

Comprehensive Plan Periodic Update and Wilburton Vision Implementation

Environmental Impact Statement

January 2023

Scoping Comment Summary—Final



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- Attachment 1 – Determination of Significance
- Attachment 2 – Scoping Period Comments
- Attachment 3 – Wilburton Vision Implementation Related Comment Summary

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1. Introduction and Project Overview

The City of Bellevue's Comprehensive Plan is updated approximately every 10 years in accordance with the Growth Management Act (GMA). The 2024 Periodic Update, to guide Bellevue's development through 2044 ("Bellevue 2044"), is now underway. The update includes an Environmental Impact Statement (EIS) as a requirement of the State Environmental Policy Act (SEPA). The EIS will also include additional analysis for the Wilburton study area. The purpose of this Scoping Comment Summary document is to summarize the EIS scoping comments received by the City of Bellevue (city) during the scoping period for the Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS.

Scoping is the first step in the EIS process. Scoping helps focus the EIS by identifying specific elements like carbon emissions, wildlife habitat or resident displacement that might be affected by the proposed growth alternatives. During scoping members of the public can learn more about the Comprehensive Plan Periodic Update and the draft growth alternatives. As part of the process members of the public can raise any concerns about potential environmental impacts of each alternative. The draft growth alternatives will be analyzed along with comments received during scoping. The EIS analysis will determine if the impacts are significant.

This summary provides information on the comments received and does not indicate any position by the city regarding the stated information. Many of the comments address topics for the general Comprehensive Plan update or the Wilburton Vision Implementation as opposed to comments on the environmental elements or alternatives. Comments will be considered for evaluation and analysis in the Draft EIS as appropriate.

The city project team will review all scoping comments received and use them, as appropriate, to focus the environmental analysis in the Draft EIS. This will include identifying specific environmental analyses for the elements of the environment and the range of alternatives to be analyzed in the Draft EIS. Scoping comments will not be addressed individually with a specific response; however, the concerns and topics identified will be addressed in the body of the Draft EIS document.

a. Project Background

The city's most recent periodic update in 2015 was built around an overall growth strategy to focus most of the new growth in Bellevue's Downtown neighborhood, which is a designated Regional Growth Center, and the BelRed area. The remainder of the growth was planned for other mixed-use areas such as Eastgate and Factoria, and other multi-family and commercial areas across the city. This growth strategy has resulted in investments in transportation with planning around six new light rail stations as well as other infrastructure and capital facilities.

The current work to update the city's Comprehensive Plan will plan for growth of at least an additional 35,000 housing units and 70,000 jobs by the year 2044. The update includes an EIS consistent with the requirements of SEPA in Washington State.

The EIS will consider a range of approaches to distribute this growth that aligns with regional requirements for equity, climate change, and housing, as well as the recently adopted vision and priorities by the City Council.

The EIS will also consider implementation of the vision established by a Citizen Advisory Committee (CAC) in 2018 for the Wilburton study area (referred to as the "Wilburton Commercial Area") by amending the existing Wilburton/NE 8th Street Subarea Plan and BelRed Subarea Plan, the Comprehensive Plan Map, and the City's Land Use Code. A Draft EIS was prepared for the Wilburton study area in 2018. The EIS process now underway combines Wilburton-specific environmental analysis in the overall Comprehensive Plan Periodic Update EIS process to ensure the cumulative evaluation of potential environmental impacts.

b. Alternatives

As part of the Comprehensive Plan update, the city had developed the No Action Alternative and three Action Alternatives to support housing and job growth. Four alternatives for the Comprehensive Plan update as proposed during scoping are listed below.

- **Alternative 0: No Action.** Capacity for about 30,000 additional housing units beyond ~65,000 existing units in 2022.
- **Alternative 1: Providing options for families of all kinds.** Capacity for 45,000 – 50,000 additional housing units beyond ~65,000 existing units in 2022.
- **Alternative 2: Unlocking access for more residents.** Capacity for 55,000–60,000 additional housing units beyond ~65,000 existing units in 2022.
- **Alternative 3: Providing options throughout the city.** Capacity for 65,000–70,000 additional housing units beyond ~65,000 existing units in 2022.

Action Alternatives for the Wilburton study area were also presented during scoping. The Alternatives for the Wilburton study area build on the preferred development alternative identified in the 2017–2018 Wilburton Commercial Area Study. The three alternatives proposed during scoping for the Wilburton study area are listed below:

- **Wilburton Study Area Alternative 0: No Action.** Capacity for ~330 housing units. Capacity for ~12,000 jobs.
- **Wilburton Study Area Alternative 1: Focus of Growth in Core.** Capacity for 5,000–7,000 additional housing units above No Action Alternative. Capacity for around 20,000 or more additional jobs above No Action Alternative.

- **Wilburton Study Area Alternative 2: Focus of Growth in Core + Transition Areas.** Capacity for 7,000–10,000 additional housing units above No Action Alternative. Capacity for around 20,000 or more additional jobs above No Action Alternative.
- **Wilburton Study Area Alternative 3: Focus of Growth in Core + Secondary Nodes.** Capacity for 12,000 or more additional housing units above No Action Alternative. Capacity for around 20,000 or more additional jobs above No Action Alternative.

Full details about the draft alternatives are available on [the city website](#).

In addition, the city may decide to make additional revisions to the alternatives or review of environmental elements prior to the Draft EIS analysis. Any additional changes made will be documented in the Draft EIS. While scoping comments do not receive individual responses, each comment received during the Draft EIS comment period will receive a response in the Final EIS.

2. EIS Scoping Process

Scoping is one of the earliest steps in the EIS process, as mandated by SEPA (Washington Administrative Code [WAC] 197-11-408) and includes a public comment period. The purpose of scoping is to determine the range, or “scope,” of issues to study in the EIS. The City of Bellevue is committed to sharing information and gathering feedback from community members amid the ongoing Covid-19 pandemic. The city followed the legal notification requirements and conducted outreach activities to notify agencies, tribal governments, members of the public, and stakeholders of the scoping comment period and in-person and virtual public scoping meetings. City staff remain available to answer questions via email and telephone during regular business hours.

a. Determination of Significance and Scoping Notice Issuance

Pursuant to SEPA, the city issued a SEPA threshold Determination of Significance on September 29, 2022, to notify the public of the intent to prepare an EIS so that agencies, tribes, communities, organizations, and members of the public have an opportunity to comment on the scope of the impacts and range of alternatives to be analyzed. The minimum required scoping comment period is 21 days. However, the city elected to expand the scoping comment period to 30 days. Information obtained from the public comments will be used to help the city in framing the alternatives to be evaluated and the environmental elements to be analyzed in the SEPA EIS. Please see Attachment 1 Determination of Significance to view the threshold determination.

b. Public Notifications

The city notified the public of the SEPA scoping comment period through the following methods:

- Email notification to existing city email subscribers
- Email notification to city employees
- Email notification shared with organizations to forward to their memberships
- City of Bellevue website
- Neighborhood News
- Press release
- Website
- Social media posts
- Legal ad posted in the Seattle Times on September 29, 2022

The scoping notice, available on the Comprehensive Plan update [website](#), was translated from English into seven other languages used in the city: traditional Chinese, simplified Chinese, Japanese, Korean, Russian, Spanish, and Vietnamese.

3. SEPA Scoping Outreach Activities

The city accepted public comments through the following means: an online portal linked to the website; mailed through the postal service; emailed comments addressed to city staff or the city's Comp Plan2044 EIS email address; hand-delivered comments; comments submitted via laptop computer stations provided at the in-person public meeting; verbal comments in person at the public meeting, and via Zoom at the virtual public meeting (transcribed by a court reporter).

a. Virtual Public Meeting

The city hosted a virtual public meeting on Zoom on October 13, 2022, starting at 6:00 pm to accept verbal comments on the scope of the EIS. A total of 12 members of the public attended the virtual meeting, and four of them provided verbal comments. The meeting was recorded and posted on the city website for community members to view. The scoping meeting was formatted into two sections, starting with a presentation by the project team. After the presentation, an open forum allowed attendees to submit their comments about the EIS process through the Q&A tool on Zoom. Attendees were asked to submit EIS comments or questions directly related to the EIS process to be answered live; any other questions, including those related to the Comprehensive Plan, were answered offline by a project team member. The meeting concluded with a public scoping comment session.

Those wishing to give comment had 2 minutes to speak. A court reporter attended to record all comments into a formal transcript.

b. In-Person Public Meeting

An in-person public meeting started at 6:00 pm on October 18, 2022, at Bellevue City Hall. The meeting began with an informal open house in the lobby. City project team members were stationed at boards that provided an overview of the Comprehensive Plan update and EIS process. Community members were able to casually review boards, ask clarifying questions, and sign up to provide written public comments.

The formal public meeting included a short presentation by the project team, an opportunity for clarifying questions about the EIS and scoping period, and then a formal public comment. Those wishing to provide comments had 2 minutes to speak. A court reporter was present to record all comments into a formal transcript. Laptops were also available for participants to write their comments and submit them to the website. A total of 15 members of the public attended and seven of them provided verbal comment. Comment forms were also available for attendees to complete and submit in writing at the public meeting.

4. Summary of Scoping Comments

This section provides a high-level summary of comments received during the SEPA scoping process. The comments are organized by topic according to general themes. Comments have been summarized and paraphrased and are grouped generally for review purposes.

Please go to Attachment 2 Scoping Period Comments to see the complete list of comments received. Please go to Attachment 3 Wilburton Vision Implementation Related Comment Summary to see examples of comments made specific to the Wilburton study area.

a. Comment Review Methodology

Comments received during scoping will be used to inform the analysis performed in development of the Draft EIS. All comments received through the scoping process were reviewed and categorized by topic. Many topics overlap, and best professional judgement was used to sort the comments and classify them into an appropriate category. The purpose of this summary is to provide information on the comments received and does not indicate any position by the city regarding the stated information. Comments will be considered for evaluation and analysis in the Draft EIS as appropriate.

A total of 163 individual comments were received during the scoping period, excluding duplicates of the same comment from the same person submitted via different channels.

These comments are compiled and included in Attachment 2 of this report. Comment letters were largely submitted by email. Comments include four verbal comments given during the virtual public meeting held on October 13, 2022, and seven verbal comments given at the in-person public meeting on October 18, 2022. A court reporter attended and transcribed comments at both events.

In addition to the individuals submitting comments on their own behalf, many submitted comments on behalf of organized groups. A list of those groups that provided comments is included below:

- Alexandria Real Estate Equities
- Amazon
- American Capital
- Bellevue Chamber Permitting, Land Use, Sustainability, and Housing (PLUSH) Committee
- Bellevue College
- Bellevue Downtown Association
- Bellevue Redmond Professional Center
- Berg Holdings
- Beta-Bellevue Auto Center LLC
- Blu Compass LLC, Wallace Park LLC, & Wig Properties LLC
- Brierwood Center LLC
- Careage
- CIRC Downtown Action To Save Housing (DASH)
- Coast Hospitality
- Color Cult Art
- Compton Design Office
- Continental Properties
- Ditty Properties
- Dog Walk LLC
- Eastridge Partners LLC
- Eastside Affordable Housing Coalition
- Edson family
- EGBW38R Owner LLC
- Futurewise
- Guntower Capital LLC
- Habitat for Humanity Seattle-King & Kittitas Counties
- Hal Woosley Properties, Inc./Brierwood Center
- Henbart and Gorlick
- Independent
- Kemper Development Company
- KG Investment Properties
- KORE Bellevue Technology Center, INC
- KTB Properties
- Legacy Commercial
- Lexus of Bellevue/Hansen Real Estate, LLC
- Master Builders Association of King and Snohomish Counties
- Microsoft
- MRM Capital
- N124 Holdings, LLC
- NAIOP Washington State
- Overlake Farm
- Overlake Medical Center
- Parkay Investments LLC
- Pine Forest Properties
- PMF Capital Management

- Public Health-Seattle & King County
- Puget Sound Energy
- RCJ Properties, LLC
- Scarff Law Firm
- Seattle King County Realtors
- Sterling Realty Organization
- Timothy E Siegel Patent Law, PLLC
- Wright Runstad & Company
- WTM Property Owner, LLC

b. High-Level Comment Themes

Comments regarding the Bellevue Comprehensive Plan update and the Wilburton Vision Implementation were collected, and themes and examples from both are presented in this summary. The summary is not exhaustive and does not replace the review of each of the individual comments received. Across all forms of comments key themes include:

- ♣ Land Use Patterns and Urban Form: Support or refinements of alternatives to be studied. Alternative 3 with all types and locations of housing in nodes, corridors, and across neighborhood residential areas was supported the most followed by a suggested new alternative.
- ♣ Plans, policies, and regulations: Need for housing especially affordable housing and avoiding displacement.
- ♣ Population, employment, and housing: Enhance green space, parks, urban tree canopy, and addressing climate change and sustainable development patterns.
- ♣ Transportation: Improve connections for walking, biking, transit, other. Each major theme is addressed below.

Other topics that received fewer comments were related to natural environment, public services, displacement elements, and alternatives as indicated below:

- Air quality
- Noise
- Water quality
- Plants and animals
- Public services
- Displacement
- Comments on Different Alternatives

The most common comments received are summarized below by topic. Although the comment summary is not presented as quoted material, the summary text preserves the nature and flavor of the individual comments received. Therefore, the text uses a mix of grammatical constructions (e.g., phrases, full sentences, questions, etc.) that reflect the

original comments and best represent the intent of the commenter, rather than parallel construction (each part of sentence using the same grammatical structure).

c. Land Use Patterns and Urban Form

The topic of land use patterns and urban form received over 150 comments during the scoping period. Many of the comments in this category fell outside of the scope of the comprehensive plan and instead relate more directly to land use code or other areas. These topics are still included in this summary report that relate more directly to the comprehensive planning work. Because many of the comments on land use were broad and overlapping, they have been broken into subtopics with examples quotations of comments provided for each:

Zoning

- *Expand the BR-MO-1 node designation north of NE 12th Ave and increase height and FAR.*
- *Increase the areas in which 450' building heights apply between 116th Ave NE and Eastrail in Wilburton Study Area Alternative 3.*
- *Increase amount of residential allowed in the BR-MO area.*
- *Expand high-rise zoning area.*
- *Explore opportunities to streamline zoning process and update city code.*
- *Consider modifying zoning to mixed-use in Eastgate, BelRed, and Wilburton to maximize housing capacity.*
- *Request zoning changes including medical to mixed-use residential and campus from residential to zoning.*
- *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.*
- *EIS should analyze trade-offs of square footage requirements for commercial/retail space for mixed-use buildings.*
- *Alternatives evaluation should consider the impact of rezoning the 140th corridor on housing capacity.*
- *Alternatives evaluation should include impact of zoning changes on "neighborhood character."*
- *Analyze implementation of mandatory inclusionary zoning across all the growth alternatives.*
- *Consider form-based codes in single-family zoned areas to allow for more housing capacity.*

- *Alternatives evaluation should consider impacts of increasing maximum residential height requirements in urban centers.*
- *Alternatives evaluation should analyze potential displacement risk in different neighborhoods and mitigation strategies.*
- *Alternatives evaluation should consider displacement risk across different demographic groups.*

Density

- *Expand low density zoning.*
- *Increase densities and height in BelRed.*
- *Allow additional density in the lowest density areas of the city, such as Bridle Trails.*
- *Add density in areas with good transit access, as well as more housing options.*
- *Consider focusing density in areas already zoned for it.*
- *Consider changing requirements that limit housing density, including lot coverage limits and setback requirements.*
- *Alternatives evaluation should consider possible trade-offs between high-rise zoning and housing affordability.*
- *Expand areas zoned for high-density housing to include the area north of the Downtown core.*
- *Explore ways that publicly owned land could be used to create more housing density.*
- *Alternatives evaluation should consider expanding low-density (5–8 story) zoning.*
- *Increasing density along 120th Avenue NE toward the Spring District.*
- *Analyze trade-offs of eliminating, or providing exemptions to, the critical areas and development density requirement in urban centers to maximize housing capacity.*
- *Increase housing density in residential areas with access to transit and jobs.*
- *Consider increasing density in Wilburton due to its numerous transit connections.*

Development Costs & Incentives

- *Consider the efficacy of using multi-family tax exemption as a building incentive.*
- *Consider incentives to develop residential buildings, including exemptions to the multi-family tax and floor area ratio requirements.*
- *Increase affordable housing incentives or requirements.*
- *Maintain affordable housing incentives rather than requirements.*
- *Include analysis of building requirements and impact on housing construction cost.*

d. Plans, Policies, and Regulations

There were over 20 comments related to plans, policies, and regulations and some examples quotations of comments are provided below:

- *Request for the scoping process to conduct foundational work to address the myriad regulatory requirements and processes (structural, energy, climate, and environmental) that add tremendous costs to housing construction.*
- *Lobby King County and the State Legislature to modify the SEPA and county zoning to allow more development in rural areas with proximity to major highways and freeways.*
- *Weigh the implications of each policy change and how they will be implemented. Many times, new and revised policies are implemented through the development of new or modified regulations. New regulations often have a direct or indirect impact on the cost of providing housing.*
- *How will the Comprehensive Plan and EIS address implementation of the state's Clean Energy Transformation Act (CETA)?*
- *How will the Comprehensive Plan and EIS integrate applicable information from the ongoing King County–Cities Climate Collaboration, such as the Joint Letter of Commitment: Climate Change Actions in King County?*
- *How will the Comprehensive Plan and EIS address the city's implementation of transportation electrification and building electrification?*
- *Revise Alternatives 1, 2, and 3 to ensure that each alternative will be developed to meet the 35,000-housing unit growth objective in accordance with 2021 King County Countywide Planning Policies.*

e. Population, Employment, and Housing

There were over 50 comments related to population, employment, and housing and the examples of quotations of comments are provided below:

- *Maximize housing capacity in mixed-use centers, neighborhood centers, and light rail stations.*
- *Desire for increased housing and housing density.*
- *Incentivize horse pasture owners in Bridle Trails to allow their lots to be developed into housing.*
- *Consider increasing density in areas with numerous transit connections.*
- *Alternatives evaluation should consider the impact of remote work on housing.*
- *Alternatives evaluation should consider impacts on people with jobs in the city who cannot afford to live in the city.*
- *Explore the impact of subarea planning policies on overall housing capacity.*

- *Alternatives evaluation should explore ways to use unused or underutilized parcels of land for housing. Bridle Trails was called out multiple times as a place for upzoning/development.*
- *Consider allowing small businesses to operate out of people's homes.*
- *Consider policies to support arts organizations in the BelRed area.*
- *Ensure that an increase in housing and jobs in BelRed is considered across all alternatives.*
- *Concern about rental costs for small businesses.*
- *Concern about impacts of increased housing.*
- *Concern about high-rises in Downtown providing jobs for non-Bellevue residents and the associated impacts.*
- *Analyze impacts from the rate of growth from the proposed increase in housing and jobs.*
- *Analyze the impact of increasing housing capacity to single-family neighborhoods.*
- *Analyze the impact of adding more housing units beyond the minimum growth targets.*
- *Evaluate reducing or eliminating minimum parking space requirements to reduce housing costs.*

Housing affordability was a key topic mentioned in over 70 scoping comments. Many commented on the need for affordable housing and were concerned about how density was placed. Because affordable housing was brought up so frequently, it has been broken into a subtopic with example quotations of comments listed below.

Affordable Housing

- *Explore range of “missing middle” housing options including accessory dwelling units (ADUs), detached accessory dwelling units (DADUs), fourplexes, townhouses, and cottage clusters throughout the city.*
- *Address strategies to allow middle and low-income people to live near where they work.*
- *Consider mandates on percentage of affordable units for new development.*
- *Explore a mandatory housing affordability program and zoning incentive programs that will produce housing at all affordability levels.*
- *Affordable housing should be spread throughout the city, not limited to high-density areas.*
- *Alternatives evaluation should analyze potential displacement risk in different neighborhoods and mitigation strategies.*
- *Alternatives evaluation should consider displacement risk across different demographic groups.*

f. Transportation

Transportation, especially transit and multimodal options, emerged as a significant theme of interest in over 65 scoping comments. The following are examples of quotations of comments related to transportation:

Transit

- *Terminate the extension of NE 6th Street at 120th Ave NE.*
- *Consider building housing density at transportation hubs to address congestion and greenhouse gas emissions.*
- *Consider increasing density at transportation nodes including light rail stations to maximize transit ridership.*
- *Alternatives evaluation should consider the impact of remote work on transit use.*
- *Alternatives evaluation should consider reducing or eliminating minimum parking ratios to encourage transit use.*
- *Study traffic impacts due to increased density.*

Multimodal Transportation

- *Look at expanding bus lanes, bike lanes, and sidewalks to address congestion.*
- *Alternatives evaluation should assess options through 15-minute city lens (i.e., ensure a community's needs can be met within 15 minutes from home on foot, bike, or via public transit).*
- *Consider lidding portions of I-405 to encourage multimodal transportation.*
- *Consider exemptions to street grid for Wilburton and BelRed.*

g. Air Quality

There were approximately 10 comments related to air quality with examples of quotations of comments provided below:

- *Analyze the impact of single-family home zoning on air quality.*
- *Alternatives evaluation should analyze how to decrease greenhouse gas emissions from increasing building density and building emissions that could result in increased emissions.*
- *Reduce carbon emissions from building construction and implement stricter efficient building design standards.*
- *Alternatives evaluation should consider 2030 decarbonization goals.*
- *Analyze potential air quality impacts due to the proximity of highways, traffic congestion, and public transit.*

- *Alternatives evaluation should consider the impact of greenhouse gas emissions from increased transportation due to displacement.*
- *Encourage city to take up stronger regulations on new construction relating to greenhouse gas emissions. Update code to statewide 2031 goals. Require greater energy efficiency and low carbon or no carbon impacts from new buildings.*

h. Water Quality

There were approximately 6 comments related to stormwater and local watersheds with examples of quotations of comments provided below:

- *Alternatives evaluation should consider the impacts of new development on area watersheds, such as Kelsey Creek basin.*
- *Alternatives evaluation should examine impacts of surface water runoff.*
- *Analyze the impact of single-family home zoning on water use and quality.*
- *Renew water (and other utilities) infrastructure for the northeast Bellevue neighborhood to accommodate the next 50 years.*
- *Incorporate existing waterways into all development – daylight rivers and streams and provide access to riparian areas.*

i. Noise

There were approximately 5 comments related to noise with examples of quotations of comments provided below:

- *Consider better sound barrier walls to reduce excessive traffic noise in neighborhoods.*
- *Noise even several hundred feet away from the current noise wall off I-405 is often above noise regulations in the City of Bellevue.*
- *Noise pollution creates health risks to sensitive receivers.*
- *Soundproof all buildings to the highest degree.*
- *Noise wall is not effective along 116th Avenue NE, and noise from the road is loud.*

j. Plants and Animals

There were approximately 7 comments related to plants and animals with examples quotations of comments provided below:

- *Alternatives evaluation should look at potential impacts on plants and animals in natural areas, including Coal Creek and Kelsey Creek.*
- *Consider requirements to add vegetation for new buildings.*

- *We have deer, coyotes, bald eagles, hawks, blue herons, beavers, opossums, and other wildlife living in our Wilburton neighborhood between Bel-Red and NE 8th. There are numerous trees over 100 years of age and the Kelsey Creek stream runs through the neighborhood.*
- *There should be more dense foliage areas in each new building location too; right now, the emphasis seems to be tons more parking with black tarmac, which just creates more heat maximizing for cars and traffic.*

There were approximately 13 comments specifically related to trees so it has been broken into a subtopic with examples of quotations of comments provided below:

Trees

- *Alternatives evaluation should include the impact of the loss of tree canopy on greenhouse gas emissions, urban wildlife, heat reduction, and green space.*
- *Consider mandates to replace trees removed during construction.*
- *Alternatives evaluation should analyze impacts of removing mature trees.*
- *Exempt urban center and transit-oriented development (TOD) areas from tree preservation regulations, similar to Downtown.*
- *Impacts on tree canopy if there are changes to single-family zoning, specifically requiring more housing.*

k. Public Services

There were approximately 10 comments related to public services with examples below:

- *Evaluate impact of population growth on public services, including schools and use of public parks and trails.*
- *Evaluate impact of population growth on infrastructure, including roads and utilities.*
- *Alternatives evaluation should consider the impact of population growth on public safety services, including law enforcement, fire, and rescue services.*
- *Implement complete streets to improve public safety.*
- *Consider greatly expanded recreation facilities.*

l. Displacement

There were a few comments related to displacement. Commenters were concerned about potential displacement of vulnerable communities. A comment example is provided below:

- *I am against a brutal transition to skyscrapers as we've seen downtime Bellevue, and the displacement of low, moderate, and stable incoming residents. We need a progressive transition to duplex, triplex, supported by a capable infrastructure.*

m. Comments on Different Alternatives

Approximately 70 comments related to the proposed alternatives. The majority of comments related to alternatives expressed a preference for Citywide Alternative 3 or Wilburton Option 3. Examples of quotations of comments received include:

- *Of the alternatives drafted, Alternative 3 goes the furthest to scale up housing production, distribute growth more equitably, and advance housing affordability. However, we recommend changes to the scope of the proposed alternatives to ensure Bellevue leads the region and creates a more affordable, equitable, and sustainable city.*
- *I support to implementation on alternative 3. I've lived in this neighborhood all my life and have seen the incredible growth over the decades. The cost of housing here is way too high. The demand far out stretches the supply. My friends and I would love to live/own in the area where we grew up, but currently it is out of reach.*
- *We ask that Alternative 3 in the EIS be refined to include this area immediately north of and adjacent to Downtown in the target zone for development of greater intensity.*
- *In the Bellevue 2044 EIS Scoping Handout, Alternatives 2 and 3 are the only ones that make sense, and Alternative 3 is really the only one that will have a chance of providing a spectrum of affordable housing and a variety of housing types.*
- *There is significant investment being made in Wilburton for parks and trails and a high density neighborhood should be created to take advantage of the presence of the Eastrail and future Grand Connection. Please select (Wilburton) option 3 in the scoping alternatives and increase the housing studied to 15,000 new units.*

Examples of quotations of comments that relate to other Alternatives include those listed below:

- *As a general matter, we support (Wilburton) Alternative 3 described in the EIS scoping notice, with the notation that this alternative should also be informed by code changes. We also note that Alternatives 1 and 2 reflect a lower density for the core area of Wilburton, which may be useful for comparison purposes, but the fundamental concept that should be reflected in all alternatives is that the maximum height and density within Wilburton should occur at the Property, since the Property is the epicenter of urban activity in the subarea.*
- *Alternative 2 would turn the city into a hodgepodge that would not be conducive to either the young professional or young family crowds.*
- *Alternatives Two and Three include voluntary incentive-based programs that provide flexibility to develop more housing for all incomes widely across Bellevue sub-areas.*
- *In Alternative 1 it focuses on Wilburton, Crossroads, Eastgate and Factor, but not Bel-Red. RECOMMENDATION: Bel-Red is the most blank slate of all these areas and should be a top priority focus for density.*

- *I support Bellevue 2044 Alternative 1 because it addresses the need for growth while maintaining the neighborhood-friendly aspect of our city. Duplexes, cottage housing, and other low-density typologies will continue to provide family-friendly areas while allowing growth to occur in major developmental areas; this aligns with the nature of today's younger generation who are marrying later and delaying their choice to have families.*
- *Hope Option 1 is not chosen because it sounds like the City is going not put in the sweeping rezones that would increase supply of housing, but rather help affordability through increased government policies to incentivize affordability.*
- *Revise Alternatives 1, 2, and 3 to include only those changes needed to bring Alternative 0 into compliance with the housing unit growth target specified in 2021 King County Countywide Planning Policies.*

5. Next Steps

The Draft EIS is scheduled to be published in the spring of 2023, at which point it will be available for public review and comment. Following publication of the Draft EIS, agencies, affected tribes, and the public will have an opportunity to comment on the content of the document. The city will host an extensive public notification process to solicit comments on the Draft EIS.

Notice of the public comment period will be posted in the Seattle Times, on the Washington State Department of Ecology's SEPA Register, and sent directly to all parties who submitted scoping comments, as well as affected tribes, agencies with jurisdiction, and those who have specifically asked to receive notice about the project. Notice will also be posted on the project website.

After the Draft EIS comment period, the City of Bellevue will prepare the Final EIS, which will identify a preferred alternative for the Comprehensive Plan and Wilburton Vision Implementation.