



Development Services Department  
Environmental Coordinator  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98009-9012

## DETERMINATION OF NON-SIGNIFICANCE

<b>PROPOSAL NAME:</b>	City of Bellevue Transportation Curb Management Plan and Comprehensive Plan Amendment
<b>LOCATION:</b>	City-Wide
<b>FILE NUMBERS:</b>	22-106192-LM
<b>PROPONENT:</b>	Chris Iverson, Project Manager City of Bellevue Transportation Department
<b>DESCRIPTION OF PROPOSAL:</b>  <b>SEPA environmental review of the proposed City of Bellevue Transportation Curb Management Plan and associated 2022 City-initiated Comprehensive Plan Amendment, permit number 22-103136 AC.</b>	

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.

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 proposed Curb Management Plan and Comprehensive Plan Amendment. 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.

**DATE ISSUED:** 9/8/2022

This DNS may be withdrawn at any time if the proposal is modified so as to have significant adverse environmental impacts; if there is significant new information indicating a proposals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.

**Issued By:** Elizabeth Stead **for** Date: September 8, 2022  
Elizabeth Stead, Environmental Coordinator  
Development Services Department



**City of Bellevue  
Development Services Department  
Environmental Review and State Environmental Policy Act (SEPA)  
Threshold Determination**

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Proposal Location: City-Wide

Proposal Description: SEPA environmental review of the proposed City of Bellevue Transportation Curb Management Plan and associated 2022 City-initiated Comprehensive Plan Amendment, permit number 22-103136 AC.

File Number: 22-106192-LM

Applicant: Chris Iverson, Project Manager  
City of Bellevue Transportation Department

Decisions Included: SEPA Threshold Determination  
Process II Administrative Decision  
BCC 22.02

Planner: Drew Folsom, Senior Land Use Planner  
Development Services Department

State Environmental Policy Act  
Threshold Determination: Determination of Non-Significance (DNS)  
  
*Elizabeth Stead*  
Elizabeth Stead, Environmental Coordinator  
Development Services Department

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Application Date: April 27, 2022  
Notice of Application Publication Date: June 9, 2022  
Notice of Threshold Determination: September 8, 2022  
Appeal Deadline: Council Action

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**Attachments**

1. SEPA Checklist – Enclosed
2. Transportation Staff Response Letter and TR-2 Analysis – Enclosed
3. Public comments and Correspondence – In file

**I. PROPOSAL DESCRIPTION AND OBJECTIVES:**

**A. The Proposed 2022 Comprehensive Plan Amendments (CPA).**

On February 14, 2022, the City Council initiated a work program to amend policy in the Transportation Element and Downtown Subarea Plan to support curb management as part of the 2022 Annual Comprehensive Plan Amendments (CPA). The City has broad authority to manage the right-of-way, including curb uses within the right-of-way, independent of the proposed CPA and the attendant Curb Management Plan (CMP).

In connection with this nonproject legislative proposal, the City's Transportation Department prepared and submitted the environmental checklist, including the Supplemental Sheet for Nonproject Actions, in a manner consistent with the requirements of the State Environmental Policy Act, chapter 43.21C RCW. Thereafter, the Transportation Commission prepared a recommendation that included repealing existing policies, amending existing policies, and adding new policies to establish a comprehensive approach to curb management and to create alignment and consistency between the existing policies, proposed policies, and the CMP.

The Transportation Commission then transmitted its recommended policy amendments regarding curb management to the Planning Commission for consideration. It is anticipated that the Planning Commission will hold a public hearing on the CPA on September 14, 2022 and transmit its recommendation on the proposed CPA to the City Council following the public hearing.

The proposed CPA policies will align curb uses with the needs of adjacent land uses, accommodate growing demands, and optimize the curb's use to align with climate, equity, and economic outcomes of the City. The proposed CPA policies include:

- Designating curb uses, curb typologies, and modal priorities as outlined in the CMP;
- Implementing a pricing-based curbside management program as recommended in the CMP;
- Ensuring flexible design and regulation of the curb to enable new and prioritized curb uses;
- Aligning supply with the most important demands based on curb priorities and values;
- Managing curb demands and making the most efficient use of limited

- curb space based on curb priorities and values;
- Identifying where additional supply for access-based curb uses is needed (including passenger and commercial loading zones);
- Promoting the use of innovative curb technology solutions that enhance the safety and efficiency of the curbside environment;
- Developing curb strategies that allow for the easy transfer among public, private, and active travel modes;
- Enabling activated curbside zones, such as on-street dining areas, parklets, and other placemaking solutions in strategic locations; and
- Determining where on-street parking might be warranted while managing curb-related congestion and safety issues.

## **B. The Proposed Curb Management Plan.**

The CMP will provide a new, long-range planning vision for designating, maintaining, and operating curbside areas – primarily borders between streets and sidewalks – in Bellevue’s most dense neighborhoods. The CMP will establish an operational policy framework, design recommendations, and programmatic direction for areas covered under PMA-1, also known as the Growth Corridor. The Growth Corridor includes the neighborhoods of East Main, Downtown, BelRed, the Spring District, and Wilburton.

The curb, as defined by the proposal, is the space immediately adjacent to the raised sidewalk spanning 10-15’ from the 6” curb, including air space above it that is not controlled by FAA. Within this larger curb space, there are three generalized zones:

- **Curb zone:** this includes the curb itself, as well as immediate front of curb uses within right-of-way like travel lanes, parking, or loading zones.
- **Furnishing zone:** this area often forms a buffer between the roadway and pedestrians. Common elements include planting strips, trees, lighting, as well as street furniture such as seating.
- **Sidewalk zone:** also known as the pedestrian zone, this is the area that includes a clear zone for walking and sometimes includes additional elements to support adjacent building frontages.

The proposed CMP will inform decisions on how curb uses are prioritized in the City and how curb space may be managed and optimized as the City continues to grow rapidly and competition for these urban spaces increases. The operational policy framework, design recommendations, and programmatic direction for areas covered by the CMP will align with climate, equity, and economic outcomes prioritized and adopted by the

City.

### **C. Required SEPA Review for the Proposed CPA and CMP.**

SEPA requires the City to consider the environmental consequences of proposed nonproject actions. The adoption of comprehensive plans and other long-range planning activities is a nonproject, or programmatic, action under SEPA. A nonproject action is defined as an action that is broader than a single site-specific project and involves decisions on policies, plans or programs.

SEPA establishes that environmental analysis for a nonproject proposal may discuss potential impacts at a level of detail appropriate to the scope and level of planning for the proposal. Bellevue City Code section BCC 22.02.033 requires submittal of an environmental checklist and any relevant supporting materials for any proposal that is not deemed to be exempt from SEPA review as listed in BCC 22.02.032.

The checklist submitted by the City's Transportation Department, the environmental record developed subsequent to June 9, 2022, and information filed with and reviewed by the Land Use Division of the Development Services Department provide the basis for the City's threshold determination under SEPA. This report analyzes potential environmental impacts consistent with the environmental record developed for the CPA and CMP and as appropriate to the general nature of this nonproject proposal.

## **II. IDENTIFIED NEED FOR THE PROPOSAL:**

As stated above, the City has broad authority to manage curb uses within the right-of-way independent of the proposed CPA and CMP. However, as demand for curb access grows and travel behavior in Bellevue continues to shift, the City has proposed a comprehensive management framework and policy guidance that strategically, sustainably, and equitably balances curb access. The proposed curb management framework will consolidate and clarify existing policies and practices in order to:

- Ensure safe and inclusive curb access for everyone;
- Maximize the public benefits associated with curb management;
- Prioritize curb use in alignment with Citywide policies and plans;
- Provide a unified curb policy approach that is comprehensive, consistent, and flexible;
- Improve coordination between City staff and curb stakeholders, including residents, workers, visitors, businesses, and public

- agencies; and
- Deliver data and information to help the City evaluate performance, address challenges, and make decisions.

### **III. CONSISTENCY WITH LOCAL AND REGIONAL PLANNING POLICIES:**

Recent amendments to the Transportation Element of the City's Comprehensive Plan support a multimodal approach to the City's transportation system; and a DNS was issued for these CPAs on September 23, 2021. Similarly, the King County Countywide Planning Policies (CPPs) were ratified by the Bellevue City Council through Resolution No. 10080 on March 28, 2022. Prior to City ratification of the CPPs, an "Addendum to Existing Environmental Documents for the 2021 King County Planning Policies" was issued on May 31, 2021.

The proposed CPA and CMP are consistent with the following goals and policies of the Transportation and Environmental Elements of the Comprehensive Plan:

- **Policy TR-2:** To aggressively plan, manage, and expand transportation investments to reduce congestion and expand opportunities in a multimodal and comprehensive manner and improve the quality of the travel experience for all users.
- **Policy TR-20:** Scope, plan, design, implement, operate, and maintain a complete and multimodal transportation system in accordance with the Performance Metrics, Performance Targets and Performance Management Areas as established in the Mobility Implementation Plan.
- **Policy TR-21:** Ensure that the transportation system infrastructure in Bellevue provides mobility options for all modes, and accommodates the mobility needs of everyone, including underserved populations.
- **Policy TR-25:** Increase system connectivity for all modes by providing for vehicular, transit, pedestrian, and bicycling facilities to create a Complete Streets network throughout the city.
- **Policy TR-32:** Evaluate the performance of all modes and engage the community to identify projects, priorities, programs and resources to meet Complete Streets goals and the Performance Targets through updates to the Transportation Facilities Plan.
- **Policy TR-33:** Plan for transportation system projects to accommodate the forecast demand and to meet Performance Targets in each update of the Transportation Facilities Plan.
- **Policy TR-49:** Ensure that maintenance of the existing transportation system be given priority consideration.
- **Policy TR-102:** Incorporate pedestrian and bicycle facilities along

with other mobility options in scoping, planning, designing, implementing, operating and maintaining the transportation system.

- **Policy TR-130:** Provide and prioritize transportation funding to meet Performance Targets for people walking, biking, riding transit, and travelling in a car.

Similarly, the CPA and CMP are consistent with the CPPs, which encourage (1) an “integrated, multimodal transportation system that supports the regional vision for growth, efficiently moves people and goods, and is environmentally and functionally sustainable over the long term;” (2) “[a] well-integrated, multimodal transportation system;” and (3) “[a] transportation system that is well-designed and managed to protect public investments, promote equitable access, provide mobility, promote public health and safety, and achieve optimum efficiency.”

Further, the specific CPPs ratified by the City that the CPA and CMP support include the following:

- **Policy T-4:** Reduce the need for new roadway capacity improvements through investments in transportation system management and operations, pricing programs, and transportation demand management strategies that improve the efficiency of and access to the current system.
- **Policy T-12:** Promote the mobility of people and goods through a multimodal transportation system based on regional priorities consistent with VISION 2050 and local comprehensive plans.
- **Policy T-20:** Consider mobility options, connectivity, active transportation access, and safety in the siting and design of transit stations and mobility hubs, especially those that are serviced by high-capacity transit.
- **Policy T-22:** Respond to changes in mobility patterns and needs for both people and goods, encouraging partnerships with nonprofit providers and the private sector where applicable.
- **Policy T-32:** Plan and develop a countywide transportation system that supports the connection between land use and transportation, and essential travel that reduces greenhouse gas emissions by advancing strategies that shorten trip length or replace vehicle trips to reduce vehicle miles traveled.
- **Policy T-33:** Apply technologies, programs, and other strategies (e.g., intelligent transportation systems (ITS), first and last mile connections) to optimize the use of existing infrastructure and support equity; improve mobility; and reduce congestion, vehicle miles traveled, and greenhouse gas emissions.



- **Policy EC-19:** Add to the vibrancy and sustainability of our communities and the health and well-being of all people through safe and convenient access to local services, neighborhood-oriented retail, purveyors of healthy food (e.g., grocery stores and farmers markets), and transportation choices.

#### IV. **PUBLIC NOTICE AND COMMENT:**

##### **A. Noticing.**

Application for environmental review was submitted on April 27, 2022, and a notice of application was published in the June 9, 2022 City Permit Bulletin. Although an initial minimum comment period was held open for 14 days, the City accepted public comment well beyond the minimum 14 days and received comments up to the date of issuance of this threshold determination.

Noticing for SEPA review has been completed as follows:

Application Date:	April 27, 2022
Determination of Complete Application:	May 25, 2022
Public Notice (Permit Bulletin):	June 9, 2022
Minimum Comment Period:	June 9 – June 23, 2022 (14 Days)
Public Notice of SEPA DNS:	September 8, 2022
DNS Decision Appeal Period:	Council Action

##### **B. Public Comment Received.**

The City received several public comments and requests for further information primarily focused on curb pricing, staffing, and potential transportation impacts. These comments are summarized and addressed below:

##### 1. Public comment requesting information regarding curb pricing:

Response: The pricing-based curb program is intended to better address curb supply and demand over the long term. Curb pricing recommendations may include adjusted pricing for continued uses (e.g., shuttle permit fees) or, for example, new pricing for on-street parking uses. Any curb pricing recommendations in the CMP are not anticipated to have any significant adverse environmental effects than would be expected under existing conditions.

2. Public comment requesting information regarding staffing needs:

Response: Specific staffing needs, including roles and responsibilities, are being developed through the CMP process and will not be identified through the curb policies specifically. Any staffing needs and/or program options identified in the CMP are not anticipated to have any significant adverse environmental effects.

3. Public comment expressing concern that the CPA and CMP may affect surface street traffic patterns, conflict with Performance Targets/Level-of-Service Targets identified in the City's Mobility Implementation Plan, or increase vehicular traffic and emissions:

Response: The policies and recommendations associated with the CPA and CMP are intended to modernize the City's approaches to curb designs and operational considerations and to provide a comprehensive approach to curb access, storage, and place-making functions at the curb. The CPA and CMP are informed by the City's adopted policies and the Mobility Implementation Plan (MIP), which consider and plan for all modes of travel, including vehicular travel, transit, bicycling, and pedestrian use of the transportation system.

Under the MIP, the intersection Performance Targets for the vehicle mode assess the "volume-to-capacity ratio (V/C) at System Intersections in the two-hour PM Peak period (4-6 PM)." The proposed policy changes and CMP would allow the City to maximize the curb's utility at various times of the day while ensuring peak mobility demands are not compromised, consistent with the MIP. For example, curbside travel lanes along some arterial streets could be used for parking or loading outside of the PM Peak period. This would result in curbs allowing for multimodal functionality during times of the day outside of the 4-6 PM range without impacting the applicable intersection Performance Target.

Further, the CPA and CMP will provide a framework for the City to continue to respond to evolving mobility demands, including alternatives to single-occupant vehicle transportation, while recognizing the needs associated with the vehicular mobility option. The policies and CMP will not lead to increased growth or increase vehicular traffic, and the proposal will provide transparency as the City continues to address curb operational challenges and continues to expand multimodal opportunities and improve the quality of the travel experience for all users within Bellevue. The proposal is also designed to provide a framework to reduce inefficiencies in the transportation network, such as addressing double parking, circling, and idling vehicles.

Improved curbside efficiency and consolidated, comprehensive operational approaches may help incentivize non-vehicle modes and contribute to reducing overall per capita Vehicle Miles Traveled. In addition, the CMP will provide programmatic direction for curb management on a block-level within the Growth Corridor.

Still, matters such as curb pricing, passenger loading, and commercial loading are operational matters that will remain flexible over time and respond to altered travel patterns as growth occurs. While the CPA and CMP will provide a framework to prioritize and evaluate appropriate uses in the curb zone, the proposal is designed to prioritize new and existing curb uses consistent with preexisting climate, equity, and economic outcomes identified by the City. .

The proposed CPAs and CMP are also consistent with the MIP and with the City's framework for measuring multimodal traffic performance through the MIP. The proposal, as well as the specific design recommendations and programmatic direction, are not anticipated to have significant adverse environmental impacts related to traffic patterns, will not increase growth or vehicular traffic, and will not affect the Transportation Improvement Projects developed and proposed by the City under the MIP framework. Regulation of curb space in connection with private development proposals and City transportation system improvement projects will continue to be assessed on a project-specific basis with related project-level environmental review.

4. Public comment regarding potential policy conflict between the proposal and Transportation Element Policy TR-2:

Response: The applicant, Chris Iverson, of the City's Transportation Department, provided a response to the comments included in Attachment 2 of this report. The response included a detailed analysis of Transportation Element Policy TR-2 and the proposal's consistency with Policy TR-2, and the Transportation Department's response is incorporated herein by reference.

The City already has policy and code authority to manage and regulate the curb space. Many of the proposed policy amendments consolidate and clarify existing policies and practices. Projects that may, in the future, be informed by curb management policies would be addressing curb operation challenges, rather than proposing changes to transportation capital investments. Refined curb management policies are intended to expand multimodal opportunities, consistent with existing policies, the

CPPs, and the MIP, and to improve the quality of travel experiences within Bellevue. The curb management policies and the CMP may reduce inefficiencies in the transportation network, such as addressing double parking, circling, and idling vehicles.

The curb management policies will provide a framework to address mobility conditions and rapid growth in Bellevue, and the CMP is designed to provide the flexibility necessary to respond to evolving mobility demands in the Growth Corridor and to create consistency within the Comprehensive Plan. Review of the information submitted indicates there is broad alignment between TR-2 and proposed curb management policies, with no inherent conflict in policy. Collectively, the CPAs, CMP, and existing policies all provide policy guidance with outcomes that may reduce transportation and infrastructure impacts and address existing inefficiencies. The proposal is not anticipated to result in direct or indirect impacts to the natural or built environment or the City's transportation network, nor is it anticipated that the proposal would affect Transportation Improvement Projects developed and proposed by the City under the preexisting MIP framework.

5. Public comment expressing concern regarding potential impacts to (or related to) street system uses, property owners, passenger loading, commercial delivery loading zones, parking, and on-street electric vehicle charging:

Response: As outlined in the SEPA checklist and discussed in Section V, curb management policies and CMP recommendations will provide streamlined approaches to managing the City's curb areas, which will optimize the multiple functions of the transportation network and foster transparency with respect to curb uses. Improved curbside operational approaches may help incentivize non-vehicle modes and contribute to reducing overall per capita Vehicle Miles Traveled.

Matters such as curb pricing, passenger loading, and commercial loading will remain operational matters that will continue to be flexible over time and respond to altered travel patterns as growth occurs. It is not anticipated that the proposed policies or the CMP will result in significant adverse environmental impacts related to these operational matters or the City's ongoing curb management. In turn, any regulation of curb space in connection with private development proposals—as well as City transportation system improvement projects that impact curb space—will continue to be assessed on a project-specific basis with related project-level environmental review.

**V. SEPA / ENVIRONMENTAL SUMMARY:**

This remainder of this report summarizes the environmental consequences that could result from the CPAs and CMP consistent with WAC 197-11-060. The City's Environmental review included consideration of the following documents:

- The SEPA Environmental Checklist and Supplemental Sheet for Non-Project Actions – April 12, 2022;
- Public comments and responses to public comments submitted into the environmental record;
- The prior environmental review and DNS for the 2021 amendments to the Transportation Element of the Comprehensive Plan, which was adopted by the City through Ordinance 6633;
- The prior environmental review for the CPPs, which were ratified by the City through Resolution No. 10080, including the “Addendum to Existing Environmental Documents for the 2021 King County Planning Policies”;
- The City's MIP, which is incorporated herein by reference; and
- The documents and analysis submitted to Development Services and included in Project File No. 22-106192-LM - COB Transportation Curb Management Plan and Comprehensive Plan Amendment.

In general, the proposed CPA and CMP are designed to provide a Citywide framework for curb management, and the CMP will establish an operational policy framework, design recommendations, and programmatic direction for areas covered under PMA-1, also known as the Growth Corridor (East Main, Downtown, BelRed, the Spring District, and Wilburton). The CPA and the CMP will refine and clarify the City's curb management program consistent with current Comprehensive Plan policies, the MIP, and in order modernize the City's framework for curb designs and operational considerations. The guidance provided by the CPA and CMP will further the City's goal of creating an efficient, reliable, safe, and integrated multimodal transportation network. The CPA and CMP will also inform City efforts to accommodate growing demands and optimize the curb's use to align with climate, equity, and economic outcomes of the City.

The proposal builds on existing curb management practices, existing policies, and the regional policy guidance memorialized in the CPPs. The CPAs and CMP are consistent with the priorities and guidance in each of those previously-adopted policy documents and attendant Plans. Although the CMP will introduce and prioritize new curb uses, based on demand and multimodal functionality, it will not radically change the natural or built environment, or increase growth or vehicular congestion beyond existing

conditions. Instead, the proposal will fill in gaps, foster transparency, and provide support and guidance for curb management consistent with preexisting policy. The proposal is likely to provide a net benefit to the community because the policy changes and attendant curb management guidance will address curb inefficiencies and demand imbalance manifested through double parking, circling, and idling drivers.

Moreover, in the rapidly urbanizing neighborhoods of Bellevue, the curb should meet the needs of a myriad of modes. This is again consistent with the MIP and the City's existing multimodal transportation policies. The CMP will help people access the Link light rail, public transit, low-stress bicycle facilities, and seek out other non-vehicle options of movement. The CPA and CMP will provide guidance, strategies, and a framework to address curb management strategies related to curb uses and typologies, curb pricing, passenger loading and commercial delivery, parking, electric vehicle charging, vendor and food truck activity, on-street dining, parklets, and potential place-making solutions in curb spaces. All of these uses are currently managed by the City on an ad-hoc basis, but the proposal will consolidate and streamline City management of these curb uses within the curb zone, furnishing zone, and sidewalk zone.

The proposal will also promote the use of curb technology that enhances safety and efficiency in connection with the City's curb management. The proposed policies and the CMP will provide guidance, as well as flexibility and decision-making tools, to inform and improve the City's curb management operations—and anticipate when curb changes are needed as demands change—but the policies and CMP will not change existing demands, increase growth, or result in significant adverse environmental impacts to the natural or built environments.

With respect to curb demand, parking, and congestion, the comprehensive approach proposed by the CMP looks at curb management on a block and network level. Although some blocks may experience a reduction in parking supply while others may see an increase in parking supply, either as flexible parking spaces in existing travel lanes or permanent parking spaces, it is anticipated that the curb network, on the whole, will be more balanced. And, as explained above, the proposed policy changes and CMP would allow the City to maximize the curb's utility at various times of the day while ensuring peak mobility demands are not compromised, consistent with the MIP.

Because demand for curb access can change quickly based on growth and future development in the City, a primary objective of the CPA and CMP is to provide certainty and transparency when the City addresses curb management consistent with preexisting policies and the MIP. The CPA and

CMP will not increase growth, or change the City's multimodal framework for evaluating its transportation system. Instead, the curb management policies and CMP will align the City's management of the curb space with those preexisting policies and Plans.

Importantly, the policies will provide clarity, consistency, and transparency with respect to right-of-way that the City already manages consistent with preexisting policy documents. The alternative course of action would be to not adopt the proposed CPA and CMP. If the CPA and CMP are not adopted, curb-related matters will continue to be managed on an ad hoc basis.

**VI. CONCLUSION AND THRESHOLD DETERMINATION:**

For the proposed nonproject action, review of the environmental record suggests no probability of significant adverse environmental impacts occurring as a result of the proposed CPA and CMP. The proposal does not create or mandate any new policy direction that could lead to significant adverse environmental impacts; and an Environmental Impact Statement (EIS) is not required under RCW 43.21C.030(2)(c). Therefore, issuance of a DNS under SEPA and pursuant to WAC 197-11-340 and BCC 22.02.034 is appropriate.

Mr. Folsom,

Pursuant to your request, this email is the Transportation Department's response to the letter received on June 23 from the Eastside Transportation Association and Kemper Development Company regarding the optional DNS notice for COB Curb Management Plan and CPA. Our project team has reviewed the letter carefully and has included responses below.

The commenter suggests that proposed curb management policy amendments may be in conflict with the City's Comprehensive Plan. The commenter noted Bellevue's Comprehensive Plan policy TR-2 which was adopted on December 13, 2021, as part of the Mobility Implementation Plan (MIP) as justification for this perspective. TR-2 states, "To aggressively plan, manage, and expand transportation investments to reduce congestion and expand opportunities in a multimodal and comprehensive manner and improve the quality of the travel experience for all users."

As stated in the SEPA checklist, curb management policies are intended to address significantly changed mobility conditions and rapid growth in Bellevue. Proposed policies respond to evolving mobility demands and create consistency within the Comprehensive Plan. The policies do not lead to nor cause increased emissions at select locations or citywide. Additionally, the policies will not lead to an increase in vehicular traffic.

Please note that the City already has policy and code authority to manage and regulate the curb space. Many of the proposed policy amendments consolidate and clarify existing policies and practices. Most projects inspired by curb management policies would be addressing curb operation challenges, rather than proposing changes to transportation capital investments. Refined curb management policies are intended to both expand multimodal opportunities and improve the quality of travel experiences for a myriad of users within Bellevue. The checklist indicates that the curb management policies and the associated plan will aim to reduce inefficiencies in the transportation network, such as addressing double parking, circling, and idling vehicles. For these reasons, the project team believes there is broad alignment between TR-2 and proposed curb management policies, and no inherent conflict in policy exists.

Additionally, the commenter suggests that curb management plan implementation may be in direct conflict with vehicle mode Performance Targets as identified in the city's Mobility Implementation Plan, specifically Level-of-Service targets for certain intersections in Downtown and other monitored zones. According to the MIP, the intersection Performance Targets for the vehicle mode assess the "volume-to-capacity ratio (V/C) at System Intersections in the two-hour PM Peak period (4-6 PM)."

As stated in the SEPA checklist, some proposed policy changes aim to ensure flexible design and regulation of the curb to enable new and prioritized curb uses. This aspect of flexible curb design and regulation would allow the city to maximize the curb's utility at various times of the day while ensuring peak mobility demands are not compromised. For example, curbside travel lanes along some arterial streets could be used for parking or loading outside of the PM Peak period. This would result in curbs allowing for multimodal functionality during times of the day outside of the 4-6 PM range and would therefore not impact the intersection Performance Target.

Finally, the commenters mentioned that areas of uncertainty and controversy listed in the SEPA checklist require a broader discussion on environmental impacts of the Curb Management Plan and curb policies. As outlined in the SEPA checklist, curb management policies and the Curb Management Plan



recommendations will provide streamlined approaches to managing the city's curb areas, which will optimize the multiple functions of the transportation network. Improved curbside operational approaches may help incentivize non-vehicle modes and contribute to reducing overall per capita Vehicle Miles Traveled. Matters such as curb pricing, passenger loading, and commercial loading are operational matters that can remain flexible over time and respond to altered travel patterns as growth occurs.

For these reasons, the project team believes that there are no significant adverse impacts that cannot be mitigated as part of this application.

Thank you,

Chris Iverson  
Bellevue Transportation Department

## **Transportation Element Policy TR-2 Staff Analysis**

**Policy TR-2.** To aggressively plan, manage, and expand transportation investments to reduce congestion and expand opportunities in a multimodal and comprehensive manner and improve the quality of the travel experience for all users.

Policy TR-2 encourages City actions to ultimately “improve the quality of the travel experience for all.” Staff provides the following analysis of the component language of policy TR-2:

- **Aggressively plan.** Bellevue plans for a transportation system in accordance with the Complete Streets policy (TR-20), other Transportation Element goals and policies included below, and the Mobility Implementation Plan goals to improve safety, consider equity, support growth and provide access and mobility.
- **Manage.** Bellevue prides itself on the management and maintenance of the infrastructure it builds. Management of infrastructure is for operational efficiency, safety, and for multiple mobility purposes. Maintenance prioritization is highlighted in policy TR-49.
- **Expand transportation investments.** Through the Capital Investment Program and associated funding mechanisms, Bellevue continually strives to achieve a safe, complete and connected multimodal transportation system.
- **Reduce congestion.** Vehicle congestion is expressed in two ways in the Council adopted Mobility Implementation Plan – as the volume/capacity ratio at system intersections and the vehicle travel speed along Primary Vehicle Corridors. At intersections and along corridors where Performance Targets are not met, proposed projects to improve performance (reduce congestion) may be considered for funding and implementation. TR-2 is not limited to vehicular congestion, but looks at congestion impacts to all users, considering equity and inclusion, consistent with the multimodal framework.
- **Expand opportunities.** Transportation Element policies, especially TR-21, call for the city to expand mobility opportunities for all users of the transportation system.
- **Improve the quality of the travel experience for all users.** The Mobility Implementation Plan identifies Performance Metrics for each mode and Performance Targets that describe the intended user experience. When a Performance Target is not being met, it indicates that an intervention may be needed to attain the intended user experience. Consideration of equity and inclusivity are included in evaluating such interventions.

## **Transportation Element Goals**

- To scope, plan, design, implement, operate, maintain, and enhance a comprehensive multimodal transportation system to serve all members of the community.
- To improve all mobility options so that everyone in Bellevue has a safe, comfortable, and efficient experience on their preferred mode, while encouraging and transitioning to more environmentally and fiscally sustainable modes.

## **Related Transportation Element Policies**

**TR-20.** Scope, plan, design, implement, operate, and maintain a complete and multimodal transportation system in accordance with the Performance Metrics, Performance Targets and Performance Management Areas as established in the Mobility Implementation Plan.

**TR-21.** Ensure that the transportation system infrastructure in Bellevue provides mobility options for all modes, and accommodates the mobility needs of everyone, including underserved populations.

**TR-25.** Increase system connectivity for all modes by providing for vehicular, transit, pedestrian, and bicycling facilities to create a Complete Streets network throughout the city.

**TR-32.** Evaluate the performance of all modes and engage the community to identify projects, priorities, programs and resources to meet Complete Streets goals and the Performance Targets through updates to the Transportation Facilities Plan.

**TR-33.** Plan for transportation system projects to accommodate the forecast demand and to meet Performance Targets in each update of the Transportation Facilities Plan.

**TR-49.** Ensure that maintenance of the existing transportation system be given priority consideration.

**TR-102.** Incorporate pedestrian and bicycle facilities along with other mobility options in scoping, planning, designing, implementing, operating and maintaining the transportation system.

**TR-130.** Provide and prioritize transportation funding to meet Performance Targets for people walking, biking, riding transit, and travelling in a car.