

April 9, 2024



Mr. Pat McLaughlin
Director, King County Solid Waste Division
Department of Natural Resources and Parks
201 South Jackson Street, Suite 5701
Seattle, WA 98104

Ms. Mary K. O'Hara
NERTS Project Manager, King County Solid Waste Division
Department of Natural Resources and Parks
201 S. Jackson Street, Suite 5701
Seattle, WA 98104

RE: NORTHEAST RECYCLING AND TRANSFER STATION DRAFT ENVIRONMENTAL
IMPACT STATEMENT

Dear Mr. McLaughlin and Ms. O'Hara,

The City of Kirkland has reviewed the draft Environmental Impact Statement (DEIS) for the Northeast Recycling and Transfer Station (NERTS) Project. I am submitting this letter as the City of Kirkland's formal staff comments on the DEIS. Below, I summarize some of the City's primary areas of interest and provide general concerns about the DEIS. The City is also providing detailed, comprehensive comments on specific portions of the DEIS in the attached spreadsheet.

Before providing more detailed comments on the DEIS, I want to take this opportunity to reaffirm and reiterate the City's position that the city hosting the new NERTS should receive significant mitigation to eliminate negative impacts the facility may have on the surrounding area and community. The Houghton Transfer Station and former landfill are surrounded by residences, businesses, schools, and recreational facilities that will be impacted by any of the alternatives. If the Houghton site is selected for the new facility, the City of Kirkland expects the County will reallocate the entire unspent property acquisition budget of approximately \$36 million, in addition to the existing budget allocated to fund mitigation, to provide substantial additional mitigation measures on the development site, other areas of the closed landfill, and surrounding infrastructure. If King County selects Alternative 1, the City's preference for that site is 1A, as the Draft EIS is clear that 1A is less impactful environmentally, requires significantly less excavation of the former landfill, has a smaller footprint, and minimizes encroachment on the community's use of Taylor Fields.

Mitigation must include, but is not limited to, comprehensive odor, bird, and material controls similar as those provided at Seattle Public Utilities' North Transfer Station 1350 N 34th St in Seattle. Additional mitigation will be necessary transportation infrastructure improvements, public park space maintenance and improvements, modern environmental protections, and controls, increased public access to recycling, repair, and reuse space, and additional community benefits and amenities. The City has consistently voiced this reasonable requirement for appropriate mitigation throughout the siting process, with more specific details provided in earlier correspondence.

Turning to the primary focus of this comment letter, the following general areas of the DEIS require additional research and analysis to be addressed and included in the final EIS:

- **Transportation and infrastructure:** The DEIS traffic and intersection analysis for Alternative 1 is insufficient. For example, the DEIS ignores any impacts on NE 60th Street east of the project site. In addition, the scope of the intersection analysis must be expanded to incorporate impacts on additional intersections including, at minimum, NE 60th St/122nd Ave NE and NE 70th St/122nd Ave NE to ascertain impacts resulting from increased traffic to the site. A proportional share impact analysis will demonstrate whether other close-by intersections will be significantly impacted. The DEIS fails to provide a pavement evaluation or to describe any specific mitigation measures for the referenced potential roadway wear and tear from heavy equipment and truck hauling. Required frontage improvements would not fully mitigate roadway wear and tear along anticipated traffic routes. The DEIS focuses on truck traffic coming from I-405; however, this ignores that there would be trips from the east that would impact intersections. To accurately identify traffic impacts, the FEIS should include a trip distribution and assignment. For clarity, figures showing traffic volumes at the analyzed intersections should be provided.
- **Community amenities:** The open space and ballfields available at Taylor Fields on the Alternative 1A and 1B sites are important community assets that have been used for decades. Additional information on construction impacts to their use and potential future mitigation measures is needed. A new NERTS on this site could adversely impact the community's use of this open space during and after construction, so improvements would be needed to enhance usability. The negative impacts of a new transfer station in the neighborhood need to be offset by improved amenities like better ballfields and management of the park and open space. A new station should offer public amenities similar to those provided at Seattle's North Transfer Station, such as meeting spaces, space for visitor education, circular economy and reuse space, sports courts, playground areas, public seating, and landscaping.
- **General water, soil, and hazardous waste considerations:** Alternatives 1A and 1B drain to groundwater rather than directly to Yarrow Creek, which may change the surface water design for the facility. In addition, additional information on the regulations in effect at the closed landfill site and their impacts on development should be added.
- **Treatment of the closed landfill.** The DEIS acknowledges that selection of Alternatives 1A or 1B would disturb the materials buried in the closed landfill at the Houghton site. The Draft EIS does not adequately describe the excavation process, waste characterization of buried materials, mitigation of potential hazards during construction process, and materials handling and disposal. The final EIS needs additional information on new controls that could be added for landfill gas collection and monitoring and should memorialize as mitigation the direct impact recommendation for adding leachate collection systems.
- **Closure of the existing Houghton Transfer Station facility.** The DEIS does not clearly indicate the types of mitigation necessary to properly close the existing facility, with the primary focus limited to considerations of possible asbestos contamination. However, the

final EIS should more comprehensively address closure and cleanup of the existing facility. In addition, the final EIS must address impacts and associated mitigation at the closed Houghton Transfer Station should the County select Alternative 2. The DEIS makes no reference to such impacts or mitigation if Alternative 2 is selected.

- **Land use, development, and construction:** The DEIS indicates that “all sites would be built to meet the highest green building standards possible at each site.” However, green building principles should be identified in more detail in the final EIS. Regardless of the impacts and mitigation identified in the final EIS, if Alternative 1 is selected, King County will be required to follow the City’s development processes, including addressing comprehensive plan policies, permit and impact fees, connection charges, code requirements, and standard specifications. All required improvements and upgrades, including those to City surface water, sewer, and water distribution systems, for a new transfer station development should be constructed to meet or exceed City development standards. The DEIS indicates proposed operating hours that are outside the current operating hours of the existing Houghton station and are inconsistent with Kirkland regulations. If Alternative 1 is selected, King County would be required to comply with the City’s noise and operation regulations.

While all these issues must be addressed regardless of the Alternative selected, should King County select the Houghton site, the City believes Alternative 1A is the environmentally preferable option, provided it is done with a fully mitigated, state-of-the-art facility in the same location as the existing transfer station.

We appreciate the opportunity to review the NERTS DEIS. We expect the County will consider this letter and the attached detailed comments. We further expect the County will be particularly mindful of and give substantial weight to the comments received from residents living adjacent to or near the existing Houghton Transfer Station.

If you have any questions, please contact Truc Dever, Interim Public Works Director, at (425) 587-3802 or Jenna McInnis, Solid Waste Program Lead, at (425) 587-3814.

Sincerely,


Kurt Triplett (Apr 9, 2024 20:19 PDT)

CITY OF KIRKLAND
Kurt Triplett, City Manager

Enclosure:

- (1) City of Kirkland’s detailed comments on the Draft EIS

NERTS Project Draft EIS Comments

The following comments from the City of Kirkland are provided in section/page number order, not in order of importance or priority. Where a comment is made in reference to only one section but it relates to other sections and areas, the intention is that it be carried throughout relevant/related sections.

Section	Page #	Comment
Introduction, Table S-3	S-15, S-24, S-30	First bullet point under Water, Operation states impervious surfaces would increase runoff and degrade water quality, but third bullet says all runoff would be treated and action would be beneficial to runoff quality and quantity. These statements seem to contradict each other. Please expand and clarify.
Introduction, Table S-3	S-16, S-25	First bullet under Wetlands, Operation suggests an increase in runoff to wetlands and streams, but Section 3.3 stated that the action would be beneficial for runoff quantity. Please clarify.
Introduction, Table S-3	S-16, S-25, S-31	2nd bullet under Veg Fish Wildlife, Operation suggests an increase in contaminated runoff to wetlands and streams, but Section 3.3 stated that the action would be beneficial for runoff quantity. Please clarify.
2.2.2.1	2-10	The DEIS notes that buffers would be established to reduce/eliminate impacts on surrounding uses. The FEIS should contain a minimum buffer width and should provide more detail on the anticipated buffer conditions, including any expected landscaping or noise reduction elements.
2.2.2.1	2-10	The overall height of the new facility states is expected to be 70 feet above the lowest level. The current facility height is not provided to provide relative context. Regardless, the expected height and footprint sizes seems to be substantially taller and larger than the North Seattle Fremont Transfer Station. It would be useful to provide a comparison of building height/size/land footprint of the proposed alternatives and the North Seattle Fremont Transfer station and the current Houghton facility.
2.1.1	2-7	For Alternatives 1A and 1B, are any enhancements planned for the active recreational space at Taylor Field? The negative impacts of a new transfer station in the neighborhood need to be offset by improved ballfield amenities and better management of the park and open space.
2.1.1	2-7	For Alternatives 1A and 1B, would any changes be needed to the methane monitoring in place at Taylor Field to accommodate either construction or operation of the project?
2.1.1	2-7	What impacts would occur to the use of Taylor Fields during the construction period for Alternatives 1A and 1B? Kirkland expects ongoing access to Taylor Fields.
2.1.1	2-7	For Alternative 1B, the DEIS indicates that the existing Transfer Station building will be repurposed or replaced after the new station is open but states that a future use has not been determined. Then each of the various parts of Chapter 3 fail to address in any meaningful way the range of impacts that replacement or repurposing of the existing building/site could have, depending on selected use. The Final EIS should include additional details for how the space currently occupied by the existing transfer station building might be utilized. Depending on the use for this space, increased impacts may occur and differing mitigation would be required and should be addressed in each of the relevant parts of Chapter 3.

2.1.2	2-8	The DEIS does not provide any analysis of impacts or mitigation related to the Houghton site if Alternative 2 is selected. What are the expected adverse environmental impacts from King County closing the old site and removing the building? Is King County considering other uses for the site? Those impacts are not outlined in the DEIS. Mitigation to improve the existing Houghton site would be required with either site selection.
2.1.1	2-7	Please provide additional detail about the regulatory conditions currently in effect for the closed landfill portion of Alternatives 1A and 1B. How might these affect further development of Taylor Fields and park spaces?
2.2.2.1	2-10	All public improvements associated with Alternative 1A and 1B, including street and utility improvements, must meet the City of Kirkland Public Works Pre-Approved Plans and Policies Manual. A Public Works Pre-Approved Plans and Policies manual can be purchased from the Public Works Department, or it may be retrieved from the Public Works Department's page at the City of Kirkland's website. Permit fees, connection charges, and impact fees must be paid for all project permits. If an impact fee category is not available, the applicant will provide an analysis to determine a fee (see KMC 27.04.040 or KMC 27.10.040). All street and utility improvements shall be permitted through a Building Permit or Land Surface Modification (LSM) Permit. Street and utility improvements covered under a building permit will not require a separate LSM permit, unless otherwise specified by staff.
2.2.3.1	2-11	The DEIS specifies that the new NERTS would operate 9.5 hours per day, not earlier than 6:00am on weekdays and 8:00am on weekends and close no later than 6:00pm any day. This is significantly earlier than the current weekday operation starting at 8:00am. The DEIS does not acknowledge potential impacts from this extended and earlier operation. King County will be required to comply with Kirkland noise and operation regulations, including KZC 115.95. Even if earlier operation is permitted, what mitigation will be done to address noise, traffic, and other impacts arising from earlier operation?
2.2.3.3	2-12	In line with King County's efforts on Re+ and Kirkland's Sustainability Strategic Plan, any new NERTS station must have space designated for reuse, repair, and other circular economy activities. This could include building material reuse and exchange, a tool library space, or community repair space. Modern transfer stations must consider the changing management of materials as resources.
2.3	2-12	Any action alternative will require closure and demolition of the current facility, along with remedial site work. The FEIS should recognize this need in the construction methods subsection (and in numerous other sections throughout the FEIS where impacts of closing/demolishing the existing facility have not been analyzed).
3.1.3.2.1.1	3-21	The last paragraph on this page starts with the statement, "The sites for each action alternative do not include any areas classified as having erosion hazards (Figures 3-1.6 and 3-1.10) (King County 2023g)." But the study area for Alternative 2 is "categorized as an environmentally sensitive area due to potential landslide hazards, potential erosion hazards, and significant seismic hazards (King County 2023g)" in Section 3.1.2.3.1.4 on page 3-16. Although construction erosion impacts apply primarily to the site, it seems that erosion hazards in the study area should be considered for things like construction entrances to the site.

3.1.3.2.1.1	3-21, 3-22	Erosion control measures for any site in Kirkland must follow the 2021 King County Surface Water Design Manual, which contains slightly different requirements than those in the Stormwater Pollution Prevention Plan (SWPP) developed to comply with the requirements of the NPDES Construction Stormwater General Permit. The FEIS must ensure proper references and acknowledgment of those different requirements.
3.1.3.3.1.1	3-23	For construction excavation of site Alternative 1A, there is no mention of potential dig depth and what risk there could be with the materials in the landfill area.
3.2.3.2	3-44	It would be useful to quantify the emissions associated with customers driving vehicles to use the facility. Anti-idling measures should be included as mitigation measures to reduce emissions.
3.2.3.2	3-44	What are the quantified emissions associated with the hauler and transfer truck vehicles? What mitigation measures (cleaner engines, cleaner fuels, etc.) are available to reduce these emissions?
3.3.1.3.2	3-65	The FEIS should evaluate and reference Kirkland Zoning Code (KZC) 90 (Critical Areas), and Kirkland's Surface Water Master Plan, accessible online here: https://www.kirklandwa.gov/files/sharedassets/public/v/1/public-works/surface-water/2014-surface-water-master-plan-final.pdf
3.3.2.2.1	3-70	It appears that water from this site discharges to groundwater rather than to the channel of Yarrow Creek. The Final EIS should examine stormwater flow control and treatment requirements in light of this information. This will change the stormwater design for the facility.
3.3.2.2.2	3-72	Please accurately map surface water in this area; the mapping needs to be redone. Yarrow Creek is mapped about 270 ft south of the site, but this GIS data is not accurate, as the channel actually starts much further south, near the Bridle Trails State Park entrance, outside of the study area. There is a conveyance channel that conveys stormwater south from NE 60th St into the park, but the channel appears to taper out into the forest and does not appear to have a surface connection to the stream. Photos and more information can be provided by Kirkland staff if needed.
3.3.2.2.4.2	3-75	"Extraordinary Contact" is no longer a designation under WAC recreational uses. Replace with "Primary contact"
3.3.2.2.4.2	3-75	Paragraph 1 states that portions of Yarrow Creek have Supplemental Spawning designation. Kirkland staff have not able to verify this on Water Quality Atlas or Ecology Publication Number 06-10-038. Instead, it appears that Yarrow Creek is all Core Summer Salmonid Habitat. Please either provide sources or correct.
3.3.2.2.4.2	3-75	The WQI data is out of date. The data should be updated with 2023 scores. More current WQI data is accessible online here: https://kingcounty.gov/services/environment/watersheds/streams-data/water-quality-index.aspx
3.3.2.2.4.3	3-75	The DEIS states: "Runoff from the RTS ultimately discharges to Lake Washington via Yarrow Creek." This may not be accurate unless it is referencing subsurface/groundwater connections. As noted earlier, the stormwater conveyance channel from 60th St does not have any visible surface connection to Yarrow Creek; instead it tapers out into the vegetation of the state park.

3.3.2.3.4.1	3-78	"Extraordinary Contact" is no longer a designation under WAC recreational uses. Replace with "Primary contact"
3.3.2.3.4.1	3-78	Related to Alternative 2, the DEIS states that Sammamish River has Supplemental Spawning designation. Kirkland staff were not able to verify this on Water Quality Atlas or Ecology Publication Number 06-10-038. Instead, it appears to be Core Summer Salmonid Habitat. Please either provide sources or correct.
3.3.2.3.4.1	3-78	The WQI data is out of date. The data should be updated with 2023 scores. More current WQI data is accessible online, as noted above.
3.3.3.2.1	3-85	Section states "Under all action alternatives, construction activities would require coverage under Ecology's Construction Stormwater General Permit (CSWGP) " In addition, a project in Kirkland would need to meet requirements of the 2021 King County Surface Water Design Manual for construction pollution prevention. This is noted in following sections but should also be noted here.
3.3.3.2.2	3-87	Are any changes to groundwater monitoring, or to interception and treatment of groundwater flowing away from the landfill proposed as part of any of the Kirkland alternatives? There is baseline groundwater monitoring upstream of the landfill, and current sampling downstream of the landfill shows some exceedances. What is the plan if exceedances increase? Groundwater interception, monitoring, and treatment or disposal should be built into plans for the NERTS at this site. This is addressed in the Environmental Health and Hazardous Materials section but should be referenced here.
3.3.3.2	3-90	The impacts section assumes that stormwater discharges to Yarrow Creek. However, there is not a surface connection to Yarrow Creek.
3.4.3.2.1.1	3-120	Further detail on excavation is needed. How much digging is needed? What type of materials are expected? Where would materials be relocated? What type of controls would reduce concerns from excavation?
3.4.3.3.1.1	3-122	Identify the controls that would be implemented to reduce landfill gases, along with a monitoring plan to ensure that exposures meet safety thresholds for surrounding residents.
3.4.4.1.1.1.	3-128	We recommend establishment of a monitoring protocol to measure landfill gases and groundwater vapor during the construction period to ensure that safety thresholds are not exceeded.
3.4.4.3.2.2	3-132	A leachate collection system should be specifically identified as mitigation to address direct impacts identified for Alternative 1.
3.5.2.2	3-137	While not mapped on city GIS browser, wetland areas are present in low spots within the study in Bridle Trails State Park, about 500 ft south of 60th St. You can see approximate location here: https://www.bridletrails.org/visit
3.5.3.1.2.1	3-141	For Alternative 2, please mention if there are impacts from construction to wetland buffer of Wetland A. It appears to overlap with the project site, although formerly paved portions of buffer would not be part of the "functional buffer."
3.5.4	3-147	What is the disposition of the existing bioretention swale under Alternatives 1A and 1B? Is there potential for improving the ecological value of this swale as a mitigation measure?

3.6.2.2.3	3-153	This site also provides homes to large mammals including deer, bobcat, and black bear. These large mammals must be identified in the FEIS.
3.6.2.2.2	3-153	Yarrow Creek is indeed mapped about just south of the site, but this GIS linear data is not accurate as the channel starts much further south, near the State Park entrance, outside of the study area.
3.6.2.2.2	3-153	Cutthroat trout and coho have been observed in lower reach of Yarrow Creek. (well outside of study area)
3.6.3.3.3.	3-158	This section and subsequent sections note cumulative impacts associated with vegetation management at the site. Mitigation measures should include opportunities for ecological restoration nearby, in Bridle Trails State Park or at Taylor Fields, to reduce these impacts.
3.7.1.3.2	3-165	Kirkland's Sustainability Strategic Plan, adopted in 2020, is the local plan that should be reviewed regarding environmental issues. This plan should be reviewed for potential energy efficiency and other environmental measures that could be implemented as part of Alternatives 1A and 1B.
3.7.3.3.1.2	3-173	The EIS should identify clear commitments to using low-emissions or electric haul vehicles to reduce and mitigate energy use impacts and impacts on air quality identified in previous chapters.
3.8.2.2.1	3-186	This section states that there is no leachate collection system for the closed Houghton Landfill, and one is recognized as beneficial. A leachate collection system should be included as a mitigation measure.
3.8.2.2.3	3-187	This section states that MSW can attract pest species and animals. Currently transfer trailers are covered by heavy tarp lids to minimize bird attraction. Mitigation for a new NERTS site should specify an enclosed facility to reduce birds from accessing the facility and waste, reducing scavenging and spread of materials and protecting bird populations.
3.8.3.2.1.1	3-198	This section states, "None of the action alternatives are likely to have direct significant impacts on environmental health during construction." It does not address either the possible hazardous waste that might exist in the capped landfill or, once the capped landfill is disturbed, what the impacts could be of such disturbance or what the waste characterization is likely to include.
3.8.3.2.1.1	3-199	Emissions from King County trucks are discussed in relation to a planned change to electric and hybrid County vehicles. Do these emissions impacts consider private hauler trucks or personal vehicles that will be going to and from the site? WM's fleet trucks utilize compressed natural gas, and this should be included in the evaluation.
3.9.2.2.2.2	3-221	Nearby neighbors prefer the land use designated in Kirkland Comp Plan, as "park/open space." Kirkland Comp Plan references the expected closure of the Houghton Transfer Station, consistent with King County's earlier plans. Significant mitigation would be needed to address this inconsistency.
3.9.2.2.2.2	3-221	Review and reference applicable policies in Bridle Trails Neighborhood Plan, which is a chapter of the City's Comprehensive Plan, including Policy BT-17 and BT-25.
3.9.3.3.2.1	3-237	Please provide additional details on landscape buffers that could be provided as part of mitigation on Alternatives 1A and 1B, particularly given the view impacts.

3.9.3.3.2.1	3-237	Please more precisely identify any construction-period impacts to Taylor Fields (would any of the ball fields be out of use during the construction period?) Are mitigation measures needed to reduce impacts to other recreational facilities in Kirkland that would receive more use during the construction period?
3.10.4.3	3-265	The analysis indicates that pile driving and other loud construction activities could generate noise levels of 94dBA at 50 feet (approximately the distance to the nearest residences under Alternatives 1A and 1B). This is not considered a significant impact in the EIS but represents extremely high noise levels, warranting mitigation. Please identify what measures would be implemented to reduce these extremely high construction-period noise levels, beyond the optional measures described on page 3-277.
3.10.4.4.2	3-270	Do the noise contours shown on Figure 3.10-5 include noise associated with increased operational traffic to the site? If not, what are the associated impacts on noise levels?
3.11.4.1	3-298	No significant aesthetic impacts are identified for Alternatives 1A or 1B, but the design of the building will have significant implications for the aesthetic quality of the area. Please identify urban design/green building principles that would be incorporated into any future design to reduce significant impacts and that respond to the existing wooded quality of the site and surrounding open space resources.
3.13		<p>As a general comment throughout chapter 3, part 13, the DEIS indicates that the no action alternative and the action Alternative 1 are unlikely to require modifications to the existing roadway network.</p> <p>However, even in the no action alternative, the roadway network and intersections are not sufficient to support the existing and anticipated truck traffic caused by the facility, as evident from noted safety concerns at the intersections even in the no-action alternative. Installation of a traffic signal at NE 60 St. / 116th Ave NE is noted as a possible but not required safety mitigation for Alternative 1A. The FEIS should clearly identify roadway and intersection improvements as intended mitigation measures to address pedestrian and vehicle safety and safe truck movements in no-action or action Alternative 1. While a traffic signal will best address impacts at NE 60 St. / 116th Ave NE, at minimum the four-way stop intersection should be reconstructed and re-channelized to meet ADA standards and accommodate safe co-use by pedestrians, bicyclists, and light and heavy vehicles. The westbound NE 60th St. to northbound 116th Ave NE right turn lane should be reconstructed to ensure safe turning movements for large waste trucks and trailers.</p> <p>In addition to necessary intersection improvements, for any action Alternative 1, Kirkland development standards will require frontage improvements on NE 60th St, which likely include the construction of a safe and ADA accessible pedestrian and bike connection on the north side of NE 60th St between 116th Ave NE and 122nd Ave NE, and will further require frontage improvements on the west side of 120th Ave NE between NE 60th St and NE 64th St., which likely include improvements such as sidewalks, curb/gutter, storm water infrastructure, and parking for users of Taylor Fields, and other appropriate public works infrastructure required to meet development standards.</p> <p>The FEIS should incorporate more specific roadway network mitigation throughout various sections of part 13 to address these issues.</p>

3.13.2.1	3-318	The scope of the intersection analysis omits intersections east of the action alternative 1A and 1B sites. Specifically, staff believe that, <i>at a minimum</i> , the intersections at NE 60th Street / 122nd Avenue NE and NE 70th Street / 122nd Avenue NE should be included in the DEIS analysis to ascertain impacts resulting from increased WB traffic to the site. In particular, NE 70th Street / 122nd Avenue NE
3.13.2.1	3-318	Table 3.13 identified the City of Kirkland Policy R-38 Transportation Impact Analysis Review, but the DEIS did not assess transportation impact based on the requirements within Policy R-38.
3.13.2.1	3-318	In addition to the intersections adjacent to the project site, a proportional share impact analysis should be done to determine if other close-by intersections will be significantly impacted.
3.13.2.1	3-318	The DEIS ignores the impacts on NE 60th Street east of the project site.
3.13.2.2.3	3-324	The DEIS references active transportation facilities in the study area but does not evaluate impacts to transportation modes other than vehicle traffic. The Final EIS should include evaluation of other transportation modes, such as biking and walking, in the study area. See City of Kirkland Transportation Master Plan and Capital Facility Plan to identify non-motorized projects in the affected area. Refer to Kirkland Policy R-38 for potential multi-modal mitigations.
3.13.2.2.4	3-327	The information is identified as being current through the March 2023 service change, but staff recommend updating the analysis to be current to the September 2023 service change, through which the City of Kirkland experienced transit service reductions. The reductions affected Routes 225, 230, 231, 245, 255, 311, 342.
3.13.2.2.5	3-328	Define the term "Critical Crash Rate."
3.13.2.2.5	3-328	The DEIS does not provide clarity on the type of crash data included. Please clarify if crash data were collected and analyzed for NE 60th Street and NE 70th Street within 150 feet of the project sites. Please provide data on crashes involving large trucks.
3.13.2.2.5	3-328	Sight distance safety analyses at the project driveways should be completed.
3.13.2.2.5	3-328	The proposed facility will increase traffic through the intersection of NE 70th Street and 116th Avenue NE, as a consequence, crashes may increase at the intersection. The FEIS should address mitigating measures to reduce crashes at the intersection where the observed crash rate is higher than the critical crash rate.
3.13.3.1.2	3-342	DEIS states that traffic volumes are expected to increase as the service area population grows but does not provide any information related to the magnitude at which it is expected to increase. Please provide further information here and references to Section 3.13.3.3.2.1, at a minimum.
3.13.3.1.2.1	3-345	The analysis on Active Transportation Facilities omits any discussion on the East Link Connections Restructure that is being finalized in partnership between Sound Transit, Metro, and local jurisdictions. This needs to be part of the analysis, as many routes will be revised in 2025 following the opening of the Sound Transit East Link 2 Line light rail service. More info can be found here: https://kingcounty.gov/en/dept/metro/programs-and-projects/east-link-connections

3.13.3.2.1.1	3-352	The DEIS indicated there could be potential roadway wear and tear during construction from heavy equipment and truck hauling and frontage improvement would occur to minimize impacts on traffic, but did not provide a pavement evaluation or provide specific mitigations.
3.13.3.2.3	3-354	The DEIS indicated that traffic growth assumptions also reflect changes in background traffic volumes that are projected in the traffic forecasts. What growth rate was used to forecast the background traffic growth for the future condition.
3.13.3.3.1.1	3-355	The larger hauling truck trailer turning radii may impact NE 60th Street/116th Avenue NE, has an analysis been done to evaluate truck impacts to the analyzed intersections such as turning radius? If there is impact, what improvements have been considered?
3.13.3.3.2.1	3-358	The DEIS should provide the daily trips generated by the existing and the proposed facility for each of the trip type as in Table 3.13-22. The number of daily KC transfer trailers and larger commercial trucks may have significant impact to the roadway and pavement. The report indicated that there will be less transfer trucks in Alternative 1 due to the compacted loads in the future, does that mean that the transfer truck will be heavier and creating more impact to the road pavement?
3.13.3.3.2.1	3-358	It appears that the analysis assumed all trips are coming from I-405. A trip distribution and assignment should be provided, as we believe that there will be trips coming from east of the site in alternatives 1A and 1B that would impact intersections to the east of the site. For clarity, figures showing the traffic volumes at the analyzed intersections should be provided. What are the trip generations and volumes for the existing, No action, and all Action Alternatives?
3.13.3.3.2.1	3-358	The existing Houghton station has a queue lane on NE 60th Street to mitigate traffic queuing onto NE 60th Street. It is anticipated that there will be more traffic to the proposed site. How will the increased traffic impact queuing on the NE 60th Street and will the alternative site off 116th Avenue NE mitigate queuing that spills onto the streets? The City of Kirkland will require that all queuing for 1A or 1B be entirely on King County's site, not within the right-of-way. The FEIS should clearly indicate that a safe and efficient station entrance/exit would need to be constructed with eastbound and westbound turn lanes designed to prevent queuing on NE 60th St., particularly during peak station usage times.
3.13.4	3-376	There is a reference to V/C ratios, but that does not apply to Kirkland roads. We suggest clarifying that it is for WSDOT and Woodinville LOS standards. The EIS should determine the scope of the study area based on the City of Kirkland Pre-Approved Plans Policy R-38.
Appendix H - Appendix A Table 3	7	Why were only two locations chosen for tube counts? The locations appear to not capture the full picture. Please explain. Have the traffic volumes been adjusted for the impact of COVID? The traffic volumes between the 2040 No Action and 2040 Alternative 1 do not add up.
Appendix H - Appendix A Table 4	8	K Line project assumptions are likely to change as this project has just recently restarted planning work with Metro and the City of Kirkland. A locally preferred alternative (LPA) has not been developed yet.
Appendix H- 4.2.1.2	4-18	Typo in first sentence. Should read "Under Action Alternative 1..."

Appendix I		Appendix I lists the source for the reasonably foreseeable future projects in the study area as a Kirkland “What’s Happening” website. For the FEIS, please see the City of Kirkland Transportation Strategic Plan and Capital Facility Plan to identify non-motorized projects in the affected area.
3.14.3.3.2.1	3-381	There are four diamond fields currently at Taylor Fields. The PROS Plan does not specify the condition or quality of those fields because these fields are not managed by the City and are currently under agreement with the Little League and King County. The four little league ballfields should remain in place during and after construction and should be upgraded with the addition of/improvements to restrooms, field turf, scoreboards, dugouts, backstops, fencing, seating, parking and lighting.
3.14.3.3.2.1	3-381	The PROS Plan also states to explore a partnership with King County Solid Waste to further develop Taylor Fields as a park with a sports complex with multi-purpose synthetic turf with lights, specifically containing a regulation sized rectangular field that also contains two diamond fields within it. Should King County select this site, KCSWD should work with City of Kirkland on park development.
3.14.3.3.2.1	3-381	With the input of the community, explore opportunities to develop the remaining portion of the closed landfill into parks and recreation areas including such amenities as multi-use sports fields, playgrounds, off-leash dog areas, community garden space, sheltered picnic areas, walking and biking paths, sport courts, pickleball, exercise/parkour equipment, all linked to the Bridle Trails State Park to the south of the station.
3.14.3.2.1.1	3-397	Kirkland Fire now has 6 stations and Woodinville Fire is no longer, the area is now served by Eastside Fire and Rescue. We would request that KCSWD engage with local Emergency Management agencies in planning, mitigation, and operation of any site.
3.14.3.2.2	3-398	Should Alternative 1A or 1B be selected, King County will be expected to follow the city's permitting and zoning process to address connecting new water and sewer connections. As mitigation for the surrounding community, the County should connect, at no cost to residents, those residences on septic to the new sewer main and abandon failing residential septic systems.
3.13.3.2.2	3-403	What enhancements to the existing baseball field facilities at Taylor Fields are being proposed? What other recreational enhancements are being proposed (page 3-406), and how precisely will these new facilities mitigate for removal of the southern portion of the open field area north of the existing Houghton RTS?
3.14.2.2.9	3-386	What mitigation would be planned to improve safe walk routes to nearby schools? Engagement with City and LWSD would be necessary to improve safety of students.



Final Comment Letter to King County

Final Audit Report

2024-04-10

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