **Consider density increases to accommodate additional middle housing-type units within walking distance of bus lines and stops, per the community-initiated amendment request.**

Housing Element


Additional analysis is needed to meet new planning requirements under HB 1220. In alignment with Washington State Department of Commerce (“Commerce”) guidance, we recommend that the City of Kirkland “plan for and accommodate housing affordable to all economic segments of the population” with the following analyses:

- **Inventory and analysis of all housing needs ([draft guidance](#)).**
- **Identify sufficient capacity of land for each income level and housing type, including special housing needs, based on current and proposed comprehensive plans and zoning ([guidance](#)).**
 - The housing element of the comprehensive plan must **show sufficient capacity for each income level and housing type** (including PSH, emergency housing, and middle housing) based on current zoning. The resulting analysis should relate zone designations and generalized zone categories to potential income levels and housing types, summarize residential capacity by zone category, and compare this capacity to projected housing needs. If a deficit is found, zoning actions must be implemented to increase capacity for one or more housing needs (income level and/or type).
 - We recommend that the City of Kirkland analyze each Alternative’s ability to meet housing capacity requirements by income level with a **special focus on low-rise and mid-rise wood frame construction typologies (4-8 stories)**. Due to its economical form, low- and mid-rise wood frame housing types (4-8 stories) are most likely to provide housing affordable to 0-80% AMI households.³
 - Depending on the results of the analysis, this may require adjustments to the Future Land Use Map to accommodate additional mid-rise housing.
- **Make adequate provisions for all housing needs, including documenting barriers to housing availability ([guidance](#)).** The updated GMA does not require jurisdictions to construct housing. However, jurisdictions are required to identify what kinds of barriers exist and programs and actions that, when implemented, have the potential to overcome barriers to housing production.
 - Housing policies, regulations, funding, and processes interact comprehensively. **We therefore suggest a cumulative impact analysis of housing affordability tools, zoning changes, and regulatory changes** to understand how they might function in totality vs. isolation.

³ Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 33 (Aug. 2023), last accessed on Nov. 11, 2023, at: <https://deptofcommerce.app.box.com/s/1d9d517g509r389f0mjpgowh8isjpirlh>.



- **Address racially disparate impacts, exclusion, and displacement risk in housing through policies and regulations ([guidance](#)).** As part of the new requirements in RCW 36.70A.070(2), jurisdictions must now adopt a racially disparate impacts analysis into their Comp Plans.
 - Depending on the results, **the racially disparate impacts analysis may require adjustments to the Alternatives that can address and begin to undo identified racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions.** We recommend providing staff with the opportunity to adjust Alternatives based on the analysis findings.
 - For example, consider a hypothetical low-density neighborhood currently zoned single-family only. Consider also that this neighborhood has a documented history of [racially restrictive covenants](#). If this neighborhood still has indicators of exclusion in housing—such as a smaller proportion of communities of color than the County or other parts of the City of Kirkland—then actions are required to document, address, and begin to undo this pattern of exclusion. Some policy options, recommended by Commerce on pg. 107 of their guidance, include:
 - Rezoning [to allow relatively more affordable housing types]
 - “Zoning that may have a discriminatory effect” is specifically mentioned in RCW 36.70A.070(2)
 - Local programs to help build middle housing
 - Accessory dwelling units
 - Support programs that provide financial assistance and education to low-income homeowners
 - **Consult impacted communities when assessing existing conditions, impact effects, and mitigation measures.** VISION 2050 in MPP-DP-8 directs cities to “[c]onduct inclusive engagement to identify and address the diverse needs of the region’s residents.” Futurewise strongly recommends the City consult directly with members of the impacted communities for each type of environmental impact assessed in the SEIS. This engagement is especially pertinent in the racial disparate impacts analysis.
 - **Provide and analysis on displacement.** The SEIS should clearly distinguish between the impacts of economic and physical displacement in each alternative. The SEIS should also include cultural displacement impacts and distinguish between commercial and residential displacement. Knowing the type of displacement that has or is occurring is important for identifying policy or regulatory options to reduce the adverse impacts of displacement.
 - **Economic displacement:** Displacement due to inability to afford rising rents or costs of homeownership like property taxes.
 - **Physical displacement:** Displacement resulting from eviction, acquisition, rehabilitation or demolition of property, or the expiration of covenants on rent-or income-restricted housing. Climate-related displacement falls into this category.

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- **Cultural Displacement:** Residents are compelled to move because the people and institutions that make up their cultural community have left the area.

Additionally:

- **The City should demonstrate how alternatives comply, or do not comply, with HB 1110 requirements.** While compliance for HB 1110 does not begin until 6 months after the adoption of Kirkland 2044, we recommend aligning the Comp Plan with these requirements now to avoid a costly off-cycle update 6 months later.
- **Rezone or otherwise incentivize the redevelopment of properties owned by religious organizations-** to accommodate development of affordable housing per [RCW 35A.63.300](#). Consider meaningful bonuses that can make development feasible for religious organizations across low-, medium-, and high-density zones.
- Study incorporation of **form-based code** to increase predictability and encourage more development. This may include eliminating maximum densities in multifamily and mixed-used areas.
- Study other policies mentioned in the [Potential Study Issues document](#), such as:
 - **Transfer of development rights** to help preserve affordable housing,
 - Commercial Linkage Fee to balance residential and commercial development of land,
 - **Minimum density requirements in areas proximate to transit.**
- Study policies to encourage **family-sized units (3-4 + bedrooms) and small units/eco flats/SEDUs.**

Sustainability, Climate and Environment Element

Futurewise supports the careful analysis of greenhouse gas pollution in the SEIS.

This analysis can documents the additional reduction in greenhouse gas pollution is necessary to comply with the new requirements in RCW 36.70A.070(9) to reduce overall greenhouse gas emissions. These requirements must be met by 2029.

Futurewise recognizes the connection between transportation planning and climate change impacts. The [Washington State Department of Ecology](#) attributes nearly 40% of statewide annual greenhouse gas emissions to transportation. Emissions from on-road gasoline — personal cars and trucks — make up over half of total emissions in this category.

Comprehensive planning is one way to address both the reduction of greenhouse gases and vehicle miles traveled.

Transportation Element

We understand that the Transportation Element updates will be informed by the City's planning process to update the Transportation Master Plan (TMP) led by the Transportation Division and Transportation Commission. We wanted to use this opportunity to encourage and support the use of a **true multimodal transportation analysis** as the State Environmental Policy Act ("SEPA") and the GMA require. This analysis should replace the focus on car throughputs, with an assessment of moving people and goods that includes biking, walking, and public transportation infrastructure and recognizes the mitigation benefits of dense, mixed-use



development. We recommend adding a discussion about how each Alternative complies, or does not comply, with the GMA, VISION 2050, MPP, and CPP goals and requirements.

Thank you for considering our comments. If you require additional information, please contact me at telephone 253-886-2099 or email brady@futurewise.org.

Sincerely,
Brady Nordstrom
Eastside Program Coordinator, Futurewise



Dear Kirkland Planning and Building Department,

Thank you for providing the opportunity to give comment on the scope of Kirkland's SEIS for the 2044 Comprehensive Plan Update.

1. Growth Alternatives

The 2021 King County Urban Growth Capacity Report

(<https://kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/UGC/KC-UGC-Final-Report-2021-Ratified.ashx?la=en>) found that from 2006 to 2018 Kirkland built 3,100 new homes (an 8.72% increase from 2006) and saw 12,582 net new jobs (a 34.29% increase from 2006) for a new jobs to new housing ratio of 4.06 new jobs for every new home.

Liveable Kirkland supports the study of an alternative where the City provides additional sufficient housing capacity to maintain the city's 2018 jobs:housing ratio of 1.27 jobs for every home, especially through increased capacity for housing within a 5 or 10 minute walk of Kirkland's frequent transit routes.

2. Areas for Discussion

In the SEPA Determination, the City of Kirkland lists the following areas for discussion in the SEIS:

1. Air Quality/Greenhouse Gas Emissions
2. Land Use
3. Housing
4. Transportation
5. Public Services (police protection, fire and emergency medical services, parks, and schools)
6. Utilities

We have the following comments on how the City of Kirkland should analyze impacts in these areas, with a new area focused on impacts on Economic Development, and all alternatives:

Air Quality/Greenhouse Gas Emissions

1. The city should track the estimated per capita greenhouse gas emissions caused by activity in Kirkland.
2. The city should analyze the different health impacts from brake and tire particulate pollution on residents with estimated particulate pollution levels experienced by residents near and far from major roads and highways. See this report done for the City of Bellevue for an example of these kinds of impacts:

https://bellevuewa.gov/sites/default/files/media/pdf_document/2023/ApxJ_AOandLandUsePlanningReport_PUBLIC-DEIS.pdf

Land Use

1. The city should analyze the impacts on the availability of third places - places for social interaction that are not a person's place of residence or employment.
2. The city should analyze the different health impacts from noise pollution on residents with estimated noise levels experienced by residents near and far from major roads and highways.

Housing

1. The city should analyze the displacement impacts on residents in market-rate housing in low-, medium-, and high-rent growth scenarios along with analysis of the likely rent growth in each growth alternative. For example: what would the likely impacts on the rents of homes in existing buildings be in two different alternatives, one where 13,000 new homes are built and one where 19,000 new homes are built?
2. The city should analyze direct displacement impacts from new development.

Transportation

1. The city should analyze the likely per capita vehicle miles traveled (VMT) of residents and workers in Kirkland in each growth alternative.
2. The city should compare transportation impacts in each growth alternative by analyzing the transportation impacts of alternatives with lower housing growth versus those with higher housing growth. For example: what are the transportation impacts from 6,000 households living outside Kirkland who otherwise would live in Kirkland if alternative 1 results in 13,000 new homes and alternative 2 results in 19,000 new homes?
3. The city should measure impacts to pedestrians' ability to cross every street, sometimes called the "permeability" of a street.

Public Services

1. The city should analyze the impacts on public agencies' ability to hire new employees in each growth alternative with an eye towards the impact of housing costs on ease of hiring. For example: is it easier to hire public service employees in an alternative where 13,000 more homes are built in Kirkland or an alternative where 19,000 more homes are built?

Utilities

1. The city should look at the impacts on the demand for utility services, water, sewage, gas, and electricity, with an analysis of the difference in demand per household from new high, medium, and low density housing as well as the cost of building the infrastructure to provide those services.
2. The city should analyze the impacts on demand for electricity as new construction phases out the use of natural gas.

Economic Development

1. The city should analyze the impacts on businesses' ability to hire new employees in each growth alternative with an eye towards the impact of housing costs on ease of hiring. For example: is it easier for businesses to hire employees in an alternative where 13,000 more homes are built in Kirkland or an alternative where 19,000 more homes are built?
2. The city should analyze the impacts on businesses' ability to attract customers with a focus on the impact of increased density bringing more people or more potential customers. For example, how many more customers can a business potentially reach in an alternative where 13,000 new homes are built compared to an alternative where 19,000 new homes are built?

3. Potential Policy Changes

We support the City of Kirkland studying, and in some form adopting, the following study issues and potential policy changes:

1. Creating different affordable housing requirements, both in terms of AMI required and percentage of homes provided as affordable, in different parts of the city, recognizing that development is more profitable in some parts of the city than in others.

2. Reducing minimum lot size requirements in all low density zones to as low as 1,400 square feet along with reasonable changes to building envelope regulations (height and floor area ratio (FAR) limits, setback requirements, etc) to enable housing development on small parcels.
3. Legalizing mid-rise 6 story mixed use buildings within ¼ mile and low-rise 4 story mixed use buildings within ½ mile from bus stops served by routes 245, 250, 255, and future frequent transit routes with eased setback, upper story stepback, floor area ratio, and other building envelope requirements.
4. Allowing for limited commercial uses of up to 500 square feet in all zones where residential uses are allowed.
5. Eliminating residential minimum parking requirements.
6. Eliminating non-residential minimum car parking requirements.
7. Allowing development projects which meet certain affordability and or sustainability standards to meet more permissive building envelope (height and FAR limits, setback requirements, etc.) and permitting process standards.
8. Eliminating discretionary design review and replacing design guidelines with clear and objective design requirements.
9. Adopting no-net-loss-of-housing requirements city wide to ensure new development adds to the housing supply while allowing for flexibility.
10. Consider transfer of development rights for the preservation of existing affordable housing and historically significant properties with allowances for the resetting of these development rights after 20 or 30 years.
11. Improving pedestrian and bicycle paths through parks, as opposed to only the connections to parks.
12. Allowing commercial uses in additional parks, as with Chainline Station at Feriton Spur Park.
13. Consider more representative ways of collecting input about human services, including creating and maintaining a resident review panel with members chosen by a “civic lottery” system similar to Toronto’s Planning Review Panel.
14. Study supportive policies for water-, energy-, and space-efficient homes.
15. Creating an opportunity for the public to learn about, and provide feedback on, transportation projects by allowing the Transportation Commission to discuss project design options before project designs are 30% complete.

16. Lowering speed limits as well as design speeds on all local streets to 20 mph or less.
17. Using raised crossings as an effective and inexpensive alternative or supplement to Rectangular Rapid Flashing Beacons (RRFBs).
18. Using Level of Traffic Stress for people outside vehicles as the primary metric for projects involving local streets and deprioritizing automobile Level of Service (LOS) as a significant metric.
19. Creating regulations that ensure adherence to requirements around building pedestrian and bicycle infrastructure.
20. A policy prohibiting the addition of new personal automobile lanes when expanding the overall size of street or road.
21. Explicit legalization of personal electric vehicles/electric personal mobility devices (PEVs/EPMDs) such as electric scooters, electric skateboards, and electric unicycles.
22. Setting aggressive, specific timelines and goals for building out the bicycle infrastructure network in the Active Transportation Plan.
23. Policies that discourage the use of our downtown, waterfront, and neighborhood streets as shortcuts for drivers who do not start, end, or stop in our communities.
24. Improving pedestrians' ability to safely cross every street, sometimes called the "permeability" of a street.

Thank you for considering our scoping comments.

Sincerely,

Liveable Kirkland

From: [Luke Travis](#)
To: [Janice Swenson](#)
Subject: SEIS scoping public comment
Date: Sunday, November 12, 2023 9:58:34 AM

CAUTION/EXTERNAL: This email originated from outside the City Of Kirkland. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mrs Swenson,

I am writing as part of the public comment window for [SEIS scoping](#). I wanted to voice my support for many of the [potential study issues and policy changes slated for K2044](#).

Particularly laudable are the many potential policy changes in the Land Use and Housing elements aimed at increasing and densifying our housing stock. I see climate change, soaring housing costs, and the health and safety impacts of an overly car-dependent society as some of the biggest challenges facing our city and these policies would be a positive improvement on all three fronts.

I also wanted to call out Land Use element #5 in particular: "Introducing more allowances for small-scale neighborhood commercial uses and/or home-based businesses in low-density residential neighborhoods." Experiencing this kind of low-impact commercial use in the neighborhoods of other cities I've visited has always left me with an impression of a charming, active, and vibrant community. I'd be very excited for Kirkland to allow this kind of development in the future.

Kirkland is without a doubt a growing city and I look forward to seeing policies like these that embrace and adapt to this growth instead of freezing our city in time so that the prices are the only things that grow.

Thank you so much for your hard work in developing and implementing these improvements.

Yours,
Luke Travis

From: [Niel Lebeck](#)
To: [Janice Swenson](#)
Subject: Comment on SEIS scope
Date: Sunday, November 12, 2023 2:26:07 PM

CAUTION/EXTERNAL: This email originated from outside the City Of Kirkland. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Janice,

As part of the SEIS for the 2044 Comprehensive Plan, I hope the City of Kirkland studies a growth alternative with significant additional housing capacity. I'm pleased that Kirkland has added tens of thousands of jobs in recent years, but I'm concerned by how much housing growth has lagged job growth during this time. (I recently learned that the ratio of new jobs to new homes from 2006-2018 was more than 4:1.) I hope the City studies a growth alternative with enough housing capacity to maintain the 2018 jobs-to-homes ratio of 1.27.

Best,
Niel Lebeck

PETTERSSON PERSISTENCE LLC

KARL PETTERSSON

Janice Swenson

Senior Planner

City of Kirkland Planning and Building Director

123 5th Avenue

Kirkland, WA 98033

Re: 2044 Kirkland Comprehensive Plan Update Scoping Comment

Dear Ms. Swenson:

Thank you for the opportunity to comment on the City of Kirkland ("City") 2044 Comprehensive Plan Update, including updates to the Juanita Neighborhood Plan. Pettersson Persistence LLC owns the property located at 9755 NE Juanita Drive, Kirkland. The Property is currently developed with a single-story, 18,387 s.f. commercial building constructed in 1960 occupied by the Michael's store. The lot is 54,886 s.f. We are writing to request that the alternatives studied in the Supplemental Environmental Impact Study include development capacity on the Property that would allow for up to seven stories or 70 feet in height, density up to 300 residential, and reduced vehicle parking ratios as summarized below. Further detail is also provided in our Community-Initiated Amendment Request ("CAR").

The Property is in the Juanita Business District 4 ("JBD4") zone and partially within the Urban Mixed ("UM") Shoreline designation. The Property is designated Commercial Mixed Use on the Comprehensive Plan. The JBD-4 and UM zones limit density to one unit per 1,800 s.f., allowing for approximately 24 units per acre. KZC 52.27.070, Use Zone Chart. Height is limited to 26 feet in the JBD4 zone, and 41 feet in the UM Shoreline zone. The Property has not redeveloped since 1960 and is unlikely to redevelop under the current zoning

PETTERSSON PERSISTENCE LLC

KARL PETTERSSON

restrictions. The SEIS should study height up to 70 feet and density allowing for up to 300 multifamily units in this location to address the City's housing needs.

We are supportive of the goals stated in the Scoping Notice to address affordable housing, including increasing denser development around commercial centers and expanding multifamily options. Since the Property is uniquely positioned to help further these goals, the City should study a range of options in the SEIS so that it is fully equipped with the needed information to implement zoning policy over the next planning period.

The current Vision Statement for the current Juanita Neighborhood Plan states "There are relatively few large vacant parcels within the neighborhood so most new development will be infill and redevelopment. A major policy direction for Juanita is to protect the low-density residential areas of the neighborhood. High-density residential development is to be contained within clear and stable boundaries." The Property is a clear opportunity to provide limited, high-density residential development on one of few large parcels.

The Neighborhood Plan additionally envisions a pedestrian-oriented mixed-use center that incorporates "innovative urban design features," especially at Gateways. The Comprehensive Plan calls for a gateway node at NE Juanita Dr. and 98th Ave NE, a prominent location that identifies the south boundary of the neighborhood.

The Property in its current state is inconsistent with the Plan's vision, and is unlikely to redevelop with such limited height and density restrictions. Redevelopment of this parcel would include the gateway announcing the entrance to the Village area and enhancing the connection to the Old Market Street trail. The proposed Project would redevelop a currently under-served area contributing to a safer, more cohesive pedestrian-oriented mixed-use neighborhood that furthers the vision of Juanita Neighborhood Plan while adding housing opportunities.

PETTERSSON PERSISTENCE LLC

KARL PETTERSSON

The City should also study reduced parking requirements in this location ranging between zero to .5 spaces per unit. The Scoping Notice states that the Kirkland Transportation Plan update will “reaffirm the priority of walking, biking and transit.” Consistent with that policy choice, the City needs to reduce required vehicle parking. Current required parking ratios in the City are generally higher than other eastside jurisdictions. Vehicle parking adds to the cost of housing and is inconsistent with long-term sustainability goals to reduce single occupancy trips near transit. A reduction of parking in a transit-rich environment will also reduce traffic in the area. This is necessary to further the City’s Comprehensive Planning goals to reduce traffic congestion and increase walkability and sustainability.

Thank you for your consideration. Please do not hesitate to contact me with any questions.

Sincerely,



s/Karl Pettersson

Email: carlopeterson@hotmail.com



Puget Sound Energy
P.O. Box 97034
Bellevue, WA 98009-9734
PSE.com

November 17, 2023

Janice Swenson, Senior Planner
City of Kirkland Planning and Building Department
123 5th Avenue
Kirkland, WA 98033

Re: Notice of Determination of Significance and Scoping for Supplemental Environmental Impact Statement – 2044 Comprehensive Plan and Kirkland Transportation Plan

Dear Ms. Swenson:

This letter is in response to the City of Kirkland's request for comments pertaining to the Determination of Significance (DS) issued on October 28, 2023 for the periodic update to the Kirkland Comprehensive Plan and the Kirkland Transportation Plan. As stated in the DS, these updates are being conducted in accordance with the requirements of the Revised Code of Washington, specifically Chapters 36.70A and 43.21C.

Puget Sound Energy (PSE) supports the City's declaration of a DS and the development of a Supplemental Environmental Impact Statement (EIS). Since 2015, there have been significant changes to the state's growth management planning framework as well as legislation enacted to address climate change and energy under the state's Clean Energy Transformation Act (CETA). PSE is interested in how these requirements will be addressed and implemented through the Supplemental EIS and the Comprehensive Plan. Moreover, how the Supplemental EIS will identify potential impacts to existing and future natural gas and electric facilities based on the City's No Action and Growth Action Alternatives. This includes the potential need for additional infrastructure to meet the growth anticipated in the Alternatives.

We believe it is important for the City to understand how PSE is also implementing plans and strategies in accordance with the regulatory framework for electric and natural gas utilities in Washington. We encourage the City to work with us to integrate pertinent information from the documents below as well as other initiatives, such as PSE 2030 and PSE 2045.

- PSE Integrated Resource Plan (IRP) – 25 year Long-range Plan
- PSE Clean Energy Action Plan (CEAP) – 10 year Strategy Plan
- PSE Clean Energy Implementation Plan (CEIP) – The CEIP builds on the vision established within the Integrated Resource Plan and the Clean Energy Action Plan. The CEIP acts as a roadmap for implementing clean energy actions, programs and investments over the next 4 years.

While Kirkland is not required to have a Climate Change and Resiliency Element until 2029, PSE is interested if the City's existing 2020 Sustainability Master Plan will be included as an optional element in the Comprehensive Plan update. If so, will information from the King County - Cities Climate Collaboration be integrated into the Supplemental EIS (e.g., Joint Letter of Commitment: Climate Change Actions in King County)?

Like Kirkland, PSE is similarly addressing Diversity, Equity and Inclusion (DEI) throughout its energy resource planning and project processes. As the City looks to reduce its carbon emissions and change how energy is used in Kirkland, it will be important to mitigate disproportionate impacts, and ensure benefits, to vulnerable populations and frontline communities.

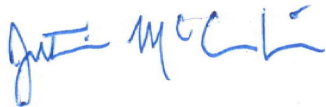
It is also important to acknowledge that recent state and local amendments to building codes, similar to some of the actions proposed in Kirkland Sustainability Master Plan, specifically target electrification for heating, cooking, and other uses for natural gas. PSE has attempted to capture these efforts in the 2023 Gas IRP and is working on implementation of targeted transportation and building electrification programs. Parallel to these efforts PSE still maintains an existing natural gas system in the City serving residential, commercial and industrial customers. We are required to maintain a safe, reliable, and affordable system under various federal and state requirements. We encourage the City to work with PSE to identify and prioritize decarbonization strategies.

Janice Swenson
November 17, 2023
Page 3

PSE encourages the City to review possible integration of information from PSE's 2023 Gas Utility IRP. This is a 20-year long-range plan filed with the Washington Utilities and Transportation Commission. It represents the most recent evaluation of PSE's options for serving its long-term natural gas demand. This is the first time PSE has been able to evaluate the Climate Commitment Act in an IRP and the first time we have used climate change informed modeling to guide future demand forecasts. PSE was also able to include early review of the Inflation Reduction Act and include the Social Cost of Carbon in its modeling.

PSE would like to thank the City for the opportunity to provide comments as part of the Supplemental EIS scoping process. We offer our assistance and look forward to working with the City throughout the update and, more broadly, to find a climate friendly path forward for Kirkland's energy use. If there are any questions or information, please do not hesitate to contact me at (206) 517-3432 or at justin.mcconachie@pse.com.

Sincerely,



Justin McConachie
Senior Municipal Liaison Manager

Cc: Adam Weinstein, City of Kirkland
Dave Andersen, WA Department of Commerce
Tom Buroker, WA Department of Ecology



Management of Mobility Division
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November 17, 2023

City of Kirkland
123 5th Avenue
Kirkland, WA 98033

Dear Ms. Swenson,

The Washington State Department of Transportation (WSDOT) appreciates the opportunity to review and comment on the scope of the Kirkland 2044 Comprehensive Plan Supplemental EIS. Alignment between local, regional, and state planning efforts is vital to advance shared interests in the comprehensive planning process. WSDOT offers the following input in support of the city's efforts.

Alternatives

WSDOT recognizes the importance of coordinated land use and transportation strategies to effectively manage demand and provide travel options in the Puget Sound region. WSDOT supports the city exploring alternatives that concentrate employment and population growth around local and regional transit. Such growth patterns support our state and regional goals to reduce greenhouse gas emissions and vehicle miles traveled by reducing the number of single occupancy vehicle trips. They also create opportunities by connecting destinations across the region through transit and active modes and reflect the city's role as a Core City with a Regional Growth Center in the Puget Sound Regional Council's Regional Growth Strategy adopted in VISION 2050.

EIS Analysis Scope

WSDOT requests that the City of Kirkland's transportation element and EIS provide thorough analysis and documentation of the "estimated multimodal level of service impacts to state-owned transportation facilities resulting from land use assumptions" (RCW 36.70a.070(6)(a)(ii)). We also suggest that the transportation element include forecasts of multimodal transportation demand and needs for at least ten years based on the adopted land use plan, to inform the development of a transportation element that balances transportation system safety and convenience to accommodate all users of the transportation system.

Other Relevant Considerations

WSDOT offers the following statewide legislative priorities for consideration during the development of the comprehensive plan update and EIS:

- **Complete Streets:** In 2022, the Washington State Legislature passed [Senate Bill 5974](#), the Move Ahead Washington package. The bill directs WSDOT to incorporate the principles of Complete Streets in most state transportation projects. More information, including staff contacts, can be found on WSDOT's [Complete Streets](#) webpage.
 - WSDOT encourages local agencies to use their comprehensive plans as an opportunity to conduct inclusive community outreach and identify locations where state facilities present a barrier to nonmotorized connectivity. This includes the intersections of highway interchange ramps and local streets, such as those along Interstate 405 in Kirkland. We encourage the City of Kirkland to consider how these intersections might fit into its broader active transportation network.
- **Vehicle Miles Traveled (VMT):** RCW 47.01.440 establishes statewide targets for reducing VMT per capita, and WSDOT is currently responding to a [legislative proviso](#) to help advance these goals. Local decisions and partnerships between local jurisdictions and state agencies are critical to achieving state

VMT reduction goals. We look forward to further working with the City of Kirkland on VMT reduction.

- **SSSB 5412:** Legislation passed in the 2023 session provides a State Environmental Policy Act (SEPA) categorical exemption for most residential development, provided that proposed projects are consistent with the comprehensive plan and development regulations, and that the comprehensive plan “analyzes multimodal transportation impacts, including impacts to neighboring jurisdictions, transit facilities, and the state transportation system.” The legislation requires that WSDOT be consulted “on impacts to state-owned transportation facilities including consideration of whether mitigation is necessary for impacts to transportation facilities.” WSDOT suggests that the EIS scoping include an expansive multimodal transportation analysis to allow for potential project-level categorical exemptions.

WSDOT Resources

WSDOT’s comprehensive planning resources for local agencies can be found on our [Land Use and Transportation Guidance](#) page. This includes a wealth of information on how WSDOT reviews local agency plans, our land use and transportation goals, best practices in building transportation efficient communities, and pertinent concurrency and SEPA guidance.

WSDOT’s [Community Planning Portal](#) may be particularly helpful for local jurisdictions. The portal includes data on the state transportation system often needed to complete the transportation element inventory required by the Growth Management Act. In addition to the data included in the portal, local planners can add their own data to ArcGIS Online and create custom reports.

Further Engagement & Coordination

Please reach out if you would like to discuss opportunities for ongoing engagement and coordination, as well as technical assistance available during your plan updates. We also ask that you add the address nwrcompplansupport@wsdot.wa.gov to your distribution list of planning related documents (i.e., scoping documents, draft plans, annual amendments, EIS documents, etc.).

Thank you again for the opportunity to review the 2024 Kirkland Comprehensive Plan Supplemental EIS. We look forward to our continuing productive partnership.

Sincerely,



Jeff Storrar

WSDOT Policy Manager

CC: Matt Kenna, WSDOT
Christina Strand, WSDOT
Mike Koidal, WSDOT
Kenneth Loen, WSDOT
Randy Frantz, WSDOT
John Maas, WSDOT
Margaret Kucharski, WSDOT
Zack Howard, WSDOT