DEVELOPMENT SERVICES DEPARTMENT
ENVIRONMENTAL COORDINATOR
450 110th Ave NE
BELLEVUE, WA 98009-9012

DETERMINATION OF NON-SIGNIFICANCE

PROPONENT: City of Bellevue, Development Services Department

LOCATION OF PROPOSAL: Eastgate Subarea

DESCRIPTION OF PROPOSAL: Land Use Code Amendment (LUCA) proposes to create three new land use districts called Eastgate Transit Oriented Development (EG-TOD), Office Limited Business 2 (OLB-2) and Neighborhood Mixed Use (NMU). The LUCA proposes to include use tables, dimensional standards, development standards, and design guidelines for each new zone. The LUCA proposes to rezone other parcels to preexisting districts. The LUCA proposes to amend the Transition Area Design District to include the OLB 2 and NMU Districts. This will serve to reduce development impacts to adjacent residential districts. The LUCA will include conformance amendments to ensure consistency with the rest of the Land Use Code.

FILE NUMBERS: 12-132861-AD **PLANNER:** Matthews Jackson

The Environmental Coordinator of the City of Bellevue has determined that this proposal does not have a probable significant adverse impact upon the environment. An Environmental Impact Statement (EIS) is not required under RCW 43.21C.030(2)(C). This decision was made after the Bellevue Environmental Coordinator reviewed the completed environmental checklist and information filed with the Land Use Division of the Development Services Department. This information is available to the public on request.

☐ There is no comment period for this DNS. There is a 14-day appeal period. Only persons who submitted written comments before the DNS was issued may appeal the decision. A written appeal must be filed in the City Clerk's office by 5:00 p.m. on

☒ This DNS is issued after using the optional DNS process in WAC 197-11-355. There is no further comment period on the DNS. Only persons who submitted written comments before the DNS was issued may appeal the decision. This DNS is only appealable as part of the City's action on the amendment to the Land Use Code. In order to comply with requirements of SEPA and the State of Washington Growth Management Act for coordination of hearings, any appeal of the SEPA threshold determination herein will be considered by the Growth Management Hearings Board along with an appeal of the City Council's action. For information on how to appeal a proposal, visit the Permit Center at City Hall or call (425) 452-4188.

☐ This DNS is issued under WAC 197-11-340(2) and is subject to a 14-day comment period from the date below. Comments must be submitted by 5 p.m. on _____. This DNS is also subject to appeal. A written appeal must be filed in the City Clerk's Office by 5:00 p.m. on _____.

This DNS may be withdrawn at any time if the proposal is modified so as to have significant adverse environmental impacts; if there is significant new information indicating a proposals probable significant adverse environmental impacts (unless a non-exempt license has been issued if the proposal is a private project): or if the DNS was procured by misrepresentation or lack of material disclosure.

Carol Heller
Environmental Coordinator

6/9/2016
Date

OTHERS TO RECEIVE THIS DOCUMENT:
☒ State Department of Fish and Wildlife / Stewart.Reinbold@dfw.gov; Christa.Heller@dfw.wa.gov;
☒ State Department of Ecology, Shoreline Planner N.W. Region / Jobu461@ecy.wa.gov; sepaunit@ecy.wa.gov
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☒ Muckleshoot Indian Tribe Karen.Walter@muckleshoot.nsn.us; Fisheries.fileroom@muckleshoot.nsn.us

ENVIRONMENTAL CHECKLIST

A. BACKGROUND

1. Name of the proposed project:

Eastgate/I-90 Land Use and Transportation Project

2. Name of Applicant:

City of Bellevue

3. Address and telephone number of applicant and contact person:

Terry Cullen
Planning & Community Development
City of Bellevue
P.O. Box 90012
Bellevue, WA 98009-9012
(425) 452-4070

4. Date of Review:

Original Date of Review: December 2012

Modified Date of Review: May 2016

5. Agency requesting checklist:

City of Bellevue

6. Proposed timing or schedule (including phasing, if applicable):

The Eastgate/I-90 Citizen Advisory Committee (CAC) submitted its Final Report and recommended Preferred Alternative to the Bellevue City Council in April of 2012. Council accepted the report and recommendation on April 23, 2012 and voted to initiate the Comprehensive Plan Amendment (CPA) process for plan implementation. Full implementation will occur through amendments to the City's Comprehensive Plan, Land Use Code, Zoning Map, Transportation Facilities Plan, and other regulatory and policy documents. Those amendments were anticipated to begin late 2012 with completion in 2014. The project implementation was delayed. During the time period when the original checklist was completed in 2012 and the present (2016), amendments to the City's Comprehensive Plan and Transportation Facilities Plan were completed. Amendments to the City's Land Use Code and Zoning Map are in process now and are expected to be adopted by year end 2016. The planning Horizon for the plan is Year 2030.

7. Plans for future additions, expansion, or further activity related to or connected with this proposal:

Following amendments to City policy and regulatory documents, future development in the I-90 corridor would occur in a manner consistent with those amendments.

8. **Environmental information that has been prepared, or will be prepared, directly related to this project:**

Preceding preparation of this checklist, the City conducted an initial environmental review of four proposed Eastgate/I-90 Land Use and Transportation Project alternatives. That Environmental Review Report (ERR) was part of the *Evaluation of Draft Alternatives Report (August, 2011)*, which considered multiple aspects of the alternatives. The ERR drew in part from other environmental documents prepared for this project, including the following: *Eastgate Preliminary Screening Analysis (Perteet, December 2009); Existing Conditions Inventory (City of Bellevue, Summer 2010);* and the Technical Memos appended to the *Evaluation of Draft Alternatives Report (City of Bellevue, September 2011).*

In developing the Preferred Alternative, two additional reports were prepared: 1) the *Draft Eastgate / I-90 Land Use and Transportation Project: Land Use Characteristics by District Report (Makers, 2011)* and 2) *The Eastgate / I-90 Land Use and Transportation Project: Transportation Strategies Report (Bellevue, 2012).*

9. **Applications that are pending for governmental approvals or other proposals directly affecting the property covered by the proposal:**

The City of Bellevue is drafting land use code amendments to create 3 new zoning districts – Neighborhood Mixed Use, Office Limited Business-2 and Eastgate TOD and conducting an areawide rezoning to put these new districts into place. A map is attached showing the proposed location of each area being considered for rezoning.

A privately initiated comprehensive plan amendment has been submitted for the 2016 cycle. This privately-initiated application would amend the map designation on this 14-acre site from Office (O) to Office Limited Business (OLB). This site is currently developed with 280,000 square feet of office in four buildings with surface parking and is located in the general vicinity of SE 30th Place. A location map is attached.

The City of Bellevue is in the process of amending its development codes and standards to implement Low Intensity Development principles. This citywide code amendment will directly affect property in the Eastgate study area.

The City of Bellevue is updating the background information for its Critical Areas Ordinance. This may or may not result in amendments to the City codes. Any potential code amendments will be citywide and may directly affect property in the Eastgate study area.

10. **List of governmental approvals or permits that will be needed for the proposal:**

Approvals or permits that were needed for this proposal and have been completed in the time period between the original checklist (2012) and the modified, updated checklist (2016):

- Amendments to the City's Comprehensive Plan;
- Amendments to the Transportation Facilities Plan

Approvals or permits that are pending for this proposal and have yet to be completed:

- Amendments to the City's Land Use Code including the text and city zoning map. (Expected completion is 2016.)

11. **Brief, complete description of the proposal, including the proposed uses and the size of the project and site:**

Project Overview

The purpose of the City of Bellevue's Land Use & Transportation Project is to develop a long-range (to Year 2030) plan for the evolution of the Eastgate/I-90 corridor. From November, 2010 through April, 2012 the project team worked with a Council-appointed Citizen Advisory Committee to develop and evaluate several alternative growth scenarios for the Eastgate/I-90 corridor to help ensure that the area continues to attract and retain employers, provides a mix of services to surrounding neighborhoods, and serves as a vibrant and significant contributor to Bellevue's economic health in the coming decades.

Based on the studies supporting the Evaluation of Draft Alternatives Report (Bellevue, 2011), a preferred alternative, encompassing elements of the studied alternatives, was developed for recommendation to the Bellevue City Council. Following Council acceptance on April 23, 2012, revisions to the Bellevue Comprehensive Plan, Land Use Code, Zoning Map, Transportation Facilities Plan, and other policy or regulatory documents are required to implement the plan. Amendments to the Comprehensive Plan and Transportation Facilities Plan have been completed. Amendments to the Land Use and Zoning Map are currently in process. Those amendments will be reviewed through the City's Commission processes.

The primary geographic focus of this project is the commercial area fronting the north and south sides of I-90, one of the city's major employment centers. The study area contains 633 acres, and supports approximately 24,300 jobs, or 17% of the city's total employment (March 2009).

SEPA/GMA Integration

For the purpose of compliance with the State Environmental Policy Act (SEPA), this project is utilizing the "Integrated SEPA/GMA" process authorized by WAC 197-11-210. This integrated process ensures early consideration of environmental issues, helping inform the development of alternative courses of action and crafting a final preferred plan or alternative. It also includes early and expanded "scoping" of environmental concerns to identify environmental issues that might influence decisions on future plans or courses of action. Since the project's inception, public input has been sought on environmental issues, through such measures as public open houses, online questionnaires, stakeholder interviews, presentations to interest groups, and public

comment opportunities at CAC meetings. Environmental considerations have informed the understanding of the study area and the development of alternatives including the Preferred Alternative.

Because this type of environmental review occurs at the "programmatic" or "non-project" level, it is by definition less specific or quantifiable than what would occur at a "project" level. More in-depth environmental review will be required at future stages. These stages include reviewing any proposal to construct a project in accordance with the amended policy or regulatory documents.

For the purpose of the Eastgate/I-90 Land Use & Transportation Project, an assessment of potential environmental consequences arising from a no action alternative and three action alternatives was undertaken. That assessment was one of several inputs used by the CAC and the project team in developing the Preferred Alternative. This current checklist builds on the information contained in the prior assessment, and addresses potential environmental impacts of the Preferred Alternative.

Developing the Preferred Alternative

As part of the project, the City of Bellevue developed one "no action" and three draft "action" land use and transportation alternatives. The draft alternatives were informed by the known environmental characteristics and the public's stated environmental concerns regarding the study area and surrounding neighborhoods. The draft alternatives reflect anticipated outcomes of three scenarios with varying emphases: Alternative 1 reflected a "Jobs/Housing Mix" theme, Alternative 2 a Regional Employment Center theme, and Alternative 3 a Functional Improvements theme. The no action alternative projected the growth that could be expected to occur absent any changes to the Comprehensive Plan, Land Use Code, Transportation Facilities Code, or other policy and regulatory documents.

Based on the analysis of the alternatives in the Evaluation of Draft Alternatives Report (Bellevue, 2011), a preferred alternative, representing a "hybrid" of the three action alternatives, was developed. It incorporates elements of the three action alternatives. The characteristics of the Preferred Alternative (land use pattern; housing units, office, retail, industrial and institutional space; transportation improvements and open spaces) fall within the range of parameters analyzed in the Evaluation of Draft Alternatives Report.

In general office, retail, hotel, and institutional development proposed under the Preferred Alternative are in the range of draft alternatives 1 and 2. The amount of housing is similar to, but higher than, draft alternative 3 (800 vs. 400 units). No new industrial development is proposed or expected. The table below compares the types and amounts of new development that would be expected within the study area under the No Action and three draft Action alternatives, and the Preferred Alternative.

Projected Growth by Land Use Type (Year 2030)

Land Use Type:	No Action	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative
Office (Sq Ft)	200,000	1,000,000	2,000,000	500,000	1,000,000
Retail (Sq Ft)	0	100,000	50,000	200,000	100,000
Industrial (Sq Ft)	86,000	-167,000	0	0	0
Institutional (Sq Ft)	280,000	350,000	420,000	280,000	350,000
Residential (Housing Units)	0	2,000	0	400	800
Hotel (Rooms)	0	200	300	100	300

The Preferred Alternative

The preferred alternative can be organized into nine districts, each with a unique character and distinguishing features. The entire Eastgate area would be anchored by a transit-oriented core featuring a mix of transit, commercial, and residential uses located north of I-90, between the 142nd Pl Bridge and 148th interchange. For each district, key development assumptions are presented in Table 2 and brief summaries of the proposed changes in land use, transportation and character are provided.

Key Features of the Eastgate Districts

	Proposed Uses	FAR*	Height*
Transit-oriented Development Center	Office, commercial, and residential w/ ground floor retail	Rezone to the proposed Eastgate TOD zoning district. 2.0 FAR with requirements for design standards.	Up to 160 feet
Richard's Valley	Light-industrial and flex-tech	No change	No change
King County Site and vicinity	Medium density office	Rezone to proposed Office Limited Business-2 zoning district. 1.0 FAR with requirements for design standards.	Up to 75 feet

Sunset Village	Short term: Support existing auto dealerships. Encourage existing retail to remain.	No change	No change
I-90 Office Park and vicinity	Infilling parking lots with additional office space and ancillary retail	North part remains 0.5 FAR – no change. South part rezone to proposed Office Limited Business-2 zoning district. 1.0 FAR with design guidelines.	Up to 75 feet
Eastgate Plaza and vicinity	Long term uses: office, retail, restaurants, lodging and multi-family residential; community-serving uses	Rezone to the proposed Neighborhood Mixed Use zoning district. 1.0 FAR with design guidelines.	Mixed use residential/retail up to 75 feet height and requirements to protect neighboring SFR from impacts.
North Factoria and Vicinity	West and south of Newport Corporate Center: A range of office and residential uses with pedestrian oriented uses on ground floor. Newport Corporate Center and eastward: Office uses allowing other commercial uses and residential.	Newport Corporate Center and westward and southward: maintain existing FAR. East of Newport Corporate Center: rezone to the proposed Office Limited Business-2 zoning district 1.0 FAR with design guidelines.	Newport Corporate Center and westward-consistent with existing. East of Newport Corporate Center – 75 feet.
Interchange Gateway 1: Eastgate Interchange	Road and tree canopy improvements are proposed		
Interchange Gateway 2: Lakemont Interchange			

** FAR and height are approximate and will be more fully refined as part of plan implementation/code amendment phase.*

Transit-oriented Development Center

The district would encompass all properties fronting the Park-and-Ride/Transit Center, and those extending to the northern edge of the Bellevue College campus and eastward to the lot on the west side of 146th Place SE. It would be Eastgate's focal point with the most intense and greatest diversity of uses, best multi-modal access, and highest visibility. The area would have the highest and most visible concentration of buildings and structures framed by the wooded slopes and landscaped SE Eastgate Way. Key attributes of the district plan include:

- New zoning and land use provisions for increased densities, reductions in parking requirements, and incentives for intense mixed-use development.
- Improvements to 142nd Place SE to create a "transit emphasis corridor" including a widened covered walkway on the bridge structure and improvements to Snoqualmie River Road to enhance bus service.
- Formalizing an east-west main street for multi-modal users between 142nd and 148th, connecting the Lincoln Executive Center with the Park-and-Ride.
- Enhancing access and connectivity along SE Eastgate Way with the addition of bicycle lanes.

Richards Valley

Richards Valley currently contains a light industrial area with several other uses including a King County transfer station and electrical substation. The Plan would maintain the light-industrial uses while encouraging higher density flex-tech development and stream and vegetation corridor enhancements. Key attributes of the district plan include:

- Improving the function of riparian corridors, floodplains, and wetlands with redevelopment.
- Reducing impervious surfaces and encouraging additional planting with redevelopment.
- Daylighting streams with redevelopment, where possible.
- Improving street frontages and landscaping along Richard Road.

King County Site and Vicinity

This site is located north side of I-90 midway between Richards Road and the Park-and-Ride/Transit Center. The site includes a large vacant parcel owned by King County and adjacent properties to the west fronting Eastgate Way. The site is planned for new office development with greater heights and FAR allowances. The preferred alternative would also include substantial street landscaping and on-site open space to compensate for the additional allowed development capacity.

Sunset Village

This area directly north of the Eastgate interchange and directly east of 148th Ave SE is currently occupied by auto dealerships. It is unlikely that these uses will change in the short term. There are also small service retail businesses, which would be encouraged to remain. The long-term plan under the preferred alternative is for a greater mix of office and retail uses. Redevelopment will be accompanied by improved pedestrian/bike access and landscaping improvements. Key proposed transportation improvements include:

- Improvement of 148th/150th Ave SE intersection with a third continuous southbound through lane from SE Eastgate Way to SE 38th Street.
- Improvement of intersections at SE Eastgate Way/150th Ave SE and 156th Ave SE/SE Eastgate Way with either a) widening and channelization improvements or b) multi-lane roundabout.
- Addition of bike lanes along SE Eastgate Way.
- Improved on-site vehicle and pedestrian circulation.

I-90 Office Park and Vicinity

The area includes the cluster of office use in the Eastgate Office Park along 158th and 160th Ave SE. The buildings in the area are built to current development regulations and are relatively new. Little new development or redevelopment is expected in the near to mid-term. Over the long term, increased development capacity would encourage more intense office development. The preferred alternative also includes pedestrian connections through parking lots and pedestrian-oriented outdoor spaces. Redevelopment in the area would also improve stormwater management because existing stormwater management systems would be replaced with systems that comply with current regulations, which are more protective of water quality.

Eastgate Plaza and Vicinity

The area includes an 8-acre shopping center immediately south of I-90 and east of 150th Ave SE. It also includes several other nearby uses. Current uses are viable and unlikely to change in the short term. In the long term, the plan includes a variety of commercial and residential uses with community oriented retail and/or other community-serving uses in its western portion. In the eastern portion, office and hotel use would be encouraged. The preferred alternative also includes several transportation improvements including:

- Improvement of the intersections at 150th Ave SE/I-90 eastbound off-ramp and SE 37th St with either widening or a round-about.
- Improvement 148th Ave SE/150th Ave SE between SE 28th St and SE 38th St to be an attractive and important north-south connector in south central Bellevue.
- Widen 150th Ave SE/SE 37th St to allow for a by-pass lane on the right side of SE 37th St.

North Factoria and Vicinity

The area includes 66 acres of the Factoria Subarea centered along Factoria Boulevard SE and the commercially zoned lands stretching to the east along the south side of I-90. Most of the properties already feature substantial development and stable businesses; there may be some redevelopment opportunities in the mid to long term, especially on the sub-district's eastern and western perimeters.

In 2005, the Factoria Subarea Plan was updated with the Factoria Area Transportation Study (FATS) which recommended transportation, urban design and site planning strategies to create a pedestrian and transit-oriented neighborhood. This plan supports the FATS work by encouraging site development consistent with the earlier study.

Interchange Gateways 1 and 2

I-90 is the defining feature of the Eastgate area. The interchanges function as gateways to the study area and the city. The preferred alternative proposes increasing tree canopy to improve corridor aesthetics. It also proposes includes continuing encouraging WSDOT to move forward with planned projects that would decrease congestion at these areas. Other than roadway improvements, no other new development is proposed for these areas.

Scoping Process

Initial scoping for the Eastgate/I-90 Land Use and Transportation Project began in December 2009 when the City of Bellevue conducted a preliminary screening analysis of traffic operations through the study area in order to evaluate the viability of two preliminary growth scenarios. The results of this analysis provided a good understanding of existing transportation conditions, identified existing points of congestion, and provided a solid foundation on which to base future development and land use alternatives. The Bellevue City Council approved the project scope and principles in early February 2010, including the concept of using the integrated SEPA/GMA process.

The project scope, in part, was designed to address environmental considerations. In addition to being cognizant of natural environmental constraints, such as steep slopes, streams, and wetlands within and neighboring the study area, the project scope and principles were concerned with ensuring adequate utility, transportation, and social (parks, fire, police, etc.) infrastructure to support any future land use and transportation scenario that might emerge from the planning process. Key among these considerations is the development of alternatives for transportation infrastructure based on an analysis that focused on modeling and evaluating preferred land use alternatives including providing regional access and promoting adequate circulation within the study area, while mitigating impacts to the surrounding landscape.

Additionally, considerations for greenhouse gas emissions were studied for the alternatives in accordance with Washington State greenhouse gas reduction goals by exploring means to reduce GHG emissions within the project area. The selection of a preferred alternative was based on, in part, an understanding of the GHG emission

consequences of each draft alternative, and of the necessary transportation improvements needed to accommodate the project vision and providing strategies to minimize impacts to the surrounding area.

The project principles were developed with the intention of enhancing the economic viability of the Eastgate corridor while not degrading the mobility of other parts of the city, and to ensure that it continues to contribute to the diversity of the City's economic mix. In achieving this goal, planning would require the consideration of integrated land uses and transportation across Eastgate, with the consideration of transit-oriented developments in portions of the area. Changes in land use should be informed by transportation opportunities and impacts, such that facilities may create opportunities for a well integrated district promoting land use and transportation performance. The project principles are based on a model of environmental sustainability so that future plans for the area produce measurable environmental benefits.

Public Outreach

Public involvement was integral to the environmental scoping and planning process and played a significant role in identifying and directing goals for the development of the Eastgate/I-90 Land Use and Transportation Project. Beginning in spring 2010 the Eastgate/I-90 Land Use and Transportation Project, the City of Bellevue worked with the public to identify issues and concerns through a series of dialogues, including open houses, online surveys, stakeholder interviews, community association dialogues, and other interest group interactions.

The first set of open houses was held in March 2010 and addressed the project objectives in addition to the SEPA and GMA methodology to be used in the planning process. The public was encouraged to identify environmental issues to help in the SEPA determination. To assist in project development the City prepared the *Eastgate I-90 Land Use & Transportation Project Existing Conditions Inventory* in summer 2010. This inventory documents several environmental features including existing land uses, elements of the physical environment (i.e. streams, wetlands, topography/steel slopes), parks and recreation, utility infrastructure, transportation infrastructure, and transit services.

A Citizens Advisory Committee (CAC) was appointed by the City Council in October 2010 and quickly became familiar with the preliminary screening analysis, the project scope and principles, the existing conditions inventory, and public input. From this information the CAC drafted the alternatives that are currently under consideration. The draft alternatives were introduced for public feedback through two open houses held in June 2011. In addition to open house forums, SEPA-related comments were collected through CAC meetings, online questionnaires, an online visual preference survey, stakeholder interviews, neighborhood association presentations, interest group/professional association presentations, and economic development forums. A final open house was held in October 2011 to seek input on the emerging Preferred Alternative (at the time, called a Preliminary Preferred Alternative).

Through the planning process and public involvement several environmentally-related topics were identified as important. Traffic and transportation infrastructure was the most prevalent concern identified through public feedback. Notable problems with transportation infrastructure include congestion, poor circulation, poor freeway access, and poor signal timing.

A concern identified by some residents living around the nearby Phantom Lake was the effect that further development in the northeast part of the study area might have on water quantity and quality in Phantom Lake, particularly if impervious surface area is increased as a result of any action alternative. These residents expressed concerns that further development in the Phantom Lake drainage basin (a portion of which lies within the study area) may exacerbate existing or perceived water quality issues in Phantom Lake. In addition, several environmental concerns were identified by the public including, but not limited to, stream, wetlands, and steep slopes, particularly in the Richards Valley industrial area. People questioned how these natural features might be impacted or might influence future development. Other concerns expressed by the public included existing freeway noise, light and glare impacts from auto dealers on the north side of I-90, air quality, and aesthetics related to lack of freeway landscaping and the general appearance of the corridor.

A number of valuable environmental interests were identified through the planning process in conjunction with the CAC and through public involvement. Among the environmental interests expressed, those that were identified as having a high level of interest include:

- *promoting environmentally sustainable development;*
- *providing a variety of transportation choices, mixing land uses to provide services and amenities within walking distance of office buildings;*
- *exploring opportunities for improving environmental conditions in Richards Valley; and*
- *landscaping of the freeway corridor, and using the Mountains-to-Sound Greenway (MTSG) Trail as a unifying visual element/basis for a "green theme".*

The Preferred Alternative was developed with these and other environmental considerations in mind. Completion of the "missing link" of the MTSG Trail through the study area, as envisioned by the Preferred Alternative, will not only provide the public with recreation opportunities and greater transportation mode choice, but will serve as a key component of a broader non-motorized network in the study area. Opportunities will be sought to leverage and reflect the MTS Greenway theme in the built environment, in ways that promote environmental sustainability. Land use regulations will be made more flexible to allow and promote retail and service uses that support the study area's employment base, as well as surrounding neighborhoods. By making such uses more available throughout the study area and within walking distance to offices, there will be less reliance upon the automobile for routine daytime errands.

The Richards Valley industrial area is characterized by steep topography, streams, and wetlands. Some of the streams have been re-routed and/or culverted over the years to accommodate development. The Preferred Alternative envisions enhancement of these wetlands and streams as properties redevelop, but also recognizes that the number and locations of these features will make redevelopment challenging.

The Preferred Alternative also recognizes the concerns of Phantom Lake residents regarding possible impacts on lake water quality and quantity resulting from increased development in the northeast portion of the study area. Any new development (or redevelopment) would be required to satisfy stricter storm water standards than those that applied to prior (existing) development, and therefore would maintain and could improve water quality. These stormwater standards would address the Phantom Lake water quality/quantity concerns.

12. **Location of the proposal, including street address, if any, and section, township, and range; legal description; site plan; vicinity map; and topographical map, if reasonably available:**

The Eastgate/I-90 study area is located in the south central part of Bellevue. It contains the Eastgate/I-90 employment corridor, one of the city's five major employment centers. The study area extends east from I-405 a distance of roughly 2-1/4 miles to approximately 161st Avenue SE, plus an extension encompassing I-90 right-of-way out to and including the Lakemont Interchange. In a north-south direction, the study area generally extends from SE 26th Street on the north to SE 38th Street on the south. The study area contains 633 acres, 504 acres north of I-90 and 129 acres south of I-90. The study area includes portions of several planning subareas, including Eastgate, Richards Valley, and Factoria. Appendix A includes a map showing the study area boundaries.

B. ENVIRONMENTAL ELEMENTS

(This part not required for non-project actions)

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: Terry Cullen

Date Submitted: May 19, 2016

D. SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

Discharge to Surface and Ground Water

No direct discharge of waste materials to surface or ground waters is anticipated from land uses included in the Preferred Alternative. There would be no septic systems or livestock in the study area. Considerations for waste material discharge during construction would be identified and evaluated on a case-by-case basis for proposed developments within the study area. Waste material containment, storage, and disposal would be considered for projects with the potential to contaminate surface water bodies or ground water.

The Eastgate/I-90 study area contains approximately 59% impervious area. Total impervious area is not likely to decrease and may increase slightly. However, because increases in impervious surface area would likely be part of redevelopment or road expansion projects, they would be subject to stormwater management regulations requiring maintenance or improvement in stormwater hydrology and water quality.

There are no provisions in the Preferred Alternative for the operational production, storage, or release of toxic or hazardous substances. Considerations would be required on a case-by-case basis to ensure that individual construction sites take measures to properly store hazardous, toxic, or otherwise dangerous materials appropriately to prevent potential impacts.

Emissions to Air

Development under the Preferred Alternative may result in air quality impacts during construction activities including fugitive dust, odors, and emissions from heavy machinery, trucks, and other vehicles traveling to and operating on construction sites. Increased traffic congestion and delays due to construction would have the potential to increase localized emissions by slowing or stopping traffic.

Increased development density, particularly office and institutional, would likely result in an increase in the number of auto trips (see traffic analysis) and associated emissions. As part of the *Evaluation of Draft Alternatives Report*, a greenhouse gas emissions analysis was conducted (Fehr and Peers, 2011). The results of the analysis showed that because of the inclusion of residential development and multimodal transportation options, Alternative 1 was the only alternative that achieved lower per capita CO_2 emissions than the No Action Alternative. Alternatives 2 and 3 generated slightly higher levels of CO_2 per capita.

The greenhouse gas analysis was not extended to the Preferred Alternative, but it is assumed that the results would fall within the range found for the draft alternatives. The Preferred Alternative includes similar transportation improvements, but not as many projected housing units as Alternative 1. Therefore, greenhouse gas emissions would likely be lower than Alternatives 2 and 3, but may be higher than the no action scenario.

Noise

Under the Preferred Alternative, short-term noise impacts could result from construction activities including vehicles and equipment. Construction noise is exempt from the City's noise control ordinance (BCC 9.18) from 7 a.m. to 6 p.m. on weekdays and 9 a.m. to 6 p.m. on (BCC 9.18.020.C). Sound generating development activities occurring outside of these times, on Sundays or on holidays, would require permission from the Director of the Development Services Department and only in cases where activity would not interfere with residential use permitted in the zone. There are no new noise-producing land uses proposed for the area. Long-term impacts could result from increased traffic in the Eastgate/I-90 study area. However, the incremental increase in auto noise would be unlikely to significantly raise the overall noise level.

Proposed measures to avoid or reduce such increases are:

Surface and Ground Water

Considerations would be required on a case-by-case basis to ensure that individual construction activities and development sites take measures to abate and capture storm and waste water runoff, and properly store hazardous, toxic, or otherwise dangerous materials in a way to prevent potential impacts to ground water resources. If construction activities comply with the City's storm and wastewater regulations, clearing and grading standards, and all other building and development codes significant impacts to groundwater are unlikely.

Air

Mitigation measures to control air quality impacts would be considered and developed on a project-by-project basis, and could include transportation demand management strategies such as transit and carpooling incentives, bike facilities, and other means of encouraging alternatives to SOV travel.

Noise

The City's code (BCC 9.18.025 – 9.18.030) regulates noise levels through classes of environmental designations for noise abatement (EDNA). Residential land use districts are classified as EDNA A, commercial land use district are classified as EDNA B and industrial land use districts are classified as EDNA C. For each EDNA, maximum sound levels are established in BCC 9.18.030 based on the sound's source. Maximum permissible sound levels are lowest for EDNA A and highest for EDNA C. Specific zoning has not been established at this point in the planning process. Residential development may be located in either an EDNA A or B area and these designations would determine the allowable sound levels.

In addition, each development proposed under the Preferred Alternative will be required to comply with the development restrictions of BCC 9.18.045B for exterior and interior sound and noise attenuation measures. New development adjacent to I-90 is expected to buffer areas (particularly north of the Transit Oriented Center) from freeway noise. Residential

buildings could also be sited and designed to minimize noise impacts on residents. Assuming this was done; impacts from noise could be maintained below a significant level. Existing noise standards for construction and operation are considered sufficient to control potential noise impacts.

2. **How would the proposal be likely to affect plants, animals, fish, or marine life?**

The majority of the study area that would be impacted by new land uses has been largely cleared of vegetation through past development. The amount of vegetation that will be removed or altered as a result of new development will depend on specific development proposals. There are no known threatened, endangered, or critical vegetation species in the study area.

Animals in the study area include species typically found in urbanized areas of the Pacific Northwest. Terrestrial species likely include various species of hawk, bald eagles, various songbirds, and various small mammals. Aquatic species likely include trout and various amphibians.

Limited portions of study area streams are fish passable. According to WDFW Priority Habitats and Species (PHS) database (2011), Sunset Creek and Richards Creek are mapped as habitat for Coho salmon north of I-90. East Creek is listed as habitat for cutthroat trout. Richards Creek is mapped as habitat for Sockeye and Chinook salmon north of its confluence with Sunset and East Creek (WDFW, 2011). All development under the Preferred Alternative would have to comply with the City's critical areas regulations which would preclude impacts to streams, wetlands, buffers and protected species and habitats.

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

Projects occurring in the study area under the Preferred Alternative would be subject to review on a case-by-case basis and impacts to vegetation would be mitigated consistent with the City's critical area buffer standards and tree retention regulations.

The study area is highly developed and has not been identified as habitat for threatened or endangered terrestrial species. Sunset and Richards Creeks are identified as salmon bearing. Individual project activities would be required to avoid or (in limited cases, where no feasible option exists for public projects) mitigate any impacts to these streams, as well as wetlands and buffers.

As part of project development, green features such as utilizing natural drainage patterns and restoring fragmented or altered habitat would be encouraged under the Preferred Alternative. Restoration plantings, landscaping, and the development of park infrastructure would occur under the Preferred Alternative as well.

Consistent with BCC 20.25H, development proposals under the Preferred Alternative would have to include a determination of whether the proposal would impact habitats associated with species of local importance (defined in BCC 20.25H.150). If so, the proposal would have to

implement wildlife management plans that have been developed by WDFW for such species (BCC 20.25H.160).

3. **How would the proposal be likely to deplete energy or natural resources?**

Energy and natural resource use in the study area would be typical of urbanized commercial, institutional and/or high density residential areas. Under the Preferred Alternative, new and existing development will require electrical power and natural gas. Construction would require gasoline and diesel as well as typical building materials.

The Preferred Alternative envisions a higher density urban area that would likely require more energy and natural resources than are used under current conditions. Infill and more intensive redevelopment of existing urbanized land is expected to consume fewer energy and natural resources than if the same amount of development were to occur in an area that had not previously been converted to urban uses. The expected new development is modest relative to the vast developed areas in the region and there are no proposed uses that would accelerate depletion of an energy source or supply or natural resource, as compared to the No Action Alternative.

Proposed measures to protect or conserve energy and natural resources are:

Existing city and local utility infrastructure is adequate to serve the growth projected under the Preferred Alternative. Development and redevelopment in the study area would be consistent with all local utility standards. In addition, new development under the Preferred Alternative would be required to consider and incorporate green features and energy conservation into building design. Accordingly, no significant impacts to energy availability are anticipated.

4. **How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?**

The study area contains several environmentally sensitive areas and public parks. Wetlands are located around Richards Creek just south of Eastgate Way and around headwater segments of East Creek north of SE 30th Street. Other small wetland areas are on the Bellevue Airfield Park site. In addition to wetlands, several streams are located through the study area. Richards, Sunset, East, and Vasa Creeks run through the central portion of the study area, while four additional streams are located near the Lakemont extension. Richards, Sunset, and East creeks have been identified as salmon bearing.

Steep slopes have also been identified in the study area. Specific areas of steep slopes (>40% and ≥ 1,000 Sq Ft) are near Sunset ravine, along the southern edge of Bellevue College, south of I-90 along SE 36th Street, along the area just west of 150th Avenue, and along the northwest side of the landfill park site. A more detailed inventory of environmentally

sensitive area can be found in the Eastgate I-90 Land Use & Transportation Project Existing Conditions Inventory (City of Bellevue, 2010).

There are several public areas and parks in the study area including Robinswood, Spiritridge and Sunset Parks. In addition, City staff is working on the master plan for a new park, on land collectively called 'The Eastgate Area Properties'; a 27.5 acre area, located near the Advanta office building, near the 'Lake to Lake Trail.'

According to the National Register of Historic Places and the Washington Heritage Register, there are no listed places or objects on or adjacent to the Eastgate/I-90 study area.

The Preferred Alternative has been developed to protect sensitive and public lands and resources. One of the primary objectives of the Preferred Alternative is to improve the area's environmental quality by enhancing natural systems and stream corridors and improving public lands. Critical areas would be protected consistent with the city's critical areas regulations. All parks would be maintained and/or improved. The Mountains to Sound Greenway is proposed to be improved.

Proposed measures to protect such resources or to avoid or reduce impacts are:

Impacts to environmentally sensitive areas and public lands are not anticipated. The study area is highly developed and has not been identified as habitat for threatened or endangered terrestrial species. Sunset and Richards Creeks are identified as salmon bearing. Individual project activities would be required to avoid or (in limited cases, where no feasible option exists for public projects) mitigate any impacts to these streams, as well as wetlands and buffers. The inventory of parks would be maintained or improved. All development would be required to comply with all state and federal law regulating inadvertent discovery of archeological, historic or cultural resources.

5. **How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?**

An examination of the Eastgate/I-90 corridor, resulting in the Eastgate/I-90 Land Use & Transportation Project, was called for in the City of Bellevue's Comprehensive Plan. The objective of the development and implementation of a preferred alternative is pursuant of the City's Comprehensive Plan Policy ED-19 which recognizes the need to "maintain and update integrated land use and transportation plans to guide the future of the City's major commercial areas and help them respond to change" and to further establish as a goal "to maintain the quality of older commercial areas, promoting redevelopment and revitalization as needed to maintain their vitality".

The Preferred Alternative was developed to meet the policy goals of the City, improve environmental conditions and avoid impacts to surrounding areas. The Preferred Alternative, while consistent with the general policy direction in the Comprehensive Plan, would necessitate specific changes to the City's Comprehensive Plan, Land Use Code, Zoning Map, and Transportation Facilities Plan, and would include design elements to avoid land use incompatibilities. There are no shorelines in the study area.

Proposed measures to avoid or reduce shoreline and land use impacts are:

Development of the Preferred Alternative was consistent with the goals of the city and policies in the City's Comprehensive Plan. No shoreline or land use impacts are anticipated. Therefore, no additional measures are provided.

6. **How would the proposal be likely to increase demands on transportation or public services and utilities?**

Transportation

Improvements to the study area's roadway network, transit system, and pedestrian accessibility are a key element of the Preferred Alternative. A complete description of these proposed improvements are included in the *Transportation Strategies Report for the Eastgate I-90 Land Use & Transportation Project* (City of Bellevue, January 2012).

The City's Bellevue-Kirkland-Redmond (BKR) travel demand model (EMME version MP030r5.5) was used to evaluate how projected traffic under the Preferred Alternative would impact 2030 roadway facilities. The total number of estimated trips generated under three scenarios is as follows:

Development Scenario	PM Peak Trips
Exiting (2009)	95,434
2030 with improvements	120,374
2030 without improvements	120,878

According to the traffic analysis of the Preferred Alternative, the proposed capacity improvements at area intersections will accommodate future traffic growth and result in measurable improvements over existing conditions at these same locations. Furthermore, when considered from a corridor-wide perspective, the "2030 with improvements" scenario results in 41.7 seconds of delay per vehicle compared to 46.5 seconds of delay per vehicle in the "2030 without improvements" scenario, a 12 percent reduction in vehicle delay at corridor intersections. The complete and detailed analysis of traffic and transportation in the study area is included in the *Transportation Strategies Report for the Eastgate I-90 Land Use & Transportation Project* (City of Bellevue, January 2012).

Public Services and Utilities

The Preferred Alternative includes increased office, institutional, and retail development, which would increase the demand for public services such as emergency services. The modest amount of residential growth would generate the need for additional emergency, school, library, and health care services.

In general, however, the existing utility infrastructure is adequate to serve the anticipated growth, and substantial upgrades are not expected to be needed. Therefore, significant impacts to public services are not anticipated.

Proposed measures to reduce or respond to such demand(s) are:

Transportation

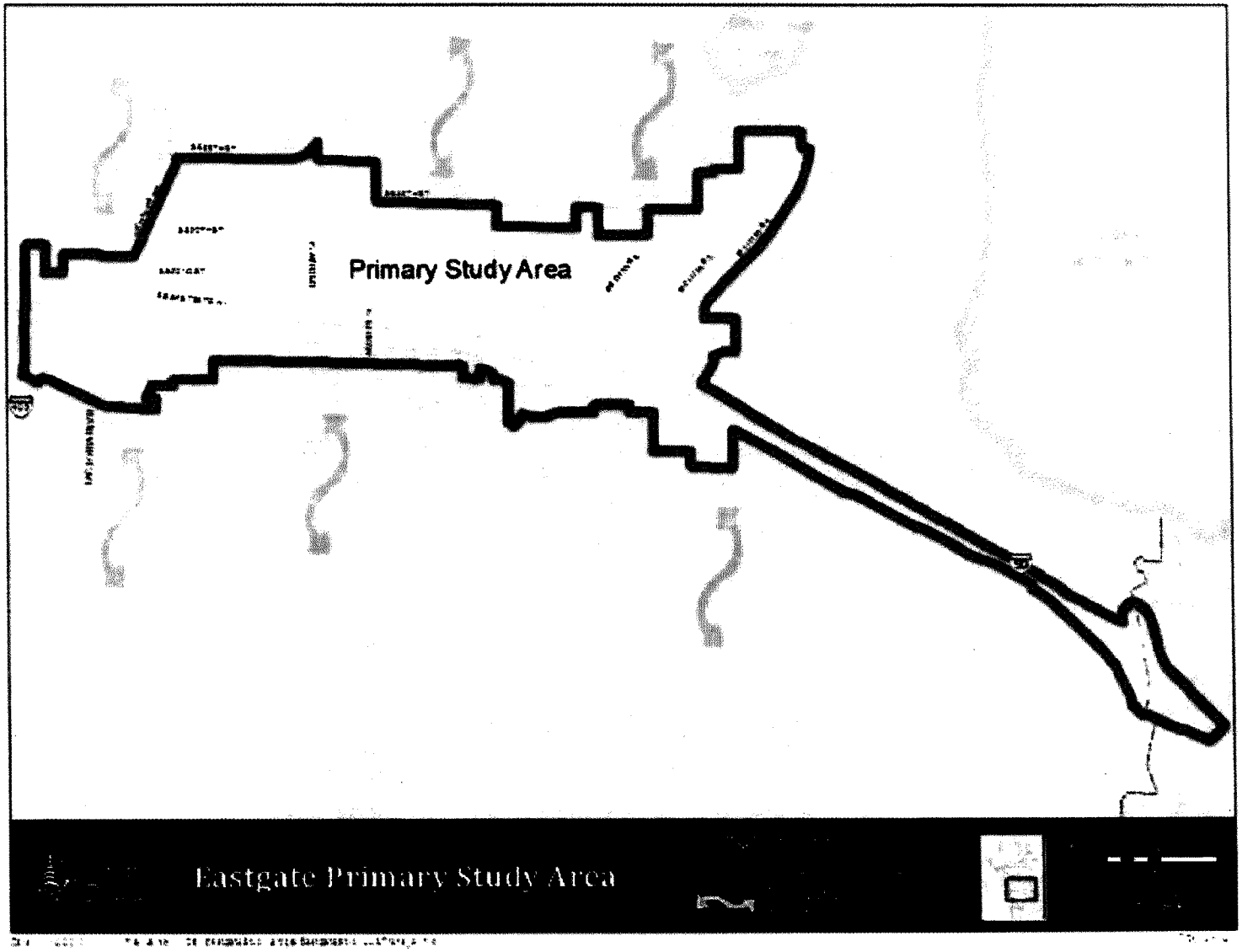
The Preferred Alternative includes transportation improvements that address congestion, transit, and pedestrian facilities. All of these improvements are being evaluated as measures to improve connectivity and access within the study area. Improvements will accommodate future traffic growth and result in overall improvements over existing conditions. Improvements are described in detail in the *Transportation Strategies Report for the Eastgate I-90 Land Use & Transportation Project* (City of Bellevue, January 2012).

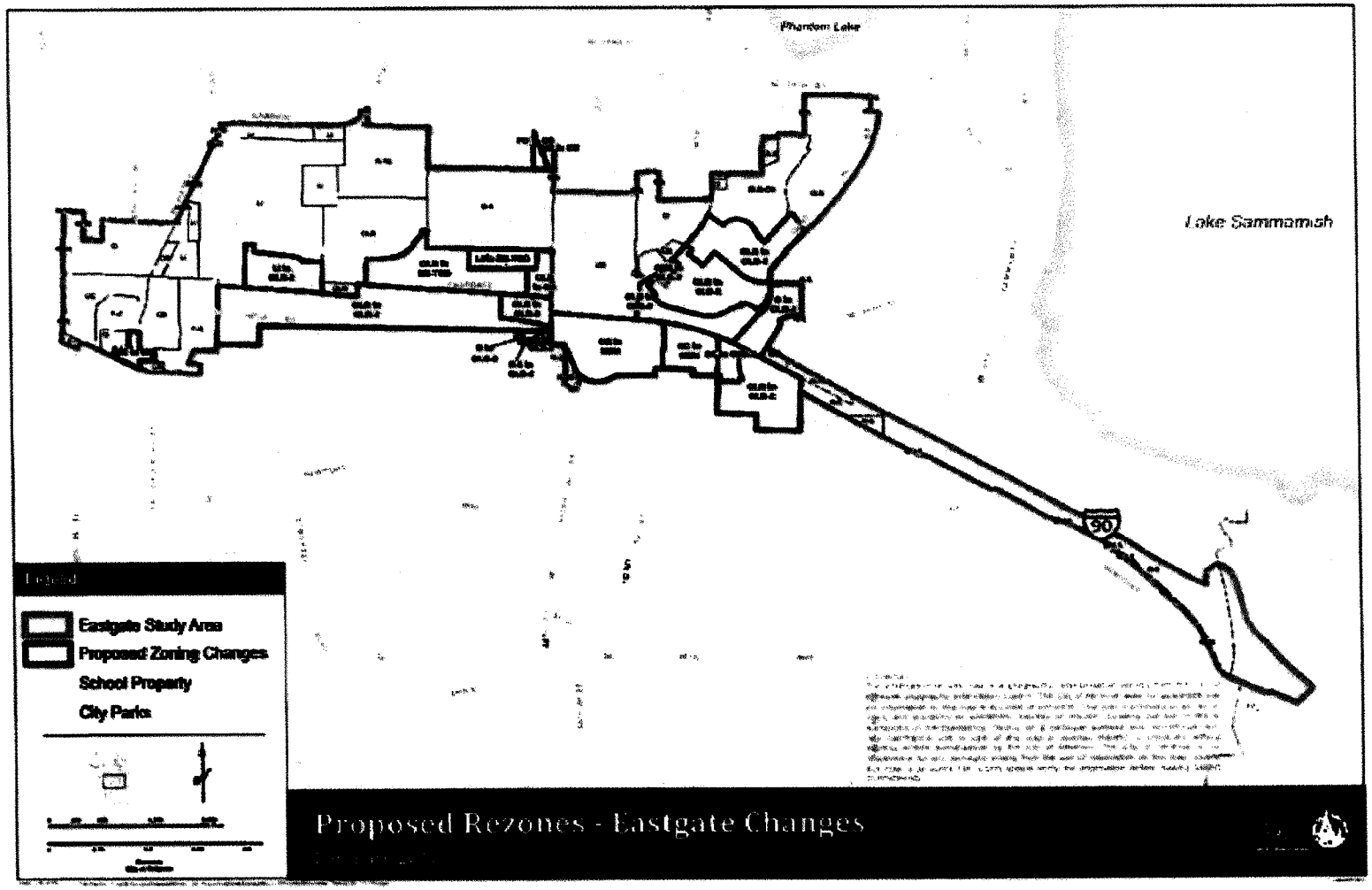
Public Services and Utilities

Existing public services and utilities are generally adequate to serve the anticipated growth under the Preferred Alternative, therefore no measures are proposed. Depending on the nature of residential development that is proposed, it may be necessary to evaluate whether expansion of services for new residents is necessary.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

In general, the Preferred Alternative will rely on existing local, state and, to a lesser extent, federal regulations to protect existing environmental conditions. The Preferred Alternative will also include incentives for private developers to improve ecological conditions and open space. All development will be required to comply with the City's regulations for stormwater (including state NPDES requirements for construction), clearing and grading, critical areas protection and development regulations and standards. Projects would also have to comply with state and federal standards including protection of ESA listed species.


Primary Study Area
Eastgate Primary Study Area


Phantom Lake
Lake Sammamish
90
Legend
Eastgate Study Area
Proposed Zoning Changes
School Property
City Parks
Proposed Rezones - Eastgate Changes