

# EIS Scope Update Report

January 2023

Comprehensive Plan Periodic Update  
& Wilburton Vision Implementation



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## Background Information

The City of Bellevue is carrying out a Periodic Update to the Comprehensive Plan and working on implementing the vision for the Wilburton study area. Analysis of the potential environmental impacts is required through an Environmental Impact Statement (EIS). The EIS for the Comprehensive Plan Periodic Update and Wilburton Vision Implementation is an analysis of the environmental impacts of possible changes in land use and policy. The EIS will also define mitigation measures for each approach.

The EIS will aid Planning Commission, Council and the public in understanding the environmental impacts of ways the city could grow. The Scoping Notice was released September 29, 2022 and comments were received on the scope of the analysis to be completed until October 31, 2022. The Scoping notice included four different draft approaches to growing over the next twenty years, including a “no action” approach that is used as a baseline or status quo approach (available on the city’s [Environmental Review webpage](#)). The city held several meetings to explain the scope and gather public comments throughout the month of October. The scoping process and comments received are detailed in a Scoping Comment Summary posted on the city’s website.

This report summarizes the most critical comment themes and how they influenced the scope of the analysis to be completed. The alternatives are presented as they will be analyzed. The Draft EIS (DEIS) will be released in the spring with analysis of the no action alternative and the three action alternatives. The city may choose to move forward with one of the alternatives or a hybrid of two or more alternatives. If a hybrid is chosen, additional analysis will be included in the Final EIS.

## Analysis to be Completed

The EIS includes several elements (listed below). The city will also be conducting additional analysis to support the evaluation of the alternatives.

### Environmental Elements

- Earth and water quality
- Air quality
- Greenhouse gas emissions
- Plants and animals
- Energy and natural resources
- Noise
- Land use patterns and urban form
- Historic resources
- Relationship to plans, policies, and regulations
- Population, employment and housing
- Transportation
- Public Services
- Utilities

The additional information in support of the EIS analysis includes:

- Economic analysis including implications such as housing costs
- Equity analysis such as the relationship between race and the location of land use changes
- Analysis on the potential displacement of residents and businesses with special attention to small local businesses and low-income households

Several comment themes related directly to the type of analysis to be completed. These themes are listed below, accompanied by the resulting changes.

Table 1. Comments on Analysis to be Done

<b>Comment Theme Summary (Analysis to Complete)</b>	<b>Resulting Change (Analysis to Complete)</b>
Analyze air quality impacts for the three action alternatives	Potential impacts of air quality due to high volume roadway emissions will be studied.
Analyze greenhouse gas emissions variation among alternatives	Additional detail will be studied in this area
Analyze impact of alternatives on affordable housing production	Economic analysis will include approximation of housing production including unit type and affordability bracket

## Alternatives Summary

### *Comment Summary and Integration*

Several changes were made to the alternatives in response to comments received during the scoping period. The Detailed Scoping Comment Summary posted on the city’s website describes all comments received in more detail, including an appendix with every comment. The tables below summarize the comment themes received and the resulting changes made.

Table 2. Comments on Land Use Changes

Comment Theme Summary	Resulting Change
Expand the BR-MO-1 node designation north of NE 12 Ave and increase height and FAR	Expansion of the node in all three alternatives reflecting similar changes to BR-MO-1 density south of NE 12th Ave.
Increase densities and height in BelRed	Further expansion of high-density node designations, primarily in alternative 3
Increase amount of residential allowed in the BR-MO area	Increased allowance for residential within ½ mile of light rail in alternative 3
Expand low density zoning	Increased density both in Neighborhood Centers and in multi-family areas to allow more mid-scale housing options
Add density in areas with good transit access, as well as more housing options	The density assumed in Alternatives 2 and 3 for changes in areas with good access to transit, Neighborhood Centers, or major employment centers was increased to a low multifamily level
Allow additional density in the lowest density areas of the city, such as Bridle Trails	Alternative 3 now allows increased dwelling units per acre to match other low-density areas of the city. This could allow large parcels within low density areas to create additional housing while maintaining open space & natural areas
Increase affordable housing incentives or requirements	Both approaches are being analyzed, but Alternative 3, which had previously matched Alternative 2’s approach, has been adjusted to reflect a stronger approach to a mandatory

Maintain affordable housing incentives rather than requirements	program and to analyze a wider variety of affordable housing approaches. Additional assumptions around affordable housing, such as continuation of existing programs, will be utilized in the economic analysis as well
<b>Comment Theme Summary (Wilburton Detail)</b>	<b>Resulting Change (Wilburton Detail)</b>
Study additional housing capacity, especially in Alternative 3	Updates to land use types and building heights were made in all action alternatives to increase housing capacity.
Increase the areas in which 450' building heights apply between 116 <sup>th</sup> Ave NE and Eastrail in Alternative 3	Alternative 3 was updated to allow up to 450' tall buildings for parcels within the area bounded by 116th Ave NE to the west, NE 4th St to the north, Eastrail to the east, and SE 1st St to the south.
Retain medical focus in area across from Kaiser/Overlake Medical Centers, reflecting concerns that introducing residential in this area would preclude or disincentivize medical uses locating in this area.	All alternatives were updated to analyze predominantly medical uses in this area.
Terminate the extension of NE 6 <sup>th</sup> Street at 120 <sup>th</sup> Ave NE	The No Action alternative was updated to analyze NE 6th St extending to 116th Ave NE while Alternative 3 was updated to analyze NE 6th St extending to both 116th Ave NE and 120th Ave NE.
Increase density along 120 <sup>th</sup> Ave NE heading toward Spring District to the north	Alternative 3 was updated to increase building heights along both sides of 120th Ave NE, and include redevelopment on Lake Bellevue parcels as part of the analysis.

## *Alternatives Summary*

The EIS will analyze four ways that Bellevue could grow. Alternative 0, or the “no action” approach, will be used as a baseline representing continued growth under existing conditions. Alternatives 1 through 3 will be analyzed against this baseline in order to understand the impacts of the changes in each alternative.

The starting place for all the alternatives is the existing capacity, primarily in the [growth corridor](#), which would allow for about 40,500 housing units and about 120,000 jobs if developed to its full capacity. This is the “no action” alternative. This capacity is somewhat higher than was reported in the King County Urban Growth Capacity (UGC) Report for several reasons:

- The UGC Report included a market factor that reduced the total capacity by about 15% overall. The EIS does not include the market factor because it is analyzing informed build-out.
- Bellevue has added capacity since the publishing of the UGC Report in East Main and on faith-owned properties.
- Permits have been issued for projects that are developing at a higher density than what was assumed in the UGC Report.
- Some properties that were not considered redevelopable in the UGC Report have permits issued for development.
- In the attempt to capture all potential development, the threshold for classifying a property as “redevelopable” is more generous than in the UGC Report.

The rest of the alternatives include some type of change to this baseline. They all continue to invest in the city's existing [mixed-use centers](#) as the primary focus of growth, with Downtown remaining the main focus. Each alternative allows significant growth in the Wilburton study area, which is an area that will receive more analysis because it is going through the Vision Implementation process. The additional detail for this area is included in this document. BelRed land use is adjusted in all three alternatives to reflect the final

### ***The Growth Corridor***

The area of the city in which most of the growth has traditionally been focused. This has traditionally included Downtown and BelRed and now also includes East Main and the Wilburton study area.

### ***Mixed-Use Centers***

The larger, denser areas of the city in which a mix of uses including retail, office, housing, and more may be allowed. These include the areas in the Growth Corridor described above as well as Crossroads, Eastgate, and Factoria.

### ***Neighborhood Centers***

The commercial or mixed use areas that serve more residential neighborhoods like Northtowne Center, Lake Hills Shopping Center, or the area around Bellevue Technology Center.

locations of the light rail stations as well as expanding the existing medical node northward. Other [mixed-use centers](#) are also shown with continued investment in all alternatives, including Crossroads, Eastgate, and Factoria. Some alternatives also look at providing options for developing more housing and some commercial area in [neighborhood centers](#).

The City is planning for 35,000 additional housing units and 70,000 additional jobs between 2019 and 2044. In addition to the No Action alternative, the EIS is analyzing three action alternatives that will create additional capacity so the city can meet its responsibility to provide a range of housing options for households of different income levels, including housing for those with very low incomes. Following Council direction, the action alternatives meet the city's housing and jobs growth targets in different ways. The capacity for housing increases in each alternative. Regardless of the capacity in the alternative, the city is still planning for 35,000 housing units. The additional capacity provides more flexibility in how the City can reach the housing target. The EIS analyses an informed build-out scenario that includes more construction than what is expected by 2044.

Below is a brief description of each alternative to be analyzed in the EIS.

#### No Action

Housing capacity: about 40,500 new housing units

Focus of growth: Downtown and BelRed

The No Action Alternative is always included in an EIS as a benchmark. It does not have enough capacity to meet city goals such as housing affordable for people at a variety of income levels, and a broader range of housing types. It does have capacity meet the job target. This alternative makes no land use or policy changes. The analysis is of the city's current capacity for housing and jobs, which is almost entirely within the City's Growth Corridor, primarily Downtown and BelRed. This benchmark is what the other alternatives are measured against.

#### Alternative 1

Housing capacity: about 59,100 new housing units

Focus of growth: Mixed-Use Centers

Alternative 1 focuses capacity for additional residential housing units in mixed-use centers. Housing in these areas would likely follow current development patterns and consist mostly of studio and one-bedroom apartments. To achieve greater housing choice/options this alternative is paired with policies allowing a greater diversity of low-density housing types throughout the city, such as duplexes, triplexes, and cottage housing. In BelRed, the 130<sup>th</sup> node is expanded east to include areas within walking distance of the light rail station. The land use around the 120<sup>th</sup> light rail station in BelRed is adjusted to expand the medium density and height within walking distance of the node to the south. West of the Overlake light rail station, density and height is increased in areas within walking distance of the station.

#### Alternative 2

Housing capacity: about 76,300 new housing units

Focus of growth: Mixed-Use Centers & areas with [good access to transit](#)

Alternative 2 includes the housing capacity in Mixed-Use Centers found in Alternative 1 and adds capacity for housing types like small apartment buildings and mixed-use buildings near Neighborhood Centers and along arterials and near transit. This alternative also increases allowable densities in all existing multifamily areas and increases the range of allowable housing types in single-family areas that have good access to transit. Across the city, additional housing typologies like duplexes are allowed. Within BelRed, this alternative also expands the density around 120<sup>th</sup> and

#### ***Good Access to Transit***

Frequent bus service (every 15 minutes) during the daytime and early evening



130<sup>th</sup> light rail stations south to BelRed Road and allows medium density south of BelRed road in areas within walking distance of the stations.

### Alternative 3

Housing capacity: about 94,500 new housing units

Focus of growth: Mixed-Use Centers, areas with good access to transit, and areas close to Neighborhood Centers

Alternative 3 includes the capacity in Mixed-Use Centers found in Alternatives 1 and 2 and the capacity along arterials and close to transit found in Alternative 2. Alternative 3 includes more capacity for small apartment buildings and mixed-use buildings within walking distance of Neighborhood Centers than

Alternative 2, including along arterials that go through them. As in Alternative 1, duplexes, triplexes, and cottage housing would be allowed throughout the City. This alternative also allows small apartment buildings and similar scale residential buildings close to [Major Employment Centers](#) like Downtown. Within BelRed, the nodes are further expanded eastward in the 130<sup>th</sup> node, east and north in the 120<sup>th</sup> node, and west in the Overlake node. Residential use is also expanded to more areas in BelRed.

### *Major Employment Centers*

large commercial areas where the majority of Bellevue's jobs exist today. These include Downtown and East Main, the commercial parts of BelRed, Wilburton, Crossroads, Factoria, and Eastgate, as well as other jobs nodes like in Yarrowwood.

Table 3. Summary of Growth Alternatives

(Changes since Scoping Notice are *italicized*)

Land Use Characteristics	Alt 1	Alt 2	Alt 3
<b>Increased residential Floor Area Ratio (FAR)</b>	Applies equally in all alternatives: Increased FAR in Downtown, Eastgate, Crossroads, and Factoria mixed use areas		
<b>Increased density in Wilburton Study Area</b>	Detailed in the separate chart that follows		
<i>Expansion of medical office node</i>	<i>Expansion north and with increased density similar to designations to the south, in the Wilburton Study Area.</i>		
<b>Increased height and FAR near station areas within BelRed</b>	Expansion of nodes as noted above	Moderate node expansion as noted above	<i>Significant node expansion as noted above</i>
<b>Allow for more residential use within the BR-MO area</b>	N/A	N/A	<i>Allow more residential use in BR-MO within ½ mile of light rail.</i>
<b>Increased FAR within Neighborhood Centers</b>	N/A	Commercial or mixed-use areas within Neighborhood Centers <i>include increased density and</i> a greater percentage of residential use	
<i>Increased density in existing multi-family areas</i>	N/A	<i>Existing multi-family areas would allow a broader array of housing typologies at higher densities</i>	
<b>Additional density and some multi-family types allowed in certain existing single-family areas</b>	N/A	In areas close to frequent transit	
		N/A	Near existing Neighborhood Centers & Jobs
<b>Additional typologies allowed across the city in existing single-family areas</b>	Typologies like triplexes and cottage housing	Typologies like duplexes	Typologies like triplexes and cottage housing
<i>Increased allowed density in lowest density areas of the city</i>	N/A	N/A	<i>Additional density within existing SF-L or SF-M areas</i>
<b>Affordable Housing Incentives/Requirements within market-rate projects</b>	Increased incentives across the city		
	Mandatory inclusionary within Growth Corridor	Tiered voluntary incentives in mixed-use centers and neighborhood centers.	<i>Mandatory inclusionary within mixed-use centers.</i>

### *Wilburton Study Area Additional Detail*

Below is a description of how each growth alternative applies within the Wilburton study area. Changes that were made in response to comments received during the scoping period are *italicized*.

#### No Action

- No changes to land use or policy
- Housing and jobs growth occur within current capacity
- Maximum building heights are based on current Land Use Map
- No changes to planned transportation investments; includes NE 6th St extended between I-405 and 116th Ave NE to *116<sup>th</sup> Ave NE*.

#### Alternative 1

Capacity: *about 9,600 housing units and 54,100 jobs (about 5.5:1 jobs to housing ratio)*

Focus of growth: in the core of the study area, around the Wilburton light rail station, Eastrail, and Grand Connection

#### *Commercial Mix*

- Mix of residential and office uses in a mixed-use node within the core
- Primarily office uses surrounding the mixed-use node as well as along 116<sup>th</sup> Ave NE south of NE 8<sup>th</sup> St
- Primarily residential development in areas east and west of 124<sup>th</sup> Ave NE, and in the area south of NE 4<sup>th</sup> St and east of Eastrail
- *Primarily medical uses in the area north of NE 8<sup>th</sup> St and east of 116<sup>th</sup> Ave NE*

#### *Development Intensity*

- Building heights up to 450' adjacent to I-405 in the core and transition to lower heights ranging from 100 to 250' in the north, south, and east

#### *Housing Typologies & Locations*

- Residential buildings in a central mixed-use node between 160 and 250' tall, and along the eastern edge of the study area up to 100' tall
- Some residential buildings up to 450' tall between I-405, NE 8<sup>th</sup> St, NE 4<sup>th</sup> St, and 116<sup>th</sup> Ave NE

#### *Transportation*

- Extension of NE 6<sup>th</sup> Street analyzed to 116<sup>th</sup> Ave NE, as well as new multimodal connections and walkable blocks

#### Alternative 2

Capacity: *about 14,600 housing units (same as Alternative 3) and 47,500 jobs (about 3.5:1 jobs to housing ratio)*

Focus of growth: spreads capacity for growth more evenly across the study area compared to Alternative 1, with medium intensity development in the east portion of the study area

#### *Commercial Mix*

- More residential use and less area for office use compared to Alternative 1
- Primarily office uses along west side of 116<sup>th</sup> Ave NE and north of NE 8<sup>th</sup> St
- Primarily residential uses located east of Eastrail
- *Primarily mix of residential and office uses between 116<sup>th</sup> Ave NE and Eastrail*
- Like Alternative 1, *designates the area north of NE 8<sup>th</sup> St and east of 116<sup>th</sup> Ave NE primarily for medical use*

#### *Development Intensity*

- Compared to Alternative 1, building heights are increased up to 160' along the east edge of the study area north of NE 1<sup>st</sup> St and east of Eastrail
- Building heights are increased along the northwest edge of the study area adjacent to Overlake Medical Center and along the southwest edge of the study area adjacent to I-405 and East Main

#### *Housing Typologies & Locations*

- Residential buildings in a central mixed-use node between 160 and 250' tall, and along the eastern edge of the study area between 100 and 160' tall
- More residential buildings up to 450' tall adjacent to I-405 compared to Alternative 1

#### *Transportation*

- Extension of NE 6<sup>th</sup> Street analyzed to 116<sup>th</sup> Ave NE, as well as new multimodal connections and walkable blocks

#### Alternative 3

Capacity: *about 14,600 housing units (same as Alternative 2) and 53,900 jobs (about 4:1 jobs to housing ratio)*

Focus of growth: in the core of the study area (same as Alternative 1), as well as in several new mixed-use nodes located throughout the study area

#### *Commercial Mix*

- Mix of residential, office, and commercial uses across most of the study area
- Primarily residential uses east of 124<sup>th</sup> Ave NE, *along Lake Bellevue*, and along 118<sup>th</sup> Ave NE and NE 1<sup>st</sup> St
- Compared to Alternatives 1 and 2, *smaller area for primarily medical uses north of NE 8<sup>th</sup> St and east of 116<sup>th</sup> Ave NE*

#### *Development Intensity*

- Compared to Alternative 1, *building heights are increased along both sides of 120<sup>th</sup> Ave NE north of NE 8<sup>th</sup> St heading toward Spring District, including the Lake Bellevue parcels.*

- Building heights are also increased along the *northwest edge of the study area adjacent to Overlake Medical Center*, along the southwest edge of the study area adjacent to I-405 and near East Main, and around the Grand Connection between 116<sup>th</sup> Ave NE and Eastrail

#### *Housing Typologies & Locations*

- *Residential uses all throughout the study area except for the medical mixed area along 116<sup>th</sup> Ave NE*
- More residential buildings between 250 and 450' tall compared to other alternatives

#### *Transportation*

- *Extension of NE 6<sup>th</sup> Street analyzed to both 116<sup>th</sup> Ave NE and 120<sup>th</sup> Ave NE, as well as new multimodal connections and walkable blocks*