

## Comments Comprehensive Plan DEIS

Barbara Braun - 13609 SE 43<sup>rd</sup> Place

### 1. Alternatives:

- a. Alternative 3 appears to be the most climate friendly option because:
  - i. It more broadly distributes high density growth, rather than concentrating such growth primarily downtown.
  - ii. It allows greater Mixed-Use Areas with residential and commercial density around major transit stops to make it easier for more people to reduce their car trips.
  - iii. It allows greater focus on distributed locations for small convenience commercial developments with a goal of more walkable neighborhoods and the reduced use of cars.
  - iv. It allows more types of lower cost housing options distributed broadly across the city, with a goal of enabling more people who work in Bellevue to live in Bellevue, and thereby reduce long distance commuting.
- b. Growth must be done wisely and in parallel with other equally important goals - reducing greenhouse gas emissions by 50% by 2030; increasing our tree canopy to 40% city wide; and maintaining our excellent quality of life in Bellevue. A summary needs to be provided stating that Alternative 3 can meet these other goals. At plan adoption, measures and accountabilities should be in place to monitor progress.
- c. The City is at risk of overbuilding based on recent trends in remote work and worker relocation to more rural locations. The buildout of Alternative 3 should be done in a monitored and managed fashion. Growth data should be updated every 2-3 years. Building growth rates could be managed through new building size and density caps, in concert with incentivization of near zero carbon footprint remodeling of existing buildings, and with the city's development of zero emissions transportation alternatives.

### 2. Air quality and greenhouse gas emissions:

- a. Reducing greenhouse gas emissions by 50% by 2030 is not sufficiently analyzed in the Comp Plan. Each Alternative should be analyzed on its ability to meet the goal. No plan should be adopted without full confidence that the goal will be met.
- b. I am favor of "pro Climate growth." Growth must not come at the expense of missing our GHG emissions reduction targets. We must do both. Growing this rapidly AND meeting GHG emissions targets can only be achieved if the Comprehensive Plan includes concrete plans/mitigations, policies and development regulations that require sustainable growth practices. Alternative 3 must do BOTH and include mitigations and policies that require all growth (new builds, redevelopment, transportation, and all infrastructure) to be built and operated with ultra-low greenhouse gas emissions practices.
- c. New or redeveloped buildings should:
  - i. be all electric (i.e., no new gas hookups),
  - ii. be required to meet high efficiency performance standards such as LEED Platinum certification or better,
  - iii. include EV charging stations, and
  - iv. have appropriate waste management systems including composting and recycling.

- d. Affordable housing, mitigations should meet the same GHG emissions building standards as other buildings.
- e. With more electrification, mitigations need to include requirements that our utility company offer programs to modulate peak electricity loads such variable rate schedules and "Demand Response." For example:
  - i. The City should require PSE to create an hourly time variable rate schedule that would incent people to charge EVs and use other appliances at low demand times of the day.
  - ii. The City should require PSE to provide a rigorous "Demand Response" program whereby they could remotely turn off water heaters, refrigerators, and other non-essential appliances at peak demand hours of the day to lessen peak loads on the grid.
- f. The GHG emissions mitigations primarily evaluate transient impacts of construction such as dust and noise. Because construction activity levels will be very high during the study period and occurring across the city, more pervasive or "permanent" construction impact mitigations must also be put in place. For example, mitigations should include highly favorable or exclusive permitting for zero/low emissions developers as measured during construction as well as the built product. This should apply to both building developers as well as infrastructure developers. Construction could be considered low emissions if all vehicles and equipment used are electric, if all materials are non-polluting/renewable/sustainable, and if zero waste building practices are used.

### 3. Land use patterns and urban form

- a. Mitigation of heat island and runoff impacts must be required for Mixed Use Areas, large square footage developments (commercial or public) and other high-density development. Mitigation regulations should include highly reflecting or green planted roofs, rainwater-detention to slow stormwater runoff or rainwater capture for use in irrigation, shade and shade tree scaping, pavement minimization, pervious pavement where pavement is allowed, and underground or multi story parking structures where vehicle parking is needed to minimize paved land.
- b. All roads could be lidded with tree scaping.
- c. Tree canopy analysis was excluded from the DEIS. This is unacceptable. The canopy impact needs to be studied in the comp plan and must explicitly include plans/mitigations, policies and development regulations that require and ensure 40% tree canopy throughout the City.
- d. It is urgent to maintain our cooling tree canopy by getting better tree preservation ordinances in place asap, by requiring minimum tree canopy requirements for new and redevelopments and by preserving and protecting, in perpetuity, the current remaining trees and forested areas within the City.
- e. Tree preservation and canopy improvements need to be incorporated into development regulations. Developers should have to show that they've designed their buildings to keep the best (largest, oldest) trees on the property, and they should be required to replant and maintain trees to bring every lot up to a minimum tree canopy goal.
- f. Land needs to be identified in the plan for new parks, protected forests, and beaches. Zoning regulations should be developed to set new areas aside for these uses and to ensure our existing parklands and open spaces are not converted to residential or commercial uses.
- g. All current forests in Bellevue should be set aside in perpetuity as public forests. These forests should be managed to maximize their carbon sequestration services as well as for public access.



- h. Incentivize the development of remote work hubs in Mixed Use centers to reduce the amount of office space required and distribute workers throughout the City. This will increase the viability of small businesses in the Mixed-Use areas.

#### 4. Noise and Aesthetics

- a. Dense treescaping should be used as a traffic noise, air quality and aesthetics mitigation strategy.

#### 5. Transportation

- a. Mitigations must include intensive intercity traffic congestion management.
- b. Mitigations must include a major investment in intercity mass transit to reduce VMT and GHG emissions.
- c. Mitigations should include tax or other disincentives to drive gas cars in Bellevue.
- d. Mitigate and manage congestion through programs in partnership with large businesses. For example, move commuters to mass transit by via high parking fees/taxes or parking restrictions based on license plate numbers (odd or even days), incent businesses to allow remote work, promote free use of public transit passes, etc.

**From:** Alicia Hoppers <Alicia.Hoppers@circliving.org>  
**Sent on:** Wednesday, May 3, 2023 11:10:36 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Feedback on Wilburton Vision Implementation - DEIS

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Hello - We deeply appreciate the City's work, and consideration in creating the alternatives 1-3 in the Wilburton study area. We are excited to see up to 16 stories for our two sites in the alternative 2; Evergreen Court located at 900 124<sup>th</sup> AVE Ne and Glendale Apartments at 12640 NE 10<sup>th</sup> PL. We recognize that alternative 3 yields the most job and housing growth in the City but it doesn't reach the height limit that we see in alternative 2 for Evergreen and Glendale locations. These communities are a unique opportunity for the City of Bellevue to make significant gains in reaching its affordable housing targets, reaching people at all stages of life, and responding to the Wilburton 63% neighborhood preference to develop more housing. CIRC and Transforming Age are committed to a larger scale of affordability on those two sites than what is there now. We seek to optimize the development potential that may come from the height limits discussed in alternative 2 and respond to community needs. We're advocating for the height limits on those two sites in alternative 2 to be overlaid in alternative 3. This affordability commitment is promised for decades after a redevelopment (which is still some years away). We anticipate a minimum of 50-99 years of affordability maximizing the greatest density envisioned in the alternative 2. Additionally, the scale of redevelopment projects along 124<sup>th</sup> seems to be consistent with the overlay we seek from alternative 2.

Thank you for your consideration,

Alicia Hoppers



**Alicia Hoppers**  
*Sr. Director of Asset & Risk Management*  
Cell: 206-640-4175



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**From:** Plummer David F. <pdf3@comcast.net>  
**Sent on:** Saturday, May 27, 2023 7:07:47 PM  
**To:** Pittman, Reilly <RPittman@bellevuewa.gov>  
**CC:** onebellevuereads@googlegroups.com; Phyllisjwhite <phyllisjwhite@comcast.net>  
**Subject:** Fwd: City of Bellevue Proposed Comprehensive Plan for 2024-2044

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*Hello Mr. Pittman!*

*Reference: Agenda Item 22-64 memo (E. King, et al. to Planning Commission) dated 28 September 2022*

The reference memo lists all 13 elements (and the entirety) of the existing comprehensive plan for which the staff has developed updates to be incorporated (following EIS review) into the updated 2024-2044 comprehensive plan. These updates should be compiled and released as a supplement to the existing DEIS so that citizens can make informed comments on the DEIS. Could you please advise whether this can be done, and when the compiled material would likely be available for citizen review?

RSVP,

David Plummer

Begin forwarded message:

**From:** "Plummer David F." <pdf3@comcast.net>  
**Subject:** City of Bellevue Proposed Comprehensive Plan for 2024-2044  
**Date:** May 26, 2023 at 9:03:10 PM PDT  
**To:** RPittman@bellevuewa.gov  
**Cc:** onebellevuereads@googlegroups.com, Maskin Rebecca <rmaskin@kingcounty.gov>, "claudia.balducci@kingcounty.gov" <claudia.balducci@kingcounty.gov>

*Hello Mr. Pittman!*

Apparently the DEIS titled "2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation" is a document prepared by CoB to evaluate the environmental impacts of the (subject) proposed plan:

1. Is there a draft of the Bellevue proposed Comprehensive Plan for 2024-2044 that can be obtained by submitting a public records request to the City Clerk's office; if not, what is the basis for the descriptions in Chapter 2 of the DEIS titled "Draft Environmental Impact Statement 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation" dated April 2023?
2. If there is no draft of the Bellevue proposed Comprehensive Plan for 2024-2044, what is the basis for the impact statements in Table 1-2 of the DEIS, and the impacts, areas of controversy, and benefits/disadvantages described in paras. 1.8, 1.9 and 1.10 of the DEIS?
3. Does the City have a reasonably detailed/draft version of the proposed Bellevue Comprehensive Plan for 2024-2044 that can be obtained by submitting a public records request to the City Clerk; if so, could you provide the title and date of the draft version; if not, how is it possible to evaluate the 4 alternatives to the proposed action, i.e., to the proposed version of the Bellevue Comprehensive Plan for 2024-2044 ?

RSVP,

David Plummer

**From:** Plummer David F. <pdf3@comcast.net>  
**Sent on:** Friday, May 26, 2023 3:49:30 AM  
**To:** Pittman, Reilly <RPittman@bellevuewa.gov>  
**Subject:** Re: Table 1-2 in Comp. Plan DEIS

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hi Reilly!

Many thanks for the response.

Cheers,

Dave P.

> On May 25, 2023, at 5:03 PM, Pittman, Reilly <RPittman@bellevuewa.gov> wrote:

>

> Hi David,

>

> The table is responding to impacts for each element of the environment. "3 Land Use Patters and Urban Form" relates to chapter 3 of the DEIS which is land use patterns and urban form. Chapter 1 of the DEIS is a summary chapter and chapter 2 is on the alternatives. Table 1-2 is addressing impacts and mitigation for the alternatives per each environmental element and each element has its own chapter in the document. I hope that clears this up.

>

>

> Reilly Pittman  
> Environmental Planning Manager  
> Development Services Department  
> 425-452-4350  
> rpittman@bellevuewa.gov  
> Pronouns: He/Him/His

>

> \*New!\* Visit our Virtual Permit Center to schedule a one-on-one virtual appointment with review staff for general permitting questions.

>

> -----Original Message-----

> From: Plummer David F. <pdf3@comcast.net>

> Sent: Thursday, May 25, 2023 2:34 PM

> To: Pittman, Reilly <RPittman@bellevuewa.gov>

> Subject: Table 1-2 in Comp. Plan DEIS

>

> [EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

>

>

> Hello Reilly!

>

> Table 1-2, pg 1-19, in the Comp. Plan DEIS begins with an entry identified as "3 Land Use Patterns and Urban Form". Are there entries for "1" and "2" that are not shown, or is there some reason that the tabulation starts with #3?

>

> RSVP,

>

> David Plummer

**From:** Plummer David F. <pdf3@comcast.net>  
**Sent on:** Saturday, May 27, 2023 7:39:30 PM  
**To:** Pittman, Reilly <RPittman@bellevuewa.gov>  
**CC:** King, Emil A. <EAKing@bellevuewa.gov>; tharajohnson@bellevuewa.gov  
**Subject:** Housing Element Amendments to Comprehensive Plan Periodic Update

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***Hello Mr. Pittman!***

According to the 28 September 2022 Planning Commission agenda item memo (from E.King, et al. to the Planning Commission) for meeting agenda item 22-64 the staff has developed the following proposed changes to the Housing Element for the proposed update of the City's comprehensive plan:

- Significant amendments in order to meet the state, regional, and county requirements around housing types and affordability
- Record and address past discriminatory or inequitable practices
- Broader housing choices and affordable housing approaches and priorities
- Approach policies that give preferential treatment to some areas or residents over others with an equity lens
- Address homelessness and tie it to policies regarding deeply affordable units and policies found within the Human Services Element

Copies of the proposed changes are needed in order to make informed comments on the Comprehensive Plan Periodic Update DEIS. Can you email me copies of the proposed changes, or at least post them to the DEIS web site?

RSVP,

David Plummer



March 23, 2023

Tharsis Law  
Jacquie Quarré  
425-891-7842  
jacquie@tharsis.land

City of Bellevue Community Development  
450 110<sup>th</sup> Ave NE  
Bellevue WA 98004  
Attn: Brooke Brod, Janet Shull, and Kate Nesse

**VIA EMAIL to:**

CompPlan2044EIS@bellevuewa.gov  
bbrod@bellevuewa.gov  
jshull@bellevuewa.gov  
knesse@bellevuewa.gov

**RE: City of Bellevue Housing Options Comment Letter**

Dear Brooke, Janet, and Kate:

This firm represents Beta-Bellevue Auto Center, L.L.C. (“Beta-Bellevue”). Beta-Bellevue is the owner of property in City of Bellevue’s Wilburton planning area at 620 – 638 116<sup>th</sup> Ave NE. The Beta-Bellevue Property is a lightly developed ~134,00 SF parcel located *less than 500 feet away from the Sound Transit Wilburton Station*. Beta Bellevue has participated in the informative City-led Housing Forums that are intended to inform the City’s Comprehensive Plan update. Thank you for this opportunity to provide comments on this matter. For the reasons identified below, **we urge the City adopt comprehensive plan housing policies that encourage high-rise residential development within 1/4-mile of the Wilburton Station.**

In recent Planning Commission and Transportation Commission meetings, as well as the Housing Forums, we heard Bellevue residents’ desire to accommodate growth through a variety of housing types. We also heard concerns about new housing impacts on existing neighborhoods, the need for thoughtful transitions between new development and existing housing, and concerns about increased vehicular congestion. We have also heard interest in increasing high-density, transit-oriented development.

With respect to the Wilburton area, the City and other public agencies are investing heavily in a number of transit, pedestrian, and bicycle transportation projects. In particular, Sound Transit’s Wilburton light rail station, the City’s Grand Connection pedestrian/bicycle connection to Downtown Bremerton, and the Wilburton section of the Eastrail Multi-Use Corridor project

(connecting the Wilburton Station to the Grand Connection and to communities north and south) all represent a tremendous public investment in transit and in pedestrian/bicycle transportation connections. These connections are all close to or adjacent to the Beta-Bellevue Property in Wilburton. We encourage the City to take full advantage of these public investments by increasing opportunities for housing in this area within easy walking or biking distance from transit.

We urge the City to plan for significant residential growth by authorizing significant, high-rise transit-oriented housing with ¼-mile of the Wilburton Station. This approach to accommodate growth provides myriad benefits and addresses or mitigates many of the concerns raised during the housing forums and in other public meetings related to the current comprehensive plan process.

- **More Housing Units.** The region is in a housing crisis, and the City of Bellevue desires to create additional housing of all types that meets the needs of people at all stages of life. Thoughtfully located residential towers can provide housing with efficiency, density, and public amenities that cannot be matched by other housing typologies, such as typical wood over concrete apartments, townhomes, single family housing, or accessory dwelling units. Of course, all housing typologies are necessary and desired. However, the City should seize this unprecedented opportunity to provide meaningful high-rise transit-oriented housing as it prepares to update its Comprehensive Plan and enact the Wilburton rezone. The Wilburton area has the infrastructure and location to be a posterchild for successful transit-oriented, sustainable, and affordable housing.
- **Neighborhood Transitions.** High-rise transit-oriented housing encourages growth in already urbanized areas. Placing growth in these urbanized areas, in turn, reduces pressure to accommodate growth in areas commonly viewed as single family neighborhoods or transitional areas near these neighborhoods.
- **Access to Transit and Jobs / Reducing Congestion.** High-rise transit-oriented housing encourages growth near transit. Placing growth near transit provides residents with access to transit and jobs. In turn, these transportation options reduce vehicular trips and congestion, and create an overall more sustainable community.
- **Affordable Housing.** When incentive zoning and MFTE are properly aligned with market forces and incentive-based zoning, high-rise residential development provides market-rate and affordable housing units.
- **Other Uses.** Recent economic forces have dampened demand for office development. Office redevelopment should remain allowed as a permitted use in these transit-oriented areas, but residential uses should also be a permitted use in these areas for the reasons above. Together, the residential and commercial uses will create a vibrant mixed-use urban fabric. Residents both in the Wilburton area and surrounding neighborhoods will benefit from the opportunities for services and workplaces that are accessible via transit or on foot.

Thank you for the opportunity to provide these Comprehensive Plan comments. We look forward to working with the City on its Comprehensive Plan update and the upcoming Wilburton Rezone.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Quarré". The signature is fluid and cursive, with a small dot at the end.

Jacquie Quarré  
Tharsis Law



**From:** Joe Cooledge <jtc8176@gmail.com>  
**Sent on:** Tuesday, May 16, 2023 7:53:07 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** Joe Cooledge <jtc8176@gmail.com>; Cooledge Cynthia <cpcooledge@hotmail.com>  
**Subject:** Comment on the draft EIS

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Greetings,

Here is my comment on the draft EIS for the 2044 comprehensive plan:

The 20-year planning study, and the draft EIS, are based on a projected 35,000 additional residents and 70,000 additional jobs in Bellevue over the next 20 years. These figures are based on studies and/or estimates at the state level, and apportioned to the counties then the cities. But no detail has been provided that describes how these estimates and calculations were made. There is no explanation of the underlying assumptions of growth, business and financial environment, migration, birth/death rates, and other factors that influence the estimates. Please provide details on how these figures were arrived at, and include this information in the final EIS.

Sincerely,

Joe Cooledge

**From:** Joe Cooledge <jtc8176@gmail.com>  
**Sent on:** Friday, May 19, 2023 11:16:13 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** Joe Cooledge <jtc8176@gmail.com>  
**Subject:** Comments on the draft EIS

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Greetings,

Here are my further comments on the Comprehensive Plan draft EIS. These are in addition to my earlier email dated 5/16/23.

#### 1. Unacceptable environmental impacts from construction are already happening in downtown Bellevue

For downtown Bellevue residents, our environment has been severely degraded by numerous construction projects, especially the high-rise construction.

Noise, smoke, dust, detours and lane closures, sidewalk closures, traffic backups, convoys of loud, smelly trucks, debris in the road – these are all daily occurrences. The noise level at our condo has frequently been so loud that one cannot sit outside without hearing protection. The EIS needs to be clear about the magnitude of these environmental impacts, that they are happening now, and that they are unacceptable. Given the potential for even more high-rise construction over next 20 years, these adverse environmental effects need to be classified as permanent rather than temporary.

#### 2. Downtown Bellevue is at risk of being over-built for office space

With the large growth projections in the draft EIS (70,000 additional jobs and 35,000 additional housing units), and without validation of those numbers, many people are concerned that downtown will soon reach an over-built condition of office space. Indeed, there is evidence that downtown Bellevue may already be over-built. Consider the following:

- The West Main project, three nearly completed high-rise office buildings totaling one million square feet of office space, sit empty. Amazon, the principal tenant, is reconsidering their usage of this space.
- Microsoft is not renewing their leases on over one million square feet of office space in Bellevue.
- Working at home is a long term trend and will continue to reduce the demand for office space, especially in the area of technology, which comprises many of the downtown jobs. All four of the young people in my family (two in tech, a writer, and an attorney) work remotely and have no need or desire to work in an office building.
- Several companies have announced intent to sub-lease their office space.
- Office vacancy rates are increasing.

We have seen what is happening in other highly regarded cities such as San Francisco, Portland and Seattle: vacant buildings, increased crime, businesses and residents leaving, reduced tax revenue, and general deterioration of the downtown zone. Excess office space is a major factor. The Comprehensive Plan needs to be implemented in a way that prevents this from happening to our city.

Sincerely,  
Joe Cooledge

**From:** Micki Larimer <mickilarimer@gmail.com>  
**Sent on:** Wednesday, May 17, 2023 7:45:08 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** No to Future Heat Islands / Disorganized Neighborhoods

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My overriding concern for each of the proposed alternatives is the development of Heat Islands throughout Bellevue. Unmitigated, the current deficit of required private property green space and water infiltration space, in combination with increase in concrete surfaces, and taller, denser development is a recipe for unlivable neighborhoods in our shifting climate.

It is essential that we ensure private property green spaces for trees and water infiltration as part of the increased density. The creation and enforcement of strong codes requiring space for water infiltration, light, and tree canopy to exist is paramount as density increases. These cannot be giveaways for denser housing.

My second concern regards the highly disordered land use and horrible aesthetics likely to result from the " R-Low" zoning designation of neighborhoods currently zoned single family residential (Alternative 3) .

The inclusion of small apartment buildings dotted haphazardly among single family, duplex, triplex homes will decimate the character and visual aesthetics of previously single family neighborhoods. Using R-Low zoning smaller, more unified areas situated in the busier areas of neighborhoods makes more sense structurally and is more visually pleasing.

Sincerely,

Micki Larimer  
Bellevue WA

**From:** p johnston <pamjjo@msn.com>  
**Sent on:** Friday, May 19, 2023 9:19:11 AM  
**To:** Stead, Elizabeth <estead@bellevuewa.gov>  
**CC:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>; Loretta Lopez <ljllopezmsl@gmail.com>; Margie Ye <ye.margie@gmail.com>; Barbara Hughes <barbara\_hughes@hotmail.com>; Norm Hansen <Hansennp@aol.com>; Stuart Heath <ElliottBay@Yahoo.com>; Eva <comptontrails@outlook.com>; Warren Halverson <whalvrsn1@frontier.com>; Michelle Wannamaker <mwannamaker@comcast.net>; Karen Morris <moe@msn.com>; Heidi Dean <technogeekswife@yahoo.com>; Anne Coughlin <doctorannecoughlin@gmail.com>; Don Marsh <don.m.marsh@hotmail.com>; Albert Ting <alt7070@hotmail.com>; Anne Coughlin <doctorannecoughlin@gmail.com>; Craig Spiezle <craigsp@agelight.com>; Scott Lampe <scottlampe@msn.com>; Dick Thompson <seattlerust@gmail.com>; Renay Bennett <renaybennett@msn.com>; Eastgate Association <eastgatecommunitywa@gmail.com>; Ashley Kaiser <wilburtonpresident@gmail.com>; Erin Kenway <erin.kenway@icloud.com>; Robinson, Lynne <LRobinson@bellevuewa.gov>; Nieuwenhuis, Jared <JNieuwenhuis@bellevuewa.gov>; Robertson, Jennifer S. <j.robertson@bellevuewa.gov>; Mindy Garner <mindy@eldermove.com>  
**Subject:** DEIS Extension

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More time is needed for the DEIS2044 official comment period.  
What is the process and criteria for extending the DEIS comment period?

Cordially,

— *pamela johnston.*

[425-881-3301](tel:425-881-3301)

**From:** Steven Demonnin <katesgladdad@gmail.com>  
**Sent on:** Thursday, May 4, 2023 8:37:28 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Environmental impact of good transit

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I don't like any plan that doesn't have walkability (and bus ability and bike ability) as an imperative. Walkable means that roads can be smaller and as jobs and shopping can be closer there is a lot less pollution. Any road that is car dependent is more polluting by itself, but also creates additional pollution for everything that needs to happen for the citizens.

The Moving Finger writes; and, having writ,  
Moves on; nor all your Piety no  
Shall lure it back to cancel half a Line,  
Nor all your Tears wash out a Word of it.

# Public Comment Meeting

**In re: City of Bellevue's Comprehensive Plan Update**

**May 18, 2023**



**206.287.9066 | 800.846.6989**

1325 Fourth Avenue, Suite 1840, Seattle, Washington 98101

[www.buellrealtime.com](http://www.buellrealtime.com)

email: [info@buellrealtime.com](mailto:info@buellrealtime.com)



CITY OF BELLEVUE

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City of Bellevue Comprehensive )  
Plan Periodic Update and Wilburton )  
Vision Implementation )  
Draft Environmental Impact ) File No. 22-116423-LE  
Statement (DEIS) )

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VIRTUAL PUBLIC MEETING

PUBLIC COMMENT PERIOD

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Taken via Zoom Videoconference

DATE TAKEN: May 18, 2023, at 6:00 p.m.

REPORTED BY: Sierra Zanghi RSR, CCR 22004202

1 REMOTE; THURSDAY, MAY 18, 2023

2 6:00 P.M.

3 --oOo--

4 KRISTIN ANDERSON: We are now moving, as  
5 Thara said, to the public comment period. You're  
6 invited to provide comments on the EIS alternatives and  
7 policies and how they best reflect the City of  
8 Bellevue's needs, accuracy of information in the DEIS,  
9 assumptions used in the environmental analysis, where  
10 clarification is needed, and potential impacts and  
11 mitigation.

12 Next slide, please. So this is how  
13 we'll do things tonight. Some of you have  
14 preregistered when you registered for the meeting to  
15 give comments tonight. And we'll start with that group  
16 of people.

17 You'll log in. I will call your name  
18 and the names of the next two people in line to provide  
19 comment. You can look for a notification that will  
20 look like this one that's shown here on the screen to  
21 unmute yourself. You won't be on camera. And when you  
22 start, please first state your full name and physical  
23 address, and then you'll have three minutes to speak,  
24 after which you'll be muted and we'll go on to the next  
25 person. And a reminder that we have a court reporter



1 here to transcribe public comments. Next slide,  
2 please.

3 Yeah. And as a reminder, we ask  
4 everyone to be respectful this evening of the public  
5 process and all those who are participating in the  
6 meeting. Our community norms, acceptable behavior  
7 include using welcoming and inclusive language, be  
8 respectful of different viewpoints and experiences, and  
9 try to frame your comments positively.

10 Unacceptable behavior includes  
11 harassment, bullying, and intimidation; any action  
12 meant to convey or cultivate hostility, insults, or  
13 other attacks; and encouraging any of the above  
14 behavior.

15 Next slide, please. Again, as I  
16 mentioned, we're going to start with folks who  
17 preregistered. And with that, let's get started.

18 Our first speaker this evening will be  
19 Clifford Cawthon -- apologies for any  
20 mispronunciations -- the second, Todd Stabler; and then  
21 T. J. Woosley.

22 So Clifford Cawthon?

23 CLIFFORD CAWTHON: Yes.

24 KRISTIN ANDERSON: Yes. Great.

25 CLIFFORD CAWTHON: Thank you for

1 allowing me to speak here tonight.

2 I just wanted to express -- so I'm the  
3 advocacy and policy manager for Habitat for Humanity in  
4 Seattle and King and Kittitas Counties, and we've been  
5 working alongside the great staff at the City of  
6 Bellevue, as well as a number of community members, to  
7 provide input during the process.

8 And I just want to say that we see that  
9 there is a bright future ahead, and that Alternative 3  
10 puts us on a path to get there. But we can go even  
11 further.

12 While Alternative 3 incorporates a  
13 number of principles, having affordability tools in the  
14 process such as inclusionary zoning mechanisms  
15 throughout the city to ensure that affordable units get  
16 made, as well as making sure that policy is right-sized  
17 so we can actually build the kind of affordable housing  
18 that our community desperately needs is essential.

19 So I just want to contribute that  
20 perspective. And particularly when it comes to  
21 impact -- yes, when it comes to impact, to recognize  
22 that when we talk about equity, particularly racial  
23 equity in thinking of economic inequality, that we  
24 remember that the kind of exclusionary zoning --  
25 patterns of exclusionary zoning were very much a part

1 of the very tragic history that kept people out of  
2 communities of opportunity.

3 So by allowing our communities to be  
4 inclusive and building more housing, particularly more  
5 affordable home ownership opportunities, that we can  
6 make Bellevue the kind of inclusive community that all  
7 of us will be able to afford to live in and many of us  
8 cannot right now. Thank you.

9 KRISTIN ANDERSON: Thank you. All  
10 right. Thank you for resetting.

11 So next up, Todd Stabler, then T. J.  
12 Woosley and Stanley Xu.

13 So Todd? Let's see, I think I'm seeing  
14 Todd in the participant list. I'm not hearing you and  
15 it appears that you aren't muted. Hmm. I'm just going  
16 to give you a minute. If you want to try to adjust  
17 your audio settings. Thank you, everyone, for your  
18 patience. We'll see if --

19 Why don't we do this? Todd, your name  
20 is still on our list, and we'll try to help in the chat  
21 with some technical suggestions for addressing your  
22 audio issue. I'm not sure if your microphone isn't  
23 working. And we'll come back to you.

24 T. J. Woosley?

25 T. J. WOOSLEY: Hello, can you hear me?

1 KRISTIN ANDERSON: Yes.

2 T. J. WOOSLEY: Okay. I am Timothy J.  
3 Woosley. We live at 3015 124th Avenue Northeast in  
4 Bridle Trails, and we're also commercial property  
5 owners down in the Wilburton area. And so I'm speaking  
6 a little bit on my own personal behalf and also on the  
7 Wilburton Commercial Property Owners Group. We discuss  
8 this a lot.

9 But, let's see. I think the one main  
10 comment -- we support the Alternative 3 for this as  
11 well. And we think that it's important that everybody  
12 realize that it's not just the City's rules that  
13 dictate what gets developed.

14 You have to go through a whole litany of  
15 people and parties that agree. Property owners have to  
16 agree to develop their property. The developer has to  
17 want to do it. Their equity and debt partners, all  
18 their financial partners, banks, et cetera, have to do  
19 that -- have to agree. The tenants have to want to go  
20 there for a rate that is reasonable for them. The  
21 customers of those tenants need to go there --  
22 commercial and also residential tenants.

23 And then there's also the regulatory  
24 environment. So the regulatory environment is just one  
25 part of this. Honestly, you can zone a place to have

1 400 feet of height, but only -- the market may only  
2 support, you know, 140 feet. So we have to be  
3 cognizant of that. Therefore, we think that it's  
4 really important that the envelope be as large as  
5 possible, and then the market will help determine what  
6 can be developed.

7 That was the main point. We just think  
8 that we should have as many alternatives as possible  
9 and that the limiting factor should not be the  
10 regulatory environment. So we strongly support  
11 Alternative 3. Thank you.

12 KRISTIN ANDERSON: I'd like to open it  
13 up again to Todd Stabler. We have been trying to  
14 communicate and haven't heard anything. I'm just going  
15 to wait a few seconds. I'm looking over at my  
16 participant list.

17 All right. Well, know that after we get  
18 through these preregistered comments, through comments  
19 from people who preregistered, we will open the floor  
20 and there will be an opportunity; so we'll keep trying.

21 Next up, Stanley Xu.

22 So one thing I might suggest for people,  
23 especially for people who preregistered but maybe  
24 they're sharing a computer and so, like, Zoom  
25 automatically recognized, potentially, someone else in

1 your family or who uses the computer.

2 Is there -- let me -- I'm just going to  
3 look -- I want to make sure Todd Stabler or Stanley Xu,  
4 if there are other names or if you think you're  
5 misrepresented, like your nameplate is different in  
6 what you're seeing at the bottom of your -- the square  
7 where you're showing up, but you're -- okay. I wanted  
8 to just give that opportunity just in case. And if  
9 just -- yeah. Okay. All right.

10 Well, right now, we'd like to open the  
11 floor to folks if they didn't preregister and haven't  
12 commented already but would like to comment tonight.

13 Okay. Jacquie Quarre. And remember,  
14 you can unmute yourself and then state your first  
15 name -- your full name, excuse me, and your full  
16 address.

17 JACQUIE QUARRE: Okay, thank you. This  
18 is Jacquie Quarre, and my address is 285 Southeast 10th  
19 Circle in North Bend, Washington. We spend a lot of  
20 time in Bellevue and are working with property owners  
21 in Bellevue.

22 I'm a land use attorney. I work for  
23 Tharsis Law, and wanted to thank staff for all of their  
24 work that's gone into this process. We've been  
25 participating and tracking along the way and really

1 appreciate how much time and effort has been put into  
2 this.

3 We'll be submitting public comment in  
4 written form, but I actually had a quick question this  
5 evening that I was hoping to get some clarification on  
6 the EIS -- draft EIS. And that's with respect to the  
7 mixed use that's being proposed in all of the  
8 alternatives in the Wilburton sub-area.

9 We were just curious to know if the  
10 mixed use is going to be as flexible as allowing, you  
11 know, an entirely office, for example, use building, or  
12 an entirely residential building within that mixed  
13 zone, or if there's truly some ratio of one commercial  
14 use versus the residential use in each building that's  
15 being built.

16 So just a question along the way as  
17 we're kind of reviewing the EIS, and submitting our  
18 comments. Thank you.

19 KRISTIN ANDERSON: Thank you. All  
20 right. We have next up someone identified as "prof"  
21 tonight.

22 PROF BROWN: That's me. My name is Prof  
23 Brown. My address is 2660 118th Avenue Southeast, Unit  
24 8-101. First time commenter in a public forum.

25 I just -- I really like these plans.

1 I'm all-in on Alternative 3. I'm just curious about  
2 how much of the residential is earmarked for affordable  
3 housing and what that definition is.

4 I am a former renter, and I want to make  
5 sure that these plans take into account their presence  
6 and contribution to the community, because it is often  
7 underlooked. And as a new homeowner, I want to make  
8 sure I use my voice and power to advocate for them. So  
9 that's a priority for me, and I'm curious about the  
10 details on the housing requirements.

11 And that's all.

12 KRISTIN ANDERSON: -- if you haven't,  
13 use the "raise hand" feature. Sten Leszynski?

14 STEN LESZYNSKI: You did great. Can you  
15 hear me?

16 KRISTIN ANDERSON: Yeah. Thank you.  
17 Did you hear the pause?

18 STEN LESZYNSKI: Thanks for allowing me  
19 to speak and for holding these meetings. I've been to  
20 several. I was at a few three or four years ago when  
21 this rezone was first proposed and I, along with a few  
22 other of my friends, also met with some of the City  
23 planners with the specific goal of talking about how to  
24 make the Lake Bellevue area more productive. So I'm  
25 really thrilled that in this particular wave there are



1 considerations, at least, about allowing for some  
2 density in the Lake Bellevue area.

3 I have, I guess, a couple specific  
4 comments with respect to that. I own a piece of  
5 property on Lake Bellevue and I'm also a resident in  
6 Crossroads; so I'm a double-Bellevue-ite, I guess you  
7 could say.

8 With respect to the Lake Bellevue area,  
9 the parking lot there in front of our building, which  
10 is 9 Lake Bellevue, has been proposed for a rezone for  
11 higher density.

12 And I think, from my perspective, it's  
13 fairly clear that the transit-oriented development  
14 concept really kind of wasn't applied fully in our area  
15 there, and so I would like to say that it makes really  
16 good sense to me for allowing people in Bellevue to  
17 jump on a train just outside their residence and race  
18 to Microsoft, or people in other parts with train  
19 access to, you know, get to downtown Bellevue for work.  
20 So -- which might include, in that area near the train  
21 station, some additional development for, you know --  
22 in addition to maybe some housing, maybe in that area  
23 some restaurants and things like that, and more support  
24 for parking for example, for the Pumphouse, which is an  
25 icon, you know, since my youth here in Bellevue.

1                   So long story short is it makes really  
2   good sense to me to improve the opportunity to develop  
3   that Lake Bellevue area parking lot into something that  
4   was, you know, 5, 10 -- I think 16 stories max.

5                   But the one thing I would suggest is  
6   that we consider that that maybe shouldn't be part and  
7   parcel of Option 3. I'm not sure why that couldn't be  
8   considered in the other options, and I'd like to  
9   propose that that be revisited because it's sort of a  
10   microcosm there by the train station with its own  
11   unique needs apart from the other parts of the plan.  
12   And so it seems to me it would be worth discussion,  
13   maybe regardless of which plan is passed, that that be  
14   reconsidered.

15                  Thank you.

16                  KRISTIN ANDERSON: Thank you.

17                  We're seeing that Stanley Xu, who  
18   preregistered, has joined; so Stanley.

19                  STANLEY XU: Yes, I'm here.

20                  KRISTIN ANDERSON: Great. So you'll  
21   have three minutes to speak. Please start by stating  
22   your full name.

23                  STANLEY XU: My name is Stanley Xu. I'm  
24   a resident of the City of Bellevue. I came in support  
25   of the Alternative No. 3, because I think it provides

1 the most density for the housing units.

2 I even suggest you even make it more  
3 fairness for the densities, especially for the Bel-Red  
4 area and between the 140th Avenue Northeast and 148th,  
5 and Northeast 20th Street and Bel-Red. That area, you  
6 have not made any change. The City has not made any  
7 change. But I think that area should be included in  
8 the, you know, into the density area. Seems like that  
9 area has not changed density.

10 That's all I want to say. Alternative  
11 No. 3 is better than Alternative No. 1 or 2, but I  
12 think even Alternative No. 3 should be considered to  
13 provide more density for Bel-Red area.

14 That's all I want to say. Thank you  
15 very much.

16 KRISTIN ANDERSON: Okay, thank you. So  
17 I understand that T. J. Woosley -- there's another  
18 person in the login with you that would like to make a  
19 comment.

20 T. J. WOOSLEY: No, I just have a  
21 clarification question. It's still me, T. J.

22 KRISTIN ANDERSON: Oh, I see. Yeah. We  
23 aren't taking -- if you want to submit a question  
24 through the DEIS process and the City can follow up,  
25 but we're not taking questions this evening. We're in

1 the kind of official comment period.

2 T. J. WOOSLEY: Thank you.

3 KRISTIN ANDERSON: All right, I'll pause  
4 just momentarily, see if anyone else would like to  
5 provide -- give public comment tonight. We have plenty  
6 of time. Looks like Phyllis White.

7 So, Phyllis, let's see. We can -- are  
8 you able to unmute yourself? Is it working? All  
9 right, we're working on it, Phyllis. Oh, no. Did we  
10 lose Phyllis? Oh, no.

11 All right, Phyllis, if you change your  
12 mind -- it looks like your hand went down. I want to  
13 make sure that wasn't an accident. Technology can be  
14 finicky. Oh, good -- Phyllis. I see your hand is  
15 raised. Let's see if we can come up with a way to --  
16 looks like there's -- you're having trouble or we're  
17 having trouble on our end unmuting you. Give us just a  
18 minute, we're working on it.

19 Okay. Well, we -- Phyllis?

20 PHYLLIS WHITE: Can you hear me?

21 KRISTIN ANDERSON: Yes. Are you -- it's  
22 coming through "Lime White." Is that you, Phyllis?

23 PHYLLIS WHITE: Yes, that's me.

24 KRISTIN ANDERSON: Okay. I'm hearing a  
25 little bit of an echo, so I don't know, if you're

1 logged in on two devices, if you could mute the other  
2 one or mute one. Okay. Try speaking again. Oh, darn.  
3 Now I'm not hearing you. Oh, try again.

4 PHYLLIS WHITE: Hold on.

5 KRISTIN ANDERSON: Yeah. We have time  
6 to help you figure this out.

7 PHYLLIS WHITE: Okay. Can you hear me?

8 KRISTIN ANDERSON: Yes. There we go.

9 PHYLLIS WHITE: Okay. So my name is  
10 Phyllis White. I live in the Wilburton area. And we  
11 are about maybe a block away from the light rail.

12 And we don't oppose growth; however, we  
13 are, you know, affected by maybe 5,000 units on Bel-Red  
14 area and also on 116th. I've talked with my neighbors  
15 a lot and we've interacted with neighbors on 130th and  
16 132nd, and we'd like to see very gentle growth because  
17 we have a lot of tree canopies. We have the Kelsey  
18 Creek Watershed, the Goff Stream. And we appreciate  
19 the salmon stream and also the tree canopies.

20 So because we're already so, I guess,  
21 stressed by the amount of growth surrounding us, the  
22 initial plan was to leave our neighborhoods alone and  
23 to have the growth areas surrounding us accommodate --  
24 you know, become more dense.

25 We don't have sidewalks. Our streets

1 are very narrow. We're not really used to having a lot  
2 of pop- -- you know, a great deal of population,  
3 because we have so much wildlife areas.

4 And so I'd like to request that our  
5 community be considered. Across of us is  
6 Northeast 8th. Their neighborhood is denser than our  
7 neighborhood. And I just want to say that we really  
8 appreciate what we have right now, and we'd like to  
9 have, you know, other residents consider us as well in  
10 their views of having a lot of density. We're already  
11 affected by the transit and the large-growth areas.

12 So thank you very much and thanks for  
13 letting me speak.

14 KRISTIN ANDERSON: Thank you.

15 PHYLLIS WHITE: That's it. Thank you.

16 KRISTIN ANDERSON: Thank you to everyone  
17 for your comments and your questions. And please note  
18 that, again, questions -- you can submit them through  
19 the DEIS and the City will note them and work to follow  
20 up.

21 So we do still have time if there are  
22 others that would like to provide comment tonight. I  
23 see one. It's showing up as "Jper."

24 JASPER LEE: Yeah. I'm sorry, I did not  
25 realize my name was like that. I thought it was my

1 full name. Sorry.

2 KRISTIN ANDERSON: No problem.

3 JASPER LEE: But I live at 900 20th  
4 Place West. I live in Kirkland but I work and go to  
5 school in Bellevue. And yeah, this is my first time  
6 speaking. First time attending one of these, actually.

7 But yeah, I think just, like, being in  
8 kind of two different areas every day, I think I do see  
9 in Bellevue a lot more cleaning up and just overall  
10 nice keeping of, like, the parks and everything, which  
11 is good, compared to Kirkland. There's, like -- I  
12 don't know, I just feel like I see a lot more just  
13 public or City trucks around, and I like that, that  
14 they keep it nice and clean.

15 But I do -- I believe someone mentioned  
16 this earlier -- I agree that kind of the Bel-Red area  
17 and the Highland Park area could be maybe patrolled a  
18 little better or, I guess, just, like, kept a little  
19 more clean. Because there is kind of some, like,  
20 sketchy stuff that goes on around there. But yeah.  
21 That's all I had to say. Thank you.

22 KRISTIN ANDERSON: Can you please state  
23 your full name?

24 JASPER LEE: Oh, sorry. It's Jasper  
25 Lee.

1 KRISTIN ANDERSON: Jasper. Thank you.

2 JASPER LEE: Sorry about that.

3 KRISTIN ANDERSON: No problem.

4 JASPER LEE: All right. Yeah. Thank  
5 you for letting me speak.

6 KRISTIN ANDERSON: Thank you. All  
7 right, pausing once again. If you'd like to provide  
8 comment, please use the "raise hand" feature at the  
9 bottom of the screen.

10 And all right, why don't we go to the  
11 next slide? For those of you who would like to comment  
12 in another way, you can do so in the following ways  
13 shown on the screen here. You can submit your comments  
14 online, you can -- at the address listed below, you can  
15 submit them in writing or by mail at the address. And  
16 you can also submit them by email by 4:30 on June 12th,  
17 2023, at the email listed below.

18 We will leave this up for a minute so  
19 you can take a picture or write it down. And we'll  
20 wait here for a minute if someone changes their mind.  
21 We'll be here for another few minutes. Raise your hand  
22 and you can provide comment.

23 And otherwise, we just want to say thank  
24 you very much for attending this evening, for providing  
25 your comments and your questions and spending a



1 beautiful evening with the team here, listening and  
2 providing comment.

3 JULIE BEFFA: Thank you.

4 KRISTIN ANDERSON: If you're still here,  
5 we've also provided a link to where you can provide  
6 your comments online in the chat. And you can click on  
7 that link.

8 I am still noticing that we have quite a  
9 few participants in the meeting. I would just remind  
10 you that this does conclude the evening for us unless  
11 someone would like to provide public comment.

12 Looks like we have a hand raised. Can  
13 we go back up to the timer slide? Thank you. Steve  
14 Williams?

15 STEVE WILLIAMS: Yes. Can you hear me?

16 KRISTIN ANDERSON: Yes.

17 STEVE WILLIAMS: My name is Steve  
18 Williams. We live in the Wilburton area just above the  
19 International School.

20 I'm new to this and really hadn't done  
21 much research, but the first thing that occurs to me is  
22 what is the current population of the Wilburton area?  
23 And when we're talking about these alternatives, what  
24 sort of a percentage increase is that? Are we doubling  
25 the population? And what's the impact of that on our

1 school system, on the water and sewage systems, and in  
2 particular on vegetation and tree canopy?

3 Most of us moved here because of the  
4 environment and the quality of the schools, and the  
5 openness and the well-kept city. I fear we're about to  
6 become another New York with skyscrapers and no  
7 vegetation.

8 In our neighborhood, we're seeing a lot  
9 of big-box houses coming in, clearing all the trees,  
10 and going up three or four stories above the adjacent  
11 houses. It changes the feeling of the neighborhood.  
12 It changes the quality of life in the neighborhood.  
13 And so I'm concerned about how do we protect that? Is  
14 there a percentage of open space for vegetation  
15 associated with each level of development?

16 And while we're at it, if we're adding  
17 all these rooftops and pavement, is there a way of  
18 making some of that solar panels and generating energy  
19 in a passive way locally? I see the rooftop of the  
20 International School would be a perfect place for solar  
21 panels. It's a huge area, unused.

22 Another thought is having services  
23 locally within neighborhoods so people can walk to a  
24 grocery store and come home with a gallon of milk or  
25 that evening's dinner and not have to drive all over

1 town to get services.

2 And also, what provision is there for  
3 service delivery like supplying stores and removing  
4 garbage and, you know, delivery of all that sort of  
5 stuff? COVID was one factor, but suddenly we had four  
6 or five delivery vans a day in our little cul-de-sac.  
7 And again, that's a huge environmental impact and,  
8 frankly, I think an unnecessary service if people could  
9 simply walk to a store within two or three blocks.

10 And then what's the impact of all this  
11 population on our atmosphere? Where do you plan to get  
12 fresh air? How do you plan to keep the level of  
13 temperatures in your area acceptable, since we're all  
14 breathing hot air and utilizing energy and putting more  
15 CO2 into the atmosphere?

16 So a whole bunch of concerns, and I'd  
17 like to see some percentages. Thank you.

18 KRISTIN ANDERSON: Thank you.

19 For those of you who are still with us,  
20 I'd also like to share some information about two  
21 in-person meetings that we'll be hosting very similar  
22 to the setup of this meeting, but in person.

23 The first one is next Tuesday, May 23rd  
24 at Crossroads Community Center at 6:00 p.m. And  
25 another on June 1st at City Hall, also at 6:00 p.m.

1 And you can find information about those meetings  
2 online at the address listed in the online -- the  
3 bottom left, there.

4 All right, let me double-check my list,  
5 see if anyone else would like to provide comment  
6 tonight before we wrap up. Let us know by raising your  
7 hand using the "raise your hand" feature.

8 All right. Well, thank you again very  
9 much for joining us this evening, for providing your  
10 comments and questions.

11 Thank you, everyone. We'll log off now.  
12 Good night, team.

13 (Hearing concluded at 6:55 p.m.)

14 --oOo--

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## C E R T I F I C A T E

STATE OF WASHINGTON )  
 ) ss.  
COUNTY OF SNOHOMISH )

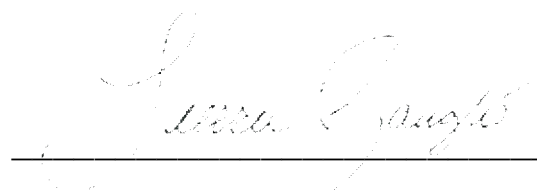
I, Sierra Zanghi, Certified Court Reporter in and for the State of Washington, reported the within and foregoing hearing on Thursday, May 18, 2023; that said hearing was taken by me in shorthand and thereafter under my supervision transcribed; and that the same is a full, true and correct record of the proceedings including all testimony and questions, answers, and objections, if any, of counsel.

I further certify that I am not a relative or employee or attorney or counsel of any of the parties, nor am I financially interested in the outcome of the cause.

This transcript and billing has been prepared/submitted for final preparation and delivery in accordance with all Washington State laws, court rules, and regulations.

Rules regulating formatting and equal terms requirements have been adhered to. Alterations, changes, fees, or charges that violate any of these provision are not authorized by me and are not at my direction or with my knowledge.

IN WITNESS WHEREOF I have set my hand this 30th day of May, 2023.

  
SIERRA ZANGHI, RSR,  
WA CCR NO. 22004202



## DEIS ALTERNATIVES:

# Summary of Wilburton Capacity

### Wilburton Alternative 1

**9,200** housing units / **44,800** jobs



### Wilburton Alternative 2

**14,200** housing units / **38,100** jobs



### Wilburton Alternative 3

**14,300** housing units / **44,500** jobs



**Highrise 3**  
Up to 45  
stories

**Highrise 2**  
Up to 25  
stories

**Highrise 1**  
Up to 16  
stories

**Midrise**  
Up to 7-10  
stories

### Wilburton Alternative 0

**300** housing units / **3,900** jobs

**Sent on:** Tuesday, June 6, 2023 3:36:05 PM

**To:** Nicole Lobodzinski <NLobodzinski@esassoc.com>; Pittman, Reilly <RPittman@bellevuewa.gov>; Stead, Elizabeth <estead@bellevuewa.gov>

**CC:** Nesse, Katherine <KNesse@bellevuewa.gov>

**Subject:** FW: EIS comment - sending to this email address, as the online comment was lost two times

FYI

**From:** Dale Scott <dscott6853@msn.com>

**Sent:** Monday, June 5, 2023 8:23 PM

**To:** Johnson, Thara <TMJohnson@bellevuewa.gov>

**Subject:** EIS comment - sending to this email address, as the online comment was lost two times

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

The EIS, open for comment this week, is written in such a way that it implies that meaningful snowfall is not a concern.

In fact: Snow Removal capability, and capacity, and planning, leads to results currently can take 5 - 14 days to clear roads so that they are accessible to EMS. Very Important Life Safety Issue: In recent 5-10 years, there have been many days where emergency equipment cannot reach homes and property of the citizens of Bellevue. For example, in February, 2019 snow covered neighborhood roads made homes inaccessible for more than 2 weeks, in portions of the city.

Referring to the Snow Removal Priorities\* of September, 2018, Bellevue has apparently little intent, and little opportunity, to get to the neighborhoods proper. By performance to date, "Primary neighborhood" are cleared and the streets where the homes are—those that are "Not Indicated" are not plowed\*\*. Particularly so, if the weather system causes more than a single snow event. I have asked about this life safety issue many times.

The EIS should address this. There are methods to address that are not budget busting and with low overhead should it not snow in any given winter month. This is not about planetary climate, this is what happens at local addresses and is difficult to forecast.

Families living on the many scores of miles of streets not indicated as response priorities are currently at risk on dates in which snow falls. It appears that the 2018 map-still being referenced by Bellevue staff, has become a life threatening de facto policy.

**\*File Name:** V:\Trans\ArcGIS\streets\Snowroutes\Date: 9/28/2018 SnowRoute\_11x17.mxd; dated 9/28/2018.

**\*\*Note:** Streets not indicated as response priorities are plowed as resources become available.

Tahnk you,  
Dale Scott  
Bellevue, Washimngton

**From:** Pittman, Reilly <RPittman@bellevuewa.gov>  
**Sent on:** Wednesday, June 7, 2023 6:39:13 PM  
**To:** Plummer David F. <pdf3@comcast.net>  
**Subject:** RE: Comments on DEIS for the City of Bellevue's 2024-2044 Comprehensive Plan Periodic Update

Mr. Plummer,

Your emails have been added as comments and we will be reviewing all of the comments and questions that have been submitted. The DEIS is the only document that will be issued as part of the SEPA review process at this stage. If you have further comments or questions please submit them by June 12<sup>th</sup>.



**Reilly Pittman**

Environmental Planning Manager  
Development Services Department  
425-452-4350  
[rpittman@bellevuewa.gov](mailto:rpittman@bellevuewa.gov)  
Pronouns: He/Him/His

**\*New!\*** Visit our [Virtual Permit Center](#) to schedule a one-on-one virtual appointment with review staff for general permitting questions.

**From:** Plummer David F. <pdf3@comcast.net>  
**Sent:** Monday, June 5, 2023 9:15 PM  
**To:** Pittman, Reilly <RPittman@bellevuewa.gov>  
**Subject:** Comments on DEIS for the City of Bellevue's 2024-2044 Comprehensive Plan Periodic Update

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

*(Please disregard the earlier version of this email.)*

**Hello Mr. Pitman!**

1. Can you please tell me whether you have received my comments on the City's 2024-2044 Comprehensive Plan Periodic Update DEIS that I submitted on 5 June 2023?
2. I sent you 3 emails (attached, below); can you please provide answers to my questions, as they may affect the comments I submitted to the City today on the City's 2024-2044 Comp. Plan DEIS?

RSVP,

David Plummer

Bellevue, WA





Bellevue's Comprehensive Plan Update provides an excellent opportunity for the city to live its values and truly be a place that welcomes the world. This process is not just about how much we'll grow and where – *the questions this process answers and the directions this update sets in motion will fundamentally affect who is able to belong in Bellevue*. Historically, our city has not been a welcoming place to Black and Brown residents or people of lower economic status, and regardless of reality, this perception persists to this day for many in our region. Our city leaders have the moral responsibility to correct these injustices by recognizing the importance of providing the amount and types of housing that will enable everyone who wants to call Bellevue home to do so. With this goal in mind, Complete Streets Bellevue provides the following comments on the city's Draft Environmental Impact Statement:

### **Alternative 3 is the minimum - we must make it even better**

Bellevue's Growth Alternative 3 is the only option that comes close to providing enough capacity for growth in a way that is equitable. Alternative 3 provides the most flexibility in helping Bellevue reach its housing growth target of 35,000 units by 2044, and by providing far more capacity than what is required, Alternative 3 ensures we have sufficient room for our city to accommodate growth beyond its approved targets.

Bellevue and the state of Washington do not exist in a vacuum, and there are many factors that will continue to make western Washington a desirable location for new residents. With our region projected to experience fewer climate change impacts compared to other areas in North America; with our state being a haven for the LGBTQ+ community as anti-trans legislation gets passed in states nationwide; with abortion protections under attack and people's rights to control decisions over their own bodies being decimated across the country; western Washington's function as a safe haven from these existential hazards will be all the more crucial.

If our city wants to be a place that supports the queer community; if we want to be a place that adapts and is resilient to the climate crisis; if we want to truly be a safe haven for those fleeing from persecution; then it is our moral imperative to make it possible for these people to call our city home. This work will require that we provide housing opportunities for people of all backgrounds and income levels in all of our city's neighborhoods. Alternative 3 is the growth option that brings us the closest to this vision, and our organization supports calls from other coalition partners like Futurewise & the Housing Development Consortium to push this option even further.

### **Further Support & Emphasize Multimodal Transportation Options**

Complete Streets Bellevue and others have frequently drawn attention to the reality that our city has historically been designed to prioritize the movement of automobile traffic over the safety and well-being of people. However, our organization would like to acknowledge and applaud the city leadership and staff who have directed changes that have begun to shift how Bellevue thinks about allocating its streetspace. From Curb Management to the Mobility Implementation Plan to Bike Bellevue, programs have been put in place that will help improve the transportation experience for people outside of cars. Continuing along this positive trajectory will require constant vigilance and intentional choices at every stage of policy-making, including in the city's Comprehensive Plan policies. We therefore submit the following comments related to the transportation element of the Draft Environmental Impact Statement:



- Road expansion should not be a transportation impact mitigation strategy in any MMA for any growth alternative. Ample studies show that increasing roadway capacity for the use of automobile traffic may bring temporary congestion relief, but through induced demand, congestion is increased over the long term. The only proven & reliable method to reduce congestion is to reduce the number of cars on the roadway – an outcome that reduces pollution, improves health, and increases our city's livability. This can be achieved through equitable growth patterns, investments in safe & protected multimodal infrastructure, and improved transit service.
- Staff's analysis reveals there is no merit to extending NE 6th St to 120th Ave NE, as this option creates additional safety conflicts with people using Eastrail and does not even improve vehicle travel times. Because of this, staff time and resources should not be utilized to evaluate a NE 6th St extension to 120th Ave NE further in the Final EIS.
- Eliminating parking minimums is a great transportation impact mitigation strategy and the city's final growth alternative should incorporate policies that support implementation. Not only does the elimination of parking minimums encourage more people to get around by other modes of transportation, it reduces barriers to development that could prevent much-needed housing & retail space from getting built.
- The DEIS mentions a transportation mitigation strategy of creating transit-only lanes on city streets, and CSB strongly supports the inclusion of this policy in the final EIS. However, existing Comprehensive Plan policy TR-85 precludes the city from creating transit-only lanes unless new right of way is created, which is both costly and time-consuming. The final EIS and adopted Growth Alternative should include policy language that supports the repurposing of existing travel lanes for more space- and energy-efficient travel modes like walking, biking, and transit.
- Staff analysis reveals that current TFP projects will not get the City of Bellevue to 100% system completion for its biking and walking networks by 2044. In fact, the analysis foresees that Bellevue's pedestrian and cycling networks, with current projected levels of investment, will only be 59% and 62% complete, respectively, in 20 years' time. Although the MIP is an improvement over previous city policy, this analysis reveals its fundamental weakness in that it puts forward no concrete timeframe to bring pedestrian & bicycle networks to 100% system completion. For a city that has adopted a bold Vision Zero goal that needs to be met in seven years' time, this is unacceptable. Bellevue's Comprehensive Plan & Final Growth Alternative should incorporate policies that require the timely and complete build out of the city's pedestrian and cycling networks.
  - To this end, the inclusion of pedestrian and cycling facilities as mitigation strategies is a welcome addition that should be included in a final growth alternative, but the city must go further by expanding the strategy to say that Bellevue should set target dates (e.g. 2030) for the completion of its pedestrian and cycling networks.
- The Mobility Implementation Plan has been a helpful tool to extend mobility analyses to travel modes beyond the private automobile, but clear priorities should be delineated in how the city evaluates impacts and gaps in its mobility network. Because of Bellevue's built-out street network, "gaps" in the vehicle network represent inconvenience and minor time delays to drivers, but these road users are ultimately able to arrive at their final destination safely and reliably. However, the system gaps that are identified for pedestrians, cyclists, and transit users represent actual infrastructure deficiencies that



could severely impact somebody's life & personal safety. To further clarify: although it is possible for drivers to safely travel to and from anywhere in Bellevue that they please, the same cannot currently be said of people who walk, bike, roll, or take transit. These gaps are therefore not equivalent in impact or scope. Therefore, in the city's final growth alternative, special priority and preference should be given to fully completing the city's pedestrian, cyclist, and transit systems over making the mobility system for private cars simply more convenient to use,

- To further emphasize this point, through the use of traffic modeling, this analysis has revealed potential *hypothetical* impacts to future vehicle travel times 20 years in the future. However, the complete absence of multimodal facilities creates significant, real impacts to the mobility & safety of people who walk, bike, or take transit *today*. These impacts, whose difference in scale should at this point be clear, should not be treated as equivalent in any policies that the city adopts as part of this Comprehensive Plan Update.

### **Housing & Land Use Policies Need to Support our Equity Goals**

Although we are first and foremost a transportation organization, Complete Streets Bellevue recognizes the inextricable link between housing, land use policy, and transportation. CSB is a founding member of the Bellevue Housing Research Coalition, a group of organizations that commissioned a poll of Bellevue residents to better understand their perspectives on housing policy in our city. We recognize that implementing better land use & housing policy makes it easier to support multimodal transportation networks that are accessible to everyone. To this end, we submit the following comments on the housing element of the Draft Environmental Impact Statement:

- In discussing housing impacts for alternative 3, the following language is used: "This alternative focuses on *equitably* providing middle-scale housing in areas of high opportunity across the city [emphasis added]. A large variety of middle-scale housing types will focus on areas of high demand while a smaller variety is available across the rest of the city." This second sentence is inconsistent with the first, as only allowing certain missing middle housing typologies in certain neighborhoods is not equitable. All missing middle housing typologies should be available in all city neighborhoods, so that families of all backgrounds are able to find the housing they need no matter where they live in Bellevue. We urge that the growth alternative evaluated in the Final EIS allow for the same, wide variety of missing middle housing typologies across all neighborhoods.
- We are in a housing crisis, where families & students are unable to afford starter homes in Bellevue because starter homes do not exist. In neighboring cities and in towns around the country, historical preservation programs for residential dwellings have been weaponized to block much-needed housing development, which leads to real consequences on who is able to call Bellevue home. *Valuing our past is important, but we must not let the pursuit of this goal get in the way of meeting the material needs of people in the present.* Because of this, we urge the city to not establish a historical preservation program for residential buildings. If such a program is established as a part of this Comprehensive Plan Update process, it must be incredibly limited in scope so as to not impede the construction of new housing.
- Avoiding displacement while increasing the affordability and supply of housing is essential. As the DEIS notes, tenant protections are a valuable mitigation strategy against rising



housing costs, and they should be included in any final growth alternative. The City of Bellevue should, at a bare minimum, adopt the suite of ARCH-recommended tenant protections, but the city should go even further by evaluating additional policies that could protect existing residents. For example, Bellevue should evaluate the impact of rent stabilization policies (such as those proposed in the 2023 State Legislative session), establishing of a community land trust program, and city-funded public/social housing programs on displacement risks. Impacts and policies to implement these programs should be included in Bellevue's final growth alternative and Comprehensive Plan.

- The final EIS should include a more detailed methodology for how future displacement is estimated. The analysis makes clear that a PSRC-created index is used for today, but for future timescales the methodology seems unclear. How are "lower", "moderate", and "higher" defined in terms of displacement risk? What distinctions are being made between "physical" displacement and "economic" displacement? We ask that the precise impacts of increased housing supply and more affordability tools on reduced displacement risk be made clear in the Final EIS.
- City leadership have repeatedly expressed the importance of both creating affordable retail space and supporting the 15-minute city paradigm by making it easier for residents to access their daily needs nearby without a car. To support both of these priorities, our organization encourages the city to, in its final preferred alternative, evaluate the impacts of land use policies that would allow for small-scale & low-impact businesses – like corner stores, bars, coffee shops, doctor's offices, etc. – to be established in residential neighborhoods. Allowing businesses that meet the daily needs of nearby residents to operate out of people's homes supports the creation of affordable retail space by removing the requirement for entrepreneurs to rent a separate commercial space. Enabling the creation of small-scale commercial spaces in residential neighborhoods also supports increased social cohesion and community bonding through the support of "third places" – areas separate from work and the home that contribute to a sense of belonging. Our organization would also posit that creating more amenities & necessities closer to where people live & play would reduce negative impacts to the overall transportation system by reducing trip lengths, thus making it possible for more people to complete more trips outside of a car. To determine whether this hypothesis is true, we strongly encourage the inclusion of such an evaluation in the final EIS.

In closing, Complete Streets Bellevue appreciates the opportunity to provide feedback during this important process. We will always support policies and initiatives that make Bellevue a more welcoming, sustainable, accessible, and inclusive place, and we believe all our recommendations above serve to further this mission.

Sincerely,

Christopher Randels  
Director, Complete Streets Bellevue  
470-205-4310  
[crandels@cs-bellevue.org](mailto:crandels@cs-bellevue.org)  
he/him



# Wig Properties LLC

4811 – 134<sup>th</sup> Place Southeast; Bellevue, Washington 98006 • Office: (425) 641-2044 • Fax: (425) 865-8648

June 8, 2023

Reilly Pittman, Planning Manager  
Department of Community Development  
City of Bellevue  
450 110th Avenue NE  
Bellevue, Washington 98004

Dear Reilly and Members of the Staff:

We reviewed the draft EIS for the City of Bellevue and would like to submit the following comments for your review and consideration. The first two items below show our suggested language edits in red and are put forth only with the intent to correct the record. The third item is a new request that we hope will be considered.

1. On page 653, in Appendix B, it defines the East Main district as follows: “East Main – Transit Oriented Development. Mix of residential, hotel & commercial uses in buildings between 4 & 6 stories with ground floor active uses along 112th.”

We would suggest deleting the wording “between 4 & 6 stories.” As you are aware, the East Main Land Use Code allows for building heights of 300’, with the opportunity to pursue taller heights through a Development Agreement if certain conditions are met. The East Main Land Use Code also only requires 100% ground floor uses along 112<sup>th</sup> but requires 50% ground floor uses along Main St & Potential Streets, and does not require ground floor uses along 114<sup>th</sup>. It is not accurate to characterize the urban form in East Main as “between 4 & 6 stories,” and would like to clarify that ground floor active uses are only 100% required along 112th.

2. On B-5, page 641, it notes the following about East Main: “This district’s size is limited to achieve desired intensities in a compact, walkable pattern wherever reasonably feasible that reinforces its role as development-oriented to transit. The policies are intended to promote a balanced mix of housing, office, retail, and hotel uses that support a safe and active neighborhood during daytime and evening hours.”

We suggest the two insertions noted above to bring the description in the line with the following excerpts from the East Main CPA:

**“Promote a mix** of housing, office, retail and hotel uses that create a vibrant active center during both daytime and evening hours.”

“Foster walkability and visual interest by establishing a pattern of small walkable blocks within the station area **wherever reasonably feasible.**”

Thus, these two revisions ensure that the language of the Draft EIS conforms to the City’s Comprehensive Plan for the area.

3. Finally, we would recommend examining taller building heights (~450’) along the freeway in the high density East Main district if a shorter residential building was constructed at 112<sup>th</sup> & Main St in the EIS. This would:
  - a. Shift height away from the Surrey Downs neighborhood and toward I-405;

- b. Allow more affordable housing units quicker since the MFTE program can be utilized in the midrise building but is very difficult to justify in a high rise; and
- c. Allow the same number of housing units to be delivered at East Main (instead of fewer if the building heights were not increased along the freeway and the site was instead underbuilt).

We note that the anticipated building heights in Wilburton on the east side of I-405 (as described in the Draft EIS) may rise to 450', so this additional flexibility in East Main would be consistent with the planned urban form across I-405.

We greatly appreciate your time and willingness to review our comments above. We thank the Staff for their support and consideration.

Warm regards,



Mon Wig  
Wig Properties



Leshya Wig  
Wig Properties

5 June 2023

City of Bellevue Development Services Department  
Attn: Reilly Pittman  
450 110th Avenue NE  
Bellevue, WA 98004

Hello Mr. Pittman!

Following are my comments on the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement:

1. General, applicable to entire DEIS:

1.1 The City has failed to explain why the DEIS alternatives have departed so drastically from King County's adopted 2021 Countywide Planning Policies which established the 2019-2044 housing and job targets. The attached Table X1 compares the City's planned housing and jobs growth capabilities (in Alternatives 0, 1, 2, and 3) with the King County approved targets: the City's values for the housing/job metrics are about 2 to 3 times higher than the County-approved values, but there are no credible explanations for these differences. The alternatives should be revised to comply with the housing unit and jobs targets set forth in Table DP-1 of the King County Countywide Planning Policies, dated 21 December 2021.

1.2. The DEIS should be revised to eliminate the separate Wilburton subarea changes; a separate DEIS for this subarea should be prepared so that public comments on the City's proposal can be made.

1.3. There is no description in the body (or as an appendix) of the DEIS of the City's proposed version of the 2024-2044 comprehensive plan; thus, it is not clear just what changes, if any, the City is proposing to make in the existing Comprehensive Plan which would form the basis of the City's proposed action; without this description it is not possible to understand the 4 alternatives. The DEIS should be revised to include a description of the 2024-2044 comprehensive plan with proposed changes in each section highlighted, as this is the basis for the DEIS. Without such a description, it is not possible to understand the 4 alternatives described in the DEIS, since the proposed alternatives must identify how they differ from the proposed version of the comprehensive plan.

2. Para. 2.1, pg 2-1: The text on this page does not explain that the 35,000 housing-unit and 70,000 job goals were established by the City of Bellevue staff during their coordination in 2021 with the King County Office of Performance, Strategy and Budget. Indeed, the Bellevue staff's proposed 35,000/70,000 goals both are 30% higher than the goals originally proposed by King County; thus, the source and qualitative and quantitative rationale for the 35,000/70,000 goal values should be identified and published in the DEIS/EIS. The City should also explain the City staff's qualitative and quantitative rationales for the higher-value targets for each alternative in this paragraph.

3. Para. 2.1, pg 2-1: The text on this page states that the No Action Alternative does not meet other new planning requirements, including affordable housing across income bands

and a range of housing types. However there is no specific reference to the source or the definition of the “other new planning requirements”, nor any comparison of HUs produced under the No Action Alternative to the specific requirements referred to; this omission should be corrected. In addition, the City staff has provided no information on what types and numbers of HUs would be produced *yearly* by private contractors and builders, or by City actions under the No Action Alternative during the time period (2024-2044) covered by the comprehensive plan.

4. Para. 2.3.4, pp 2-11 and 2-12:

4.1 WA OFM has recently (April 2023) released their Postcensal Estimates of WA State housing units; this data shows that Bellevue had approximately 65,900 total housing units (HU) in 2022; included in this total are the approximately 2,100 HU that the City claims were added to the City’s inventory during 2017-2022. Thus, the City’s total HU supply in 2044 should approach 106,900 units under the No Action Alternative, a value that provides ample HU growth capacity for the City.

4.2 The text in this para. states that this alternative does not meet other new planning requirements, but there is no explanation of what the new requirements are, and what the City’s HU/jobs target values (under the new requirements) would be. These omissions should be corrected by listing the new requirements, and by identifying the new City HU/jobs target values. It should be noted that the King County 35,000/70,000 housing/jobs targets are specific values, they are not minimum values and are required to form the basis for the proposed 2024 version of the City’s comprehensive plan.

5. Table 2-12, pg 2-33:

5.1 In the Theme row of this table, the table should be revised to describe what the “Current plan” theme is for Alternative 0; simply stating “Current plan” does not provide sufficient information to compare it with the other 3 alternatives.

5.2 Why would Alternative 0 restrict housing types to residential buildings with studios and 1-bed units; why would other residential buildings with 2 or 3 bedroom units not be built?

5.3 What does the entry “Less than 10%” mean in the Housing Affordability row for Alternative 0?

6. Para. 4.2.3, pg. 4-5:

6.1. The City states in this paragraph that the City has determined new housing growth targets because: (a), the City does not include a market factor; (b), the City has added capacity in two areas; (c), projects are developing at higher densities than assume in the UGC Report; (d), redevelopment of certain properties; and, (e), a more generous City redevelopable threshold. Since the City was responsible for developing and submitting to King County the 35,000HU and 70,000 jobs targets, the DEIS should include a more detailed explanation of what the quantified impact is of each of the 5 factors, and the dates they became effective. The City should also describe what the new City targets are if they are different from the King County approved values (35,000 housing units, 70,000 jobs).

6.2. Exhibit 55 in the 2021 King County Urban Growth Capacity Report (June 2021, ratified 6 April 2022) shows that Bellevue has more than adequate capacity to meet the 2019-2044 housing and jobs targets (35,000 HU, 70,000 jobs). Thus, there is no need to consider changes in the Comprehensive Plan that would permit development of



the extravagant housing/jobs values for the 4 alternatives as shown in Table 5-6 of the DEIS, and in the attached Table X-1.

7. Para. 5.3.2, pg 5-12: No Bellevue population forecasts are provided for each alternative; they should be included in this paragraph (or as appendices), and should show values for each year, 2024-2044, and include 'breakouts' that show the number of persons that are assumed to be housed in each of the 16 City subareas (Bridle Trails, Bel-Red, Crossroads, etc.) of the City for each year.

Sincerely,

Would you please confirm your receipt of a readable copy of my comments?

*David F. Plummer*

David F. Plummer

14414 NE 14th Place  
Bellevue, WA. 98007

Attachment: Table X1. Bellevue Housing-Unit and Job Growth Predicted Under DEIS  
Alternatives, 2024-2044

**Table X1. Bellevue Housing–Unit and Job Growth  
Predicted Under DEIS Alternatives, 2024–2044**

23–May–23

		CoB Alternative			KCPP	CoB Current
Metric	No–Action	No.1	No.2	No.3		
Housing Units	41,000	59,000	77,000	95,000	35,000	65,891
Jobs	124,000	179,000	177,000	200,000	70,000	??
% Chg From						
KCPP Value						
Housing Units	117%	169%	220%	271%		
Jobs	177%	256%	253%	286%		

- Source:
1. Bellevue values: 2024–2044 Comp.Plan Periodic Update DEIS, April 2023
  2. King County Values: 2021 King County Countywide Planning Policies, April 2022
  3. CoB current values: WA OFM, Postcensal Estimates, April 2023

# BELLEVUE'S DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

John Wu

Wilburton Resident Since 2011

6/9/2023

Dear Ms. Stead:

**Please include me as a party of record.**

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. The Wilburton subarea and its residents are dedicated to protecting, restoring, and enhancing the character and livability of Wilburton, including the Kelsey Creek Watershed system. Natural elements play a vital role in enhancing the quality of life for Wilburton residents, and the Kelsey Creek Watershed Basin system, and all of its other basin streams such as Goff stream, sub-tributaries, and wetlands flowing throughout Wilburton. King County's DRNP Water Quality Index rated Kelsey Creek at NE 8th with a "Moderate" score, and its Oxygen levels, a "Poor" rating score.

As a resident of Wilburton, I support the inception of the Wilburton/NE 8th Subarea Plan Goals:

## **"Wilburton/NE 8th Subarea Plan Goals**

- **To separate residential, recreational, and open space areas from commercial areas and to protect space.**
- **To improve pedestrian accessibility and attractiveness of commercial areas for residents of Bellevue.**
- **To support the provision of commercial services in Wilburton that complement Downtown..."**

and:

**"...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."**

I also support the following **Land Use Policies** and aligning with the Wilburton/NE 8th Subarea Plan:

**"...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas.**

and are committed to supporting policies protecting and preserving Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays a crucial role in providing a sense of well-being.

## Natural Determinants Policies:

### "Policies

**POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin.**

**POLICYS-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek.**

**POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan."**

Wilburton is home to many animals that fall into Washington Fish and Wildlife's priority and endangered habitat and species. They include the Great Blue Heron, the Bald Eagle, Chinook Salmon, Coho Salmon, Sockeye Salmon, Steelhead, bats, owls, hawks, and a variety of different birds.

The City's Determination of Non-Significance is not aligned with the conservation of the City of Bellevue's Critical Areas Regulations for Streams and Riparian Areas, Wetlands, and Habitats for Species of Local Importance including the Kelsey Creek Watershed Report and the City's efforts to protect and maintain the health of Wilburton's critical areas.

[https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2021/KelseyCreek\\_Assessment\\_Report\\_2021\\_1130.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/KelseyCreek_Assessment_Report_2021_1130.pdf):

**"The Kelsey Creek Watershed is a vital ecosystem that supports numerous species of wildlife and provides essential ecological services to the surrounding communities. The proposed development of density in these areas including private properties has the potential to significantly impact the delicate balance of the ecosystem,..."** including water quality, habitat fragmentation, increasing runoff, and effects of water temperatures with decreasing tree canopies. Young trees cannot make up for the shade and protection offered by 100-plus-year-old trees. Decreasing tree canopies result in increased water temperatures and may be detrimental to priority animals, as well as the endangered Chinook, Coho, and other salmon. The Greater Kelsey Creek Watershed historically provides extensive spawning and rearing habitat for a larger number of other salmon species such as Chinook, Sockeye, Coho, Cutthroat Trout, Peamouth Minnows, and Steelhead.

The DEIS's Determination of Non-Significance does not align with the City's efforts to restore and protect critical areas in the Kelsey Creek Watershed System (KCWS) due to the limited factors being taken into account. The DEIS was written before House Bill 1110, HB 1337, HB 1181 were passed into law. It also does not include the impact of Covid on the workplace resulting in increased remote employment, Bellevue's pending tree code ordinance, and the impact of the different housing target strategies on the Kelsey Creek Watershed, impervious surfaces, and their effect on endangered species of local importance. The loss of century-old tree canopies and their effect on water and air temperatures, the increasing air and land pollution with increasing traffic, and the decreased habitat and food sources. Also, incentives should not be seen as a substitute for effective stormwater management. Wilburton's watershed and ecosystem require proper stormwater management measures to mitigate the risks of flooding and water pollution caused by toxic runoff.

Moreover, according to a technical report by Golder Associates and the Watershed Company, the city of Bellevue's DEIS falls short of utilizing the best available science and existing conditions. This critique addresses the impacts of this inadequacy:





















1. Information related to traffic and site conditions is incomplete and potentially inaccurate, which hinders environmental evaluations.
2. Protecting the environment leads to the long-term sustainability of the community and its people. It is essential for their health, safety, and quality of life. For example, in the case of Kelsey Creek, the watershed provides critical ecosystem services that directly support the community's health and well-being, such as clean water, clean air, and flood control. Prioritizing the environment can help prevent harm to low-income communities of color, and indigenous people who are disproportionately affected by harmful environmental conditions. Environmental equity addresses these inequalities and provides equal protection and access to clean, and healthy communities.
3. The report encourages low-impact development and retrofits that improve stormwater runoff. Untreated run-off causes pre-spawn mortality on Coho salmon, and depending on future rates of urbanization, localized extinction of Coho salmon could occur within a matter of years to decades.
4. According to the report, Bellevue is in the process of updating its Shoreline Management Act. Under the proposed update, shorelines themselves are not regulated as critical areas, and critical areas within shoreline jurisdiction would be regulated under LUC Part 20.25H. Bellevue has not identified all critical areas in the city.
5. The City of Bellevue's Greater Kelsey Creek Watershed's riparian corridor across all of the sub-basins includes both approximately 90% private properties and 10% publicly owned properties and is critical to species of local importance, aquatic animals, and other wildlife, Peregrine Falcon, Bald Eagles, Red-tailed Hawks, Blue Herons, Pileated Woodpecker, Great Blue Heron, cardinals, hummingbirds, bats, opossums, beavers, bobcats, deer, coyotes, and many others. The diverse range of animals needs to be managed, protected, and maintained as part of the existing riparian corridor structure and function within the entire sensitive ecosystem. This ecosystem provides shelter, food, and protection, and maintains temperatures critical to their survival.
6. Adopting green infrastructure practices to maximize the achievement of objectives, these efforts are expensive and limited.
7. With 90% of the riparian corridor on private properties, the city has not been able to keep up with tracking damages in and near open streams.
8. The City's options are insufficient. The City's plan mitigates some of the side-effects of water overflow. The new plan should focus on preventing runoff from the source, increasing impervious surfaces caused by development. Unanticipated cleanup efforts with increased stormwater runoff may suggest that the city may end up footing the bill, and cause tax-payer runoff plan liability. We need solutions that offer long-term sustainability.
9. Wilburton's Kelsey Creek has the greatest amount of impervious surface areas. Increasing mixed-use developments, multi-unit dwellings, increasing cars and toxic

waste from their tires, and increasing construction will cause even greater impervious surface areas with increasing toxic stormwater runoff.

Subbasin	Commercial/ Office (%)	Highway (%)	Industrial (%)	Mixed- use (%)	Multi- Family (%)	Park (%)	Single- family (%)	Total (ac)
Richards Creek	13.3%	1.9%	8.1%	4.8%	17.0%	10.2%	44.8%	1380
Sunset Creek	5.6%	6.3%	1.0%	2.4%	1.6%	4.0%	79.2%	854
West Tributary	8.4%	2.4%	0.0%	26.2%	4.4%	9.2%	44.2%	958
Goff Creek	8.4%	0.8%	0.0%	10.3%	0.0%	4.4%	76.2%	529
Valley Creek	7.2%	2.0%	0.0%	5.0%	15.0%	10.0%	60.8%	1300
Sears Creek	32.7%	3.0%	0.0%	21.8%	9.8%	0.0%	32.8%	355
Greater Kelsey Creek Watershed	11.8%	2.9%	1.7%	8.4%	11.0%	11.3%	51.8%	10376

Table 7 compares the change in canopy cover and impervious surfaces between 2006 and 2017 for the nine subbasins and the Greater Kelsey Creek Watershed (HRCd 2021). The Sears Creek Subbasin and the Sturtevant Creek Subbasin experienced the largest tree canopy loss and impervious surface increase of all the subbasins in the Greater Kelsey Creek Watershed.

**Table 7. Change in Tree Canopy and Impervious Surfaces from 2006 to 2017 in the Greater Kelsey Creek Watershed**

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factors of the urban environment and can contribute to changes in citywide canopy numbers. As described in the Urban Tree Assessment, it is important for the City to use this assessment to inform future investments in the urban forest so that all those who live, work, and play in Bellevue can benefit from the urban forest. The City must proactively work to protect the existing urban forest and replenish the canopy with additional native trees. Nowhere in the DEIS do the alternatives address how the existing urban forest will be protected. We are hoping that the DEIS will address replacing lost trees with native trees, and that the Comprehensive Plan show synchrony with its Urban Tree Assessment, as well with the planned updated tree code. Which alternatives may be best for protecting our urban trees?

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It is nearly impossible to keep up with every possible land use bill and in the annual legislative session. These bills passed in this legislative session are important for the comprehensive plan in any city, and if not covered under this DEIS then an amendment would be needed. An amendment would take more time and it would be more costly to the City of Bellevue. We recognize the significant effort already undertaken for this DEIS but we also desire to review a complete DEIS that includes passage of bills and regulations that have occurred in 2023.

Thank you for the opportunity to comment and we look forward to working with you and your staff in creating a City of Bellevue comprehensive plan that is complete, meaningful, and applicable for immediate use.

Sincerely,

John Wu

# BELLEVUE'S DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Liangwei Ge

13018 NE 1<sup>st</sup> St., Bellevue WA 98005

06/09/2023

Dear Ms. Stead:

## **Please include me as a party of record.**

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. The Wilburton subarea and its residents are dedicated to protecting, restoring, and enhancing the character and livability of Wilburton, including the Kelsey Creek Watershed system. Natural elements play a vital role in enhancing the quality of life for Wilburton residents, and the Kelsey Creek Watershed Basin system, and all of its other basin streams such as Goff stream, sub-tributaries, and wetlands flowing throughout Wilburton. King County's DRNP Water Quality Index rated Kelsey Creek at NE 8th with a "Moderate" score, and its Oxygen levels, a "Poor" rating score.

As a resident of Wilburton, I support the inception of the Wilburton/NE 8th Subarea Plan Goals:

### **"Wilburton/NE 8th Subarea Plan Goals**

- **To separate residential, recreational, and open space areas from commercial areas and to protect space.**
- **To improve pedestrian accessibility and attractiveness of commercial areas for residents of Bellevue.**
- **To support the provision of commercial services in Wilburton that complement Downtown..."**

and:

**"...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."**

I also support the following **Land Use Policies** and aligning with the Wilburton/NE 8th Subarea Plan:

**"...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas.**

and are committed to supporting policies protecting and preserving Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays a crucial role in providing a sense of well-being.

### **Natural Determinants Policies:**

#### **"Policies**

**POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin.**

**POLICYS-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek.**

**POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan."**

Wilburton is home to many animals that fall into Washington Fish and Wildlife's priority and endangered habitat and species. They include the Great Blue Heron, the Bald Eagle, Chinook Salmon, Coho Salmon, Sockeye Salmon, Steelhead, bats, owls, hawks, and a variety of different birds.

The City's Determination of Non-Significance is not aligned with the conservation of the City of Bellevue's Critical Areas Regulations for Streams and Riparian Areas, Wetlands, and Habitats for Species of Local Importance including the Kelsey Creek Watershed Report and the City's efforts to protect and maintain the health of Wilburton's critical areas.

[https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2021/KelseyCreek\\_Assessment\\_Report\\_2021\\_1130.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/KelseyCreek_Assessment_Report_2021_1130.pdf):

**"The Kelsey Creek Watershed is a vital ecosystem that supports numerous species of wildlife and provides essential ecological services to the surrounding communities. The proposed development of density in these areas including private properties has the potential to significantly impact the delicate balance of the ecosystem,..."** including water quality, habitat fragmentation, increasing runoff, and effects of water temperatures with decreasing tree canopies. Young trees cannot make up for the shade and protection offered by 100-plus-year-old trees. Decreasing tree canopies result in increased water temperatures and may be detrimental to priority animals, as well as the endangered Chinook, Coho, and other salmon. The Greater Kelsey Creek Watershed historically provides extensive spawning and rearing habitat for a larger number of other salmon species such as Chinook, Sockeye, Coho, Cutthroat Trout, Peamouth Minnows, and Steelhead.

The DEIS's Determination of Non-Significance does not align with the City's efforts to restore and protect critical areas in the Kelsey Creek Watershed System (KCWS) due to the limited factors being taken into account. The DEIS was written before House Bill 1110, HB 1337, HB 1181 were passed into law. It also does not include the impact of Covid on the workplace resulting in increased remote employment, Bellevue's pending tree code ordinance, and the impact of the different housing target strategies on the Kelsey Creek

Watershed, impervious surfaces, and their effect on endangered species of local importance. The loss of century-old tree canopies and their effect on water and air temperatures, the increasing air and land pollution with increasing traffic, and the decreased habitat and food sources. Also, incentives should not be seen as a substitute for effective stormwater management. Wilburton's watershed and ecosystem require proper stormwater management measures to mitigate the risks of flooding and water pollution caused by toxic runoff.

Moreover, according to a technical report by Golder Associates and the Watershed Company, the city of Bellevue's DEIS falls short of utilizing the best available science and existing conditions. This critique addresses the impacts of this inadequacy:





















1. Information related to traffic and site conditions is incomplete and potentially inaccurate, which hinders environmental evaluations.
2. Protecting the environment leads to the long-term sustainability of the community and its people. It is essential for their health, safety, and quality of life. For example, in the case of Kelsey Creek, the watershed provides critical ecosystem services that directly support the community's health and well-being, such as clean water, clean air, and flood control. Prioritizing the environment can help prevent harm to low-income communities of color, and indigenous people who are disproportionately affected by harmful environmental conditions. Environmental equity addresses these inequalities and provides equal protection and access to clean, and healthy communities.
3. The report encourages low-impact development and retrofits that improve stormwater runoff. Untreated run-off causes pre-spawn mortality on Coho salmon, and depending on future rates of urbanization, localized extinction of Coho salmon could occur within a matter of years to decades.
4. According to the report, Bellevue is in the process of updating its Shoreline Management Act. Under the proposed update, shorelines themselves are not regulated as critical areas, and critical areas within shoreline jurisdiction would be regulated under LUC Part 20.25H. Bellevue has not identified all critical areas in the city.
5. The City of Bellevue's Greater Kelsey Creek Watershed's riparian corridor across all of the sub-basins includes both approximately 90% private properties and 10% publicly owned properties and is critical to species of local importance, aquatic animals, and other wildlife, Peregrine Falcon, Bald Eagles, Red-tailed Hawks, Blue Herons, Pileated Woodpecker, Great Blue Heron, cardinals, hummingbirds, bats, opossums, beavers, bobcats, deer, coyotes, and many others. The diverse range of animals needs to be managed, protected, and maintained as part of the existing riparian corridor structure and function within the entire sensitive ecosystem. This ecosystem provides shelter, food, and protection, and maintains temperatures critical to their survival.
6. Adopting green infrastructure practices to maximize the achievement of objectives, these efforts are expensive and limited.

7. With 90% of the riparian corridor on private properties, the city has not been able to keep up with tracking damages in and near open streams.
8. The City's options are insufficient. The City's plan mitigates some of the side-effects of water overflow. The new plan should focus on preventing runoff from the source, increasing impervious surfaces caused by development. Unanticipated cleanup efforts with increased stormwater runoff may suggest that the city may end up footing the bill, and cause taxpayer runoff plan liability. We need solutions that offer long-term sustainability.
9. Wilburton's Kelsey Creek has the greatest amount of impervious surface areas. Increasing mixed-use developments, multi-unit dwellings, increasing cars and toxic waste from their tires, and increasing construction will cause even greater impervious surface areas with increasing toxic stormwater runoff.

Subbasin	Commercial/ Office (%)	Highway (%)	Industrial (%)	Mixed- use (%)	Multi- Family (%)	Park (%)	Single- family (%)	Total (ac)
Richards Creek	13.3%	1.9%	8.1%	4.8%	17.0%	10.2%	44.8%	1380
Sunset Creek	5.6%	6.3%	1.0%	2.4%	1.6%	4.0%	79.2%	854
West Tributary	8.4%	2.4%	0.0%	26.2%	4.4%	9.2%	44.2%	958
Goff Creek	8.4%	0.8%	0.0%	10.3%	0.0%	4.4%	76.2%	529
Valley Creek	7.2%	2.0%	0.0%	5.0%	15.0%	10.0%	60.8%	1300
Sears Creek	32.7%	3.0%	0.0%	21.8%	9.8%	0.0%	32.8%	355
Greater Kelsey Creek Watershed	11.8%	2.9%	1.7%	8.4%	11.0%	11.3%	51.8%	10376

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Thank you for the opportunity to comment and we look forward to working with you and your staff in creating a City of Bellevue comprehensive plan that is complete, meaningful, and applicable for immediate use.

Sincerely,

July 7, 2016

To Whom It May Concern:

Re: Newport Hill Shopping Center

During the past few weeks several people have asked me what I think about the proposed development of the Shopping Center. Like most people I have been thinking about this issue for many years. In the interest of finding a solution to the problem of defining the best use of the Newport Hills Shopping Center property I would like to make the following comments:

It is understandable that we Newport Hills residents feel strongly about what will happen to this property because of loyalty to the current businesses, fear of losing what has become familiar to us and fear of how changes might affect our future lives. Unfortunately, we don't have the power to exclusively decide what will happen to this property because it is privately owned and regulated by City Zoning and Building codes. But we do have the power to influence proposed zoning changes which affect the value of the property and what a developer might be able to do with the property. It appears that we have used this power to stop the recent proposal to re-zone the property so that it could be sold and re-developed into condos and businesses.

So now what? What will the next proposal look like and when will it come? Did we dodge a bullet this time? Or did we pass up an opportunity to renew the center of our community? Maybe it's time we took a proactive look at what might be coming our way in the future. I think everyone would agree that the current condition of the shopping center is long overdue for an overhaul or replacement. The question is, what is the best plan for the Shopping Center property that will benefit the owners who want to sell, a developer who wants to make money and the residents who will live with the results of the plan?

First, let's talk about car traffic. Do you remember when if you wanted to see a movie in your home you had to buy or rent a VCR? One or two trips to Blockbuster each week. Now we can stream movies with the click of a remote control. So, that's less driving and less traffic. We can now buy our groceries online and have them delivered. Less driving. We can now deposit checks by taking a photo of them on our smart phones. Soon there will be no need to go to the bank. Less driving. We can now have Uber pick us up to take us to anywhere we want. And driverless cars are coming online within 3-5 years or sooner. Will this mean less traffic? Maybe not, but fear of more traffic should not be the issue here because we will be doing less of it ourselves. The increase in traffic we have experienced on 119<sup>th</sup> Ave SE during the last few years is a result of two

sources: 1. cut-through cars coming and going to newer housing units built to the south of Newport Hills (Newcastle) and 2. An increase in the number of kids being driven to schools. The amount of traffic to and from the shopping center has actually decreased since year 2000. If we look back a few years, we used to have two grocery stores (one with a post office), two banks, a liquor store, a drugstore and two gas stations. The parking lot was filled with a lot more cars than there are now. Not to mention, two grade schools and a middle school. The recent development proposal showed some 100 new condos. These condos would be near the bus line and schools which would reduce the traffic impact. Even if 100 cars left home every morning at the same time, it would only take about 10 minutes for them all to leave the hill. And remember if we want any more businesses in the shopping center there WILL be more traffic. If a Trader Joe's had agreed to come here (we petitioned them to do so a few years ago) there would have been at least 30 to 50 cars per hour coming in and out of the shopping center. The point here is that whatever changes are made to the shopping center traffic issues should not be a limiting factor for what is the best use of the property.

Next, is there any hope that we will ever have the kind of shopping center we had prior to year 2000? I have been hearing that the former Albertson's store (also formerly Stod's batting cages) will soon become an international market. Will this be the "anchor" store we have all been missing? The kind of products this store will have on the shelves most likely will not be like Safeway or QFC. If it succeeds here, it will confirm and support a cultural shift that is already taking place in Newport Hills. The values of this cultural shift are just beginning to emerge. Will these newer residents have a different set of values for the area we now call Newport Hills? And how will their needs influence what happens on the shopping center property? But, for whoever lives here, having more businesses here, especially "anchor" tenants like a QFC type grocery store and/or a drugstore is very unlikely to happen without more local residents to support those businesses. We have already found this out with a succession of failed grocery stores, the exodus of (2) banks, the drugstore, a liquor store and a gas station. Does anybody really believe that this will change without more residents living on the hill to support them? In year 2000 at one of the c

Newport Hills Community Club meetings, by a raising of hands, people at the meeting were asked if they shopped at Costco and Trader Joes. Just about everybody's hand went up. We tried getting Trader Joe's to come here. They said no. And unless Costco begins to operate smaller stores we will never see a Costco in Newport Hills. Clearly our food choices have evolved since the 60's and 70's and there is a greater mix of cultures and ages now, all requiring differing kinds of foods. The success or failure of the proposed international food store will tell us a lot about the future needs of residents here with respect to the shopping center redevelopment.

It is also worth noting the business cycle of commercial properties of this kind. Someone or some corporation buys the land, then constructs buildings and then leases the spaces. The owners generally don't use the profits to make improvements to neighborhood surrounding a shopping center. They pay taxes to the City who is charged with making such improvements. And when a shopping center ages and loses tenants, the property is sold to buy land and build a new shopping center somewhere else. I'm surprised that the sale of this property hasn't take place sooner. But then we just went through a recession. I'm sure the price of the land is greater now than ever before which obviously is the reason for the proposed zoning change. Without a rezone, will the owners be willing to sell the property for less? At this point, only time will tell.

By now you might think that I'm in favor of the proposal that was recently presented. Nope. I'm not. For the record, the more I consider what was being proposed the more I did not like the idea of a bunch of garage doors all lined up like they are in San Francisco where the lots are so skinny. My reaction to this proposal is not based on what I think is best for the shopping center property, because at this point, I'm not sure WHAT is the best plan for re-development. I just don't like the look of it, a mostly emotional reaction. I don't think the City would approve of something like this in the middle of Medina or Enatai, so why in Newport Hills? What I'd like to see on this property may never happen but I'm getting ahead of myself. First, I will outline several Scenarios that are all possible, then I'll tell you which ones I like.

Scenario #1: Residents resist any sort of redevelopment for various reasons, the city agrees with the residents and does not rezone the property. Then the owners choose not to sell the property for less money and potential buyers go elsewhere. Left as is, over time, the mix of businesses could change. Maybe a Day Care center would move in or a thrift store. Maybe the City would lease space for a senior center. This condition could last for the next 30 years or longer. For example, we have recently acquired a beer and pizza restaurant which took the place of the Chinese food restaurant.

Scenario #2: The owners decide to sell property without a re-zone. Not being a developer I have no idea what could then happen. We know large retail businesses and banks most likely will not be back. If my memory is correct, in about the year 2000 the City proposed a rezone to 2 stories with retail on the main floor and professional offices on the second floor as I remember it. I think there were even some apartments in the mix. 119<sup>th</sup> Avenue was to be tree lined and made beautiful. But if you remember, the City paid for this design work in the hopes of enticing the owners to self-redevelop the property. Because there was never any requirement for the owners to act on the plans presented, there was never any guarantee any

of it would actually happen. Then the dot.com bubble burst, 9-11 occurred and all these grand ideas were forgotten. So, if the property is sold under the current zoning code who will take the risk of rebuilding the Shopping Center without an anchor tenant? I have heard little or nothing about any plans by the current owners to do anything with the property.

Scenario #3: Owner and future developers keep the pressure on the City to approve SOMETHING that involves a re-zone. A new proposal comes forth and another vote of confidence from the residents would take place. There is no guarantee that any amount of resistance to any plan will actually stop the plan. I'm pretty sure the City can choose to listen, then ignore the resident's objections. If this happens we may be forced to live with what the developer proposes with some minor concessions or file a lawsuit which would divide the community after which there would be winners and losers. The City has the right and a duty to rezone the property to reflect changing needs and as long as the developer follows the building codes there won't be anything anyone can do about it except to file a lawsuit. If the lawsuit succeeds in preventing a plan from going forward, then we are back to where we started after lost time, energy spent and the community broken in half with resentments lasting for another generation.

These first (3) Scenarios all are based on the land purchaser (developer) and the City deciding what is right for this property with reactive input from residents. At this point in time, I think it is very important that other options are considered and even forwarded to the City for review (which I am doing with this letter). Rather than collecting money to hire a lawyer to stop a proposed plan, a collection could be made to hire a consultant to research options that reflect the needs and wants of the community that would also be attractive to a future developer. The point is, if the residents of Newport Hills and/or the City don't come up with a vision for what is best, for now and for the future of the Shopping Center, how can there possibly be any clear feedback to the City about what is acceptable to the residents from a development point of view? It's easy to tell the City what we don't want after it's presented to us. Do the owners have a vision for the property? Has anyone asked them? My guess is that if they did and it was profitable, it would already have taken place. Maybe the city could fund another feasibility study. They did it before, why not again? It's been over 15 years since there was any serious study of what could be done.

Are we residents just going to keep reacting to what is put before us without knowing WHAT is possible? If we could know what is possible then we would have something tangible to talk about and look forward to.

The next two Scenarios are ones that I have been thinking about for the last 15 years. Maybe the time has come for them to be formally

considered. I have no idea about the feasibility of these ideas but then few people thought a person could someday walk on the moon. I know that when I began to speak about these ideas 15 years ago most people, I talked to thought I was just dreaming. Anyway, here we are 15 years later and this still what I think should be considered:

Scenario #4: Rezone the property for 10 stories businesses, condos and apartments so that there would be enough new residents to support a small retail “village”. There could also be a small mini-mart grocery store, a coffee shop, a bakery, a thrift store, a day care center, a small performing arts center, a senior resource center, an Uber car storage lot, some small “one person” business suites, a few small commercial spaces for a local plumber, electrician, painter, handyman service, etc. There could be some underground parking. There could be a small “Zocalo” (public square) for public gatherings. The top floors would be apartments and condos. These new residents might be exactly what the Newport Hills Swim and Tennis Club needs for new membership so that they could build their indoor tennis facility which would in turn allow them to rebuild the locker room building with a day care facility and finally replace the two aging swimming pools. This Swim Club is a community treasure that could be supported by new members living right across the street. So how is a 10-story apartment building any better than rows of garages and condos? Well, you would only see one or two entrances to the underground parking for one thing. Going “up” instead of “out” would also preserve valuable space for people to gather. I think it’s a better way to increase density to a point that will support the vision and reality of a Newport Hills village. This is the way it’s been done in Europe and Canada for years. Out of place? Maybe, but think of Newport Hills 50 years from now. My hope is that we can all walk or ride a bike to a small shopping district in the center of our neighborhood, similar to the way it is done in Europe and other places. Take a look at what is happening in Columbia City in Seattle. They have a new PCC store there, several new high-rise apartment/condo buildings and an improving business core of small businesses and restaurants. Sure, there are more people but are there more cars? Some increase, but not proportional to the increase in people living there. And what about Queen Anne Hill in Seattle?: mostly single family homes with lots of apartments along the bus routes that support (3) grocery stores including a Trader Joe’s. And the roads have not been widened to handle more cars since they were built in the 1920’s, almost 100 years ago. Queen Anne Hill is proof that people who live in apartments use buses to go to work and walk to shopping and restaurants. I believe that more condos and apartments would be a great opportunity for residents to downsize without leaving Newport Hills. Apartments also are perfect for young people who are just getting out of college and establishing themselves. They could become future homeowners in Newport Hills and when THEIR kids grow up and move away, they could move back into the condos and apartments. What a great mix of young and old people this

could be. Young people have always been the first adopters of new ideas and technologies. Embracing youth is a key element to sustaining a vibrant and fun neighborhood.

Now a side note about taxes. I think ANY kind of improvement might help to increase the value of homes in Newport Hills. But then housing prices in Newport Hills are continuing to rise to historic levels even with the shopping center just as it is. The effect of a re-development, whatever it might be, is not a relevant factor with respect to taxes.

Scenario #5: Vote on a bond issue for the City to form a Coop to buy the property and let the residents of Newport Hills help pay for the property with a small amount of additional taxes paid each year for the next 50 years. In this Scenario, the residents would all become owners and have more input about what to do with the property. This property never again would be sold to the highest bidder. It could be preserved as it is now while the planning work takes place, then developed when the time is right for something on a grander scale. This would provide time to see how the demographics of the neighborhood might change the needs of residents and how new technologies will affect our lives. Maybe it should just be a few small businesses (like it is now) along with a park. Or a performing arts center or a branch of the YMCA. Or a Zocalo surrounded by small businesses. Lots of options. There really isn't that much land there, so there would be some tough choices about what would be the best mix of uses. If residents don't want a rezone so more housing can be built on this property, this option might be the only way to prevent this.

These last two options will most likely be met with lots of resistance, either emotionally or from a practical/financial standpoint. I don't know what is possible either financially or zoning code wise but it's time we started thinking about what might be possible. Are there other viable options that would fit with current lifestyles here in Newport Hills that could also serve us well into the future? And how will any plan evolve and come into being?

I think it is educational to look at what took place along Gilman Boulevard in Issaquah a few years back. All the shopping centers that are there now appear to have been built without a good master plan. Why? Because for many years before all the construction began, the city council which consisted of older, longtime residents of Issaquah just said "no" to rezoning for commercial purposes. So, for years, the pressure grew to develop the properties without any advance planning. When the older members of the city council passed away and/or retired the dam broke so to speak. Based on what is there now it appears that rezoning took place without much good long-term planning and coordination of projects. Sure, we don't have acres and acres of farmland to work like they did, but just

saying “no” to development is not the best way to deal with this issue in my opinion. Do I mean to say we should have said “yes” to the recent proposal? No, not at all. But sooner or later we will be again challenged to weigh in on a proposal. I think it’s time to take a look at feasible options and begin forming opinions about them so the City has advance notice of what will work for us. We need to have more communication with the City to attempt to get some help with planning for the future of this property. People in Newport Hills pay a lot of taxes and some of that tax money could be spent helping us to come up with a plan.

Complaining about how the shopping center looks, succumbing to irrational fears about traffic and feeling badly that we don’t have more of the type of businesses we want will not produce the changes we want and need. And vilifying the owners, the developers and/or the City won’t help either. Land of this kind gets developed for PROFIT, none of which will come back to our community except for the taxes that get paid. Unfortunately, that’s just the way commercial real estate business works. That said, we shouldn’t be forced to accept just what will put money in the pockets of the landowners and developers. I believe there is a moral and ethical responsibility for the owners and developers to help the process of determining what will be best for the residents of Newport Hills as the owners sell the property and go elsewhere with their profits. I have heard that they have given breaks in rent/lease payments to businesses in the recent tough times. Maybe they have already helped us the best way they can. Capitalism does not always satisfy the soul and we should not assume that we will get any help from the owners, the City or the Developer. In theory, the City is the moral and ethical conscience of its residents, but there is no guarantee that the City or any of us can fully agree on what it means to create a moral, ethical, feasible and beautiful and enduring solution for this property. But it is certainly time for this conversation to begin.

I propose that the City lead the way for discussions about feasible options that would be in alignment with existing zoning and possible zoning changes. I will be sending this letter to several people in City Hall. I encourage anyone who is interested in this subject to follow up with the City to add support for this idea. I also propose that the City look into the possibility of funding a study of its own that would identify feasible options that would be acceptable to the owners of the property for us residents to review.

One thing is certain, change is inevitable. While I’m tempted to say that any change will be an improvement on what we have now, I think we need to take a look at feasible options BEFORE the next proposal for re-development of the shopping center property is presented.

Sincerely,



Steve Kunkel      Newport Hills Resident since 1984



14400 NE Bel-Red Rd., Suite #204  
Bellevue, WA 98007

Tel: (425)455-6660  
Fax: (425)455-8333

June 12, 2023

VIA ELECTRONIC SUBMITTAL

Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Re: Bellevue 2044 Comprehensive Plan DEIS Comment

Dear Reilly:

I am writing on behalf of Radiance Tower, LLC, which owns the property at 1801 130<sup>th</sup> Avenue NE (1801 130<sup>th</sup> Ave Property), and Northrup Center LLC, which owns the property at 12021 – 12121 Northrup Way (Northrup Properties). Thank you for the opportunity to comment on the City of Bellevue's Comprehensive Plan Draft Environmental Impact Statement (DEIS).

Specifically, my comments on the DEIS are:

- **The City should adopt Alternative 3 as the Preferred Alternative, but ensure there is flexibility in the permitted uses within the allowed densities to respond to market conditions over the course of the next two decades.**
  - Alternative 3 shows the Northrup Properties as a BR-Office-Highrise-1 designation and the 130<sup>th</sup> Avenue Property as BR-Residential-Commercial-Highrise-2. We agree that the Northrup Properties are well suited for densities of up to 15 stories and the 130<sup>th</sup> Ave Property for up to 25 stories.

However, the DEIS indicates that the land use designation will be “mostly” office with “some” housing and other uses for Office-Highrise-1 and “mostly” housing with “some” office and other uses for Residential-Commercial-Highrise-2. We encourage the City to adopt a Preferred Alternative that is not prescriptive as to the size of the permitted uses that can be allowed within the development envelope. The City's updated Comprehensive Plan and zoning will guide the City for over two decades. No one can accurately predict the precise market and financial conditions over that horizon. The City should not be overly prescriptive in dictating uses within the development densities for these areas. Instead, the Preferred Alternative should allow for maximum use flexibility to be responsive to market demand.
- **For the Bel-Red subarea, the City should expand the eligible projects for transportation impact fee credits to include all right of way dedications and new infrastructure necessary to implement the Code-required street grid.**

Thank you for the opportunity to comment. Please feel free to contact me with any questions.

Sincerely,  
Radiance Tower, LLC  
Northrup Center LLC

By: Stanley Xu  
Managing Member

# BELLEVUE'S DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Ligeng Dong

602 129th Ave SE, Bellevue, WA 98005

6/10/2023

Dear Ms. Stead:

## **Please include me as a party of record.**

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. The Wilburton subarea and its residents are dedicated to protecting, restoring, and enhancing the character and livability of Wilburton, including the Kelsey Creek Watershed system. Natural elements play a vital role in enhancing the quality of life for Wilburton residents, and the Kelsey Creek Watershed Basin system, and all of its other basin streams such as Goff stream, sub-tributaries, and wetlands flowing throughout Wilburton. King County's DRNP Water Quality Index rated Kelsey Creek at NE 8th with a "Moderate" score, and its Oxygen levels, a "Poor" rating score.

As a resident of Wilburton, I support the inception of the Wilburton/NE 8th Subarea Plan Goals:

### **"Wilburton/NE 8th Subarea Plan Goals**

- **To separate residential, recreational, and open space areas from commercial areas and to protect space.**
- **To improve pedestrian accessibility and attractiveness of commercial areas for residents of Bellevue.**
- **To support the provision of commercial services in Wilburton that complement Downtown..."**

and:

**"...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."**

I also support the following **Land Use Policies** and aligning with the Wilburton/NE 8th Subarea Plan:

**"...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas.**

and are committed to supporting policies protecting and preserving Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays a crucial role in providing a sense of well-being.

## Natural Determinants Policies:

### "Policies

**POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin.**

**POLICYS-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek.**

**POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan."**

Wilburton is home to many animals that fall into Washington Fish and Wildlife's priority and endangered habitat and species. They include the Great Blue Heron, the Bald Eagle, Chinook Salmon, Coho Salmon, Sockeye Salmon, Steelhead, bats, owls, hawks, and a variety of different birds.

The City's Determination of Non-Significance is not aligned with the conservation of the City of Bellevue's Critical Areas Regulations for Streams and Riparian Areas, Wetlands, and Habitats for Species of Local Importance including the Kelsey Creek Watershed Report and the City's efforts to protect and maintain the health of Wilburton's critical areas.

[https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2021/KelseyCreek\\_Assessment\\_Report\\_2021\\_1130.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/KelseyCreek_Assessment_Report_2021_1130.pdf):

**"The Kelsey Creek Watershed is a vital ecosystem that supports numerous species of wildlife and provides essential ecological services to the surrounding communities. The proposed development of density in these areas including private properties has the potential to significantly impact the delicate balance of the ecosystem,..."** including water quality, habitat fragmentation, increasing runoff, and effects of water temperatures with decreasing tree canopies. Young trees cannot make up for the shade and protection offered by 100-plus-year-old trees. Decreasing tree canopies result in increased water temperatures and may be detrimental to priority animals, as well as the endangered Chinook, Coho, and other salmon. The Greater Kelsey Creek Watershed historically provides extensive spawning and rearing habitat for a larger number of other salmon species such as Chinook, Sockeye, Coho, Cutthroat Trout, Peamouth Minnows, and Steelhead.

The DEIS's Determination of Non-Significance does not align with the City's efforts to restore and protect critical areas in the Kelsey Creek Watershed System (KCWS) due to the limited factors being taken into account. The DEIS was written before House Bill 1110, HB 1337, HB 1181 were passed into law. It also does not include the impact of Covid on the workplace resulting in increased remote employment, Bellevue's pending tree code ordinance, and the impact of the different housing target strategies on the Kelsey Creek Watershed, impervious surfaces, and their effect on endangered species of local importance. The loss of century-old tree canopies and their effect on water and air temperatures, the increasing air and land pollution with increasing traffic, and the decreased habitat and food sources. Also, incentives should not be seen as a substitute for effective stormwater management. Wilburton's watershed and ecosystem require proper stormwater management measures to mitigate the risks of flooding and water pollution caused by toxic runoff.

Moreover, according to a technical report by Golder Associates and the Watershed Company, the city of Bellevue's DEIS falls short of utilizing the best available science and existing conditions. This critique addresses the impacts of this inadequacy:





















1. Information related to traffic and site conditions is incomplete and potentially inaccurate, which hinders environmental evaluations.
2. Protecting the environment leads to the long-term sustainability of the community and its people. It is essential for their health, safety, and quality of life. For example, in the case of Kelsey Creek, the watershed provides critical ecosystem services that directly support the community's health and well-being, such as clean water, clean air, and flood control. Prioritizing the environment can help prevent harm to low-income communities of color, and indigenous people who are disproportionately affected by harmful environmental conditions. Environmental equity addresses these inequalities and provides equal protection and access to clean, and healthy communities.
3. The report encourages low-impact development and retrofits that improve stormwater runoff. Untreated run-off causes pre-spawn mortality on Coho salmon, and depending on future rates of urbanization, localized extinction of Coho salmon could occur within a matter of years to decades.
4. According to the report, Bellevue is in the process of updating its Shoreline Management Act. Under the proposed update, shorelines themselves are not regulated as critical areas, and critical areas within shoreline jurisdiction would be regulated under LUC Part 20.25H. Bellevue has not identified all critical areas in the city.
5. The City of Bellevue's Greater Kelsey Creek Watershed's riparian corridor across all of the sub-basins includes both approximately 90% private properties and 10% publicly owned properties and is critical to species of local importance, aquatic animals, and other wildlife, Peregrine Falcon, Bald Eagles, Red-tailed Hawks, Blue Herons, Pileated Woodpecker, Great Blue Heron, cardinals, hummingbirds, bats, opossums, beavers, bobcats, deer, coyotes, and many others. The diverse range of animals needs to be managed, protected, and maintained as part of the existing riparian corridor structure and function within the entire sensitive ecosystem. This ecosystem provides shelter, food, and protection, and maintains temperatures critical to their survival.
6. Adopting green infrastructure practices to maximize the achievement of objectives, these efforts are expensive and limited.
7. With 90% of the riparian corridor on private properties, the city has not been able to keep up with tracking damages in and near open streams.
8. The City's options are insufficient. The City's plan mitigates some of the side-effects of water overflow. The new plan should focus on preventing runoff from the source, increasing impervious surfaces caused by development. Unanticipated cleanup efforts with increased stormwater runoff may suggest that the city may end up footing the bill, and cause tax-payer runoff plan liability. We need solutions that offer long-term sustainability.
9. Wilburton's Kelsey Creek has the greatest amount of impervious surface areas. Increasing mixed-use developments, multi-unit dwellings, increasing cars and toxic

waste from their tires, and increasing construction will cause even greater impervious surface areas with increasing toxic stormwater runoff.

Subbasin	Commercial/ Office (%)	Highway (%)	Industrial (%)	Mixed- use (%)	Multi- Family (%)	Park (%)	Single- family (%)	Total (ac)
Richards Creek	13.3%	1.9%	8.1%	4.8%	17.0%	10.2%	44.8%	1380
Sunset Creek	5.6%	6.3%	1.0%	2.4%	1.6%	4.0%	79.2%	854
West Tributary	8.4%	2.4%	0.0%	26.2%	4.4%	9.2%	44.2%	958
Goff Creek	8.4%	0.8%	0.0%	10.3%	0.0%	4.4%	76.2%	529
Valley Creek	7.2%	2.0%	0.0%	5.0%	15.0%	10.0%	60.8%	1300
Sears Creek	32.7%	3.0%	0.0%	21.8%	9.8%	0.0%	32.8%	355
Greater Kelsey Creek Watershed	11.8%	2.9%	1.7%	8.4%	11.0%	11.3%	51.8%	10376

Table 7 compares the change in canopy cover and impervious surfaces between 2006 and 2017 for the nine subbasins and the Greater Kelsey Creek Watershed (HRCd 2021). The Sears Creek Subbasin and the Sturtevant Creek Subbasin experienced the largest tree canopy loss and impervious surface increase of all the subbasins in the Greater Kelsey Creek Watershed.

**Table 7. Change in Tree Canopy and Impervious Surfaces from 2006 to 2017 in the Greater Kelsey Creek Watershed**

Subbasins	Tree Canopy Loss (2006 – 2017)		Impervious Surfaces Increase (2006 – 2017)		Primary Agent of Change
	Change	Trend	Change	Trend	
Goff Creek	0.4 %		0.5 %		Development
Kelsey Creek	1.0 %		1.0 %		Development
Mercer Slough	1.5 %		1.1 %		Development
Richards Creek	1.5 %		1.1 %		Development
Sears Creek	3.9 %		3.4 %		Development
Sturtevant Creek	2.2 %		3.8 %		Development
Sunset Creek	0.5 %		0.7 %		Development
Valley Creek	0.5 %		0.2 %		Tree removal
West Tributary	1.2 %		0.7 %		Development
Total Greater Kelsey Watershed	1.2 % (133 acres)		1.2 % (125 acres)		Development

data source: <https://hrcd-wdfw.hub.arcgis.com/>

Based on changes in tree canopy and impervious area data, since 2006 there has been a large amount of development in the majority of the Watershed’s subbasins. Table 7 shows the decrease in tree canopy and increase in impervious surfaces associated with rapid development and urbanization—where development indicates the conversion of a vegetated lot or parcel into a built lot or parcel, and redevelopment indicates building on a previously developed lot. With development across so much of the Greater Kelsey Creek

Greater Kelsey Creek Watershed and its connecting tributaries is a critical urban watershed for the City of Bellevue. It is one of the few watershed areas in a city the size of Bellevue remaining in the entire USA. As described in the 2003 Bellevue Critical Areas Update Best Available Science Paper: **Wildlife, forested steep slopes, and riparian areas comprise the majority of Bellevue's remaining habitat corridors and linkages.** It needs to be managed carefully over the next few decades to protect and preserve its unique aquatic and terrestrial

values. Once developed and the 100-year-old trees felled for development, all inhabitants in the watershed that relied on the natural environment for survival will be gone forever from Wilburton.

#### Other Considerations:

**Control Totals:** On January 23, 2023, Dave Andersen, managing director of the Growth Management Services unit presented one of many sessions on getting periodic update planning right. He identified having the same control total targets for each alternative as critical. The growth strategy is to determine what are different ways of achieving the growth target. We find the DEIS has a wide range of targets. Bellevue Residents understand higher targets have higher impacts. This does not result in an understanding or critique of the strategy. In addressing this deficiency, the City will need to address the same target in each of the alternatives and show how all alternatives would meet the same need, including the “no change” alternative.

**House Bill 1110 Increasing Housing Supply and Density:** On May 8, 2023, Governor Jay Inslee signed House Bill 1110, which legalizes duplexes and fourplexes in most neighborhoods in nearly every city in the State of Washington, including the City of Bellevue, which was intended to increase the state’s housing supply. House Bill legalizes six-plexes near transit and for affordable housing. House Bill 1110 [overrides local zoning rules](#) that have long kept large areas in cities for only single-family homes. The new law will not ban the construction of single-family homes, but it will stop cities from requiring neighborhoods to have only single-family homes. However, this DEIS was prepared prior to passage of House Bill 1110, and Bellevue residents have no idea how the House Bill will affect any of the alternatives. It is likely that fewer new multi-family units will be needed as shown in Alternatives 1, 2, and 3. The no-action alternative will also need to address application of House Bill 1110 since the state law will now allow continued expansion of housing in Bellevue without application of the proposed alternatives. In addressing this deficiency, the City will need to either develop a new alternative or address this House Bill in each of the alternatives, which may result in an increase or decrease in the number of housing units needed.

**House Bill 1337 Expanding Housing Options.** This bill expands housing options through easing barriers to the construction and use of accessory dwelling units, and was partially vetoed by the Governor. However, the primary components of the bill would remain, thus, affecting the number of new housing units that may be needed to accommodate new employment in any given city within Washington State. Thus, the number of new housing units for the City of Bellevue would need to be determined. An example of how this bill could affect housing would be in the State of California whereby the bill was passed and fewer new homes

were needed as a result. Thus, HB 1337 has a strong potential of affecting the no-action alternative, along with Alternatives 1 to 3.

**House Bill 1181. Climate change and resiliency.** This bill includes a climate change and resiliency component that is required to be included in city comprehensive plans. The bill is intended for cities to mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental economic, and human health and safety; and advance environmental justice. Much of this is already included in the DEIS in Appendix G (Relationship of Climate Change Vulnerability to the Alternatives) but specific compliance with the bill is not included because Governor Inslee only signed the bill on May 3.

**2023 Legislative Session:** The Growth Management Policy Board states that these bills result in significant changes to the Growth Management Act and will impact local plans. The Board received a will receive a detailed recap of the 2023 legislative session which highlights these bills on June 1, 2023. Thus, the impact of these bills has not yet been well understood or could have been included in the DEIS. We cannot expect our Bellevue residents to have an understanding of these bills at the time.

**Covid:** The Covid-19 pandemic sparked a new [working-from-home economy](#) where many workers have the flexibility to work remotely from home. This unprecedented shift to remote work will be occurring in some form over the next 20 years. Now, roughly six-in-ten U.S. workers who say their jobs can mainly be done from home (59%) are working from home all or most of the time. Working from home results in changes in office use and transportation resulting in a declining need to live in Bellevue when working in Bellevue. This is a fundamental flaw where the DEIS is not addressing employment and residency adequately based on recent changes to office uses. Many employees are now moving outside of the city and then commuting to their workplace only once or twice a week. The DEIS should be revised to reflect this change in how employees will work and live in Bellevue in the housing, office, and transportation components of the DEIS. See also Attachment D

**Updated Tree Code:** The City of Bellevue plans to update its tree code in 2023, which will have significant effects to new construction. This tree code may, hopefully, provide better protection for significant trees and require contractors and builders to redesign multi-family and single-family homes to protect these trees. The Tree Code may also deter contractors from building on sites with significant trees. Thus, BTCC is requesting that the DEIS Comprehensive Plan describe how the tree code will affect planned protection of significant trees. The City of Bellevue Urban Tree Assessment (July 2022) stated that land use changes are an important



factors of the urban environment and can contribute to changes in citywide canopy numbers. As described in the Urban Tree Assessment, it is important for the City to use this assessment to inform future investments in the urban forest so that all those who live, work, and play in Bellevue can benefit from the urban forest. The City must proactively work to protect the existing urban forest and replenish the canopy with additional native trees. Nowhere in the DEIS do the alternatives address how the existing urban forest will be protected. We are hoping that the DEIS will address replacing lost trees with native trees, and that the Comprehensive Plan show synchrony with its Urban Tree Assessment, as well with the planned updated tree code. Which alternatives may be best for protecting our urban trees?

**Homelessness.** Finally, the City must address how homelessness will be avoided or minimized under the each alternatives of its comprehensive plan. Although the City is investing in facilities such as shelters, transitional housing and affordable housing units for those living in vehicles or unsheltered in the community, how will these additional housing units affect homelessness and will some units be available to homeless people? If the City of Bellevue's notes that affordable housing, especially in the lowest income brackets, is critical to help individuals transition out of homelessness and maintain housing, then why is this not discussed on the DEIS?

**Historic Resources:** Bellevue's historic Wilburton neighborhood is an enclave of single-family and multifamily housing known for its rich history and its parks and wooded areas with close proximity to downtown Bellevue. Wilburton is also home of the acclaimed Bellevue Botanical Gardens, and the largest watershed in Bellevue.

It is nearly impossible to keep up with every possible land use bill and in the annual legislative session. These bills passed in this legislative session are important for the comprehensive plan in any city, and if not covered under this DEIS then an amendment would be needed. An amendment would take more time and it would be more costly to the City of Bellevue. We recognize the significant effort already undertaken for this DEIS but we also desire to review a complete DEIS that includes passage of bills and regulations that have occurred in 2023.

Thank you for the opportunity to comment and we look forward to working with you and your staff in creating a City of Bellevue comprehensive plan that is complete, meaningful, and applicable for immediate use.

Sincerely,

Ligeng Dong

# BELLEVUE'S DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Ping Jia

602 129th Ave SE, Bellevue, WA 98005

6/10/2023

Dear Ms. Stead:

## **Please include me as a party of record.**

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. The Wilburton subarea and its residents are dedicated to protecting, restoring, and enhancing the character and livability of Wilburton, including the Kelsey Creek Watershed system. Natural elements play a vital role in enhancing the quality of life for Wilburton residents, and the Kelsey Creek Watershed Basin system, and all of its other basin streams such as Goff stream, sub-tributaries, and wetlands flowing throughout Wilburton. King County's DRNP Water Quality Index rated Kelsey Creek at NE 8th with a "Moderate" score, and its Oxygen levels, a "Poor" rating score.

As a resident of Wilburton, I support the inception of the Wilburton/NE 8th Subarea Plan Goals:

### **"Wilburton/NE 8th Subarea Plan Goals**

- **To separate residential, recreational, and open space areas from commercial areas and to protect space.**
- **To improve pedestrian accessibility and attractiveness of commercial areas for residents of Bellevue.**
- **To support the provision of commercial services in Wilburton that complement Downtown..."**

and:

**"...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."**

I also support the following **Land Use Policies** and aligning with the Wilburton/NE 8th Subarea Plan:

**"...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas.**

and are committed to supporting policies protecting and preserving Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays a crucial role in providing a sense of well-being.

## Natural Determinants Policies:

### "Policies

**POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin.**

**POLICYS-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek.**

**POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan."**

Wilburton is home to many animals that fall into Washington Fish and Wildlife's priority and endangered habitat and species. They include the Great Blue Heron, the Bald Eagle, Chinook Salmon, Coho Salmon, Sockeye Salmon, Steelhead, bats, owls, hawks, and a variety of different birds.

The City's Determination of Non-Significance is not aligned with the conservation of the City of Bellevue's Critical Areas Regulations for Streams and Riparian Areas, Wetlands, and Habitats for Species of Local Importance including the Kelsey Creek Watershed Report and the City's efforts to protect and maintain the health of Wilburton's critical areas.

[https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2021/KelseyCreek\\_Assessment\\_Report\\_2021\\_1130.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/KelseyCreek_Assessment_Report_2021_1130.pdf):

**"The Kelsey Creek Watershed is a vital ecosystem that supports numerous species of wildlife and provides essential ecological services to the surrounding communities. The proposed development of density in these areas including private properties has the potential to significantly impact the delicate balance of the ecosystem,..."** including water quality, habitat fragmentation, increasing runoff, and effects of water temperatures with decreasing tree canopies. Young trees cannot make up for the shade and protection offered by 100-plus-year-old trees. Decreasing tree canopies result in increased water temperatures and may be detrimental to priority animals, as well as the endangered Chinook, Coho, and other salmon. The Greater Kelsey Creek Watershed historically provides extensive spawning and rearing habitat for a larger number of other salmon species such as Chinook, Sockeye, Coho, Cutthroat Trout, Peamouth Minnows, and Steelhead.

The DEIS's Determination of Non-Significance does not align with the City's efforts to restore and protect critical areas in the Kelsey Creek Watershed System (KCWS) due to the limited factors being taken into account. The DEIS was written before House Bill 1110, HB 1337, HB 1181 were passed into law. It also does not include the impact of Covid on the workplace resulting in increased remote employment, Bellevue's pending tree code ordinance, and the impact of the different housing target strategies on the Kelsey Creek Watershed, impervious surfaces, and their effect on endangered species of local importance. The loss of century-old tree canopies and their effect on water and air temperatures, the increasing air and land pollution with increasing traffic, and the decreased habitat and food sources. Also, incentives should not be seen as a substitute for effective stormwater management. Wilburton's watershed and ecosystem require proper stormwater management measures to mitigate the risks of flooding and water pollution caused by toxic runoff.

Moreover, according to a technical report by Golder Associates and the Watershed Company, the city of Bellevue's DEIS falls short of utilizing the best available science and existing conditions. This critique addresses the impacts of this inadequacy:





















1. Information related to traffic and site conditions is incomplete and potentially inaccurate, which hinders environmental evaluations.
2. Protecting the environment leads to the long-term sustainability of the community and its people. It is essential for their health, safety, and quality of life. For example, in the case of Kelsey Creek, the watershed provides critical ecosystem services that directly support the community's health and well-being, such as clean water, clean air, and flood control. Prioritizing the environment can help prevent harm to low-income communities of color, and indigenous people who are disproportionately affected by harmful environmental conditions. Environmental equity addresses these inequalities and provides equal protection and access to clean, and healthy communities.
3. The report encourages low-impact development and retrofits that improve stormwater runoff. Untreated run-off causes pre-spawn mortality on Coho salmon, and depending on future rates of urbanization, localized extinction of Coho salmon could occur within a matter of years to decades.
4. According to the report, Bellevue is in the process of updating its Shoreline Management Act. Under the proposed update, shorelines themselves are not regulated as critical areas, and critical areas within shoreline jurisdiction would be regulated under LUC Part 20.25H. Bellevue has not identified all critical areas in the city.
5. The City of Bellevue's Greater Kelsey Creek Watershed's riparian corridor across all of the sub-basins includes both approximately 90% private properties and 10% publicly owned properties and is critical to species of local importance, aquatic animals, and other wildlife, Peregrine Falcon, Bald Eagles, Red-tailed Hawks, Blue Herons, Pileated Woodpecker, Great Blue Heron, cardinals, hummingbirds, bats, opossums, beavers, bobcats, deer, coyotes, and many others. The diverse range of animals needs to be managed, protected, and maintained as part of the existing riparian corridor structure and function within the entire sensitive ecosystem. This ecosystem provides shelter, food, and protection, and maintains temperatures critical to their survival.
6. Adopting green infrastructure practices to maximize the achievement of objectives, these efforts are expensive and limited.
7. With 90% of the riparian corridor on private properties, the city has not been able to keep up with tracking damages in and near open streams.
8. The City's options are insufficient. The City's plan mitigates some of the side-effects of water overflow. The new plan should focus on preventing runoff from the source, increasing impervious surfaces caused by development. Unanticipated cleanup efforts with increased stormwater runoff may suggest that the city may end up footing the bill, and cause tax-payer runoff plan liability. We need solutions that offer long-term sustainability.
9. Wilburton's Kelsey Creek has the greatest amount of impervious surface areas. Increasing mixed-use developments, multi-unit dwellings, increasing cars and toxic

waste from their tires, and increasing construction will cause even greater impervious surface areas with increasing toxic stormwater runoff.

Subbasin	Commercial/ Office (%)	Highway (%)	Industrial (%)	Mixed- use (%)	Multi- Family (%)	Park (%)	Single- family (%)	Total (ac)
Richards Creek	13.3%	1.9%	8.1%	4.8%	17.0%	10.2%	44.8%	1380
Sunset Creek	5.6%	6.3%	1.0%	2.4%	1.6%	4.0%	79.2%	854
West Tributary	8.4%	2.4%	0.0%	26.2%	4.4%	9.2%	44.2%	958
Goff Creek	8.4%	0.8%	0.0%	10.3%	0.0%	4.4%	76.2%	529
Valley Creek	7.2%	2.0%	0.0%	5.0%	15.0%	10.0%	60.8%	1300
Sears Creek	32.7%	3.0%	0.0%	21.8%	9.8%	0.0%	32.8%	355
Greater Kelsey Creek Watershed	11.8%	2.9%	1.7%	8.4%	11.0%	11.3%	51.8%	10376

Table 7 compares the change in canopy cover and impervious surfaces between 2006 and 2017 for the nine subbasins and the Greater Kelsey Creek Watershed (HRC2021). The Sears Creek Subbasin and the Sturtevant Creek Subbasin experienced the largest tree canopy loss and impervious surface increase of all the subbasins in the Greater Kelsey Creek Watershed.

Table 7. Change in Tree Canopy and Impervious Surfaces from 2006 to 2017 in the Greater Kelsey Creek Watershed

Subbasins	Tree Canopy Loss (2006 – 2017)		Impervious Surfaces Increase (2006 – 2017)		Primary Agent of Change
	Change	Trend	Change	Trend	
Goff Creek	0.4 %		0.5 %		Development
Kelsey Creek	1.0 %		1.0 %		Development
Mercer Slough	1.5 %		1.1 %		Development
Richards Creek	1.5 %		1.1 %		Development
Sears Creek	3.9 %		3.4 %		Development
Sturtevant Creek	2.2 %		3.8 %		Development
Sunset Creek	0.5 %		0.7 %		Development
Valley Creek	0.5 %		0.2 %		Tree removal
West Tributary	1.2 %		0.7 %		Development
Total Greater Kelsey Watershed	1.2 % (133 acres)		1.2 % (125 acres)		Development

data source: <https://hrcd-wdfw.hub.arcgis.com/>

Based on changes in tree canopy and impervious area data, since 2006 there has been a large amount of development in the majority of the Watershed’s subbasins. Table 7 shows the decrease in tree canopy and increase in impervious surfaces associated with rapid development and urbanization—where development indicates the conversion of a vegetated lot or parcel into a built lot or parcel, and redevelopment indicates building on a previously developed lot. With development across so much of the Greater Kelsey Creek

Greater Kelsey Creek Watershed and its connecting tributaries is a critical urban watershed for the City of Bellevue. It is one of the few watershed areas in a city the size of Bellevue remaining in the entire USA. As described in the 2003 Bellevue Critical Areas Update Best Available Science Paper: **Wildlife, forested steep slopes, and riparian areas comprise the majority of Bellevue's remaining habitat corridors and linkages.** It needs to be managed carefully over the next few decades to protect and preserve its unique aquatic and terrestrial

values. Once developed and the 100-year-old trees felled for development, all inhabitants in the watershed that relied on the natural environment for survival will be gone forever from Wilburton.

#### Other Considerations:

**Control Totals:** On January 23, 2023, Dave Andersen, managing director of the Growth Management Services unit presented one of many sessions on getting periodic update planning right. He identified having the same control total targets for each alternative as critical. The growth strategy is to determine what are different ways of achieving the growth target. We find the DEIS has a wide range of targets. Bellevue Residents understand higher targets have higher impacts. This does not result in an understanding or critique of the strategy. In addressing this deficiency, the City will need to address the same target in each of the alternatives and show how all alternatives would meet the same need, including the “no change” alternative.

**House Bill 1110 Increasing Housing Supply and Density:** On May 8, 2023, Governor Jay Inslee signed House Bill 1110, which legalizes duplexes and fourplexes in most neighborhoods in nearly every city in the State of Washington, including the City of Bellevue, which was intended to increase the state’s housing supply. House Bill legalizes six-plexes near transit and for affordable housing. House Bill 1110 [overrides local zoning rules](#) that have long kept large areas in cities for only single-family homes. The new law will not ban the construction of single-family homes, but it will stop cities from requiring neighborhoods to have only single-family homes. However, this DEIS was prepared prior to passage of House Bill 1110, and Bellevue residents have no idea how the House Bill will affect any of the alternatives. It is likely that fewer new multi-family units will be needed as shown in Alternatives 1, 2, and 3. The no-action alternative will also need to address application of House Bill 1110 since the state law will now allow continued expansion of housing in Bellevue without application of the proposed alternatives. In addressing this deficiency, the City will need to either develop a new alternative or address this House Bill in each of the alternatives, which may result in an increase or decrease in the number of housing units needed.

**House Bill 1337 Expanding Housing Options.** This bill expands housing options through easing barriers to the construction and use of accessory dwelling units, and was partially vetoed by the Governor. However, the primary components of the bill would remain, thus, affecting the number of new housing units that may be needed to accommodate new employment in any given city within Washington State. Thus, the number of new housing units for the City of Bellevue would need to be determined. An example of how this bill could affect housing would be in the State of California whereby the bill was passed and fewer new homes

were needed as a result. Thus, HB 1337 has a strong potential of affecting the no-action alternative, along with Alternatives 1 to 3.

**House Bill 1181. Climate change and resiliency.** This bill includes a climate change and resiliency component that is required to be included in city comprehensive plans. The bill is intended for cities to mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental economic, and human health and safety; and advance environmental justice. Much of this is already included in the DEIS in Appendix G (Relationship of Climate Change Vulnerability to the Alternatives) but specific compliance with the bill is not included because Governor Inslee only signed the bill on May 3.

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**Updated Tree Code:** The City of Bellevue plans to update its tree code in 2023, which will have significant effects to new construction. This tree code may, hopefully, provide better protection for significant trees and require contractors and builders to redesign multi-family and single-family homes to protect these trees. The Tree Code may also deter contractors from building on sites with significant trees. Thus, BTCC is requesting that the DEIS Comprehensive Plan describe how the tree code will affect planned protection of significant trees. The City of Bellevue Urban Tree Assessment (July 2022) stated that land use changes are an important

factors of the urban environment and can contribute to changes in citywide canopy numbers. As described in the Urban Tree Assessment, it is important for the City to use this assessment to inform future investments in the urban forest so that all those who live, work, and play in Bellevue can benefit from the urban forest. The City must proactively work to protect the existing urban forest and replenish the canopy with additional native trees. Nowhere in the DEIS do the alternatives address how the existing urban forest will be protected. We are hoping that the DEIS will address replacing lost trees with native trees, and that the Comprehensive Plan show synchrony with its Urban Tree Assessment, as well with the planned updated tree code. Which alternatives may be best for protecting our urban trees?

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Thank you for the opportunity to comment and we look forward to working with you and your staff in creating a City of Bellevue comprehensive plan that is complete, meaningful, and applicable for immediate use.

Sincerely,

Ping Jia



# BELLEVUE'S DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Steve Engen

1049 134<sup>th</sup> Ave NE, Bellevue, WA 98005

June 11, 2023

Dear Ms. Stead:

## **Please include me as a party of record.**

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. The Wilburton subarea and its residents are dedicated to protecting, restoring, and enhancing the character and livability of Wilburton, including the Kelsey Creek Watershed system. Natural elements play a vital role in enhancing the quality of life for Wilburton residents, and the Kelsey Creek Watershed Basin system, and all of its other basin streams such as Goff stream, sub-tributaries, and wetlands flowing throughout Wilburton. King County's DRNP Water Quality Index rated Kelsey Creek at NE 8th with a "Moderate" score, and its Oxygen levels, a "Poor" rating score.

As a resident of Wilburton, I support the inception of the Wilburton/NE 8th Subarea Plan Goals:

### **"Wilburton/NE 8th Subarea Plan Goals**

- **To separate residential, recreational, and open space areas from commercial areas and to protect space.**
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and:

**"...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."**

I also support the following **Land Use Policies** and aligning with the Wilburton/NE 8th Subarea Plan:

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and are committed to supporting policies protecting and preserving Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays a crucial role in providing a sense of well-being.

### **Natural Determinants Policies:**

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**POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin.**

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The City's Determination of Non-Significance is not aligned with the conservation of the City of Bellevue's Critical Areas Regulations for Streams and Riparian Areas, Wetlands, and Habitats for Species of Local Importance including the Kelsey Creek Watershed Report and the City's efforts to protect and maintain the health of Wilburton's critical areas.

[https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2021/KelseyCreek\\_Assessment\\_Report\\_2021\\_1130.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/KelseyCreek_Assessment_Report_2021_1130.pdf):

**"The Kelsey Creek Watershed is a vital ecosystem that supports numerous species of wildlife and provides essential ecological services to the surrounding communities. The proposed development of density in these areas including private properties has the potential to significantly impact the delicate balance of the ecosystem,..."** including water quality, habitat fragmentation, increasing runoff, and effects of water temperatures with decreasing tree canopies. Young trees cannot make up for the shade and protection offered by 100-plus-year-old trees. Decreasing tree canopies result in increased water temperatures and may be detrimental to priority animals, as well as the endangered Chinook, Coho, and other salmon. The Greater Kelsey Creek Watershed historically provides extensive spawning and rearing habitat for a larger number of other salmon species such as Chinook, Sockeye, Coho, Cutthroat Trout, Peamouth Minnows, and Steelhead.

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Watershed, impervious surfaces, and their effect on endangered species of local importance. The loss of century-old tree canopies and their effect on water and air temperatures, the increasing air and land pollution with increasing traffic, and the decreased habitat and food sources. Also, incentives should not be seen as a substitute for effective stormwater management. Wilburton's watershed and ecosystem require proper stormwater management measures to mitigate the risks of flooding and water pollution caused by toxic runoff.

Moreover, according to a technical report by Golder Associates and the Watershed Company, the city of Bellevue's DEIS falls short of utilizing the best available science and existing conditions. This critique addresses the impacts of this inadequacy:





















1. Information related to traffic and site conditions is incomplete and potentially inaccurate, which hinders environmental evaluations.
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6. Adopting green infrastructure practices to maximize the achievement of objectives, these efforts are expensive and limited.

7. With 90% of the riparian corridor on private properties, the city has not been able to keep up with tracking damages in and near open streams.
8. The City's options are insufficient. The City's plan mitigates some of the side-effects of water overflow. The new plan should focus on preventing runoff from the source, increasing impervious surfaces caused by development. Unanticipated cleanup efforts with increased stormwater runoff may suggest that the city may end up footing the bill, and cause taxpayer runoff plan liability. We need solutions that offer long-term sustainability.
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Subbasin	Commercial/ Office (%)	Highway (%)	Industrial (%)	Mixed- use (%)	Multi- Family (%)	Park (%)	Single- family (%)	Total (ac)
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Sears Creek	32.7%	3.0%	0.0%	21.8%	9.8%	0.0%	32.8%	355
Greater Kelsey Creek Watershed	11.8%	2.9%	1.7%	8.4%	11.0%	11.3%	51.8%	10376

Table 7 compares the change in canopy cover and impervious surfaces between 2006 and 2017 for the nine subbasins and the Greater Kelsey Creek Watershed (HRCd 2021). The Sears Creek Subbasin and the Sturtevant Creek Subbasin experienced the largest tree canopy loss and impervious surface increase of all the subbasins in the Greater Kelsey Creek Watershed.

**Table 7. Change in Tree Canopy and Impervious Surfaces from 2006 to 2017 in the Greater Kelsey Creek Watershed**

Subbasins	Tree Canopy Loss (2006 – 2017)		Impervious Surfaces Increase (2006 – 2017)		Primary Agent of Change
	Change	Trend	Change	Trend	
Goff Creek	0.4 %		0.5 %		Development
Kelsey Creek	1.0 %		1.0 %		Development
Mercer Slough	1.5 %		1.1 %		Development
Richards Creek	1.5 %		1.1 %		Development
Sears Creek	3.9 %		3.4 %		Development
Sturtevant Creek	2.2 %		3.8 %		Development
Sunset Creek	0.5 %		0.7 %		Development
Valley Creek	0.5 %		0.2 %		Tree removal
West Tributary	1.2 %		0.7 %		Development
Total Greater Kelsey Watershed	1.2 % (133 acres)		1.2 % (125 acres)		Development

data source: <https://hrcd-wdfw.hub.arcgis.com/>

Based on changes in tree canopy and impervious area data, since 2006 there has been a large amount of development in the majority of the Watershed's subbasins. Table 7 shows the decrease in tree canopy and increase in impervious surfaces associated with rapid development and urbanization—where development indicates the conversion of a vegetated lot or parcel into a built lot or parcel, and redevelopment indicates building on a previously developed lot. With development across so much of the Greater Kelsey Creek

Greater Kelsey Creek Watershed and its connecting tributaries is a critical urban watershed for the City of Bellevue. It is one of the few watershed areas in a city the size of Bellevue remaining in the entire USA. As described in the 2003 Bellevue Critical Areas Update Best Available Science Paper: **Wildlife, forested steep slopes, and riparian areas comprise the majority of Bellevue's remaining habitat corridors and linkages.** It needs to be managed carefully over the next few decades to protect and preserve its unique aquatic and

terrestrial values. Once developed and the 100-year-old trees felled for development, all inhabitants in the watershed that relied on the natural environment for survival will be gone forever from Wilburton.

#### Other Considerations:

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and builders to redesign multi-family and single-family homes to protect these trees. The Tree Code may also deter contractors from building on sites with significant trees. Thus, BTCC is requesting that the DEIS Comprehensive Plan describe how the tree code will affect planned protection of significant trees. The City of Bellevue Urban Tree Assessment (July 2022) stated that land use changes are an important factors of the urban environment and can contribute to changes in citywide canopy numbers. As described in the Urban Tree Assessment, it is important for the City to use this assessment to inform future investments in the urban forest so that all those who live, work, and play in Bellevue can benefit from the urban forest. The City must proactively work to protect the existing urban forest and replenish the canopy with additional native trees. Nowhere in the DEIS do the alternatives address how the existing urban forest will be protected. We are hoping that the DEIS will address replacing lost trees with native trees, and that the Comprehensive Plan show synchrony with its Urban Tree Assessment, as well with the planned updated tree code. Which alternatives may be best for protecting our urban trees?

**Homelessness.** Finally, the City must address how homelessness will be avoided or minimized under the each alternatives of its comprehensive plan. Although the City is investing in facilities such as shelters, transitional housing and affordable housing units for those living in vehicles or unsheltered in the community, how will these additional housing units affect homelessness and will some units be available to homeless people? If the City of Bellevue's notes that affordable housing, especially in the lowest income brackets, is critical to help individuals transition out of homelessness and maintain housing, then why is this not discussed on the DEIS?

**Historic Resources:** Bellevue's historic Wilburton neighborhood is an enclave of single-family and multifamily housing known for its rich history and its parks and wooded areas with close proximity to downtown Bellevue. Wilburton is also home of the acclaimed Bellevue Botanical Gardens, and the largest watershed in Bellevue.

It is nearly impossible to keep up with every possible land use bill and in the annual legislative session. These bills passed in this legislative session are important for the comprehensive plan in any city, and if not covered under this DEIS then an amendment would be needed. An amendment would take more time and it would be more costly to the City of Bellevue. We recognize the significant effort already undertaken for this DEIS but we also desire to review a complete DEIS that includes passage of bills and regulations that have occurred in 2023.

Thank you for the opportunity to comment and we look forward to working with you and your staff in creating a City of Bellevue comprehensive plan that is complete, meaningful, and applicable for immediate use.

Sincerely,





# BELLEVUE'S DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Tammy Miller

1025 134<sup>th</sup> Ave NE, Bellevue, WA 98005

June 11<sup>th</sup>, 2023

Dear Ms. Stead:

## **Please include me as a party of record.**

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. The Wilburton subarea and its residents are dedicated to protecting, restoring, and enhancing the character and liveability of Wilburton, including the Kelsey Creek Watershed system. Natural elements play a vital role in enhancing the quality of life for Wilburton residents, and the Kelsey Creek Watershed Basin system, and all of its other basin streams such as Goff stream, sub-tributaries, and wetlands flowing throughout Wilburton. King County's DRNP Water Quality Index rated Kelsey Creek at NE 8th with a "Moderate" score, and its Oxygen levels, a "Poor" rating score.

As a resident of Wilburton, I support the inception of the Wilburton/NE 8th Subarea Plan Goals:

### **"Wilburton/NE 8th Subarea Plan Goals**

- **To separate residential, recreational, and open space areas from commercial areas and to protect space.**
- **To improve pedestrian accessibility and attractiveness of commercial areas for residents of Bellevue.**
- **To support the provision of commercial services in Wilburton that complement Downtown..."**

and:

**"...Protecting residential neighbourhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."**

I also support the following **Land Use Policies** and aligning with the Wilburton/NE 8th Subarea Plan:

**"...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas.**

and are committed to supporting policies protecting and preserving Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighbourhood plays a crucial role in providing a sense of well-being.

### **Natural Determinants Policies:**

#### **"Policies**

**POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin.**

**POLICYS-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek.**

**POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan."**

Wilburton is home to many animals that fall into Washington Fish and Wildlife's priority and endangered habitat and species. They include the Great Blue Heron, the Bald Eagle, Chinook Salmon, Coho Salmon, Sockeye Salmon, Steelhead, bats, owls, hawks, and a variety of different birds.

The City's Determination of Non-Significance is not aligned with the conservation of the City of Bellevue's Critical Areas Regulations for Streams and Riparian Areas, Wetlands, and Habitats for Species of Local Importance including the Kelsey Creek Watershed Report and the City's efforts to protect and maintain the health of Wilburton's critical areas.

[https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2021/KelseyCreek\\_Assessment\\_Report\\_2021\\_1130.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/KelseyCreek_Assessment_Report_2021_1130.pdf):

**"The Kelsey Creek Watershed is a vital ecosystem that supports numerous species of wildlife and provides essential ecological services to the surrounding communities. The proposed development of density in these areas including private properties has the potential to significantly impact the delicate balance of the ecosystem,..."** including water quality, habitat fragmentation, increasing runoff, and effects of water temperatures with decreasing tree canopies. Young trees cannot make up for the shade and protection offered by 100-plus-year-old trees. Decreasing tree canopies result in increased water temperatures and may be detrimental to priority animals, as well as the endangered Chinook, Coho, and other salmon. The Greater Kelsey Creek Watershed historically provides extensive spawning and rearing habitat for a larger number of other salmon species such as Chinook, Sockeye, Coho, Cutthroat Trout, Peamouth Minnows, and Steelhead.

The DEIS's Determination of Non-Significance does not align with the City's efforts to restore and protect critical areas in the Kelsey Creek Watershed System (KCWS) due to the limited factors being taken into account. The DEIS was written before House Bill 1110, HB 1337, HB 1181 were passed into law. It also does not include the impact of Covid on the workplace resulting in increased remote employment, Bellevue's pending tree code ordinance, and the impact of the different housing target strategies on the Kelsey Creek

Watershed, impervious surfaces, and their effect on endangered species of local importance. The loss of century-old tree canopies and their effect on water and air temperatures, the increasing air and land pollution with increasing traffic, and the decreased habitat and food sources. Also, incentives should not be seen as a substitute for effective stormwater management. Wilburton's watershed and ecosystem require proper stormwater management measures to mitigate the risks of flooding and water pollution caused by toxic runoff.

Moreover, according to a technical report by Golder Associates and the Watershed Company, the city of Bellevue's DEIS falls short of utilizing the best available science and existing conditions. This critique addresses the impacts of this inadequacy:





















1. Information related to traffic and site conditions is incomplete and potentially inaccurate, which hinders environmental evaluations.
2. Protecting the environment leads to the long-term sustainability of the community and its people. It is essential for their health, safety, and quality of life. For example, in the case of Kelsey Creek, the watershed provides critical ecosystem services that directly support the community's health and well-being, such as clean water, clean air, and flood control. Prioritizing the environment can help prevent harm to low-income communities of color, and indigenous people who are disproportionately affected by harmful environmental conditions. Environmental equity addresses these inequalities and provides equal protection and access to clean, and healthy communities.
3. The report encourages low-impact development and retrofits that improve stormwater runoff. Untreated run-off causes pre-spawn mortality on Coho salmon, and depending on future rates of urbanization, localized extinction of Coho salmon could occur within a matter of years to decades.
4. According to the report, Bellevue is in the process of updating its Shoreline Management Act. Under the proposed update, shorelines themselves are not regulated as critical areas, and critical areas within shoreline jurisdiction would be regulated under LUC Part 20.25H. Bellevue has not identified all critical areas in the city.
5. The City of Bellevue's Greater Kelsey Creek Watershed's riparian corridor across all of the sub-basins includes both approximately 90% private properties and 10% publicly owned properties and is critical to species of local importance, aquatic animals, and other wildlife, Peregrine Falcon, Bald Eagles, Red-tailed Hawks, Blue Herons, Pileated Woodpecker, Great Blue Heron, cardinals, hummingbirds, bats, opossums, beavers, bobcats, deer, coyotes, and many others. The diverse range of animals needs to be managed, protected, and maintained as part of the existing riparian corridor structure and function within the entire sensitive ecosystem. This ecosystem provides shelter, food, and protection, and maintains temperatures critical to their survival.
6. Adopting green infrastructure practices to maximize the achievement of objectives, these efforts are expensive and limited.

7. With 90% of the riparian corridor on private properties, the city has not been able to keep up with tracking damages in and near open streams.
8. The City's options are insufficient. The City's plan mitigates some of the side-effects of water overflow. The new plan should focus on preventing runoff from the source, increasing impervious surfaces caused by development. Unanticipated cleanup efforts with increased stormwater runoff may suggest that the city may end up footing the bill, and cause taxpayer runoff plan liability. We need solutions that offer long-term sustainability.
9. Wilburton's Kelsey Creek has the greatest amount of impervious surface areas. Increasing mixed-use developments, multi-unit dwellings, increasing cars and toxic waste from their tires, and increasing construction will cause even greater impervious surface areas with increasing toxic stormwater runoff.

Subbasin	Commercial/ Office (%)	Highway (%)	Industrial (%)	Mixed- use (%)	Multi- Family (%)	Park (%)	Single- family (%)	Total (ac)
Richards Creek	13.3%	1.9%	8.1%	4.8%	17.0%	10.2%	44.8%	1380
Sunset Creek	5.6%	6.3%	1.0%	2.4%	1.6%	4.0%	79.2%	854
West Tributary	8.4%	2.4%	0.0%	26.2%	4.4%	9.2%	44.2%	958
Goff Creek	8.4%	0.8%	0.0%	10.3%	0.0%	4.4%	76.2%	529
Valley Creek	7.2%	2.0%	0.0%	5.0%	15.0%	10.0%	60.8%	1300
Sears Creek	32.7%	3.0%	0.0%	21.8%	9.8%	0.0%	32.8%	355
Greater Kelsey Creek Watershed	11.8%	2.9%	1.7%	8.4%	11.0%	11.3%	51.8%	10376

Table 7 compares the change in canopy cover and impervious surfaces between 2006 and 2017 for the nine subbasins and the Greater Kelsey Creek Watershed (HRCd 2021). The Sears Creek Subbasin and the Sturtevant Creek Subbasin experienced the largest tree canopy loss and impervious surface increase of all the subbasins in the Greater Kelsey Creek Watershed.

**Table 7. Change in Tree Canopy and Impervious Surfaces from 2006 to 2017 in the Greater Kelsey Creek Watershed**

Subbasins	Tree Canopy Loss (2006 – 2017)		Impervious Surfaces Increase (2006 – 2017)		Primary Agent of Change
	Change	Trend	Change	Trend	
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Total Greater Kelsey Watershed	1.2 % (133 acres)		1.2 % (125 acres)		Development

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Based on changes in tree canopy and impervious area data, since 2006 there has been a large amount of development in the majority of the Watershed's subbasins. Table 7 shows the decrease in tree canopy and increase in impervious surfaces associated with rapid development and urbanization—where development indicates the conversion of a vegetated lot or parcel into a built lot or parcel, and redevelopment indicates building on a previously developed lot. With development across so much of the Greater Kelsey Creek

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Sincerely,

Tammy Miller

# BELLEVUE'S DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Phyllis White

1057 134<sup>th</sup> Ave NE, Bellevue, WA 98005

June 11, 2023

Dear Ms. Elizabeth Stead:

## **Please include me as a party of record.**

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As a resident of Wilburton, I support the inception of the Wilburton/NE 8th Subarea Plan Goals:

### **"Wilburton/NE 8th Subarea Plan Goals**

- **To separate residential, recreational, and open space areas from commercial areas and to protect space.**
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and:

**"...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."**

I also support the following **Land Use Policies** and aligning with the Wilburton/NE 8th Subarea Plan:

**"...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas.**

and are committed to supporting policies protecting and preserving Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays a crucial role in providing a sense of well-being.

### **Natural Determinants Policies:**

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**"The Kelsey Creek Watershed is a vital ecosystem that supports numerous species of wildlife and provides essential ecological services to the surrounding communities. The proposed development of density in these areas including private properties has the potential to significantly impact the delicate balance of the ecosystem,..."** including water quality, habitat fragmentation, increasing runoff, and effects of water temperatures with decreasing tree canopies. Young trees cannot make up for the shade and protection offered by 100-plus-year-old trees. Decreasing tree canopies result in increased water temperatures and may be detrimental to priority animals, as well as the endangered Chinook, Coho, and other salmon. The Greater Kelsey Creek Watershed historically provides extensive spawning and rearing habitat for a larger number of other salmon species such as Chinook, Sockeye, Coho, Cutthroat Trout, Peamouth Minnows, and Steelhead.

The DEIS's Determination of Non-Significance does not align with the City's efforts to restore and protect critical areas in the Kelsey Creek Watershed System (KCWS) due to the limited factors being taken into account. The DEIS was written before House Bill 1110, HB 1337, HB 1181 were passed into law. It also does not include the impact of Covid on the workplace resulting in increased remote employment, Bellevue's pending tree code ordinance, and the impact of the different housing target strategies on the Kelsey Creek

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5. The City of Bellevue's Greater Kelsey Creek Watershed's riparian corridor across all of the sub-basins includes both approximately 90% private properties and 10% publicly owned properties and is critical to species of local importance, aquatic animals, and other wildlife, Peregrine Falcon, Bald Eagles, Red-tailed Hawks, Blue Herons, Pileated Woodpecker, Great Blue Heron, cardinals, hummingbirds, bats, opossums, beavers, bobcats, deer, coyotes, and many others. The diverse range of animals needs to be managed, protected, and maintained as part of the existing riparian corridor structure and function within the entire sensitive ecosystem. This ecosystem provides shelter, food, and protection, and maintains temperatures critical to their survival.
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7. With 90% of the riparian corridor on private properties, the city has not been able to keep up with tracking damages in and near open streams.
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**As noted below, the impervious surface areas in the Kelsey Creek Watershed are increasing due to development.**

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Table 7 compares the change in canopy cover and impervious surfaces between 2006 and 2017 for the nine subbasins and the Greater Kelsey Creek Watershed (HRCd 2021). The Sears Creek Subbasin and the Sturtevant Creek Subbasin experienced the largest tree canopy loss and impervious surface increase of all the subbasins in the Greater Kelsey Creek Watershed.

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Total Greater Kelsey Watershed	1.2 % (133 acres)		1.2 % (125 acres)		Development

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10. Recommendation: Require the Washington Department of Ecology and the Washington Fish and Wildlife to work together to form Natural Determinant Land Use Policies for Wilburton and all of Bellevue's critical areas, and create policies regarding impervious surface areas.

Greater Kelsey Creek Watershed and its connecting tributaries is a critical urban watershed for the City of Bellevue. It is one of the few watershed areas in a city the size of Bellevue remaining in the entire USA. As described in the 2003 Bellevue Critical Areas Update Best Available Science Paper: **Wildlife, forested steep slopes, and riparian areas comprise the majority of Bellevue's remaining habitat corridors and linkages.** It needs to be managed carefully over the next few decades to protect and preserve its unique aquatic and terrestrial values. Once developed and the 100-year-old trees felled for development, all inhabitants in the watershed that relied on the natural environment for survival will be gone forever from Wilburton.

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Thank you for the opportunity to comment and we look forward to working with you and your staff in creating a City of Bellevue comprehensive plan that is complete, meaningful, and applicable for immediate use.

Sincerely,

Phyllis White

# BELLEVUE'S DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Lee White

1057 134<sup>th</sup> Ave NE, Bellevue, WA 98005

June 11, 2023

Dear Ms. Elizabeth Stead:

## **Please include me as a party of record.**

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. The Wilburton subarea and its residents are dedicated to protecting, restoring, and enhancing the character and livability of Wilburton, including the Kelsey Creek Watershed system. Natural elements play a vital role in enhancing the quality of life for Wilburton residents, and the Kelsey Creek Watershed Basin system, and all of its other basin streams such as Goff stream, sub-tributaries, and wetlands flowing throughout Wilburton. King County's DRNP Water Quality Index rated Kelsey Creek at NE 8th with a "Moderate" score, and its Oxygen levels, a "Poor" rating score.

As a resident of Wilburton, I support the inception of the Wilburton/NE 8th Subarea Plan Goals:

### **"Wilburton/NE 8th Subarea Plan Goals**

- **To separate residential, recreational, and open space areas from commercial areas and to protect space.**
- **To improve pedestrian accessibility and attractiveness of commercial areas for residents of Bellevue.**
- **To support the provision of commercial services in Wilburton that complement Downtown..."**

and:

**"...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."**

I also support the following **Land Use Policies** and aligning with the Wilburton/NE 8th Subarea Plan:

**"...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas.**

and are committed to supporting policies protecting and preserving Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays a crucial role in providing a sense of well-being.

### **Natural Determinants Policies:**

#### **"Policies**

**POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin.**

**POLICYS-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek.**

**POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan."**

Wilburton is home to many animals that fall into Washington Fish and Wildlife's priority and endangered habitat and species. They include the Great Blue Heron, the Bald Eagle, Chinook Salmon, Coho Salmon, Sockeye Salmon, Steelhead, bats, owls, hawks, and a variety of different birds.

The City's Determination of Non-Significance is not aligned with the conservation of the City of Bellevue's Critical Areas Regulations for Streams and Riparian Areas, Wetlands, and Habitats for Species of Local Importance including the Kelsey Creek Watershed Report and the City's efforts to protect and maintain the health of Wilburton's critical areas.

[https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2021/KelseyCreek\\_Assessment\\_Report\\_2021\\_1130.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/KelseyCreek_Assessment_Report_2021_1130.pdf):

**"The Kelsey Creek Watershed is a vital ecosystem that supports numerous species of wildlife and provides essential ecological services to the surrounding communities. The proposed development of density in these areas including private properties has the potential to significantly impact the delicate balance of the ecosystem,..."** including water quality, habitat fragmentation, increasing runoff, and effects of water temperatures with decreasing tree canopies. Young trees cannot make up for the shade and protection offered by 100-plus-year-old trees. Decreasing tree canopies result in increased water temperatures and may be detrimental to priority animals, as well as the endangered Chinook, Coho, and other salmon. The Greater Kelsey Creek Watershed historically provides extensive spawning and rearing habitat for a larger number of other salmon species such as Chinook, Sockeye, Coho, Cutthroat Trout, Peamouth Minnows, and Steelhead.

The DEIS's Determination of Non-Significance does not align with the City's efforts to restore and protect critical areas in the Kelsey Creek Watershed System (KCWS) due to the limited factors being taken into account. The DEIS was written before House Bill 1110, HB 1337, HB 1181 were passed into law. It also does not include the impact of Covid on the workplace resulting in increased remote employment, Bellevue's pending tree code ordinance, and the impact of the different housing target strategies on the Kelsey Creek

Watershed, impervious surfaces, and their effect on endangered species of local importance. The loss of century-old tree canopies and their effect on water and air temperatures, the increasing air and land pollution with increasing traffic, and the decreased habitat and food sources. Also, incentives should not be seen as a substitute for effective stormwater management. Wilburton's watershed and ecosystem require proper stormwater management measures to mitigate the risks of flooding and water pollution caused by toxic runoff.

Moreover, according to a technical report by Golder Associates and the Watershed Company, the city of Bellevue's DEIS falls short of utilizing the best available science and existing conditions. This critique addresses the impacts of this inadequacy:

1. Information related to traffic and site conditions is incomplete and potentially inaccurate, which hinders environmental evaluations.
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Sincerely,

Lee White

Zihong Guo

605 130<sup>th</sup> Ave. NE

Bellevue, WA 98005

June 11, 2023

Dear Ms. Stead:

**Please include me as a party of record.**

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. The Wilburton subarea and its residents are dedicated to protecting, restoring, and enhancing the character and livability of Wilburton, including the Kelsey Creek Watershed system. Natural elements play a vital role in enhancing the quality of life for Wilburton residents, and the Kelsey Creek Watershed Basin system, and all of its other basin streams such as Goff stream, sub-tributaries, and wetlands flowing throughout Wilburton. King County's DRNP Water Quality Index rated Kelsey Creek at NE 8th with a "Moderate" score, and its Oxygen levels, a "Poor" rating score.

As a resident of Wilburton, I support the inception of the Wilburton/NE 8th Subarea Plan Goals:

**"Wilburton/NE 8th Subarea Plan Goals**

- **To separate residential, recreational, and open space areas from commercial areas and to protect space.**
- **To improve pedestrian accessibility and attractiveness of commercial areas for residents of Bellevue.**
- **To support the provision of commercial services in Wilburton that complement Downtown..."**

and:

**"...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."**

I also support the following **Land Use Policies** and aligning with the Wilburton/NE 8th Subarea Plan:

**"...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas.**

and are committed to supporting policies protecting and preserving Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays a crucial role in providing a sense of well-being.

### **Natural Determinants Policies:**

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**POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin.**

**POLICYS-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek.**

**POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan."**

Wilburton is home to many animals that fall into Washington Fish and Wildlife's priority and endangered habitat and species. They include the Great Blue Heron, the Bald Eagle, Chinook Salmon, Coho Salmon, Sockeye Salmon, Steelhead, bats, owls, hawks, and a variety of different birds.

The City's Determination of Non-Significance is not aligned with the conservation of the City of Bellevue's Critical Areas Regulations for Streams and Riparian Areas, Wetlands, and Habitats for Species of Local Importance including the Kelsey Creek Watershed Report and the City's efforts to protect and maintain the health of Wilburton's critical areas.

[https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2021/KelseyCreek\\_Assessment\\_Report\\_2021\\_1130.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/KelseyCreek_Assessment_Report_2021_1130.pdf):

**"The Kelsey Creek Watershed is a vital ecosystem that supports numerous species of wildlife and provides essential ecological services to the surrounding communities. The proposed development of density in these areas including private properties has the potential to significantly impact the delicate balance of the ecosystem,..."** including water quality, habitat fragmentation, increasing runoff, and effects of water temperatures with decreasing tree canopies. Young trees cannot make up for the shade and protection offered by 100-plus-year-old trees. Decreasing tree canopies result in increased water temperatures and may be detrimental to priority animals, as well as the endangered Chinook, Coho, and other salmon. The Greater Kelsey Creek Watershed historically provides extensive spawning and rearing habitat for a larger number of other salmon species such as Chinook, Sockeye, Coho, Cutthroat Trout, Peamouth Minnows, and Steelhead.

The DEIS's Determination of Non-Significance does not align with the City's efforts to restore and protect critical areas in the Kelsey Creek Watershed System (KCWS) due to the limited factors being taken into account. The DEIS was written before House Bill 1110, HB 1337, HB 1181 were passed into law. It also does not include the impact of Covid on the workplace resulting in increased remote employment, Bellevue's pending tree code ordinance, and the impact of the different housing target strategies on the Kelsey Creek

Watershed, impervious surfaces, and their effect on endangered species of local importance. The loss of century-old tree canopies and their effect on water and air temperatures, the increasing air and land pollution with increasing traffic, and the decreased habitat and food sources. Also, incentives should not be seen as a substitute for effective stormwater management. Wilburton's watershed and ecosystem require proper stormwater management measures to mitigate the risks of flooding and water pollution caused by toxic runoff.

Moreover, according to a technical report by Golder Associates and the Watershed Company, the city of Bellevue's DEIS falls short of utilizing the best available science and existing conditions. This critique addresses the impacts of this inadequacy:

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2. Protecting the environment leads to the long-term sustainability of the community and its people. It is essential for their health, safety, and quality of life. For example, in the case of Kelsey Creek, the watershed provides critical ecosystem services that directly support the community's health and well-being, such as clean water, clean air, and flood control. Prioritizing the environment can help prevent harm to low-income communities of color, and indigenous people who are disproportionately affected by harmful environmental conditions. Environmental equity addresses these inequalities and provides equal protection and access to clean, and healthy communities.
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5. The City of Bellevue's Greater Kelsey Creek Watershed's riparian corridor across all of the sub-basins includes both approximately 90% private properties and 10% publicly owned properties and is critical to species of local importance, aquatic animals, and other wildlife, Peregrine Falcon, Bald Eagles, Red-tailed Hawks, Blue Herons, Pileated Woodpecker, Great Blue Heron, cardinals, hummingbirds, bats, opossums, beavers, bobcats, deer, coyotes, and many others. The diverse range of animals needs to be managed, protected, and maintained as part of the existing riparian corridor structure and function within the entire sensitive ecosystem. This ecosystem provides shelter, food, and protection, and maintains temperatures critical to their survival.
6. Adopting green infrastructure practices to maximize the achievement of objectives, these efforts are expensive and limited.





















7. With 90% of the riparian corridor on private properties, the city has not been able to keep up with tracking damages in and near open streams.
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9. Wilburton's Kelsey Creek has the greatest amount of impervious surface areas. Increasing mixed-use developments, multi-unit dwellings, increasing cars and toxic waste from their tires, and increasing construction will cause even greater impervious surface areas with increasing toxic stormwater runoff.



Subbasin	Commercial/ Office (%)	Highway (%)	Industrial (%)	Mixed- use (%)	Multi- Family (%)	Park (%)	Single- family (%)	Total (ac)
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Table 7 compares the change in canopy cover and impervious surfaces between 2006 and 2017 for the nine subbasins and the Greater Kelsey Creek Watershed (HRCd 2021). The Sears Creek Subbasin and the Sturtevant Creek Subbasin experienced the largest tree canopy loss and impervious surface increase of all the subbasins in the Greater Kelsey Creek Watershed.

**Table 7. Change in Tree Canopy and Impervious Surfaces from 2006 to 2017 in the Greater Kelsey Creek Watershed**

Subbasins	Tree Canopy Loss (2006 – 2017)		Impervious Surfaces Increase (2006 – 2017)		Primary Agent of Change
	Change	Trend	Change	Trend	
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Total Greater Kelsey Watershed	1.2 % (133 acres)		1.2 % (125 acres)		Development

data source: <https://hrcd-wdfw.hub.arcgis.com/>

Based on changes in tree canopy and impervious area data, since 2006 there has been a large amount of development in the majority of the Watershed's subbasins. Table 7 shows the decrease in tree canopy and increase in impervious surfaces associated with rapid development and urbanization—where development indicates the conversion of a vegetated lot or parcel into a built lot or parcel, and redevelopment indicates building on a previously developed lot. With development across so much of the Greater Kelsey Creek

Greater Kelsey Creek Watershed and its connecting tributaries is a critical urban watershed for the City of Bellevue. It is one of the few watershed areas in a city the size of Bellevue remaining in the entire USA. As described in the 2003 Bellevue Critical Areas Update Best Available Science Paper: **Wildlife, forested steep slopes, and riparian areas comprise the majority of Bellevue's remaining habitat corridors and linkages.** It needs to be managed carefully over the next few decades to protect and preserve its unique aquatic and

terrestrial values. Once developed and the 100-year-old trees felled for development, all inhabitants in the watershed that relied on the natural environment for survival will be gone forever from Wilburton.

#### Other Considerations:

**Control Totals:** On January 23, 2023, Dave Andersen, managing director of the Growth Management Services unit presented one of many sessions on getting periodic update planning right. He identified having the same control total targets for each alternative as critical. The growth strategy is to determine what are different ways of achieving the growth target. We find the DEIS has a wide range of targets. Bellevue Residents understand higher targets have higher impacts. This does not result in an understanding or critique of the strategy. In addressing this deficiency, the City will need to address the same target in each of the alternatives and show how all alternatives would meet the same need, including the “no change” alternative.

**House Bill 1110 Increasing Housing Supply and Density:** On May 8, 2023, Governor Jay Inslee signed House Bill 1110, which legalizes duplexes and fourplexes in most neighborhoods in nearly every city in the State of Washington, including the City of Bellevue, which was intended to increase the state’s housing supply. House Bill legalizes six-plexes near transit and for affordable housing. House Bill 1110 [overrides local zoning rules](#) that have long kept large areas in cities for only single-family homes. The new law will not ban the construction of single-family homes, but it will stop cities from requiring neighborhoods to have only single-family homes. However, this DEIS was prepared prior to passage of House Bill 1110, and Bellevue residents have no idea how the House Bill will affect any of the alternatives. It is likely that fewer new multi-family units will be needed as shown in Alternatives 1, 2, and 3. The no-action alternative will also need to address application of House Bill 1110 since the state law will now allow continued expansion of housing in Bellevue without application of the proposed alternatives. In addressing this deficiency, the City will need to either develop a new alternative or address this House Bill in each of the alternatives, which may result in an increase or decrease in the number of housing units needed.

**House Bill 1337 Expanding Housing Options.** This bill expands housing options through easing barriers to the construction and use of accessory dwelling units, and was partially vetoed by the Governor. However, the primary components of the bill would remain, thus, affecting the number of new housing units that may be needed to accommodate new employment in any given city within Washington State. Thus, the number of new housing units for the City of Bellevue would need

to be determined. An example of how this bill could affect housing would be in the State of California whereby the bill was passed and fewer new homes were needed as a result. Thus, HB 1337 has a strong potential of affecting the no-action alternative, along with Alternatives 1 to 3.

**House Bill 1181. Climate change and resiliency.** This bill includes a climate change and resiliency component that is required to be included in city comprehensive plans. The bill is intended for cities to mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental economic, and human health and safety; and advance environmental justice. Much of this is already included in the DEIS in Appendix G (Relationship of Climate Change Vulnerability to the Alternatives) but specific compliance with the bill is not included because Governor Inslee only signed the bill on May 3.

**2023 Legislative Session:** The Growth Management Policy Board states that these bills result in significant changes to the Growth Management Act and will impact local plans. The Board received a will receive a detailed recap of the 2023 legislative session which highlights these bills on June 1, 2023. Thus, the impact of these bills has not yet been well understood or could have been included in the DEIS. We cannot expect our Bellevue residents to have an understanding of these bills at the time.

**Covid:** The Covid-19 pandemic sparked a new [working-from-home economy](#) where many workers have the flexibility to work remotely from home. This unprecedented shift to remote work will be occurring in some form over the next 20 years. Now, roughly six-in-ten U.S. workers who say their jobs can mainly be done from home (59%) are working from home all or most of the time. Working from home results in changes in office use and transportation resulting in a declining need to live in Bellevue when working in Bellevue. This is a fundamental flaw where the DEIS is not addressing employment and residency adequately based on recent changes to office uses. Many employees are now moving outside of the city and then commuting to their workplace only once or twice a week. The DEIS should be revised to reflect this change in how employees will work and live in Bellevue in the housing, office, and transportation components of the DEIS. See also Attachment D

**Updated Tree Code:** The City of Bellevue plans to update its tree code in 2023, which will have significant effects to new construction. This tree code may, hopefully, provide better protection for significant trees and require contractors

and builders to redesign multi-family and single-family homes to protect these trees. The Tree Code may also deter contractors from building on sites with significant trees. Thus, BTCC is requesting that the DEIS Comprehensive Plan describe how the tree code will affect planned protection of significant trees. The City of Bellevue Urban Tree Assessment (July 2022) stated that land use changes are an important factors of the urban environment and can contribute to changes in citywide canopy numbers. As described in the Urban Tree Assessment, it is important for the City to use this assessment to inform future investments in the urban forest so that all those who live, work, and play in Bellevue can benefit from the urban forest. The City must proactively work to protect the existing urban forest and replenish the canopy with additional native trees. Nowhere in the DEIS do the alternatives address how the existing urban forest will be protected. We are hoping that the DEIS will address replacing lost trees with native trees, and that the Comprehensive Plan show synchrony with its Urban Tree Assessment, as well with the planned updated tree code. Which alternatives may be best for protecting our urban trees?

**Homelessness.** Finally, the City must address how homelessness will be avoided or minimized under the each alternatives of its comprehensive plan. Although the City is investing in facilities such as shelters, transitional housing and affordable housing units for those living in vehicles or unsheltered in the community, how will these additional housing units affect homelessness and will some units be available to homeless people? If the City of Bellevue's notes that affordable housing, especially in the lowest income brackets, is critical to help individuals transition out of homelessness and maintain housing, then why is this not discussed on the DEIS?

**Historic Resources:** Bellevue's historic Wilburton neighborhood is an enclave of single-family and multifamily housing known for its rich history and its parks and wooded areas with close proximity to downtown Bellevue. Wilburton is also home of the acclaimed Bellevue Botanical Gardens, and the largest watershed in Bellevue.

It is nearly impossible to keep up with every possible land use bill and in the annual legislative session. These bills passed in this legislative session are important for the comprehensive plan in any city, and if not covered under this DEIS then an amendment would be needed. An amendment would take more time and it would be more costly to the City of Bellevue. We recognize the significant effort already undertaken for this DEIS but we also desire to review a complete DEIS that includes passage of bills and regulations that have occurred in 2023.

Thank you for the opportunity to comment and we look forward to working with you and your staff in creating a City of Bellevue comprehensive plan that is complete, meaningful, and applicable for immediate use.

Sincerely,



# BELLEVUE'S DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Jiang Wu

12814 NE 4<sup>th</sup> PL Bellevue, WA 98005

6/11/2023

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**Covid:** The Covid-19 pandemic sparked a new [working-from-home economy](#) where many workers have the flexibility to work remotely from home. This unprecedented shift to remote work will be occurring in some form over the next 20 years. Now, roughly six-in-ten U.S. workers who say their jobs can mainly be done from home (59%) are working from home all or most of the time. Working from home results in changes in office use and transportation resulting in a declining need to live in Bellevue when working in Bellevue. This is a fundamental flaw where the DEIS is not addressing employment and residency adequately based on recent changes to office uses. Many employees are now moving outside of the city and then commuting to their workplace only once or twice a week. The DEIS should be revised to reflect this change in how employees will work and live in Bellevue in the housing, office, and transportation components of the DEIS. See also Attachment D

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**Homelessness.** Finally, the City must address how homelessness will be avoided or minimized under the each alternatives of its comprehensive plan. Although the City is investing in facilities such as shelters, transitional housing and affordable housing units for those living in vehicles or unsheltered in the community, how will these additional housing units affect homelessness and will some units be available to homeless people? If the City of Bellevue's notes that affordable housing, especially in the lowest income brackets, is critical to help individuals transition out of homelessness and maintain housing, then why is this not discussed on the DEIS?

**Historic Resources:** Bellevue's historic Wilburton neighborhood is an enclave of single-family and multifamily housing known for its rich history and its parks and wooded areas with close proximity to downtown Bellevue. Wilburton is also home of the acclaimed Bellevue Botanical Gardens, and the largest watershed in Bellevue.

It is nearly impossible to keep up with every possible land use bill and in the annual legislative session. These bills passed in this legislative session are important for the comprehensive plan in any city, and if not covered under this DEIS then an amendment would be needed. An amendment would take more time and it would be more costly to the City of Bellevue. We recognize the significant effort already undertaken for this DEIS but we also desire to review a complete DEIS that includes passage of bills and regulations that have occurred in 2023.

Thank you for the opportunity to comment and we look forward to working with you and your staff in creating a City of Bellevue comprehensive plan that is complete, meaningful, and applicable for immediate use.

Sincerely,

Jiang Wu

Email: [jiangwu@ymail.com](mailto:jiangwu@ymail.com)

Organization: Wilburton Community Association

# BELLEVUE'S DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Ying Jiang

12814 NE 4<sup>th</sup> PL Bellevue, WA 98005

6/11/2023

Dear Ms. Stead:

## **Please include me as a party of record.**

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. The Wilburton subarea and its residents are dedicated to protecting, restoring, and enhancing the character and livability of Wilburton, including the Kelsey Creek Watershed system. Natural elements play a vital role in enhancing the quality of life for Wilburton residents, and the Kelsey Creek Watershed Basin system, and all of its other basin streams such as Goff stream, sub-tributaries, and wetlands flowing throughout Wilburton. King County's DRNP Water Quality Index rated Kelsey Creek at NE 8th with a "Moderate" score, and its Oxygen levels, a "Poor" rating score.

As a resident of Wilburton, I support the inception of the Wilburton/NE 8th Subarea Plan Goals:

### **"Wilburton/NE 8th Subarea Plan Goals**

- **To separate residential, recreational, and open space areas from commercial areas and to protect space.**
- **To improve pedestrian accessibility and attractiveness of commercial areas for residents of Bellevue.**
- **To support the provision of commercial services in Wilburton that complement Downtown..."**

and:

**"...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."**

I also support the following **Land Use Policies** and aligning with the Wilburton/NE 8th Subarea Plan:

**"...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas.**

and are committed to supporting policies protecting and preserving Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays a crucial role in providing a sense of well-being.

### **Natural Determinants Policies:**

#### **"Policies**

**POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin.**

**POLICYS-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek.**

**POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan."**

Wilburton is home to many animals that fall into Washington Fish and Wildlife's priority and endangered habitat and species. They include the Great Blue Heron, the Bald Eagle, Chinook Salmon, Coho Salmon, Sockeye Salmon, Steelhead, bats, owls, hawks, and a variety of different birds.

The City's Determination of Non-Significance is not aligned with the conservation of the City of Bellevue's Critical Areas Regulations for Streams and Riparian Areas, Wetlands, and Habitats for Species of Local Importance including the Kelsey Creek Watershed Report and the City's efforts to protect and maintain the health of Wilburton's critical areas.

[https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2021/KelseyCreek\\_Assessment\\_Report\\_2021\\_1130.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/KelseyCreek_Assessment_Report_2021_1130.pdf):

**"The Kelsey Creek Watershed is a vital ecosystem that supports numerous species of wildlife and provides essential ecological services to the surrounding communities. The proposed development of density in these areas including private properties has the potential to significantly impact the delicate balance of the ecosystem,..."** including water quality, habitat fragmentation, increasing runoff, and effects of water temperatures with decreasing tree canopies. Young trees cannot make up for the shade and protection offered by 100-plus-year-old trees. Decreasing tree canopies result in increased water temperatures and may be detrimental to priority animals, as well as the endangered Chinook, Coho, and other salmon. The Greater Kelsey Creek Watershed historically provides extensive spawning and rearing habitat for a larger number of other salmon species such as Chinook, Sockeye, Coho, Cutthroat Trout, Peamouth Minnows, and Steelhead.

The DEIS's Determination of Non-Significance does not align with the City's efforts to restore and protect critical areas in the Kelsey Creek Watershed System (KCWS) due to the limited factors being taken into account. The DEIS was written before House Bill 1110, HB 1337, HB 1181 were passed into law. It also does not include the impact of Covid on the workplace resulting in increased remote employment, Bellevue's pending tree code ordinance, and the impact of the different housing target strategies on the Kelsey Creek



Watershed, impervious surfaces, and their effect on endangered species of local importance. The loss of century-old tree canopies and their effect on water and air temperatures, the increasing air and land pollution with increasing traffic, and the decreased habitat and food sources. Also, incentives should not be seen as a substitute for effective stormwater management. Wilburton's watershed and ecosystem require proper stormwater management measures to mitigate the risks of flooding and water pollution caused by toxic runoff.

Moreover, according to a technical report by Golder Associates and the Watershed Company, the city of Bellevue's DEIS falls short of utilizing the best available science and existing conditions. This critique addresses the impacts of this inadequacy:





















1. Information related to traffic and site conditions is incomplete and potentially inaccurate, which hinders environmental evaluations.
2. Protecting the environment leads to the long-term sustainability of the community and its people. It is essential for their health, safety, and quality of life. For example, in the case of Kelsey Creek, the watershed provides critical ecosystem services that directly support the community's health and well-being, such as clean water, clean air, and flood control. Prioritizing the environment can help prevent harm to low-income communities of color, and indigenous people who are disproportionately affected by harmful environmental conditions. Environmental equity addresses these inequalities and provides equal protection and access to clean, and healthy communities.
3. The report encourages low-impact development and retrofits that improve stormwater runoff. Untreated run-off causes pre-spawn mortality on Coho salmon, and depending on future rates of urbanization, localized extinction of Coho salmon could occur within a matter of years to decades.
4. According to the report, Bellevue is in the process of updating its Shoreline Management Act. Under the proposed update, shorelines themselves are not regulated as critical areas, and critical areas within shoreline jurisdiction would be regulated under LUC Part 20.25H. Bellevue has not identified all critical areas in the city.
5. The City of Bellevue's Greater Kelsey Creek Watershed's riparian corridor across all of the sub-basins includes both approximately 90% private properties and 10% publicly owned properties and is critical to species of local importance, aquatic animals, and other wildlife, Peregrine Falcon, Bald Eagles, Red-tailed Hawks, Blue Herons, Pileated Woodpecker, Great Blue Heron, cardinals, hummingbirds, bats, opossums, beavers, bobcats, deer, coyotes, and many others. The diverse range of animals needs to be managed, protected, and maintained as part of the existing riparian corridor structure and function within the entire sensitive ecosystem. This ecosystem provides shelter, food, and protection, and maintains temperatures critical to their survival.
6. Adopting green infrastructure practices to maximize the achievement of objectives, these efforts are expensive and limited.

7. With 90% of the riparian corridor on private properties, the city has not been able to keep up with tracking damages in and near open streams.
8. The City's options are insufficient. The City's plan mitigates some of the side-effects of water overflow. The new plan should focus on preventing runoff from the source, increasing impervious surfaces caused by development. Unanticipated cleanup efforts with increased stormwater runoff may suggest that the city may end up footing the bill, and cause taxpayer runoff plan liability. We need solutions that offer long-term sustainability.
9. Wilburton's Kelsey Creek has the greatest amount of impervious surface areas. Increasing mixed-use developments, multi-unit dwellings, increasing cars and toxic waste from their tires, and increasing construction will cause even greater impervious surface areas with increasing toxic stormwater runoff.

Subbasin	Commercial/ Office (%)	Highway (%)	Industrial (%)	Mixed- use (%)	Multi- Family (%)	Park (%)	Single- family (%)	Total (ac)
Richards Creek	13.3%	1.9%	8.1%	4.8%	17.0%	10.2%	44.8%	1380
Sunset Creek	5.6%	6.3%	1.0%	2.4%	1.6%	4.0%	79.2%	854
West Tributary	8.4%	2.4%	0.0%	26.2%	4.4%	9.2%	44.2%	958
Goff Creek	8.4%	0.8%	0.0%	10.3%	0.0%	4.4%	76.2%	529
Valley Creek	7.2%	2.0%	0.0%	5.0%	15.0%	10.0%	60.8%	1300
Sears Creek	32.7%	3.0%	0.0%	21.8%	9.8%	0.0%	32.8%	355
Greater Kelsey Creek Watershed	11.8%	2.9%	1.7%	8.4%	11.0%	11.3%	51.8%	10376

Table 7 compares the change in canopy cover and impervious surfaces between 2006 and 2017 for the nine subbasins and the Greater Kelsey Creek Watershed (HRCd 2021). The Sears Creek Subbasin and the Sturtevant Creek Subbasin experienced the largest tree canopy loss and impervious surface increase of all the subbasins in the Greater Kelsey Creek Watershed.

**Table 7. Change in Tree Canopy and Impervious Surfaces from 2006 to 2017 in the Greater Kelsey Creek Watershed**

Subbasins	Tree Canopy Loss (2006 – 2017)		Impervious Surfaces Increase (2006 – 2017)		Primary Agent of Change
	Change	Trend	Change	Trend	
Goff Creek	0.4 %		0.5 %		Development
Kelsey Creek	1.0 %		1.0 %		Development
Mercer Slough	1.5 %		1.1 %		Development
Richards Creek	1.5 %		1.1 %		Development
Sears Creek	3.9 %		3.4 %		Development
Sturtevant Creek	2.2 %		3.8 %		Development
Sunset Creek	0.5 %		0.7 %		Development
Valley Creek	0.5 %		0.2 %		Tree removal
West Tributary	1.2 %		0.7 %		Development
Total Greater Kelsey Watershed	1.2 % (133 acres)		1.2 % (125 acres)		Development

data source: <https://hrcd-wdfw.hub.arcgis.com/>

Based on changes in tree canopy and impervious area data, since 2006 there has been a large amount of development in the majority of the Watershed's subbasins. Table 7 shows the decrease in tree canopy and increase in impervious surfaces associated with rapid development and urbanization—where development indicates the conversion of a vegetated lot or parcel into a built lot or parcel, and redevelopment indicates building on a previously developed lot. With development across so much of the Greater Kelsey Creek

Greater Kelsey Creek Watershed and its connecting tributaries is a critical urban watershed for the City of Bellevue. It is one of the few watershed areas in a city the size of Bellevue remaining in the entire USA. As described in the 2003 Bellevue Critical Areas Update Best Available Science Paper: **Wildlife, forested steep slopes, and riparian areas comprise the majority of Bellevue's remaining habitat corridors and linkages.** It needs to be managed carefully over the next few decades to protect and preserve its unique aquatic and

terrestrial values. Once developed and the 100-year-old trees felled for development, all inhabitants in the watershed that relied on the natural environment for survival will be gone forever from Wilburton.

#### Other Considerations:

**Control Totals:** On January 23, 2023, Dave Andersen, managing director of the Growth Management Services unit presented one of many sessions on getting periodic update planning right. He identified having the same control total targets for each alternative as critical. The growth strategy is to determine what are different ways of achieving the growth target. We find the DEIS has a wide range of targets. Bellevue Residents understand higher targets have higher impacts. This does not result in an understanding or critique of the strategy. In addressing this deficiency, the City will need to address the same target in each of the alternatives and show how all alternatives would meet the same need, including the “no change” alternative.

**House Bill 1110 Increasing Housing Supply and Density:** On May 8, 2023, Governor Jay Inslee signed House Bill 1110, which legalizes duplexes and fourplexes in most neighborhoods in nearly every city in the State of Washington, including the City of Bellevue, which was intended to increase the state’s housing supply. House Bill legalizes six-plexes near transit and for affordable housing. House Bill 1110 [overrides local zoning rules](#) that have long kept large areas in cities for only single-family homes. The new law will not ban the construction of single-family homes, but it will stop cities from requiring neighborhoods to have only single-family homes. However, this DEIS was prepared prior to passage of House Bill 1110, and Bellevue residents have no idea how the House Bill will affect any of the alternatives. It is likely that fewer new multi-family units will be needed as shown in Alternatives 1, 2, and 3. The no-action alternative will also need to address application of House Bill 1110 since the state law will now allow continued expansion of housing in Bellevue without application of the proposed alternatives. In addressing this deficiency, the City will need to either develop a new alternative or address this House Bill in each of the alternatives, which may result in an increase or decrease in the number of housing units needed.

**House Bill 1337 Expanding Housing Options.** This bill expands housing options through easing barriers to the construction and use of accessory dwelling units, and was partially vetoed by the Governor. However, the primary components of the bill would remain, thus, affecting the number of new housing units that may be needed to accommodate new employment in any given city within Washington State. Thus, the number of new housing units for the City of Bellevue would need

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**Updated Tree Code:** The City of Bellevue plans to update its tree code in 2023, which will have significant effects to new construction. This tree code may, hopefully, provide better protection for significant trees and require contractors

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Thank you for the opportunity to comment and we look forward to working with you and your staff in creating a City of Bellevue comprehensive plan that is complete, meaningful, and applicable for immediate use.

Sincerely,

Ying Jiang

Email: [joycejy@gmail.com](mailto:joycejy@gmail.com)

Organization: Wilburton Community Association

# BELLEVUE'S DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Luming Wang

1220 134<sup>th</sup> AVE NE, Bellevue, WA 98005

06/11/2023

Dear Ms. Stead:

## **Please include me as a party of record.**

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As a resident of Wilburton, I support the inception of the Wilburton/NE 8th Subarea Plan Goals:

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I also support the following **Land Use Policies** and aligning with the Wilburton/NE 8th Subarea Plan:

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and are committed to supporting policies protecting and preserving Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays a crucial role in providing a sense of well-being.

### **Natural Determinants Policies:**

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**POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan."**

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[https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2021/KelseyCreek\\_Assessment\\_Report\\_2021\\_1130.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/KelseyCreek_Assessment_Report_2021_1130.pdf):

**"The Kelsey Creek Watershed is a vital ecosystem that supports numerous species of wildlife and provides essential ecological services to the surrounding communities. The proposed development of density in these areas including private properties has the potential to significantly impact the delicate balance of the ecosystem,..."** including water quality, habitat fragmentation, increasing runoff, and effects of water temperatures with decreasing tree canopies. Young trees cannot make up for the shade and protection offered by 100-plus-year-old trees. Decreasing tree canopies result in increased water temperatures and may be detrimental to priority animals, as well as the endangered Chinook, Coho, and other salmon. The Greater Kelsey Creek Watershed historically provides extensive spawning and rearing habitat for a larger number of other salmon species such as Chinook, Sockeye, Coho, Cutthroat Trout, Peamouth Minnows, and Steelhead.

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Watershed, impervious surfaces, and their effect on endangered species of local importance. The loss of century-old tree canopies and their effect on water and air temperatures, the increasing air and land pollution with increasing traffic, and the decreased habitat and food sources. Also, incentives should not be seen as a substitute for effective stormwater management. Wilburton's watershed and ecosystem require proper stormwater management measures to mitigate the risks of flooding and water pollution caused by toxic runoff.

Moreover, according to a technical report by Golder Associates and the Watershed Company, the city of Bellevue's DEIS falls short of utilizing the best available science and existing conditions. This critique addresses the impacts of this inadequacy:

1. Information related to traffic and site conditions is incomplete and potentially inaccurate, which hinders environmental evaluations.
2. Protecting the environment leads to the long-term sustainability of the community and its people. It is essential for their health, safety, and quality of life. For example, in the case of Kelsey Creek, the watershed provides critical ecosystem services that directly support the community's health and well-being, such as clean water, clean air, and flood control. Prioritizing the environment can help prevent harm to low-income communities of color, and indigenous people who are disproportionately affected by harmful environmental conditions. Environmental equity addresses these inequalities and provides equal protection and access to clean, and healthy communities.
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6. Adopting green infrastructure practices to maximize the achievement of objectives, these efforts are expensive and limited.





















7. With 90% of the riparian corridor on private properties, the city has not been able to keep up with tracking damages in and near open streams.
8. The City's options are insufficient. The City's plan mitigates some of the side-effects of water overflow. The new plan should focus on preventing runoff from the source, increasing impervious surfaces caused by development. Unanticipated cleanup efforts with increased stormwater runoff may suggest that the city may end up footing the bill, and cause taxpayer runoff plan liability. We need solutions that offer long-term sustainability.
9. Wilburton's Kelsey Creek has the greatest amount of impervious surface areas. Increasing mixed-use developments, multi-unit dwellings, increasing cars and toxic waste from their tires, and increasing construction will cause even greater impervious surface areas with increasing toxic stormwater runoff.

**As noted below, the impervious surface areas in the Kelsey Creek Watershed are increasing due to development.**

Subbasin	Commercial/ Office (%)	Highway (%)	Industrial (%)	Mixed- use (%)	Multi- Family (%)	Park (%)	Single- family (%)	Total (ac)
Richards Creek	13.3%	1.9%	8.1%	4.8%	17.0%	10.2%	44.8%	1380
Sunset Creek	5.6%	6.3%	1.0%	2.4%	1.6%	4.0%	79.2%	854
West Tributary	8.4%	2.4%	0.0%	26.2%	4.4%	9.2%	44.2%	958
Goff Creek	8.4%	0.8%	0.0%	10.3%	0.0%	4.4%	76.2%	529
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Sears Creek	32.7%	3.0%	0.0%	21.8%	9.8%	0.0%	32.8%	355
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Table 7 compares the change in canopy cover and impervious surfaces between 2006 and 2017 for the nine subbasins and the Greater Kelsey Creek Watershed (HRCd 2021). The Sears Creek Subbasin and the Sturtevant Creek Subbasin experienced the largest tree canopy loss and impervious surface increase of all the subbasins in the Greater Kelsey Creek Watershed.

**Table 7. Change in Tree Canopy and Impervious Surfaces from 2006 to 2017 in the Greater Kelsey Creek Watershed**

Subbasins	Tree Canopy Loss (2006 – 2017)		Impervious Surfaces Increase (2006 – 2017)		Primary Agent of Change
	Change	Trend	Change	Trend	
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Total Greater Kelsey Watershed	1.2 % (133 acres)		1.2 % (125 acres)		Development

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Based on changes in tree canopy and impervious area data, since 2006 there has been a large amount of development in the majority of the Watershed's subbasins. Table 7 shows the decrease in tree canopy and increase in impervious surfaces associated with rapid development and urbanization—where development indicates the conversion of a vegetated lot or parcel into a built lot or parcel, and redevelopment indicates building on a previously developed lot. With development across so much of the Greater Kelsey Creek

10. Recommendation: Require the Washington Department of Ecology and the Washington Fish and Wildlife to work together to form Natural Determinant Land Use Policies for Wilburton and all of Bellevue's critical areas, and create policies regarding impervious surface areas.

Greater Kelsey Creek Watershed and its connecting tributaries is a critical urban watershed for the City of Bellevue. It is one of the few watershed areas in a city the size of Bellevue remaining in the entire USA. As described in the 2003 Bellevue Critical Areas Update Best Available Science Paper: **Wildlife, forested steep slopes, and riparian areas comprise the majority of Bellevue's remaining habitat corridors and linkages.** It needs to be managed carefully over the next few decades to protect and preserve its unique aquatic and terrestrial values. Once developed and the 100-year-old trees felled for development, all inhabitants in the watershed that relied on the natural environment for survival will be gone forever from Wilburton.

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It is nearly impossible to keep up with every possible land use bill and in the annual legislative session. These bills passed in this legislative session are important for the comprehensive plan in any city, and if not covered under this DEIS then an amendment would be needed. An amendment would take more time and it would be more costly to the City of Bellevue. We recognize the significant effort already undertaken for this DEIS but we also desire to review a complete DEIS that includes passage of bills and regulations that have occurred in 2023.

Thank you for the opportunity to comment and we look forward to working with you and your staff in creating a City of Bellevue comprehensive plan that is complete, meaningful, and applicable for immediate use.

Sincerely,

Luming Wang



# BELLEVUE'S DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Yan Wang

1220 134<sup>th</sup> AVE NE, Bellevue, WA 98005

06/11/2023

Dear Ms. Stead:

## **Please include me as a party of record.**

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. The Wilburton subarea and its residents are dedicated to protecting, restoring, and enhancing the character and livability of Wilburton, including the Kelsey Creek Watershed system. Natural elements play a vital role in enhancing the quality of life for Wilburton residents, and the Kelsey Creek Watershed Basin system, and all of its other basin streams such as Goff stream, sub-tributaries, and wetlands flowing throughout Wilburton. King County's DRNP Water Quality Index rated Kelsey Creek at NE 8th with a "Moderate" score, and its Oxygen levels, a "Poor" rating score.

As a resident of Wilburton, I support the inception of the Wilburton/NE 8th Subarea Plan Goals:

### **"Wilburton/NE 8th Subarea Plan Goals**

- **To separate residential, recreational, and open space areas from commercial areas and to protect space.**
- **To improve pedestrian accessibility and attractiveness of commercial areas for residents of Bellevue.**
- **To support the provision of commercial services in Wilburton that complement Downtown..."**

and:

**"...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."**

I also support the following **Land Use Policies** and aligning with the Wilburton/NE 8th Subarea Plan:

**"...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas."**

and are committed to supporting policies protecting and preserving Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays a crucial role in providing a sense of well-being.

### **Natural Determinants Policies:**

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**POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin.**

**POLICYS-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek.**

**POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan."**

Wilburton is home to many animals that fall into Washington Fish and Wildlife's priority and endangered habitat and species. They include the Great Blue Heron, the Bald Eagle, Chinook Salmon, Coho Salmon, Sockeye Salmon, Steelhead, bats, owls, hawks, and a variety of different birds.

The City's Determination of Non-Significance is not aligned with the conservation of the City of Bellevue's Critical Areas Regulations for Streams and Riparian Areas, Wetlands, and Habitats for Species of Local Importance including the Kelsey Creek Watershed Report and the City's efforts to protect and maintain the health of Wilburton's critical areas.

[https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2021/KelseyCreek\\_Assessment\\_Report\\_2021\\_1130.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/KelseyCreek_Assessment_Report_2021_1130.pdf):

**"The Kelsey Creek Watershed is a vital ecosystem that supports numerous species of wildlife and provides essential ecological services to the surrounding communities. The proposed development of density in these areas including private properties has the potential to significantly impact the delicate balance of the ecosystem,..."** including water quality, habitat fragmentation, increasing runoff, and effects of water temperatures with decreasing tree canopies. Young trees cannot make up for the shade and protection offered by 100-plus-year-old trees. Decreasing tree canopies result in increased water temperatures and may be detrimental to priority animals, as well as the endangered Chinook, Coho, and other salmon. The Greater Kelsey Creek Watershed historically provides extensive spawning and rearing habitat for a larger number of other salmon species such as Chinook, Sockeye, Coho, Cutthroat Trout, Peamouth Minnows, and Steelhead.

The DEIS's Determination of Non-Significance does not align with the City's efforts to restore and protect critical areas in the Kelsey Creek Watershed System (KCWS) due to the limited factors being taken into account. The DEIS was written before House Bill 1110, HB 1337, HB 1181 were passed into law. It also does not include the impact of Covid on the workplace resulting in increased remote employment, Bellevue's pending tree code ordinance, and the impact of the different housing target strategies on the Kelsey Creek

Watershed, impervious surfaces, and their effect on endangered species of local importance. The loss of century-old tree canopies and their effect on water and air temperatures, the increasing air and land pollution with increasing traffic, and the decreased habitat and food sources. Also, incentives should not be seen as a substitute for effective stormwater management. Wilburton's watershed and ecosystem require proper stormwater management measures to mitigate the risks of flooding and water pollution caused by toxic runoff.

Moreover, according to a technical report by Golder Associates and the Watershed Company, the city of Bellevue's DEIS falls short of utilizing the best available science and existing conditions. This critique addresses the impacts of this inadequacy:

1. Information related to traffic and site conditions is incomplete and potentially inaccurate, which hinders environmental evaluations.
2. Protecting the environment leads to the long-term sustainability of the community and its people. It is essential for their health, safety, and quality of life. For example, in the case of Kelsey Creek, the watershed provides critical ecosystem services that directly support the community's health and well-being, such as clean water, clean air, and flood control. Prioritizing the environment can help prevent harm to low-income communities of color, and indigenous people who are disproportionately affected by harmful environmental conditions. Environmental equity addresses these inequalities and provides equal protection and access to clean, and healthy communities.
3. The report encourages low-impact development and retrofits that improve stormwater runoff. Untreated run-off causes pre-spawn mortality on Coho salmon, and depending on future rates of urbanization, localized extinction of Coho salmon could occur within a matter of years to decades.
4. According to the report, Bellevue is in the process of updating its Shoreline Management Act. Under the proposed update, shorelines themselves are not regulated as critical areas, and critical areas within shoreline jurisdiction would be regulated under LUC Part 20.25H. Bellevue has not identified all critical areas in the city.
5. The City of Bellevue's Greater Kelsey Creek Watershed's riparian corridor across all of the sub-basins includes both approximately 90% private properties and 10% publicly owned properties and is critical to species of local importance, aquatic animals, and other wildlife, Peregrine Falcon, Bald Eagles, Red-tailed Hawks, Blue Herons, Pileated Woodpecker, Great Blue Heron, cardinals, hummingbirds, bats, opossums, beavers, bobcats, deer, coyotes, and many others. The diverse range of animals needs to be managed, protected, and maintained as part of the existing riparian corridor structure and function within the entire sensitive ecosystem. This ecosystem provides shelter, food, and protection, and maintains temperatures critical to their survival.
6. Adopting green infrastructure practices to maximize the achievement of objectives, these efforts are expensive and limited.





















7. With 90% of the riparian corridor on private properties, the city has not been able to keep up with tracking damages in and near open streams.
8. The City's options are insufficient. The City's plan mitigates some of the side-effects of water overflow. The new plan should focus on preventing runoff from the source, increasing impervious surfaces caused by development. Unanticipated cleanup efforts with increased stormwater runoff may suggest that the city may end up footing the bill, and cause taxpayer runoff plan liability. We need solutions that offer long-term sustainability.
9. Wilburton's Kelsey Creek has the greatest amount of impervious surface areas. Increasing mixed-use developments, multi-unit dwellings, increasing cars and toxic waste from their tires, and increasing construction will cause even greater impervious surface areas with increasing toxic stormwater runoff.

**As noted below, the impervious surface areas in the Kelsey Creek Watershed are increasing due to development.**

Subbasin	Commercial/ Office (%)	Highway (%)	Industrial (%)	Mixed- use (%)	Multi- Family (%)	Park (%)	Single- family (%)	Total (ac)
Richards Creek	13.3%	1.9%	8.1%	4.8%	17.0%	10.2%	44.8%	1380
Sunset Creek	5.6%	6.3%	1.0%	2.4%	1.6%	4.0%	79.2%	854
West Tributary	8.4%	2.4%	0.0%	26.2%	4.4%	9.2%	44.2%	958
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Total Greater Kelsey Watershed	1.2 % (133 acres)		1.2 % (125 acres)		Development

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Yan Wang

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06/11/2023

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**"The Kelsey Creek Watershed is a vital ecosystem that supports numerous species of wildlife and provides essential ecological services to the surrounding communities. The proposed development of density in these areas including private properties has the potential to significantly impact the delicate balance of the ecosystem,..."** including water quality, habitat fragmentation, increasing runoff, and effects of water temperatures with decreasing tree canopies. Young trees cannot make up for the shade and protection offered by 100-plus-year-old trees. Decreasing tree canopies result in increased water temperatures and may be detrimental to priority animals, as well as the endangered Chinook, Coho, and other salmon. The Greater Kelsey Creek Watershed historically provides extensive spawning and rearing habitat for a larger number of other salmon species such as Chinook, Sockeye, Coho, Cutthroat Trout, Peamouth Minnows, and Steelhead.

The DEIS's Determination of Non-Significance does not align with the City's efforts to restore and protect critical areas in the Kelsey Creek Watershed System (KCWS) due to the limited factors being taken into account. The DEIS was written before House Bill 1110, HB 1337, HB 1181 were passed into law. It also does not include the impact of Covid on the workplace resulting in increased remote employment, Bellevue's pending tree code ordinance, and the impact of the different housing target strategies on the Kelsey Creek

Watershed, impervious surfaces, and their effect on endangered species of local importance. The loss of century-old tree canopies and their effect on water and air temperatures, the increasing air and land pollution with increasing traffic, and the decreased habitat and food sources. Also, incentives should not be seen as a substitute for effective stormwater management. Wilburton's watershed and ecosystem require proper stormwater management measures to mitigate the risks of flooding and water pollution caused by toxic runoff.

Moreover, according to a technical report by Golder Associates and the Watershed Company, the city of Bellevue's DEIS falls short of utilizing the best available science and existing conditions. This critique addresses the impacts of this inadequacy:

1. Information related to traffic and site conditions is incomplete and potentially inaccurate, which hinders environmental evaluations.
2. Protecting the environment leads to the long-term sustainability of the community and its people. It is essential for their health, safety, and quality of life. For example, in the case of Kelsey Creek, the watershed provides critical ecosystem services that directly support the community's health and well-being, such as clean water, clean air, and flood control. Prioritizing the environment can help prevent harm to low-income communities of color, and indigenous people who are disproportionately affected by harmful environmental conditions. Environmental equity addresses these inequalities and provides equal protection and access to clean, and healthy communities.
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4. According to the report, Bellevue is in the process of updating its Shoreline Management Act. Under the proposed update, shorelines themselves are not regulated as critical areas, and critical areas within shoreline jurisdiction would be regulated under LUC Part 20.25H. Bellevue has not identified all critical areas in the city.
5. The City of Bellevue's Greater Kelsey Creek Watershed's riparian corridor across all of the sub-basins includes both approximately 90% private properties and 10% publicly owned properties and is critical to species of local importance, aquatic animals, and other wildlife, Peregrine Falcon, Bald Eagles, Red-tailed Hawks, Blue Herons, Pileated Woodpecker, Great Blue Heron, cardinals, hummingbirds, bats, opossums, beavers, bobcats, deer, coyotes, and many others. The diverse range of animals needs to be managed, protected, and maintained as part of the existing riparian corridor structure and function within the entire sensitive ecosystem. This ecosystem provides shelter, food, and protection, and maintains temperatures critical to their survival.
6. Adopting green infrastructure practices to maximize the achievement of objectives, these efforts are expensive and limited.





















7. With 90% of the riparian corridor on private properties, the city has not been able to keep up with tracking damages in and near open streams.
8. The City's options are insufficient. The City's plan mitigates some of the side-effects of water overflow. The new plan should focus on preventing runoff from the source, increasing impervious surfaces caused by development. Unanticipated cleanup efforts with increased stormwater runoff may suggest that the city may end up footing the bill, and cause taxpayer runoff plan liability. We need solutions that offer long-term sustainability.
9. Wilburton's Kelsey Creek has the greatest amount of impervious surface areas. Increasing mixed-use developments, multi-unit dwellings, increasing cars and toxic waste from their tires, and increasing construction will cause even greater impervious surface areas with increasing toxic stormwater runoff.

**As noted below, the impervious surface areas in the Kelsey Creek Watershed are increasing due to development.**

Subbasin	Commercial/ Office (%)	Highway (%)	Industrial (%)	Mixed- use (%)	Multi- Family (%)	Park (%)	Single- family (%)	Total (ac)
Richards Creek	13.3%	1.9%	8.1%	4.8%	17.0%	10.2%	44.8%	1380
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West Tributary	8.4%	2.4%	0.0%	26.2%	4.4%	9.2%	44.2%	958
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Greater Kelsey Creek Watershed	11.8%	2.9%	1.7%	8.4%	11.0%	11.3%	51.8%	10376

Table 7 compares the change in canopy cover and impervious surfaces between 2006 and 2017 for the nine subbasins and the Greater Kelsey Creek Watershed (HRCd 2021). The Sears Creek Subbasin and the Sturtevant Creek Subbasin experienced the largest tree canopy loss and impervious surface increase of all the subbasins in the Greater Kelsey Creek Watershed.

**Table 7. Change in Tree Canopy and Impervious Surfaces from 2006 to 2017 in the Greater Kelsey Creek Watershed**

Subbasins	Tree Canopy Loss (2006 – 2017)		Impervious Surfaces Increase (2006 – 2017)		Primary Agent of Change
	Change	Trend	Change	Trend	
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Total Greater Kelsey Watershed	1.2 % (133 acres)		1.2 % (125 acres)		Development

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Based on changes in tree canopy and impervious area data, since 2006 there has been a large amount of development in the majority of the Watershed's subbasins. Table 7 shows the decrease in tree canopy and increase in impervious surfaces associated with rapid development and urbanization—where development indicates the conversion of a vegetated lot or parcel into a built lot or parcel, and redevelopment indicates building on a previously developed lot. With development across so much of the Greater Kelsey Creek

10. Recommendation: Require the Washington Department of Ecology and the Washington Fish and Wildlife to work together to form Natural Determinant Land Use Policies for Wilburton and all of Bellevue's critical areas, and create policies regarding impervious surface areas.

Greater Kelsey Creek Watershed and its connecting tributaries is a critical urban watershed for the City of Bellevue. It is one of the few watershed areas in a city the size of Bellevue remaining in the entire USA. As described in the 2003 Bellevue Critical Areas Update Best Available Science Paper: **Wildlife, forested steep slopes, and riparian areas comprise the majority of Bellevue's remaining habitat corridors and linkages.** It needs to be managed carefully over the next few decades to protect and preserve its unique aquatic and terrestrial values. Once developed and the 100-year-old trees felled for development, all inhabitants in the watershed that relied on the natural environment for survival will be gone forever from Wilburton.

#### Other Considerations:

**Control Totals:** On January 23, 2023, Dave Andersen, managing director of the Growth Management Services unit presented one of many sessions on getting periodic update planning right. He identified having the same control total targets for each alternative as critical. The growth strategy is to determine what are different ways of achieving the growth target. We find the DEIS has a wide range of targets. Bellevue Residents understand higher targets have higher impacts. This does not result in an understanding or critique of the strategy. In addressing this deficiency, the City will need to address the same target in each of the alternatives and show how all alternatives would meet the same need, including the “no change” alternative.

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in Bellevue in the housing, office, and transportation components of the DEIS. See also Attachment D

**Updated Tree Code:** The City of Bellevue plans to update its tree code in 2023, which will have significant effects to new construction. This tree code may, hopefully, provide better protection for significant trees and require contractors and builders to redesign multi-family and single-family homes to protect these trees. The Tree Code may also deter contractors from building on sites with significant trees. Thus, BTCC is requesting that the DEIS Comprehensive Plan describe how the tree code will affect planned protection of significant trees. The City of Bellevue Urban Tree Assessment (July 2022) stated that land use changes are an important factors of the urban environment and can contribute to changes in citywide canopy numbers. As described in the Urban Tree Assessment, it is important for the City to use this assessment to inform future investments in the urban forest so that all those who live, work, and play in Bellevue can benefit from the urban forest. The City must proactively work to protect the existing urban forest and replenish the canopy with additional native trees. Nowhere in the DEIS do the alternatives address how the existing urban forest will be protected. We are hoping that the DEIS will address replacing lost trees with native trees, and that the Comprehensive Plan show synchrony with its Urban Tree Assessment, as well with the planned updated tree code. Which alternatives may be best for protecting our urban trees?

**Homelessness.** Finally, the City must address how homelessness will be avoided or minimized under the each alternatives of its comprehensive plan. Although the City is investing in facilities such as shelters, transitional housing and affordable housing units for those living in vehicles or unsheltered in the community, how will these additional housing units affect homelessness and will some units be available to homeless people? If the City of Bellevue's notes that affordable housing, especially in the lowest income brackets, is critical to help individuals transition out of homelessness and maintain housing, then why is this not discussed on the DEIS?

**Historic Resources:** Bellevue's historic Wilburton neighborhood is an enclave of single-family and multifamily housing known for its rich history and its parks and wooded areas with close proximity to downtown Bellevue. Wilburton is also home of the acclaimed Bellevue Botanical Gardens, and the largest watershed in Bellevue.

It is nearly impossible to keep up with every possible land use bill and in the annual legislative session. These bills passed in this legislative session are important for the comprehensive plan in any city, and if not covered under this DEIS then an amendment would be needed. An amendment would take more time and it would be more costly to the City of Bellevue. We recognize the significant effort already undertaken for this DEIS but we also desire to review a complete DEIS that includes passage of bills and regulations that have occurred in 2023.

Thank you for the opportunity to comment and we look forward to working with you and your staff in creating a City of Bellevue comprehensive plan that is complete, meaningful, and applicable for immediate use.

Sincerely,

Yan Wang

# BELLEVUE'S DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

William Wang

1220 134<sup>th</sup> AVE NE, Bellevue, WA 98005

06/11/2023

Dear Ms. Stead:

## **Please include me as a party of record.**

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. The Wilburton subarea and its residents are dedicated to protecting, restoring, and enhancing the character and livability of Wilburton, including the Kelsey Creek Watershed system. Natural elements play a vital role in enhancing the quality of life for Wilburton residents, and the Kelsey Creek Watershed Basin system, and all of its other basin streams such as Goff stream, sub-tributaries, and wetlands flowing throughout Wilburton. King County's DRNP Water Quality Index rated Kelsey Creek at NE 8th with a "Moderate" score, and its Oxygen levels, a "Poor" rating score.

As a resident of Wilburton, I support the inception of the Wilburton/NE 8th Subarea Plan Goals:

### **"Wilburton/NE 8th Subarea Plan Goals**

- **To separate residential, recreational, and open space areas from commercial areas and to protect space.**
- **To improve pedestrian accessibility and attractiveness of commercial areas for residents of Bellevue.**
- **To support the provision of commercial services in Wilburton that complement Downtown..."**

and:

**"...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."**

I also support the following **Land Use Policies** and aligning with the Wilburton/NE 8th Subarea Plan:

**"...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas.**

and are committed to supporting policies protecting and preserving Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays a crucial role in providing a sense of well-being.

### **Natural Determinants Policies:**

#### **"Policies**

**POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin.**

**POLICYS-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek.**

**POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan."**

Wilburton is home to many animals that fall into Washington Fish and Wildlife's priority and endangered habitat and species. They include the Great Blue Heron, the Bald Eagle, Chinook Salmon, Coho Salmon, Sockeye Salmon, Steelhead, bats, owls, hawks, and a variety of different birds.

The City's Determination of Non-Significance is not aligned with the conservation of the City of Bellevue's Critical Areas Regulations for Streams and Riparian Areas, Wetlands, and Habitats for Species of Local Importance including the Kelsey Creek Watershed Report and the City's efforts to protect and maintain the health of Wilburton's critical areas.

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**"The Kelsey Creek Watershed is a vital ecosystem that supports numerous species of wildlife and provides essential ecological services to the surrounding communities. The proposed development of density in these areas including private properties has the potential to significantly impact the delicate balance of the ecosystem,..."** including water quality, habitat fragmentation, increasing runoff, and effects of water temperatures with decreasing tree canopies. Young trees cannot make up for the shade and protection offered by 100-plus-year-old trees. Decreasing tree canopies result in increased water temperatures and may be detrimental to priority animals, as well as the endangered Chinook, Coho, and other salmon. The Greater Kelsey Creek Watershed historically provides extensive spawning and rearing habitat for a larger number of other salmon species such as Chinook, Sockeye, Coho, Cutthroat Trout, Peamouth Minnows, and Steelhead.

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**Historic Resources:** Bellevue's historic Wilburton neighborhood is an enclave of single-family and multifamily housing known for its rich history and its parks and wooded areas with close proximity to downtown Bellevue. Wilburton is also home of the acclaimed Bellevue Botanical Gardens, and the largest watershed in Bellevue.

It is nearly impossible to keep up with every possible land use bill and in the annual legislative session. These bills passed in this legislative session are important for the comprehensive plan in any city, and if not covered under this DEIS then an amendment would be needed. An amendment would take more time and it would be more costly to the City of Bellevue. We recognize the significant effort already undertaken for this DEIS but we also desire to review a complete DEIS that includes passage of bills and regulations that have occurred in 2023.

Thank you for the opportunity to comment and we look forward to working with you and your staff in creating a City of Bellevue comprehensive plan that is complete, meaningful, and applicable for immediate use.

Sincerely,

William Wang

# BELLEVUE'S DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Chuyong Fu

12830 SE 4TH ST, Bellevue WA 98005

11-Jun-2023

Dear Ms. Stead:

## **Please include me as a party of record.**

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. The Wilburton subarea and its residents are dedicated to protecting, restoring, and enhancing the character and livability of Wilburton, including the Kelsey Creek Watershed system. Natural elements play a vital role in enhancing the quality of life for Wilburton residents, and the Kelsey Creek Watershed Basin system, and all of its other basin streams such as Goff stream, sub-tributaries, and wetlands flowing throughout Wilburton. King County's DRNP Water Quality Index rated Kelsey Creek at NE 8th with a "Moderate" score, and its Oxygen levels, a "Poor" rating score.

As a resident of Wilburton, I support the inception of the Wilburton/NE 8th Subarea Plan Goals:

### **"Wilburton/NE 8th Subarea Plan Goals**

- **To separate residential, recreational, and open space areas from commercial areas and to protect space.**
- **To improve pedestrian accessibility and attractiveness of commercial areas for residents of Bellevue.**
- **To support the provision of commercial services in Wilburton that complement Downtown..."**

and:

**"...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."**

I also support the following **Land Use Policies** and aligning with the Wilburton/NE 8th Subarea Plan:

**"...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas.**

and are committed to supporting policies protecting and preserving Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays a crucial role in providing a sense of well-being.

### **Natural Determinants Policies:**

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**POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin.**

**POLICYS-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek.**

**POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan."**

Wilburton is home to many animals that fall into Washington Fish and Wildlife's priority and endangered habitat and species. They include the Great Blue Heron, the Bald Eagle, Chinook Salmon, Coho Salmon, Sockeye Salmon, Steelhead, bats, owls, hawks, and a variety of different birds.

The City's Determination of Non-Significance is not aligned with the conservation of the City of Bellevue's Critical Areas Regulations for Streams and Riparian Areas, Wetlands, and Habitats for Species of Local Importance including the Kelsey Creek Watershed Report and the City's efforts to protect and maintain the health of Wilburton's critical areas.

[https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2021/KelseyCreek\\_Assessment\\_Report\\_2021\\_1130.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/KelseyCreek_Assessment_Report_2021_1130.pdf):

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The DEIS's Determination of Non-Significance does not align with the City's efforts to restore and protect critical areas in the Kelsey Creek Watershed System (KCWS) due to the limited factors being taken into account. The DEIS was written before House Bill 1110, HB 1337, HB 1181 were passed into law. It also does not include the impact of Covid on the workplace resulting in increased remote employment, Bellevue's pending tree code ordinance, and the impact of the different housing target strategies on the Kelsey Creek

Watershed, impervious surfaces, and their effect on endangered species of local importance. The loss of century-old tree canopies and their effect on water and air temperatures, the increasing air and land pollution with increasing traffic, and the decreased habitat and food sources. Also, incentives should not be seen as a substitute for effective stormwater management. Wilburton's watershed and ecosystem require proper stormwater management measures to mitigate the risks of flooding and water pollution caused by toxic runoff.

Moreover, according to a technical report by Golder Associates and the Watershed Company, the city of Bellevue's DEIS falls short of utilizing the best available science and existing conditions. This critique addresses the impacts of this inadequacy:





















1. Information related to traffic and site conditions is incomplete and potentially inaccurate, which hinders environmental evaluations.
2. Protecting the environment leads to the long-term sustainability of the community and its people. It is essential for their health, safety, and quality of life. For example, in the case of Kelsey Creek, the watershed provides critical ecosystem services that directly support the community's health and well-being, such as clean water, clean air, and flood control. Prioritizing the environment can help prevent harm to low-income communities of color, and indigenous people who are disproportionately affected by harmful environmental conditions. Environmental equity addresses these inequalities and provides equal protection and access to clean, and healthy communities.
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4. According to the report, Bellevue is in the process of updating its Shoreline Management Act. Under the proposed update, shorelines themselves are not regulated as critical areas, and critical areas within shoreline jurisdiction would be regulated under LUC Part 20.25H. Bellevue has not identified all critical areas in the city.
5. The City of Bellevue's Greater Kelsey Creek Watershed's riparian corridor across all of the sub-basins includes both approximately 90% private properties and 10% publicly owned properties and is critical to species of local importance, aquatic animals, and other wildlife, Peregrine Falcon, Bald Eagles, Red-tailed Hawks, Blue Herons, Pileated Woodpecker, Great Blue Heron, cardinals, hummingbirds, bats, opossums, beavers, bobcats, deer, coyotes, and many others. The diverse range of animals needs to be managed, protected, and maintained as part of the existing riparian corridor structure and function within the entire sensitive ecosystem. This ecosystem provides shelter, food, and protection, and maintains temperatures critical to their survival.
6. Adopting green infrastructure practices to maximize the achievement of objectives, these efforts are expensive and limited.

7. With 90% of the riparian corridor on private properties, the city has not been able to keep up with tracking damages in and near open streams.
8. The City's options are insufficient. The City's plan mitigates some of the side-effects of water overflow. The new plan should focus on preventing runoff from the source, increasing impervious surfaces caused by development. Unanticipated cleanup efforts with increased stormwater runoff may suggest that the city may end up footing the bill, and cause taxpayer runoff plan liability. We need solutions that offer long-term sustainability.
9. Wilburton's Kelsey Creek has the greatest amount of impervious surface areas. Increasing mixed-use developments, multi-unit dwellings, increasing cars and toxic waste from their tires, and increasing construction will cause even greater impervious surface areas with increasing toxic stormwater runoff.

Subbasin	Commercial/ Office (%)	Highway (%)	Industrial (%)	Mixed- use (%)	Multi- Family (%)	Park (%)	Single- family (%)	Total (ac)
Richards Creek	13.3%	1.9%	8.1%	4.8%	17.0%	10.2%	44.8%	1380
Sunset Creek	5.6%	6.3%	1.0%	2.4%	1.6%	4.0%	79.2%	854
West Tributary	8.4%	2.4%	0.0%	26.2%	4.4%	9.2%	44.2%	958
Goff Creek	8.4%	0.8%	0.0%	10.3%	0.0%	4.4%	76.2%	529
Valley Creek	7.2%	2.0%	0.0%	5.0%	15.0%	10.0%	60.8%	1300
Sears Creek	32.7%	3.0%	0.0%	21.8%	9.8%	0.0%	32.8%	355
Greater Kelsey Creek Watershed	11.8%	2.9%	1.7%	8.4%	11.0%	11.3%	51.8%	10376

Table 7 compares the change in canopy cover and impervious surfaces between 2006 and 2017 for the nine subbasins and the Greater Kelsey Creek Watershed (HRCd 2021). The Sears Creek Subbasin and the Sturtevant Creek Subbasin experienced the largest tree canopy loss and impervious surface increase of all the subbasins in the Greater Kelsey Creek Watershed.

**Table 7. Change in Tree Canopy and Impervious Surfaces from 2006 to 2017 in the Greater Kelsey Creek Watershed**

Subbasins	Tree Canopy Loss (2006 – 2017)		Impervious Surfaces Increase (2006 – 2017)		Primary Agent of Change
	Change	Trend	Change	Trend	
Goff Creek	0.4 %		0.5 %		Development
Kelsey Creek	1.0 %		1.0 %		Development
Mercer Slough	1.5 %		1.1 %		Development
Richards Creek	1.5 %		1.1 %		Development
Sears Creek	3.9 %		3.4 %		Development
Sturtevant Creek	2.2 %		3.8 %		Development
Sunset Creek	0.5 %		0.7 %		Development
Valley Creek	0.5 %		0.2 %		Tree removal
West Tributary	1.2 %		0.7 %		Development
Total Greater Kelsey Watershed	1.2 % (133 acres)		1.2 % (125 acres)		Development

data source: <https://hrcd-wdfw.hub.arcgis.com/>

Based on changes in tree canopy and impervious area data, since 2006 there has been a large amount of development in the majority of the Watershed's subbasins. Table 7 shows the decrease in tree canopy and increase in impervious surfaces associated with rapid development and urbanization—where development indicates the conversion of a vegetated lot or parcel into a built lot or parcel, and redevelopment indicates building on a previously developed lot. With development across so much of the Greater Kelsey Creek

Greater Kelsey Creek Watershed and its connecting tributaries is a critical urban watershed for the City of Bellevue. It is one of the few watershed areas in a city the size of Bellevue remaining in the entire USA. As described in the 2003 Bellevue Critical Areas Update Best Available Science Paper: **Wildlife, forested steep slopes, and riparian areas comprise the majority of Bellevue's remaining habitat corridors and linkages.** It needs to be managed carefully over the next few decades to protect and preserve its unique aquatic and



terrestrial values. Once developed and the 100-year-old trees felled for development, all inhabitants in the watershed that relied on the natural environment for survival will be gone forever from Wilburton.

#### Other Considerations:

**Control Totals:** On January 23, 2023, Dave Andersen, managing director of the Growth Management Services unit presented one of many sessions on getting periodic update planning right. He identified having the same control total targets for each alternative as critical. The growth strategy is to determine what are different ways of achieving the growth target. We find the DEIS has a wide range of targets. Bellevue Residents understand higher targets have higher impacts. This does not result in an understanding or critique of the strategy. In addressing this deficiency, the City will need to address the same target in each of the alternatives and show how all alternatives would meet the same need, including the “no change” alternative.

**House Bill 1110 Increasing Housing Supply and Density:** On May 8, 2023, Governor Jay Inslee signed House Bill 1110, which legalizes duplexes and fourplexes in most neighborhoods in nearly every city in the State of Washington, including the City of Bellevue, which was intended to increase the state’s housing supply. House Bill legalizes six-plexes near transit and for affordable housing. House Bill 1110 [overrides local zoning rules](#) that have long kept large areas in cities for only single-family homes. The new law will not ban the construction of single-family homes, but it will stop cities from requiring neighborhoods to have only single-family homes. However, this DEIS was prepared prior to passage of House Bill 1110, and Bellevue residents have no idea how the House Bill will affect any of the alternatives. It is likely that fewer new multi-family units will be needed as shown in Alternatives 1, 2, and 3. The no-action alternative will also need to address application of House Bill 1110 since the state law will now allow continued expansion of housing in Bellevue without application of the proposed alternatives. In addressing this deficiency, the City will need to either develop a new alternative or address this House Bill in each of the alternatives, which may result in an increase or decrease in the number of housing units needed.

**House Bill 1337 Expanding Housing Options.** This bill expands housing options through easing barriers to the construction and use of accessory dwelling units, and was partially vetoed by the Governor. However, the primary components of the bill would remain, thus, affecting the number of new housing units that may be needed to accommodate new employment in any given city within Washington State. Thus, the number of new housing units for the City of Bellevue would need

to be determined. An example of how this bill could affect housing would be in the State of California whereby the bill was passed and fewer new homes were needed as a result. Thus, HB 1337 has a strong potential of affecting the no-action alternative, along with Alternatives 1 to 3.

**House Bill 1181. Climate change and resiliency.** This bill includes a climate change and resiliency component that is required to be included in city comprehensive plans. The bill is intended for cities to mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental economic, and human health and safety; and advance environmental justice. Much of this is already included in the DEIS in Appendix G (Relationship of Climate Change Vulnerability to the Alternatives) but specific compliance with the bill is not included because Governor Inslee only signed the bill on May 3.

**2023 Legislative Session:** The Growth Management Policy Board states that these bills result in significant changes to the Growth Management Act and will impact local plans. The Board received a will receive a detailed recap of the 2023 legislative session which highlights these bills on June 1, 2023. Thus, the impact of these bills has not yet been well understood or could have been included in the DEIS. We cannot expect our Bellevue residents to have an understanding of these bills at the time.

**Covid:** The Covid-19 pandemic sparked a new [working-from-home economy](#) where many workers have the flexibility to work remotely from home. This unprecedented shift to remote work will be occurring in some form over the next 20 years. Now, roughly six-in-ten U.S. workers who say their jobs can mainly be done from home (59%) are working from home all or most of the time. Working from home results in changes in office use and transportation resulting in a declining need to live in Bellevue when working in Bellevue. This is a fundamental flaw where the DEIS is not addressing employment and residency adequately based on recent changes to office uses. Many employees are now moving outside of the city and then commuting to their workplace only once or twice a week. The DEIS should be revised to reflect this change in how employees will work and live in Bellevue in the housing, office, and transportation components of the DEIS. See also Attachment D

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Jun Wang

12830 SE 4TH ST, Bellevue WA 98005

11-Jun-2023

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West Tributary	1.2 %		0.7 %		Development
Total Greater Kelsey Watershed	1.2 % (133 acres)		1.2 % (125 acres)		Development

data source: <https://hrcd-wdfw.hub.arcgis.com/>

Based on changes in tree canopy and impervious area data, since 2006 there has been a large amount of development in the majority of the Watershed's subbasins. Table 7 shows the decrease in tree canopy and increase in impervious surfaces associated with rapid development and urbanization—where development indicates the conversion of a vegetated lot or parcel into a built lot or parcel, and redevelopment indicates building on a previously developed lot. With development across so much of the Greater Kelsey Creek

Greater Kelsey Creek Watershed and its connecting tributaries is a critical urban watershed for the City of Bellevue. It is one of the few watershed areas in a city the size of Bellevue remaining in the entire USA. As described in the 2003 Bellevue Critical Areas Update Best Available Science Paper: **Wildlife, forested steep slopes, and riparian areas comprise the majority of Bellevue's remaining habitat corridors and linkages.** It needs to be managed carefully over the next few decades to protect and preserve its unique aquatic and

terrestrial values. Once developed and the 100-year-old trees felled for development, all inhabitants in the watershed that relied on the natural environment for survival will be gone forever from Wilburton.

#### Other Considerations:

**Control Totals:** On January 23, 2023, Dave Andersen, managing director of the Growth Management Services unit presented one of many sessions on getting periodic update planning right. He identified having the same control total targets for each alternative as critical. The growth strategy is to determine what are different ways of achieving the growth target. We find the DEIS has a wide range of targets. Bellevue Residents understand higher targets have higher impacts. This does not result in an understanding or critique of the strategy. In addressing this deficiency, the City will need to address the same target in each of the alternatives and show how all alternatives would meet the same need, including the “no change” alternative.

**House Bill 1110 Increasing Housing Supply and Density:** On May 8, 2023, Governor Jay Inslee signed House Bill 1110, which legalizes duplexes and fourplexes in most neighborhoods in nearly every city in the State of Washington, including the City of Bellevue, which was intended to increase the state’s housing supply. House Bill legalizes six-plexes near transit and for affordable housing. House Bill 1110 [overrides local zoning rules](#) that have long kept large areas in cities for only single-family homes. The new law will not ban the construction of single-family homes, but it will stop cities from requiring neighborhoods to have only single-family homes. However, this DEIS was prepared prior to passage of House Bill 1110, and Bellevue residents have no idea how the House Bill will affect any of the alternatives. It is likely that fewer new multi-family units will be needed as shown in Alternatives 1, 2, and 3. The no-action alternative will also need to address application of House Bill 1110 since the state law will now allow continued expansion of housing in Bellevue without application of the proposed alternatives. In addressing this deficiency, the City will need to either develop a new alternative or address this House Bill in each of the alternatives, which may result in an increase or decrease in the number of housing units needed.

**House Bill 1337 Expanding Housing Options.** This bill expands housing options through easing barriers to the construction and use of accessory dwelling units, and was partially vetoed by the Governor. However, the primary components of the bill would remain, thus, affecting the number of new housing units that may be needed to accommodate new employment in any given city within Washington State. Thus, the number of new housing units for the City of Bellevue would need

to be determined. An example of how this bill could affect housing would be in the State of California whereby the bill was passed and fewer new homes were needed as a result. Thus, HB 1337 has a strong potential of affecting the no-action alternative, along with Alternatives 1 to 3.

**House Bill 1181. Climate change and resiliency.** This bill includes a climate change and resiliency component that is required to be included in city comprehensive plans. The bill is intended for cities to mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental economic, and human health and safety; and advance environmental justice. Much of this is already included in the DEIS in Appendix G (Relationship of Climate Change Vulnerability to the Alternatives) but specific compliance with the bill is not included because Governor Inslee only signed the bill on May 3.

**2023 Legislative Session:** The Growth Management Policy Board states that these bills result in significant changes to the Growth Management Act and will impact local plans. The Board received a will receive a detailed recap of the 2023 legislative session which highlights these bills on June 1, 2023. Thus, the impact of these bills has not yet been well understood or could have been included in the DEIS. We cannot expect our Bellevue residents to have an understanding of these bills at the time.

**Covid:** The Covid-19 pandemic sparked a new [working-from-home economy](#) where many workers have the flexibility to work remotely from home. This unprecedented shift to remote work will be occurring in some form over the next 20 years. Now, roughly six-in-ten U.S. workers who say their jobs can mainly be done from home (59%) are working from home all or most of the time. Working from home results in changes in office use and transportation resulting in a declining need to live in Bellevue when working in Bellevue. This is a fundamental flaw where the DEIS is not addressing employment and residency adequately based on recent changes to office uses. Many employees are now moving outside of the city and then commuting to their workplace only once or twice a week. The DEIS should be revised to reflect this change in how employees will work and live in Bellevue in the housing, office, and transportation components of the DEIS. See also Attachment D

**Updated Tree Code:** The City of Bellevue plans to update its tree code in 2023, which will have significant effects to new construction. This tree code may, hopefully, provide better protection for significant trees and require contractors

and builders to redesign multi-family and single-family homes to protect these trees. The Tree Code may also deter contractors from building on sites with significant trees. Thus, BTCC is requesting that the DEIS Comprehensive Plan describe how the tree code will affect planned protection of significant trees. The City of Bellevue Urban Tree Assessment (July 2022) stated that land use changes are an important factors of the urban environment and can contribute to changes in citywide canopy numbers. As described in the Urban Tree Assessment, it is important for the City to use this assessment to inform future investments in the urban forest so that all those who live, work, and play in Bellevue can benefit from the urban forest. The City must proactively work to protect the existing urban forest and replenish the canopy with additional native trees. Nowhere in the DEIS do the alternatives address how the existing urban forest will be protected. We are hoping that the DEIS will address replacing lost trees with native trees, and that the Comprehensive Plan show synchrony with its Urban Tree Assessment, as well with the planned updated tree code. Which alternatives may be best for protecting our urban trees?

**Homelessness.** Finally, the City must address how homelessness will be avoided or minimized under the each alternatives of its comprehensive plan. Although the City is investing in facilities such as shelters, transitional housing and affordable housing units for those living in vehicles or unsheltered in the community, how will these additional housing units affect homelessness and will some units be available to homeless people? If the City of Bellevue's notes that affordable housing, especially in the lowest income brackets, is critical to help individuals transition out of homelessness and maintain housing, then why is this not discussed on the DEIS?

**Historic Resources:** Bellevue's historic Wilburton neighborhood is an enclave of single-family and multifamily housing known for its rich history and its parks and wooded areas with close proximity to downtown Bellevue. Wilburton is also home of the acclaimed Bellevue Botanical Gardens, and the largest watershed in Bellevue.

It is nearly impossible to keep up with every possible land use bill and in the annual legislative session. These bills passed in this legislative session are important for the comprehensive plan in any city, and if not covered under this DEIS then an amendment would be needed. An amendment would take more time and it would be more costly to the City of Bellevue. We recognize the significant effort already undertaken for this DEIS but we also desire to review a complete DEIS that includes passage of bills and regulations that have occurred in 2023.

Thank you for the opportunity to comment and we look forward to working with you and your staff in creating a City of Bellevue comprehensive plan that is complete, meaningful, and applicable for immediate use.

Sincerely,



June 12, 2023

City of Bellevue Comprehensive Plan Periodic Update, Draft Environmental Impact Statement  
Comments

c/o Thara Johnson

Comprehensive Planning Manager

Via comment portal

Re: BelRed Design Center – Comments on the City of Bellevue Comprehensive Plan  
Periodic Update Draft Environmental Impact Statement

Dear Ms. Johnson,

We appreciate the opportunity to submit this comment letter in response to the Draft Environmental Impact Statement (“**DEIS**”) for the City of Bellevue Comprehensive Plan Periodic Update (“**Proposed Comprehensive Plan**”). BelRed Design Center LLC (“**BelRed Design Center**”) owns the building at 13500 Bel-Red Rd, Bellevue, WA 98005 (“**Property**”), which will be impacted by the Proposed Comprehensive Plan.

BelRed Design Center submits this comment letter in support of the City’s adoption of Alternative 3. In comparing the various Alternatives in the EIS, the City of Bellevue (“**City**”) should select the Alternative that is best suited to provide concentrated areas of development in established Mixed-Use Centers in close proximity to transportation corridors providing multi-modal forms of transportation. At the same time, the City should seek to maintain flexibility for future developments and ensure protection and enhancement of the natural environment. As explained below, Alternative 3 is most aligned with these policies as articulated in the City’s current comprehensive plan, including the Bel-Red and Factoria Subarea Plans.

### **1. The City Should Pursue Alternative 3.**

The DEIS appropriately includes extensive analysis of all Alternatives, and BelRed Design Center is encouraged to see the considerations and action-forcing solutions the City has identified. However, because Alternative 3 provides the best opportunity to sustain growth, promotes the City’s transportation investments, and protects against environmental impacts, BelRed Design Center urges the City to pursue Alternative 3.

#### **A. Alternative 3 will complement existing growth and allow unused capacity to be developed in a sustainable way, in line with State, regional, and local planning initiatives.**

Alternative 3 provides the strongest opportunity to align with the requirements of the Growth Management Act (“**GMA**”), including its recent amendments. In order to protect against uncoordinated and unplanned growth, conserve land, promote sustainable economic development, while also promoting the health, safety, and high quality of Washington residents,

the GMA identifies goals for all planning jurisdictions.<sup>1</sup> As shown in Table 4-2, Alternative 3 is more effective in meeting these goals than other alternatives. Alternative 3 accommodates the highest level of growth by focusing increased development in Mixed Use Areas by encouraging growth opportunities in areas that will be served by multimodal transportation improvements.<sup>2</sup> By providing capacity for 200,000 jobs, Alternative 3 also provides the greatest opportunity to promote economic development.<sup>3</sup>

King County's Adopted Countywide Planning Policies ("CPPs") projected an increase of 35,000 residential units, and 70,000 jobs for the City in 2044. However, single-family residential is the largest Comprehensive Land Use Designation category in the city. Although other uses such as parks and institutions are included in the single-family designation, single-family residential clearly predominates: multi-family and office, mixed-use, and retail areas comprise only a quarter of the City's land use designations. The goals and policies in the City's Comprehensive Plan identify the need to support diverse mixed uses to encourages areas of compact, livable, and walkable parts of the city.<sup>4</sup> Alternative 3 allows for the highest capacity of growth for housing, jobs, and commercial spaces, while also concentrating the areas of growth in Mixed Use and Neighborhood Centers.<sup>5</sup> These areas are ripe for development, providing access to major employment centers and opportunities for infill development.

Similarly, the City's Comprehensive Plan seeks to "[s]upport development of compact, livable and walkable mixed use centers in BelRed, Eastgate, Factoria, Wilburton and Crossroads."<sup>6</sup> As a property owner in Bel-Red, BelRed Design Center strongly supports Alternative 3 because of its emphasis on focusing growth in Mixed Use Centers. Bel-Red historically was characterized by warehouses and manufacturing, but has begun to transition to traditional uses, including the introduction of residential, office, and food services.

To that end, the City adopted the Bel-Red Subarea Plan in 2019. The Bel-Red Subarea Plan, envisions Bel-Red as a major mixed use employment and residential area characterized by a transit-oriented, nodal development patterns that will replace the area's original low-density light industrial and commercial past. The Bel-Red Subarea Plan also includes the following policies:

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<sup>1</sup> RCW 36.70A.010 ("The legislature finds that uncoordinated and unplanned growth, together with a lack of common goals expressing the public's interest in the conservation and the wise use of our lands, pose a threat to the environment, sustainable economic development, and the health, safety, and high quality of life enjoyed by residents of this state. It is in the public interest that citizens, communities, local governments, and the private sector cooperate and coordinate with one another in comprehensive land use planning. Further, the legislature finds that it is in the public interest that economic development programs be shared with communities experiencing insufficient economic growth.").

<sup>2</sup> Table 4-2: GMA Goals (1)-(3).

<sup>3</sup> Table 4-2: GMA Goals (5).

<sup>4</sup> See Bellevue Land Use Strategy LU-1 ("Promote a clear strategy for focusing the city's growth and development as follows: (1) Direct most of the city's growth to the Downtown regional center and to other areas designated for compact, mixed use development served by a full range of transportation options. (2) Enhance the health and vitality of existing single family and multifamily residential neighborhoods. (3) Continue to provide for commercial uses and development that serve community needs.").

<sup>5</sup> Table 4-2: GMA Goals (1)-(3).

<sup>6</sup> See Bellevue Land Use Strategy LU-21.

- Concentrate the majority of future Bel-Red growth into a series of mixed use, pedestrian-friendly and transit-oriented development nodes, with higher density and height therein, as enabled through a land use incentive system. Within each node, provide for tiered building heights, with maximums at the center.<sup>7</sup>
- Implement a land use incentive system that makes available additional floor area ratio (FAR) and height in exchange for infrastructure and amenities that contribute to the public good.<sup>8</sup>
- Encourage mixed use development, promoting opportunities to live, work, shop, and recreate within close proximity.<sup>9</sup>
- Provide graceful edges and transitions between new land uses and established light industrial areas, and between new development and neighborhoods in adjacent subareas.<sup>10</sup>

In line with the City's identified needs, goals, and policies, Alternative 3 will allow Mixed Use Centers like Bel-Red to take advantage of available capacity and attract development opportunities. As shown in Table 4-2, Alternative 3 accommodates the highest level of growth, yet focusing growth in Mixed Use Centers. Under Alternative 3, the citywide capacity for housing, jobs, and commercial development, results in 95,000 additional housing units, the potential increase of 200,000 jobs, and 67.3 million square feet of potential commercial development. Compared to other alternatives, this reflects the greatest potential for growth consistent with the City's planning objectives.

**B. Alternative 3 is supported by multimodal transportation and promotes the City's transportation initiatives.**

BelRed Design Center commends the City's adoption of extensive policies and investments to support public transit, bicyclists, and pedestrians to foster increased usage of multimodal transportation. Currently, there are ten light rail stations anticipated to serve 43,000-52,000 daily riders by 2026.<sup>11</sup> To complement the growth of light rail, the City's 2022-2033 Transportation Facilities Plan ("TFP") identifies high priority pedestrian and bicycle projects to create a less car-dependent infrastructure.<sup>12</sup> Specifically, the TFP states the following short-term and mid-term objectives:

- Within 10 years, implement at least two completed, connected, and integrated north-south and at least two east-west bicycle routes that connect the boundaries of the city limits, and connect to the broader regional bicycle system.

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<sup>7</sup> Policy S-BR-6.

<sup>8</sup> Policy S-BR-7.

<sup>9</sup> Policy S-BR-8.

<sup>10</sup> Policy S-BR-13.

<sup>11</sup> See <https://www.soundtransit.org/system-expansion/east-link-extension>.

<sup>12</sup> City of Bellevue Transportation Facilities Plan, July 2022. Available at [https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2022/City%20of%20Bellevue%202022-2033%20Transportation%20Facilities%20Plan\\_0.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2022/City%20of%20Bellevue%202022-2033%20Transportation%20Facilities%20Plan_0.pdf).



- Within 5 years, implement at least one completed and connected east-west and north-south bicycle route through Downtown Bellevue.
- Within 10 years, reduce pedestrian/vehicle and bicycle/vehicle accidents by 25 percent from 2007 levels.
- Within 10 years, construct 25 more miles of sidewalks along arterial streets including collector arterials above 2007 levels.
- Within 10 years, increase trips by bicycle and foot by 10 percent over 2009 levels.<sup>13</sup>

Alternative 3 is best suited to take advantage of the City's extensive investments in infrastructure, provides the highest and best available use, and would derive the most benefit from the City's investments. Currently, only 30 percent of housing units are located in areas with good access to transit.<sup>14</sup> By concentrating growth around multimodal and high-capacity transit services, Alternative 3 provides more community members with accessibility to good transit and the ability to access more areas within the region.<sup>15</sup> This approach is consistent with both GMPC policies and the City's Comprehensive Plan. Specifically, GMPC Policy H-17 states that cities should "[s]upport the development and reservation of income-restricted affordable housing that is within walking distance to planned or existing high-capacity and frequent transit." Similarly, the City's objectives seek to "[f]ocus housing and job growth in places with good access to a variety of transportation options."<sup>16</sup>

Finally, Alternative 3 is especially appropriate for Mixed Use Areas, where light rail stations are planned. By 2044, most Mixed Use Centers are or will be served by the City's frequent transit network. Alternative 3 will increase the supply and diversity of housing that are able to utilize the City's transportation system by providing additional capacity for multi-family housing. When compared to Alternatives 1 and 2, Alternative 3 is more consistent with local and regional policies because it provides more extensive multimodal transportation improvements in areas of higher proposed density.<sup>17</sup>

**C. Alternative 3 will provide developers the means to pursue market-feasible projects in design and form that is appropriate for parcel sizes to meet the City's housing needs.**

The City has demonstrated consistent growth, and is expected to need 35,000 additional housing units by 2044. But over the past decades, the percentage of City residents who own their home has declined, and the City continues to gain renter households at a much faster rate than owner households.<sup>18</sup> The City should respond to this trend by accommodating the range of

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<sup>13</sup> See Transportation Facilities Plan, p. 10.

<sup>14</sup> DEIS Section 7.2 ("Of the 64,000 existing housing units, about 19,000 units or 30 percent are in areas with good access to transit.").

<sup>15</sup> See DEIS Section 7.2 (defining "good access to transit" as "frequent bus service (every 15 minutes during the daytime and early evening).").

<sup>16</sup> DEIS, Section 2.3.

<sup>17</sup> Compare Tables 2.4, 2.6, 2.8.

<sup>18</sup> DEIS Section 7.2 ("As of 2020, an estimated 53 percent of households in Bellevue owned their home, while 47 percent rented their home. This represents a decline in the proportion of owner household units since 1990, when 58

housing needs that current and future residents require. As discussed below, Alternative 3 provides the greatest increase in housing availability, promotes affordable housing, and gives stakeholders the flexibility to determine market-feasible projects.

### **1. The City should pursue Alternative 3 to accommodate a range of housing needs for current and future residents.**

The City should adopt an alternative that provides the City, its residents, and stakeholders with the necessary tools to respond to the current and projected housing demand. Alternative 3 is the City's greatest opportunity to do so.

As noted above, the City has an established housing target of 35,000 additional units by 2044.<sup>19</sup> Although all alternatives in the DEIS allow for some growth, Alternative 3 provides the City the most flexibility to respond to a diverse housing need. Alternative 3 provides the capacity for 95,000 additional housing units,<sup>20</sup> which is 54,000 more units of housing capacity than under the No Action Alternative. And as compared to the No Action Alternative, Alternative 3 also promotes the greatest increase in housing within transit-proximate areas, Neighborhood Centers, and Mixed Use Centers.<sup>21</sup> For example, within Mixed Use Centers, Alternative 3 would provide 15,057 more housing units than Alternative 1 and 8,283 more housing units than Alternative 2. Here, Alternative 3 would provide thousands of Bellevue residents increased access to critical transportation and community infrastructure supportive of building a stronger city.

While the increased housing capacity available in Alternative 3 exceeds current projections for anticipated growth, BelRed Design Center believes the City should intentionally allow for *ample* capacity to meet current projections rather than “*barely enough*” capacity. This approach will support Bellevue's business and industry by ensuring the City's workforce has an adequate supply of housing opportunities. For example, as part of Bel-Red's transition from its historical warehouse and manufacturing uses, other uses like residential, office, and food services have expanded.<sup>22</sup> Although Bel-Red still maintains a share of industrial, manufacturing, and warehouses, the amount of commercial, mixed use or office space is steadily increasing.<sup>23</sup> Employees at these kinds of businesses will need housing. By allowing affordable options within areas such as Bel-Red, Alternative 3 will give workers the option to live close to their place of business and contribute to the City economy. At the same time, Alternative 3 allows the

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percent of Bellevue households were homeowners and 42 percent were renters. The breakdown of households between renters and owners and by size has changed over the past couple of decades. Bellevue is gaining renter households at a much faster rate than owner households. Between 2000 and 2020, the city experienced a net gain of more than 5,600 small households (1 or 2 members), the overwhelming majority of which (5,500 households) were renter households.”).

<sup>19</sup> See DEIS Section 7.3.2 (“King County's adopted CPPs establish a housing target of 35,000 for Bellevue.”).

<sup>20</sup> DEIS, Section 2.1. Alternative 2 would only allow 77,000 more housing units. Alternative 1 would only allow 59,000 additional housing.

<sup>21</sup> DEIS Table 7-6. Alternative 3 will allow an increase of 55,800 housing units in Transit-Proximate Areas, 1,907 in Neighborhood Centers, and 78,628 in Mixed Use Centers.

<sup>22</sup> DEIS Section 3.2 (“BelRed was historically characterized by warehouses and manufacturing. The center has begun to transition with the departure of many of the traditional uses, the expansion of the Medical Institution district, and the introduction of residential, office, and food services.”).

<sup>23</sup> DEIS Section 3.2 (“About 38 percent of land within the center is still considered industrial, manufacturing, or warehouses, and about 10 percent is currently vacant. About one-third is either commercial, mixed use, or office (30 percent).”).

City, and its businesses, to quickly capitalize on the potential beneficial growth opportunities with the assurance that the City is able to meet surging housing needs.

## **2. Alternative 3 supports the City's need for diverse housing.**

In addition to supplying more housing, the City should also adopt policies that foster more diverse housing options. Consistent with State, regional, and local policies, Alternative 3 promotes equity in the housing supply and flexibility for the types of available housing.

On a state level, the Washington legislature in 2021 adopted House Bill 1220 (“**HB 1220**”), which amended the GMA to require cities and counties to “[p]lan for and accommodate housing affordable to all economic segments of the population.”<sup>24</sup> Similarly, the Growth Management Planning Council (“**GMPC**”), which establishes growth management strategies for King County, has established policies to support diverse housing options that are affordable to a wider segment of the population. The policies adopted by GMPC provide useful guidance to cities like Bellevue in evaluating how to best attract, retain, and expand diverse housing options that are available to a wider segment of the population.<sup>25</sup> Finally, the City’s DEIS is guided by four housing objectives to promote “diversity and choice,” which require the City to:

- Plan for a range of housing types and densities that support efficient capital facility investments.
- Prioritize affordable housing for very low-income families.
- Address past inequities that have shaped the city.
- Plan for residential neighborhoods that protect and promote the health and well-being of residents by supporting equitable access to parks, a clean environment, educational and economic opportunities, and transportation options.<sup>26</sup>

Alternative 3 is most aligned with these objectives. Currently, the number of housing units available for residents with lower income does not meet the demand for affordable housing. Alternative 3 will require Mixed Use Areas like Bel-Red to utilize a mandatory inclusionary affordability program, promoting a range of housing options to current and future residents.<sup>27</sup>

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<sup>24</sup> See Washington House Bill 1220, Sec. 1.

<sup>25</sup> See GMPC Policy H-15 (“Increase housing choices for everyone, particularly those earning lower wages, that is co-located with, accessible to, or within a reasonable commute to major employment centers and affordable to all income levels. Ensure there are zoning ordinances and development regulations in place that allow and encourage housing production at levels that improve jobs housing balance throughout the county across all income levels.”); H-16 (“Expand the supply and range of housing types, including affordable units, at densities sufficient to maximize the benefits of transit investments throughout the county.”); H-17 (“Support the development and preservation of income-restricted affordable housing that is within walking distance to planned or existing high-capacity and frequent transit.”).

<sup>26</sup> DEIS, Section 2.3.1.

<sup>27</sup> See DEIS Table 2-8 (“This alternative focuses on equitably allowing middle-scale housing in areas of high opportunity across the city. A large variety of middle-scale types would focus on areas of high demand, while a smaller variety is available across the rest of the city. The variety of housing produced above would provide middle-income housing (80-120% AMI), but deeper affordability would still be required to achieve a majority of new units that are affordable <80% AMI. A mandatory inclusionary affordability program is included in Mixed Use Centers, while voluntary affordability incentives are expanded throughout the city.”).

Inclusionary zoning will also support diversified housing options, is consistent with GMPC policies, and has a demonstrated track record of success. The City's current housing policies cannot support diversified housing, as shown by the 80 percent increase in median rent from 2010 to 2020.<sup>28</sup> Although all alternatives anticipate increasing the supply of affordable housing, Alternative 3 is the only alternative that requires mandatory inclusionary affordable housing. As a result, Alternative 3 allows the City to adopt affordable housing policies aligned with GMPC policies intended to support the extensive affordable housing needs that are saturating the Puget Sound Region.

By allowing neighborhoods within the City to provide inclusionary zoning, the City will become a local leader and regional model for taking comprehensive steps to foster diverse housing options. As noted above, this approach has been proven to be effective in the region. In a neighboring jurisdiction, the City of Redmond has successfully implemented an inclusionary zoning system. The City of Redmond has even been ranked among the top ten U.S. cities for finding rental housing, with the development of 6,000 units between 2021 and 2021, an 85.1% increase. Alternative 3 would align the City's future housing options with Redmond's strong example of proven success.<sup>29</sup>

### **3. Alternative 3 promotes investment in the City through market-feasible development.**

Alternative 3 provides the flexibility for investors and developers to determine the types of market-feasible projects within appropriate parameters. Bel-Red's Subarea Plan is designed around a housing policy that creates a sustainable future, with economic, social and environmental dimensions. To that end, Policy S-BR-40 of the Bel-Red Subarea Plan seeks to "[e]ncourage a diversity of housing types, from high density, multi-story housing in transit nodes, to medium density housing outside nodes, to other innovative housing forms, such as live/work and work/live units." At the same time, the Bel-Red Subarea Plan recognizes that sustainable housing entails "significant challenges" because "[n]ew urban residential neighborhoods will require an array of public and private investments in open space and other amenities needed to support high quality, livable places."

Alternative 3 will allow for the most flexibility with respect to the bulk and height of housing, while consolidating development to retain natural areas and open space. Alternative 3 allows for the highest capacity of additional housing units (54,000 above the No Action Alternative, and 60,000 above the CPP housing target). Moreover, the capacity for additional jobs increases to 200,000 under Alternative 3 (76,000 above the No Action Alternative and 130,000 above the CPP job target).

Outside of Bel-Red, Alternative 3 anticipates the greatest investment in housing by allowing developers to respond to market demands. The DEIS assumes that "all developable or redevelopable parcels are built to a range of expected densities in each of the alternatives . . . letting potential developers respond to the market demands relating to the type of housing and

<sup>28</sup> DEIS Section 7.2 ("From 2010 to 2020, the median rent in Bellevue increased by more than 80 percent. Bellevue's median rent in 2020 is about \$200 higher than King County as a whole.").

<sup>29</sup> See <https://www.bizjournals.com/seattle/news/2023/01/23/redmond-top-10-finding-new-apartments.html>

commercial space and also provide flexibility for market demands.” By giving options to developers, while recognizing the limitations of market forces, Alternative 3 will attract investment and development in areas in the City where density can be affordably produced.

**D. Alternative 3 will provide the greatest protection from environmental impacts, including air quality and natural and open spaces.**

Because all alternatives expect some level of housing, commercial square footage, and job growth, all alternatives will have some impacts on viewsheds, shadows, light, and glare.<sup>30</sup> As explained in the DEIS, the Bellevue Land Use Code will provide mitigation for these kinds of impacts to viewsheds, shadows, light, and glare by establishing zoning and development regulations that govern uses, building design, site planning, and land use compatibility.<sup>31</sup> The DEIS also identifies mitigation measures not currently included in the alternatives,<sup>32</sup> and concludes that, “[w]ith the application of mitigation measures, no significant unavoidable adverse impacts on views or from shadows, light, and glare are expected.”<sup>33</sup> This is true for all alternatives, including Alternative 3.

Unlike Alternatives 1 and 2, however, Alternative 3 allows for “increased flexibility in height and building typologies for large lots that consolidate development to retain natural areas and open space.”<sup>34</sup> For example, in BelRed, Alternative 3 proposes new land use zones allowing for high rise buildings up to 25 stories, while Alternatives 1 and 2 limit heights in Bel-Red to around 16 stories.<sup>35</sup> At the same time, the areas designated as parks and open space are consistent throughout all alternatives.<sup>36</sup> By allowing development to build up as opposed to out, without reducing the amount of natural areas and open space, Alternative 3 provides the most flexible path to better integrating the built and natural environment.<sup>37</sup>

## **2. Concluding Remarks**

BelRed Design Center looks forward to continued engagement in the City’s DEIS process and ongoing planning, and thanks the City for its diligent work toward sustainable development. We urge the City to adopt Alternative 3 and promote flexible development, meet anticipated growth needs, and utilize the City’s transportation initiatives.

Thank you for taking the time to consider our comments.

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<sup>30</sup> See DEIS, Section 6.4.

<sup>31</sup> See DEIS Section 6.5.2.

<sup>32</sup> See DEIS Section 6.5.3.

<sup>33</sup> See DEIS Section 6.6.

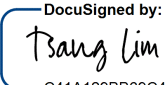
<sup>34</sup> See DEIS, Section 6.4.6.

<sup>35</sup> See DEIS Appendix B, Land Use Patterns and Urban Form Appendix

<sup>36</sup> See DEIS Appendix B, Land Use Patterns and Urban Form Appendix

<sup>37</sup> See DEIS Appendix B, Land Use Patterns and Urban Form Appendix. Proposed zoning designation include: (1) BR-RC-H1, which would allow “[m]ostly housing with limited retail, office, & services in highrise towers generally up to around 16 stories,” and BR-RC-H2, which would allow “residential highrise towers including ground floor active uses up to around 25 stories.”

Sincerely,

DocuSigned by:  
 6/10/2023  
C41A129BB69C485...  
Tsang Lim

Manager, Bel Red Design Center, LLC

June 12, 2023

City of Bellevue Comprehensive Plan Periodic Update, Draft Environmental Impact Statement  
Comments  
c/o Thara Johnson  
Comprehensive Planning Manager

Via comment portal

Re: Elufa LLC – Comments on the City of Bellevue Comprehensive Plan Periodic  
Update Draft Environmental Impact Statement

Dear Ms. Johnson,

We appreciate the opportunity to submit this comment letter in response to the Draft Environmental Impact Statement (“**DEIS**”) for the City of Bellevue Comprehensive Plan Periodic Update. Elufa, LLC (“**Elufa**”) is the owner of property located at 12839 SE 40th Place in Bellevue, Washington, otherwise known as the Sunset Village Apartments (“**Sunset Village**”). Sunset Village is a multi-family residential property in Factoria. As a housing supplier and stakeholder, Sunset Village will be impacted by the Proposed Comprehensive Plan.

The City of Bellevue has demonstrated consistent growth, and is expected to need 35,000 additional housing units by 2044, including over 10,000 affordable housing units, a majority of which will be rental units. But over the past decades, the percentage of City residents who own their home has declined, and the City continues to gain renter households at a much faster rate than owner households.<sup>1</sup> Bellevue should adopt a plan that will accommodate the range of housing needs that both current and future residents need.

The DEIS includes an extensive housing affordability analysis, and Elufa is encouraged to see the considerations and action-forcing solutions the City has identified for the action alternatives. However, because Alternative 3 best supports the City’s goal to provide affordable housing needs and capitalizes on the City’s prior investments in multimodal and high-capacity transit, Elufa submits this comment letter in support of the City’s adoption of Alternative 3.

**1. The City should pursue Alternative 3 to accommodate a range of housing needs for current and future residents.**

Alternative 3 supports state, regional, and local policies and legislative initiatives by promoting diverse housing that will utilize the City’s investment in infrastructure.

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<sup>1</sup> See DEIS Section 7.2 (“As of 2020, an estimated 53 percent of households in Bellevue owned their home, while 47 percent rented their home. This represents a decline in the proportion of owner household units since 1990, when 58 percent of Bellevue households were homeowners and 42 percent were renters. The breakdown of households between renters and owners and by size has changed over the past couple of decades. Bellevue is gaining renter households at a much faster rate than owner households. Between 2000 and 2020, the city experienced a net gain of more than 5,600 small households (1 or 2 members), the overwhelming majority of which (5,500 households) were renter households.”).

**A. The City should adopt a plan consistent with State law and County policy to promote diverse housing.**

The availability of affordable housing remains a significant need and focus throughout the state, and within King County and Bellevue in particular.<sup>2</sup> In 2021, the Washington legislature adopted House Bill 1220 (“**HB 1220**”), which requires cities and counties to “[p]lan for and accommodate housing affordable to all economic segments of the population.”<sup>3</sup> This was a clear departure from the prior, less stringent legislative directive to merely “encourage the availability of affordable” housing, demonstrating a legislative focus on actually providing housing affordable at a state level.

King County policies and guidance also support the adoption of Alternative 3. The Growth Management Planning Council (“**GMPC**”), which provides growth management strategies for King County, has established numerous policies to support diverse housing options that are affordable to a wider segment of the population. The policies adopted by GMPC provide useful guidance to cities like Bellevue in evaluating how to best attract, retain, and expand diverse housing options that are available to a wider segment of the population.<sup>4</sup>

The City’s DEIS is also guided by four housing objectives to promote “diversity and choice,” which require the City to:

- Plan for a range of housing types and densities that support efficient capital facility investments.
- Prioritize affordable housing for very low-income families.
- Address past inequities that have shaped the city.
- Plan for residential neighborhoods that protect and promote the health and well-being of residents by supporting equitable access to parks, a clean environment, educational and economic opportunities, and transportation options.<sup>5</sup>

By providing flexibility in the available types of housing citywide, and in Mixed Use areas such as Factoria, the City will promote equity in the housing supply and enhance the built and natural environment. Alternative 3 is best suited to do so.

**B. Alternative 3 supports the City’s need for diverse housing.**

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<sup>2</sup> See DEIS Section 7.2 (“The term ‘affordable housing’ refers to a household’s ability to find housing within its financial means. The city further defines affordable housing as affordable to 80 percent Area median income (AMI) and below.”).

<sup>3</sup> See Washington House Bill 1220, Sec. 1.

<sup>4</sup> See GMPC Policy H-15 (“Increase housing choices for everyone, particularly those earning lower wages, that is co-located with, accessible to, or within a reasonable commute to major employment centers and affordable to all income levels. Ensure there are zoning ordinances and development regulations in place that allow and encourage housing production at levels that improve jobs housing balance throughout the county across all income levels.”); H-16 (“Expand the supply and range of housing types, including affordable units, at densities sufficient to maximize the benefits of transit investments throughout the county.”); H-17 (“Support the development and preservation of income-restricted affordable housing that is within walking distance to planned or existing high-capacity and frequent transit.”).

<sup>5</sup> See DEIS, Section 2.3.1.



The City should adopt an alternative that provides the City, its residents, and stakeholders with the necessary tools to respond to the current and projected housing demand, provide the diverse housing needed to support cost-burdened Bellevue families, and capitalize on new transit investments that will connect the region. Alternative 3 is the City's greatest opportunity to do so, and Elufa strongly supports the City's adoption of Alternative 3.

As noted above, the City has an established housing target of 35,000 additional units by 2044.<sup>6</sup> Although all alternatives allow for growth, Alternative 3 provides the City the most flexibility to respond to a diverse housing need. Alternative 3 provides the capacity for 95,000 more housing units,<sup>7</sup> which is 54,000 more units of housing capacity under the No Action Alternative. And as compared to the No Action Alternative, Alternative 3 also promotes the greatest increase in housing in within transit-proximate areas, Neighborhood Centers, and Mixed Use Centers.<sup>8</sup> For example, within Mixed Use Centers, Alternatives 3 would provide 15,057 more housing units than Alternative 1 and 8,283 more housing units than Alternative 2. Here, Alternative 3 would provide thousands of Bellevue residents increased access to critical transportation and community infrastructure supportive of building a stronger city.

While the increased housing capacity available in Alternative 3 exceeds current projections for anticipated growth, Elufa believes the City should intentionally allow for this *ample* capacity to meet current projections rather than "*barely enough*" capacity. This approach will support Bellevue's business and industry by ensuring the City's workforce has adequate supply of housing opportunities. For example, as part of Bel-Red's transition from its historical warehouse and manufacturing uses, other uses like residential, office, and food services have expanded.<sup>9</sup> Although Bel-Red still maintains a share of industrial, manufacturing, and warehouses, the amount of commercial, mixed use or office space is steadily increasing.<sup>10</sup> Employees at these kinds of businesses will need housing. By allowing expanded housing options within areas such as Bel-Red, Alternative 3 will give workers the option to live close to their place of business and contribute to the City economy. At the same time, Alternative 3 allows the City, and its businesses, to quickly capitalize on potential beneficial growth opportunities with the assurance that the City will be able to meet surging housing needs.

In addition to supplying more housing, the City should also adopt policies that foster more diverse housing options. Currently, the number of housing units available for residents with lower income does not meet the demand for affordable housing. For example, Factoria is a major employment center, retail center, and provides services that cater to the surrounding

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<sup>6</sup> See DEIS Section 7.3.2 ("King County's adopted CPPs establish a housing target of 35,000 for Bellevue.").

<sup>7</sup> See DEIS, Section 2.1. Alternative 2 would only allow 77,000 more housing units. Alternative 1 would only allow 59,000 additional housing.

<sup>8</sup> See DEIS Table 7-6. Alternative 3 will allow an increase of 55,800 housing units in Transit-Proximate Areas, 1,907 in Neighborhood Centers, and 78,628 in Mixed Use Centers.

<sup>9</sup> See DEIS Section 3.2 ("BelRed was historically characterized by warehouses and manufacturing. The center has begun to transition with the departure of many of the traditional uses, the expansion of the Medical Institution district, and the introduction of residential, office, and food services.").

<sup>10</sup> See DEIS Section 3.2 ("About 38 percent of land within the center is still considered industrial, manufacturing, or warehouses, and about 10 percent is currently vacant. About one-third is either commercial, mixed use, or office (30 percent).").

neighborhoods, but only supplies two percent of the City’s housing units.<sup>11</sup> Further, median rents in Factoria are \$1,800, which does not meet affordability standards for households at 50 percent AMI.<sup>12</sup> Alternative 3 will require Mixed Use Areas like Factoria to utilize a mandatory inclusionary affordability program, promoting a range of housing options to current and future residents.<sup>13</sup>

Inclusionary zoning will also support diversified housing options, is consistent with GMPC policies, and has a demonstrated track record of success. The City’s current housing policies do not support diversified housing, as shown by the 80 percent increase in median rent from 2010 to 2020.<sup>14</sup> Although all alternatives anticipate increasing the supply of affordable housing, Alternative 3 is the only alternative that requires mandatory inclusionary affordable housing. As a result, Alternative 3 allows the City to adopt affordable housing policies aligned with GMPC policies intended to support the extensive affordable housing needs that are saturating the Puget Sound Region.

By allowing neighborhoods within the City to provide inclusionary zoning, the City will become a local leader and regional model for taking proven, comprehensive steps to foster diverse housing options. As noted above, this approach has been proven to be effective in the region. In a neighboring jurisdiction, the City of Redmond has successfully implemented inclusionary zoning systems. The City of Redmond has even been ranked among the top ten U.S. cities for finding rental housing, with the development of 6,000 units between 2021 and 2021, an 85.1% increase. Alternative 3 would align the City’s future housing options with Redmond’s strong example of proven success.<sup>15</sup>

### **C. Development under Alternative 3, including inclusionary zoning, will serve the City’s transportation investments.**

Alternative 3’s inclusionary zoning within Mixed Use Centers will result in affordable housing that can readily be served by the City’s strong infrastructure, letting affordable housing

<sup>11</sup> See DEIS Section 3.2 (“Factoria includes the Marketplace at Factoria—a regional center anchored by Target, Nordstrom Rack, T.J. Maxx, and Amazon Fresh—as well as retail and services that cater to the surrounding neighborhoods. Office complexes along the I-90 corridor are also home to many businesses, including T-Mobile, which is the city’s third largest employer behind Amazon and Microsoft. . . . As of 2019, the Factoria Mixed Use Center had about 8,500 jobs (6 percent of jobs citywide), 2.6 million square feet of commercial space, and 1,200 housing units (2 percent of units citywide).”); See DEIS Section 2.3.7 defining “major employment center” as a “large commercial area[] where most of Bellevue’s jobs exist today. These include Downtown and East Main, the commercial parts of BelRed, Wilburton, Crossroads, Factoria, and Eastgate.”).

<sup>12</sup> See DEIS Section 7.2 (“Median rents in Factoria area in the \$1,800 range. Based on the assessment noted above, median rents in Factoria are not affordable to households at 50 percent AMI. Rents here are affordable to households at 80 percent AMI.”).

<sup>13</sup> See DEIS Table 2-8 (“This alternative focuses on equitably allowing middle-scale housing in areas of high opportunity across the city. A large variety of middle-scale types would focus on areas of high demand, while a smaller variety is available across the rest of the city. The variety of housing produced above would provide middle-income housing (80-120% AMI), but deeper affordability would still be required to achieve a majority of new units that are affordable <80% AMI. A mandatory inclusionary affordability program is included in Mixed Use Centers, while voluntary affordability incentives are expanded throughout the city.”).

<sup>14</sup> See DEIS Section 7.2 (“From 2010 to 2020, the median rent in Bellevue increased by more than 80 percent. Bellevue’s median rent in 2020 is about \$200 higher than King County as a whole.”).

<sup>15</sup> See <https://www.bizjournals.com/seattle/news/2023/01/23/redmond-top-10-finding-new-apartments.html>

developments within Mixed Use Centers flourish and support the City's economy and development. The use of incentives within and beyond Mixed Use Centers likewise encourages diverse housing options and will ensure affordable housing can be found across the City. This will allow cost-burdened community members to find housing close to jobs or other valued resources, regardless of where they are located in the City, and will supply a range of housing options throughout the City appropriate to the current level of development.<sup>16</sup>

Alternative 3 is best suited to take advantage of the City's extensive investments in infrastructure, provides the highest and best available use, and would derive the most benefit from the City's investments. Currently, only 30 percent of housing units are in areas with good access to transit.<sup>17</sup> By concentrating growth around multimodal and high-capacity transit services, Alternative 3 provides more community members with accessibility to good access to transit and the ability to access more areas within the City and the region.<sup>18</sup> This is consistent with both GMPC policies and the City's Comprehensive Plan. Specifically, GMPC Policy H-17 states that cities should "[s]upport the development and reservation of income-restricted affordable housing that is within walking distance to planned or existing high-capacity and frequent transit." Similarly, the City's objectives seek to "[f]ocus housing and job growth in places with good access to a variety of transportation options."<sup>19</sup>

Elufa commends the City's adoption of extensive policies and investments to support public transit, bicyclists, and pedestrians to foster increased usage of multimodal transportation. Currently, there are ten light rail stations anticipated to serve 43,000-52,000 daily riders by 2026.<sup>20</sup> Alternative 3 is especially appropriate for Mixed Use Areas, where these light rail stations are planned. By 2044, most Mixed Use Centers are or will be served by the City's transportation system by providing additional capacity for multi-family housing. When compared to Alternatives 1 and 2, Alternative 3 is more consistent with local and regional policies because it provides more extensive multimodal transportation improvements in areas of higher proposed density.<sup>21</sup>

## 2. Concluding Remarks

Elufa looks forward to continued engagement in the City's DEIS process and ongoing planning, and thanks the City for its diligent work toward sustainable development. We urge the

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<sup>16</sup> See DEIS Section 2.3.7 (Under Alternative 3, "high- and mid-rise residential buildings with studios and one-bedrooms would be allowed in Mixed Use Centers, and exiting multi-family areas would allow a broader array of housing typologies at higher densities. Alternative 3 includes additional capacity for 3- to 5-story residential and mixed use buildings in and within walking distance of Neighborhood Centers. Housing types like townhomes or small residential buildings would be allowed in areas with good transit access and around Neighborhood Centers. Duplexes, triplexes, cottage housing, or other low-density typologies would be permitted across the city. Small residential buildings (2 or 3 stories) and similar scale residential buildings would also be allowed close to major employment centers like Downtown.").

<sup>17</sup> See DEIS Section 7.2 ("Of the 64,000 existing housing units, about 19,000 units or 30 percent are in areas with good access to transit.").

<sup>18</sup> See DEIS Section 7.2 (defining "good access to transit" as "frequent bus service (every 15 minutes during the daytime and early evening).").

<sup>19</sup> See DEIS, Section 2.3.

<sup>20</sup> See <https://www.soundtransit.org/system-expansion/east-link-extension>.

<sup>21</sup> Compare DEIS Tables 2.4, 2.6, 2.8.

City to adopt Alternative 3 and promote flexibility and consistency with State, regional, and local planning objectives.

Thank you for taking the time to consider our comments.

Sincerely,

DocuSigned by:  
 Tsang Lim  
C41A129BB69C485...  
Elufa, LLC Manager

June 12, 2023

VIA ELECTRONIC SUBMITTAL

Reilly Pittman  
 Planning Manager  
 City of Bellevue  
 Department of Community Development  
 450 110<sup>th</sup> Avenue NE  
 Bellevue, WA 98004

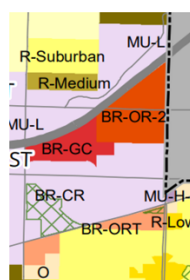
Re: Bellevue 2044 Comprehensive Plan DEIS Comment

Dear Reilly:

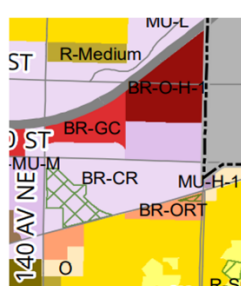
I am writing on behalf of 520 Bellevue, LLC and 520 Bellevue II, LLC, which owns property at 14404 – 14408 NE 20<sup>th</sup> Street (Bel-Red Properties), and I-90 Bellevue I Investments, LLC, which owns property at 3245 158<sup>th</sup> Avenue SE (Eastgate Property). Thank you for the opportunity to comment on the City of Bellevue's Comprehensive Plan Draft Environmental Impact Statement (DEIS) for the 2044 Comprehensive Plan (2044 Comp Plan). Our comments on the DEIS are:

- **Preferred Alternative should study and apply BR-MU-M densities to encourage viable mixed-use development options for the Bel-Red Properties.**
  - The Alternatives appear to show the Bel-Red Properties as BR-CR zoning. This is a lower-density Bel-Red designation, especially when considering that the Alternatives propose new mixed-use densities up to 15 stories to the east.

Alternative 2



Alternative 3



BR-CR	BR-CR	BelRed – Commercial/Residential. Mix
	BR-MU-M	BelRed – Mixed Use – Midrise. Mix of
		BelRed – Office/Residential Transition

It is unclear, but Alternative 3 appears to show a distinction in purple colors on the Land Use Map that suggests the area north of 20<sup>th</sup> Street – including the Bel-Red Properties – is being increased Bel-Red Mixed-Use Midrise (BR-MU-M). The story structures on the Bel-Red Properties are candidates for redevelopment within this planning horizon. The City should plan for and encourage mixed-use redevelopment of low-rise buildings on NE 20<sup>th</sup> Street.

- The Preferred Alternative should include the Bel-Red Properties at BR-MU-M designation to support infill development opportunities along 20<sup>th</sup> Street.
- **Support for Alternative 3 for the Eastgate Property, but encourage the Preferred Alternative to evaluate and propose Mixed-Use Midrise for the site.**
  - We support Alternative 3 for the Eastgate Property, which designates it as Mixed-Use Lowrise (MU-L). We would encourage the City to evaluate and propose a Mixed-Use Midrise designation for the Eastgate Property. Our Eastgate Property is likely to redevelop within the 2044 Plan time horizon.

While a Mixed-Use Lowrise designation would encourage townhome or stacked flat development options, increasing the densities to Mixed-Use Midrise would provide additional flexibility for creative housing typologies that would support more ground floor retail or on-site open space options. This will help the Eastgate area develop its neighborhood serving amenities.


- **Preferred Alternative should allow for flexibility in the mix of allowed uses.**

The City's planning for uses should be less restrictive. The Preferred Alternative should allow for all commercial, residential, retail, and lodging uses within Bel-Red and Eastgate areas, rather than being overly prescriptive.

- **The City should expand the eligible projects for transportation impact fee credits to include all right of way dedications and pedestrian infrastructure necessary to implement Code-required grids in Bel-Red and Eastgate areas.**

Thank you for the opportunity to comment. Please feel free to contact me with any questions.

Sincerely,



Jonathan Tran  
Principal – Rainier Pacific Properties

520 Bellevue, LLC – Authorized Representative  
520 Bellevue II, LLC – Authorized Representative  
I-90 Bellevue I Investments, LLC – Authorized Representative

**From:** Billis Helg <billisbygosh@gmail.com>  
**Sent on:** Sunday, June 4, 2023 4:04:52 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** concern about lack of park/public plaza space in development

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The nearest park for all of these new people to use is Goddard Park- then a bit farther out from the north side, there are the margin-strip parks running along 12th to the East of Bellevue Way. Considering the amount of new units in this large development, how many dogs are projected to need to be walked daily? Concerns about a lack of new park space in this development are valid, the existing nearby capacity is puny.  
Bills Helg 940 91st Ln NE

June 9, 2023

**Bellevue 2024-2044 Comp Plan Periodic Update & Wilburton Vision Implementation DEIS**  
**-PRIORITY COMMENTS-**

Dear City of Bellevue,

Thank you for all the effort you have expended to reach this point of the draft EIS (“DEIS”). I share this comment letter in an effort to help refine the DEIS further and to shed light on areas requiring additional study. This is all with the intent of having a Final EIS (“FEIS”) that is broad enough in its scope so that the forthcoming discussions on the Comp Plan policy revisions are well supported, whatever direction they may take.

I have been working closely with the City over the past two years to provide input on the Comp Plan update, and to shed light on much needed changes to the Comp Plan and subsequent zoning, to ensure that the growth contemplated is actually achievable. Most of my input has been focused through the lens of the Evergreen Center site, which is a 6-acre property just north of the 130<sup>th</sup> light rail station, located between 130<sup>th</sup> and 132<sup>nd</sup>. This sits in the heart of Bel-Red and has incredible potential to be a catalyst for the neighborhood, but under current zoning redevelopment is entirely infeasible. My hope is that through the FEIS and Comp Plan, the ultimate zoning changes will enable feasible redevelopment to occur.

The main areas of the DEIS requiring further study are: **1) flexibility in allowed used in Bel-Red and across the City; 2) the impact of current Critical Area standards on density; and 3) the impacts to density of the current proposed street grid, especially in Bel-Red.** Details on all of these, and other topics, follow:

**1) General Comments**

- a) The FEIS should provide a breakdown of the FAR assumptions that were made on specific sites throughout the City.
- b) The FEIS should indicate which assumptions were used for specific sites by use, e.g. how much housing vs. commercial vs. retail, etc. is assumed?
- c) Study consolidating the amount and type of zoning designations, specifically the Bel-Red zones should be combined into more general, use-agnostic zones, such as a broader Bel-Red Mixed-Use zone that would apply across the majority of Bel-Red.
- d) Study increased amounts of commercial and jobs on parcels throughout Bel-Red, specifically on the Evergreen Center property.
- e) Study and identify sites, such as those larger than 5-acres and within walking distance of light rail, that have potential to be Catalyst Projects and/or anchor sites. These larger sites offer the opportunity to have a wider range of allowed uses for commercial, residential, retail, R&D, healthcare, etc. which will work to anchor the station area. This will then drive housing, create retail opportunities, and engender an 18-hour neighborhood.
- f) Study allowing sites to apply for site-specific rezones without needing a Comp Plan amendment
- g) Study the impacts to development density of various development standards, including floor plate sizes, upper-level setbacks, building tower spacing, site impervious area requirements, on-site playground requirements, etc.
- h) Study the potential increase in housing density by eliminating all floor plate size limits for residential projects below 85 feet in height (not including mechanical/elevator penthouses).



2) **Strong support for Alternative 3 (\*\*with necessary revisions as detailed in this comment letter\*\*)**

- a) Strongly support the increased density of housing and jobs studied under Alternative 3
- b) The Comp Plan is setting the stage for Bellevue's growth over the next 20+ years. No one can predict what that growth or future demand will look like, which is why allowing flexibility for different types of growth is vital.
- c) Alternative 3 provides for the greatest potential of growth and flexibility of uses, both for housing growth and commercial/job growth.

3) **Critical areas ("CA")**, specifically stream buffers for Goff Creek, need to be studied to determine:

- a) The impact to development of maintaining existing buffers
- b) The loss of housing units and consequently affordable housing of maintaining existing buffers
- c) The increase to density and housing that could be achieved if buffers are reduced
- d) The broader infeasibility of development on large sites, specifically Evergreen Center, given that 40% of the site is consumed by current CA buffers
- e) The impact to the Comp Plan growth projections of the various Alternatives if large sites, such as Evergreen Center, are never able to re-develop due to the existing onerous CA buffers
- f) The ecological benefit of allowing stream mitigation within reduced buffer areas to improve the habitat, i.e. Is it better to have onerous CA buffers that prevent any mitigation and re-development altogether, or is it better to have flexibility within the CA buffers to allow impactful mitigation to occur?
- g) Allowing for creative habitat and ecological solutions which can be explored as an alternative to a linear setback
- h) Measure stream buffers from ordinary high-water mark rather than "top of bank". Consider exemptions like Seattle.
- i) The FEIS should study alternate stream designations, such as the "Urban Stream" designation used by Woodinville
- j) The FEIS should study the use of "mitigation banking" as a means to reduce CA buffers while providing for an improved habitat via mitigation banks. *Note: mitigation banking is allowed in almost all other jurisdictions other than Bellevue, and is the preferred method of mitigation by Ecology, Corps of Engineers, and the Tribes.*
- k) Please study an inclusion of an incentive in which a reduced 20-or 30-foot buffer / building setback could occur with either daylighting of currently piped creeks or the restoration of existing unimproved streams / creeks, such as Goff Creek, resulting in the restoration of ecological function.
- l) Overall, the FEIS needs to study the relationship between CA requirements precluding sites from redeveloping and achieving CA mitigations. If the CA requirements are so onerous so as to prevent any re-development from occurring, then the CA will never realize any mitigation, which is exactly the opposite of the intent of the CA requirements. CA restoration only occurs if development can occur.

4) **Transportation:** Strongly support the transportation summary on pg. 74 of the DEIS, specifically where it states that, "...Bellevue should focus on building out the pedestrian and bicycle network...to further reduce single-occupant driver (SOV) driving demand..." and that, "Roadway or intersection capacity expansion should be a mitigation of 'last resort'..."

- a) Agree that Bellevue should prioritize pedestrian and bicycle pathways in lieu of single occupant drivers ("SOV")
  - i) FEIS should study the elimination and/or reduction of the current proposed street grid plan throughout Bel-Red, especially for large parcels within walking distance of the light-rail stations.
  - ii) The FEIS should do a comprehensive study of the existing Bel-Red street grid plan, and revise based on actual forecasted SOV demand. It should study:

- (1) Alternate means of accommodating local, on-site traffic
  - (2) Any impractical proposed streets that either dead-end, run into steep slopes, are infeasible to build due to property line boundaries, or do not serve the intended purpose of improving SOV circulation.
  - iii) FEIS should study the benefits of having more pedestrian wayfinding and bike paths throughout Bel-Red in-lieu of the current proposed street grid.
  - iv) FEIS should further study the benefits to vehicular safety, car emissions, and pedestrian access across large sites by de-prioritizing SOVs
  - b) Agree that parking minimums should be eliminated around light rail stations
    - i) Strongly support parking maximums around light rail stations instead
    - ii) FEIS should study various parking maximums and minimums, including:
      - (1) the elimination of all parking requirements around light rail stations,
      - (2) parking requirements based on parking demand studies rather than prescriptive requirements,
      - (3) shared parking between uses
  - c) FEIS should study the impacts to development, specifically on large sites such as Evergreen Center, of requiring the build-out of the current proposed street grid.
    - i) FEIS should study the loss of housing units and consequently affordable housing if the current proposed street grid is required.
    - ii) FEIS should do a comprehensive study of Bel-Red to understand how many parcels are impacted by the current proposed street grid. For example, as proposed the Evergreen Center site would be required to build two (2) roads, one east to west, a second north to south across the property. This would consume nearly one-third of the buildable area of the site and make development infeasible.
    - iii) FEIS should study the actual benefits, if any, of the current proposed street grid, with a focus on local access only roads, and alternate ways of allowing properties to self-manage on-site vehicular, pedestrian and bike circulation.
- 5) **Site Specific Study on the Evergreen Center Property**, Please study the following conditions as it relates to the Evergreen Center property – address 1830 130th Ave NE, Bellevue, WA 98005:
- a) Impact to housing density from existing Goff Creek buffer requirements
  - b) Impact to housing density from the existing street grid plan
  - c) Impacts of foregone Goff Creek ecological restoration if site redevelopment never occurs
  - d) Loss of on-site affordable housing potential due to both A and B

Thank you and best regards,

**Charlie Bauman**

425-802-3352

[charlie@guntowercapital.com](mailto:charlie@guntowercapital.com)

**From:** Chris Langer <langner@broderickgroup.com>  
**Sent on:** Tuesday, June 6, 2023 5:27:19 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** Chris InCity <langner@incityinc.com>  
**Subject:** EIS Comments

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear City of Bellevue,

I have been a property owner and landlord in Bellevue for many years and welcome the City's pro-growth attitude. Bellevue is one of the best places to live in the entire country and has also been one of the most business friendly, both of which are reflected in the tremendous growth the past couple decades. Finding the right balance of growth and livability is a central goal of the Comp Plan update.

The EIS is a supporting tool, studying the various directions growth could take, and quantifying any potential impacts. The EIS should NOT constrain the Comp Plan. Rather it should study ample growth and alternatives so that the ultimate Comp Plan policies are well supported, rather than being limited solely because the EIS's scope was not broad enough.

Based on the draft EIS, several areas of study need to be expanded. Most notably:

- **Critical Areas:** the DEIS does not study the impacts to density that existing critical areas cause. Specifically, the various streams like Goff Creek running through Bel-Red, pose tremendous constraints to growth given current critical area mitigation buffer requirements. This poses the risk that all areas surrounding these streams never redevelop. This would needlessly limit growth potential and prevent any habitat enhancements from occurring, which is exactly the opposite intent that the existing critical area buffer requirements are meant to foster. **The FEIS should study these Critical Areas along with alternate means of mitigation, such as reduced buffers and mitigation banking.**
- **Limit Street Grid Expansion:** The future of Bellevue in transit connected neighborhoods should be one without vehicle gridlock. Bel-Red has endless potential as the spine connecting downtown Bellevue with Microsoft/Redmond, to become a dense pedestrian focused destination, well connected by light rail. Expanding the street grid in Bel-Red is counter to this vision and antithetical to the intent of the light rail. **The FEIS should study limiting all further street grid expansion within Bel-Red (and other light rail-oriented neighborhoods), and instead study the build-out of pedestrian/bicycle connections.**
- **Be Bold with Bel-Red:** No other neighborhood has the potential of Bel-Red. No other neighborhood has the frequency of light rail stations as Bel-Red. No other neighborhood connects the job centers of Downtown and Microsoft/Redmond as well as Bel-Red. Bel-Red is a massive opportunity to plan for density, job growth, and create a neighborhood that people want to visit and live within. **The FEIS should study maximizing growth within Bel-Red, not only for housing, but for office jobs, retail, entertainment, and restaurants as well.**

Thank you for your efforts.

Chris Langer  
206-650-6361

**From:** Christine Hemnes <outlook\_479792479C7DC954@outlook.com>

**Sent on:** Tuesday, June 6, 2023 9:32:16 PM

**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>; Christine Hemnes <Christineh@windermere.com>

**Subject:** City Planning - EIS

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While generally I support development of our downtown core, I am worried about the lack of additional parking, green space and dog/pet space. Please be sure to add spaces for us to enjoy our Pacific Northwest beauty along with our 4-legged family members. And please be sure to require adequate parking for all new development.

We'd also like these buildings to be required to have their own water towers so we don't need to add multiple large scale facilities throughout the city.

Thank you! -Christine Hemnes

Sent from [Mail](#) for Windows

**From:** Plummer David F. <pdf3@comcast.net>  
**Sent on:** Thursday, June 8, 2023 10:47:38 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** onebellevueads@googlegroups.com; Nesse, Katherine <KNesse@bellevuewa.gov>; King, Emil A. <EAKing@bellevuewa.gov>  
**Subject:** City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Environmental Impact Statement

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7 June 2023  
City of Bellevue Development Services Department  
Attn: Reilly Pittman  
450 110th Avenue NE  
Bellevue, WA 98004

Hello Mr. Pittman!

Following are additional comments on the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement; they are in addition to my comments submitted via email on 5 June 2023, and in ‘hard copy’ to the Bellevue Service First desk on 6 June 2023:

1B. General, applicable to entire DEIS:

The City has failed to release a draft copy of the proposed ***Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation*** to be used by citizens wanting to make informed comments to the City Council on the DEIS. Consequently, it is not possible to compare the environmental impacts of the 4 alternatives identified in the DEIS with the staff’s proposed version of the City’s 2024 comprehensive plan. The City has been working on this update since the 28 February 2022 direction from the City Council; reports on the update have been given to various City boards/commissions and the City Council; e.g., at the Planning Commission’s 28 September 2022 meeting the City staff presented a summary of changes in growth concepts and policy changes to be considered for the 2024-2044 Comp. Plan update; at the City Council’s 12 December 2022 meeting a report on the update was provided to the Council; etc. Thus, it is clear that the City staff could easily have provided a draft of the proposed 2024 Comprehensive Plan update to be used to compare the staff’s proposal to the 4 alternatives in the DEIS. This is a clear deficiency and does not comply with para. 2.3.1 of the WA State Environmental Policy Handbook, publication 98-114; it should be corrected by publication of a supplement to the DEIS that includes a non-project description of the proposed 2024 Comprehensive Plan prepared in accordance with ***WA Dept. of Ecology SEPA Checklist - Section D - Supplemental Sheet for Non-Project Actions***. This supplemental sheet is necessary to enable citizens to make informed inputs on the staff’s proposed version of the Bellevue 2024 Comprehensive Plan Update.

Please acknowledge receipt of my above comment.

Sincerely yours,

David F. Plummer  
David F. Plummer

14414 NE 14th Place  
Bellevue, WA. 98007

**From:** Elaine Anthonise <eantonise777@comcast.net>  
**Sent on:** Tuesday, May 23, 2023 3:48:35 AM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** ideas for eco-building

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The Oasis of Aboukir green wall by  
Patrick Blanc for Paris Design Week  
dezeen.com

Would I love to see more greenery implemented on large building being erected in Bellevue. This would help with glare, heat index and improving air quality. Maybe implement building requirements that make it mandatory for buildings to install greenery on some exterior walls of large buildings?

**From:** Elizabeth Anderson <liz@engates.com>  
**Sent on:** Tuesday, June 6, 2023 12:03:11 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Qfc new towers

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

City of Bellevue ,

I understand the potential new proposed plan for the Bellevue village qfc and condos west of qfc will be replaced by towers with No added parking spaces and no green spaces ?

Our downtown Bellevue park is already full of people but mainly lacking in parking spaces. Please think of the parking situation ahead of time as in our city people DO all own

cars. We are not a city of bus commuters as much as we wish we were.

Climate change is real and green space is vital for a growing city. New York is a huge city with not a lot of green but they do add a public park every couple of blocks.

Please think of our community - parks- green spaces - dog walk areas and PARKING. Do not allow the builders the right to just build what they want. Stand firm on what the city NEEDS. Cities give into builders "as long as they add affordable housing". This is not a compromise for the city, this is giving into the builder.

Sincerely,  
Elizabeth Anderson.

Elizabeth Anderson

**From:** Greg Russell <grussell@prklaw.com>  
**Sent on:** Tuesday, May 30, 2023 8:55:17 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Evergreen Court and Glendale Apts

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear City Staff – I was a founding board member of Downtown Action to Save Housing (DASH) over 25 years ago. We have been a strong advocate and developer over the years of affordable housing on the Eastside and in Bellevue. DASH is now rebranded as CIRC and is affiliated with Transforming Age, a large local nonprofit providing senior housing.

Two of our Bellevue projects (Evergreen Court Retirement, 900 124th Avenue NE, and Glendale Apartments, 12640 NE 10th Place) have provided needed affordable retirement and working class family homes near downtown Bellevue, and are now part of the Wilburton Vision Implementation. These properties are in ideal locations and primed for redevelopment to add many more badly needed affordable housing units near downtown Bellevue. We would strongly advocate for the alternative 2 overlay for these two properties. Additionally, Transforming Age made a significant commitment to this redevelopment by entering into a contract to acquire a third contiguous lot located at 12520 NE 10th Place, which greatly enhances the ability to redevelop our existing two properties, and significantly increase the affordable housing we can develop on these three parcel. We would advocate for including this third parcel in the Wilburton study area with the alternative 2 overlay.

Our agencies are committed to increasing access to affordable housing at these locations through a future redevelopment. While a redevelopment is several years away, the City has a unique opportunity to achieve great gains in reaching its affordable housing targets and responding to Wilburton's neighborhood preference to develop more housing, by supporting a height variance of 16 stories for these locations. I appreciate the City's work and consideration in overlaying alternative 2 height variance on these properties.

Thank you for your consideration of this request.

Greg

**Gregory L. Russell | PRK Livengood  
 Partner**



Peterson Russell Kelly Livengood PLLC  
 10900 NE 4th Street, Suite 1850  
 Bellevue, WA 98004  
 D: 425.990.4047 | C: 425.766.9569 | F: 425.451.0714  
[grussell@prklaw.com](mailto:grussell@prklaw.com) | [www.prklaw.com](http://www.prklaw.com)

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**From:** Jennifer Wang <jennifer@redwood-legal.com>  
**Sent on:** Monday, June 5, 2023 8:27:49 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Signed by:** Jennifer Wang on Monday, June 5, 2023 8:27:38 PM  
**Subject:** Pinnacle Bellevue  
**Attachments:** Nameless.txt (1.65 KB)

Dear Sir or Madam:

I am writing to express my concern with the proposed development of Pinnacle Bellevue at 8th Street/100th Ave.

First, the current QFC and Bartell's is heavily used and enjoyed by area residents. It is, of course, incredibly convenient to have a grocery store and drugstore nearby.

Second, the proposed towers will add tremendously to local traffic, which is already quite congested much of the time. Bringing such a large development so close to a quiet suburb also seems a very poor choice from a city-planning perspective.

If development of this area must proceed, I ask that the City of Bellevue require (a) some green spaces, (b) some ground floor retail, including a grocery store and drugstore to replace the current conveniences enjoyed by local residents, and (c) some above-ground parking to service the retail stores. Requiring underground parking every time someone wants to buy groceries or make a quick trip to a drugstore is really unpleasant and detracts from one's experience living near Bellevue.

The city has changed rapidly in a short period of time and more thought needs to be devoted toward making these new developments attractive places for area residents. I'm not against change, but there are ways to make rapid urbanization more appealing so that residents enjoy their lives here and hopefully build a good community.

Thanks for your time in reading this email.

Regards,  
Jennifer

## Redwood Legal Group, P.C.

600 1st Avenue, 1st floor

Seattle, WA 98104

t: 415.500.3335

f: 415.366.2174

[jennifer@redwood-legal.com](mailto:jennifer@redwood-legal.com)

[www.redwood-legal.com](http://www.redwood-legal.com)

**From:** Joe Razore <joe@mrmcapitalllc.com>  
**Sent on:** Wednesday, June 7, 2023 6:49:13 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Comments: DEIS - Comp Plan 2044

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello – I am a long-time resident and business owner within Bellevue and am proud to raise my family in this great city. My family and I are also the owners of the Evergreen Center site located in Bel-Red just north of the 130<sup>th</sup> light rail station. This is a 6-acre site my family and I have owned for over a decade, and it has amazing potential for future redevelopment. My colleagues and I have been working with the City over the past 2 years to share feedback on the upcoming Comp Plan update, and to convey the intricacies of our Evergreen Center site.

In short, while this site is ideally situated as the heart of Bel-Red and has potential to be a true catalyst for the neighborhood and act as an anchor for housing and jobs, there exist many constraints which, if left unchanged, eliminate any viability of redevelopment. The major constraints are the facts that 1) the current Bel-Red area plan would have the site intersected by two roads for a new street grid drastically reducing the buildable area; 2) the site has Goff Creek running through the middle, further decreasing the buildable area if all critical area setbacks are required; and 3) the site is already largely developed with operating buildings and the current zoning, allowed uses, and other code requirements place too many restrictions on development and do not provide enough of an increase in density to justify tearing down the existing buildings.

The constraints facing our site also face many more throughout Bel-Red and Bellevue. It has been our hope and intention to share these obstacles with the City and work together to produce a Comp Plan update, and subsequent zoning code changes, that result in the feasible redevelopment of this great site.

The EIS is the next step in these efforts and the current DEIS is a great start. I applaud the increased density studied in the various alternatives, but there are several areas that need further study. As I understand it, the final EIS should be sufficiently broad, and have studied a wide range of Alternatives to provide ample flexibility in the drafting of the ultimate Comp Plan policies. An unfortunate outcome will be if the Comp Plan changes desired by the City or the community, cannot be supported for the simple reason that the desired change was not studied in the EIS. To avoid this, especially with respect to the Evergreen Center site, I would like to recommend the Final EIS scope be expanded to:

- Study the impact of critical areas on density. Critical Areas (CA) and stream setbacks have a large negative impact on potential housing density. As an example, the Evergreen Center site loses nearly a quarter of its buildable area if the existing Goff Creek CA setbacks and buffers are enforced. This translates into a loss of nearly 400 apartment units including 80 affordable units which could have been provided through MFTE. The current buffer requirements are so stringent that they prevent any redevelopment from occurring. Along with decreasing housing density, this ensures that the habitat is never rejuvenated, and Goff Creek will remain a drainage ditch for years to come. This is exactly the opposite of the intent for the CA regulations. This negative impact is widespread, on multiple sites, and **the FEIS needs to quantify the exact impact on housing and habitat of the CA regulations and study alternate mitigation options.**
  - Study de-prioritizing car travel around Light Rail Stations. Avoid further street grid expansion, prioritize pedestrian and bike circulation. The DEIS already contains great priorities where it states, “...Bellevue should focus on building out the pedestrian and bicycle network...to further reduce single-occupant driver (SOV) driving demand...” and that, “Roadway or intersection capacity expansion should be a mitigation of ‘last resort’...”. We agree with this sentiment. **The FEIS should further study the benefits of eliminating any further street grid expansion and the reduced vehicular traffic that would accompany it.**
  - Study maximizing density and allowing multiple uses (residential, commercial, retail, etc.) around Light Rail Stations, especially in Bel-Red. The current Alternatives study a much-needed increase to housing density throughout Bel-Red, but **the FEIS should go further to study comparable increases to office and commercial density.** We encourage a priority for housing throughout the city but recognize that none of us can predict how growth will evolve over the next 20 years. It is difficult to redevelop a site in the best of times but becomes near impossible when redevelopment is constrained to a single use. Studying an expansion of allowed uses on the Evergreen Center site and throughout Bel-Red greatly increases the odds of redevelopment.
  - Study taking advantage of large sites around transit stations to act as catalysts for the neighborhoods by providing a center for jobs, housing, retail, and gathering. Large sites should act as neighborhood anchors, while smaller sites are best suited for infill housing. The Evergreen Center site is perfectly situated to act as the hub of Bel-Red. To enable this, many changes will be needed to allow flexibility in redevelopment. A neighborhood hub has many spillover benefits to the surrounding community, including providing a place of gathering, acting as a center for jobs, retail and restaurants, and helping to define the neighborhood identity through unique architecture, public art, and open spaces. **The FEIS should study and quantify the many benefits catalyst projects have on their communities.**
  - Of the alternatives studied, **I offer support for Alternative 3**, though additional study is needed, as noted above.
- There is a lot of work ahead, but the FEIS is a big milestone. I thank the City and all staff for your hard work through this process. Please continue to use Evergreen Center and my team as a resource. We look forward to staying engaged.

Best regards,

Joe Razore

**Joe Razore**  
**MRM Capital**  
 Direct: 425.646.5243 | Cell: 206.854.6789 | [joe@mrmcapitalLLC.com](mailto:joe@mrmcapitalLLC.com)

**From:** John Darvish <jxdarvish@gmail.com>  
**Sent on:** Friday, June 2, 2023 8:22:34 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** John Darvish <jxdarvish@Holistique.com>; Dr. Nooshin Darvish <drdarvish@Holistique.com>  
**Subject:** Feedback on 2044 DEIS

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Planning Commission,

My name is John Darvish and my wife and I have owned residential and commercial properties in Bellevue since 1990. Furthermore, we have owned a medical practice in Bellevue on 116th Ave NE since 2002.

Last night I attended the 2044 DEIS presentation at the City Hall. I have been following this project closely for the past several years since our investments and medical practice happen to be in this area. Here are my feedback and recommendations:

1- DEIS is a thorough, and thoughtfully put together document. It is the most comprehensive of its kind that I have seen. I must admit I was a bit skeptical at the beginning but I am pleasantly surprised. Congratulation on a great. I must also recognize the commission for hitting all the milestones and moving forward with the plan. It is unprecedented.

2- The feedback that I provide here is only for a small part of Wilburton area that I am familiar with and have experienced it on a daily basis for the past 21+ years. My comments refer to the portion of the plan which expands 116th Ave NE between NE 8th street and Bel-Red road.

3- This area was designated BR-MO1 for several years and it did not spur any new development for a variety of reasons. Mostly due to the lack of need for additional medical/dental space for none hospital-based practices! The addition of the Pavilion over 12 years ago on the Overlake Hospital campus satisfied the need for any new medical space. We conducted a survey for additional need of medical space, and the best we could come up with 80,000 Sqft of which 40,000 was for administrative use! To continue to limit the zoning to medical use will further stifle growth and new development. I'd imagine the whole corridor needs total of 300K-400K sqft of new medical development for the foreseeable future; immediate need is a fraction of that. A new medical only building with 400K sqft will take 10+ years to be fully leased as it did with Pavillion.

4- I recommend designating this area on 116th between NE 8th to Bel-Red road as mix use. Development can move forward and medical spaces can be developed in smaller chunks to address the need as it comes up.

5- Proximity to the light rail station will further help development of the this area given the right zoning. High rise mix-use zoning will no doubt spur new development in this corridor. I can easily see a high rise with a mix of medical/residential or residential/hotel/medical being built in this corridor. With the combination of retail on the street level suddenly we will have a vibrant neighborhood.

6- I recommend extending the Mix-use all the way to Bel-Red road.

7- I also support the proposal to up zone the area north of Bel-Red on 116th for medical use.

8- Current FAR is only 4. With the vision of high rises for this area, FAR needs to go much higher, at least double. Even with the FAR of 6 any new development will run out of FAR before height. Here is an example, a property that is 80,000 sqft., will produce floor plates as large as 50,000 sqft. With the FAR of 5, the height will be 8 stories, FAR of 6 the height will be 10 stories, and FAR of 8 will produce 12 stories. In all of these scenarios the height is less than half of anticipated 25 floors.

9- Parking requirements should be eased to take account of less need for full-time car ownership. Wealth of transportation modes have reduced the need for owning a car specially in a high density zoning. Ride-sharing, light rail, autonomous cars, preference for walking, and buses are alternatives that are being used more and more.

10- Needless to say, I support alternative 3 for this patch of Wilburton.

11- Although this recommendation fall outside of my area of interest but it falls in the bigger scope of Wilburton. The existence of Chickfillet on the corner of NE 8th and 116th, has made navigating through this intersection challenging and dangerous. Having the cars line up on this busy corner only frustrates the driver. Please suggest a different alternative to lining up on the street. Thank you.

At the end, I would like to thank the commission for the excellent job that they have done amidst lots of differing opinions. I look forward to your recommended alternative.

If I can be of any assistance, please let me know.

Respectfully,

John Darvish

Mobile: 206-321-2202  
Personal Email: JxDarvish@gmail.com

**From:** Kamran Marashi <kamranmarashi@msn.com>  
**Sent on:** Friday, June 2, 2023 8:27:45 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Comp plan 2044

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With all the new property tax revenues being generated from all these high rises and hi end live-in towers, May be it's time to stop milking our senior citizens and cap their property taxes so they are not forced to flee their nests!

Kamran Marashi  
9836 NE 34th Pl  
Bellevue

Sent from my iSay, iSay...

**From:** Karl Helmgren <khelmg@hotmail.com>  
**Sent on:** Saturday, June 3, 2023 4:20:27 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** DEIS Comments

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Assumptions regarding jobs and housing need to be reviewed in light of the impact the Covid pandemic has had on both. It is quite possible that in-office work will not come back to pre-pandemic levels; work-from-home and alternate workspaces may continue to be significant factors. This would have a significant effect on the need for office space. In addition, remote workers need not be located in (or near) Bellevue. For some jobs, workers could well live in Moses Lake or India.

The DEIS needs to make clear the relationship between potential jobs and housing for a given plan and expected or desired jobs and housing. A casual reading of the DEIS materials leads one to think that each alternative carries with it thousands more jobs and housing units; more than many of us would like to see in Bellevue! A closer reading of the DEIS materials, or a discussion of this concern with a staff member, indicates that for whatever level of jobs and housing the future holds, the different alternatives will have more of an effect on where the growth will take place than on the magnitude of the growth. It is important to make that more clear to the casual reader, and moreover, to the average Bellevue resident who will be impacted by the proposed changes.

It is vital to increase the variety of housing options available. I am particularly concerned with the availability of affordable housing. It is shameful that so many City employees cannot afford to live in Bellevue! Everyone thinks housing is too expensive. Perhaps the real problem is that wages have not kept up with the cost of housing.

A closely related issue is increasing the ability of the economically disadvantaged to build equity. Affordable housing, even with rent subsidies, does not build equity and create generational wealth. The City should develop a program to provide loans to lower income individuals to allow them to purchase affordable housing. As the loan is paid off, the individual builds equity. Equity may also be built through increases in property value, although such increases are not realized until the property is sold. As a condition of the loan, the City could require an even split of any increase in value between the individual and the City. The City's share could then be put back into the loan program and the home would be sold to another low income person. State and Federal subsidies may be necessary to support this plan.

Trees and parks should be an integral part of the development plan; Bellevue needs more of both! Parks should be distributed evenly throughout the City. A suggestion would be that the City should purchase the Bellevue Technology Center through a bond sale. Housing could replace the current offices and the open space and wooded areas would offset the intense development shown on the maps for areas near transit.

The planting of additional trees should be required with new developments, and incentivized elsewhere. Existing trees should be preserved, since most of us will not live to see a sapling grow into a Heritage tree. Many construction companies rip out trees before the sidewalk and the street when they begin construction. (Belred road and Northup are examples of this type of deforestation.) The DEIS (and the Bellevue Tree Code) should follow the guidelines supported by Trees4Livability. If large, heritage trees are removed, they must be replaced in kind. As an example, large maples and firs were removed when Newport High school was remodeled. There was no effort to reforest the site.

It is unfair that Bridle Trails has a guaranteed tree preservation program that the rest of the city does not have. If the current tree program is to remain, then there must be "red" density areas in Bridle Trails that have dense housing as well as a lovely forest environment. You can put the housing around the edge of the golf course, above the shopping centers, and rezone some horse properties for multistory housing. Stacked housing for the elderly who cannot use stairs in townhouses would be ideal, along with rapid transit to hospital and medical areas.

Building heights should be controlled to prevent creating street canyons, where a street is hemmed in on both sides by an unbroken row of tall buildings. Buildings need to be offset so large trees can be planted to afford shade to pedestrians.

Public transit should be improved so that it is easy and affordable to get anywhere in the City. The City should explore the use of driven or driverless trams in areas where a lot of foot traffic is expected. Also, the bus fleet tends to run busses of a uniform and fairly large size. This is necessary on some routes and at some times, but busses often travel with less than one tenth of the passengers they are designed for. A fleet of mixed size busses, down to van-sized, would allow the busses to run closer to capacity, which would be more economical.

The city wants to put housing where there is transit. Change the code so transit can go in more areas and the wealthy areas to support density. For example, a rapid transit line up Highland drive in Somerset with re-zoning to allow 24 unit buildings along the route would serve two purposes. It would provide more variety of housing and more density in an upscale area.

Thank you for the opportunity to provide feedback.

Karl Helmgren  
832 170<sup>th</sup> Pl. NE  
Bellevue 98008

RE: Bellevue Comprehensive Plan Draft EIS

The Earth and Climate Action Ministry of East Shore Unitarian Church supports Option 3\* of the Bellevue 2044 Comprehensive Plan as it is more sensitive to our environment and will offer more housing, especially more affordable housing.

Option 3 allows more development throughout the city, thus increasing housing potential. With more dispersed housing and commercial areas, walking and bicycling become more reasonable options and the idea of fifteen-minute city more chance of becoming a reality. Fewer car trips would mean less emissions and better air quality. Improving intercity and intracity transit are paramount for reducing car trips and ensuring the success of Option 3.

However, whatever option is chosen, there must be monitoring and concern about meeting our GHG goals. The Comprehensive Plan must include policies that require sustainable growth practices. For example, new or redeveloped buildings should be all electric, meet high efficiency performance standards (LEED Platinum or better), include EV charging stations, and have waste management systems that include composting and recycling.

Great attention needs to be given to green canopy and green spaces and insure the 40% is met throughout the city. Maintaining tree canopy throughout the city will reduce heat island effect for all and slow stormwater runoff. Developers should be required to keep the best trees on the property.

Please adopt Alternative 3 as the best way to manage our growth and our environment while at the same time providing more affordable housing than the other alternatives.

Kristi Weir  
Earth and Climate Action Ministry  
East Shore Unitarian Church



\*Partial Description of Alternative 3 from the Comprehensive Plan Draft EIS.

“Alternative 3: Providing options throughout the city. Alternative 3 would allow a greater diversity of housing types in all centers and along transit corridors, combining the areas of focus in Alternatives 1 and 2. There would be capacity for an additional 95,000 housing units (which is 54,000 more units of housing capacity than the No Action Alternative). Mandatory or inclusionary affordable housing would be required in Mixed Use Centers, with incentives for affordable housing in other locations.”

**From:** Martha <marthafreitag@gmail.com>  
**Sent on:** Saturday, May 27, 2023 9:19:49 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Comments on Environmental Impact Study

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

I am a resident of Bellevue. I am not able to attend any of the public meetings for comment related to the new EIS, but have read the study report online. I'm offering several concerns with the study as well as with the planned alternatives.

Overall I want to emphasize my opposition to growth Alternatives 1-3, which allow for creation of additional highrise towers (25-plus floors) and density beyond the Alternative 0 plan. The study, to my mind, is skewed to support the revised options that include added growth while important considerations, such as plausibility of achieving "mitigations" are not included.

I also want to share my concerns with the quality of the **EIS report** and many of its conclusions, which I find **unbelievable**. In particular, the conclusion that most development options will have "little" impact because "mitigation" measures "can" (not must or will) be implemented to "offset" them is concerning. That conclusion does not spell out the negative effects. It gives no consideration to the costs of or probability that any mitigations will actually occur.

Bellevue is being ruled (and ruined) by the directives of the state's density demands. Already our traffic is back to unbearable as the tech companies have initiated "back to office" policies. The downtown core is all hardscape -- hot and harsh concrete, little greenery or shade aside from Downtown Park. It is inconvenient for residents because basic amenities within close proximity are limited, so many residents must drive to them (eg. only two grocery stores west of 405, with the QFC about to be "developed" into a highrise). The growth alternatives proposed will further expand those highrise towers and hardscape without any specific "mitigations" required to preserve air quality and other environmental impacts, or quality of life aspects (greenery, shade). No consideration is made in the study for the impact of increased demand for air conditioning and heating from all of these structures and the costs we will bear for that infrastructure.

The study concludes in most cases that impacts from increased development will be neutral because they can be "mitigated" -- see quotations below. I find that conclusion unbelievable; a band aid "trust me" statement to push off legitimate concerns to consideration later so that development can proceed. Those mitigations listed would have to be designed, studied, approved, funded and then completed. That list is expensive to implement, especially the air quality aspects! The likelihood of the mitigations being put in place to fully offset the environmental impacts of the development plans is highly unlikely. Where will the funding come from? Who will have the political nerve to pass those measures?

**Missing from the study is any assessment of the likelihood of mitigations being applied to each alternative (i.e. assuming 100% application of mitigations). If probabilities were applied, then the impacts of development would be much higher. (That likelihood would also be impacted by the costs of the mitigations and funding sources.)**

I hope that the City of Bellevue will reconsider its interpretation of the EIS as part of its growth planning. A more realistic view of the results should include discounting for the probability of mitigations being made and the timeframe and costs for doing so. **This study looks only through "rose-colored glasses"! It's hard to trust that the outcome will be so rosy.**

See the quoted areas of the study, below, for more specific concerns.

Sincerely,

Martha Freitag  
 104011 SE 19th St.  
 Bellevue, WA 98004

#### Quotation from EIS summary conclusions (Table) -- bold added

In all alternatives, additional growth would result in impacts on the built form citywide, particularly in Mixed Use Centers, and, under the Action Alternatives, in Neighborhood Centers and near transit. This growth will, in turn, have significant adverse impacts from shadows, views, and light and glare. These impacts are to be expected as Bellevue continues to grow, especially in the context of regional transit investments and development interests. **With the application of mitigation measures, no significant unavoidable adverse impacts on views or from shadows, light, and glare are expected.**

#### Citywide and Wilburton Study Area

Mitigation measures could include:

- ☐ Regulations around Public Spaces. Bellevue could add requirements for shadow studies, height limits, maximum floorplate size, separation of high-rise building massing, floorplate reductions, and modification of high-rise tower location and orientation for development adjacent to some key parks and public spaces.
- ☐ Ground-Level and Upper-Story Setbacks. Bellevue could require all areas with higher heights to have ground-level or upper-story setbacks, which would preserve access to light, limit shading, and limit height and bulk.
- ☐ Building Form Requirements. Bellevue could add requirements for roof articulation, modulation of façades, layering of materials and massing, and tower separation.
- ☐ Streetscape Vegetation. The city could require vegetation on major streets to screen development and enhance the pedestrian experience.

#### Effects of building/construction

**Long-Term:** 1. A variety of air and GHG mitigation measures can be implemented to reduce the exposure of residents. The following measures could be applied to any of the alternatives to reduce air exposures: ☐ Land use buffers and project-specific mitigation measures to help limit exposures to emission sources such as high-capacity roadways. ☐ Implement mitigation strategies, including reducing VMT, retrofitting diesel vehicles, electrifying the city's fleet, transit-oriented development, land use buffers, improved urban design, roadside barriers, decking or lids over highways, and building design strategies. Land use buffers could include designating areas near high-impact areas as industrial or other nonresidential zones to ensure distance between these areas and residences. Bellevue could also limit residential uses within a certain distance of freeways. ☐ Promote the use of high-efficiency ventilation on residential facilities that are within 1,500 feet of major roadways. Limit sensitive uses in multi-story buildings for the floors that are at or near roadway level. ☐ Enhance the air monitoring network in Bellevue to enable the community to characterize their exposures more accurately. Prioritize highly burdened regions such as the Wilburton study area. ☐ Continue to prioritize low emissions transportation modes through the development of additional bike/walk pathways, rideshare programs, and other travel demand strategies. ☐ Identify opportunities to use roadside barriers to reduce exposure to air pollution and to provide the related benefit of reduced noise. ☐ Decking and lids over highways may also reduce exposures by consolidating emissions releases to certain locations or limiting releases in certain areas. ☐ Produce air quality-specific policies that promote a uniform approach to reducing exposures in Bellevue's future developments.

**From:** Martha <marthafreitag@gmail.com>  
**Sent on:** Saturday, May 27, 2023 9:19:49 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Comments on Environmental Impact Study

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

I am a resident of Bellevue. I am not able to attend any of the public meetings for comment related to the new EIS, but have read the study report online. I'm offering several concerns with the study as well as with the planned alternatives.

Overall I want to emphasize my opposition to growth Alternatives 1-3, which allow for creation of additional highrise towers (25-plus floors) and density beyond the Alternative 0 plan. The study, to my mind, is skewed to support the revised options that include added growth while important considerations, such as plausibility of achieving "mitigations" are not included.

I also want to share my concerns with the quality of the **EIS report** and many of its conclusions, which I find **unbelievable**. In particular, the conclusion that most development options will have "little" impact because "mitigation" measures "can" (not must or will) be implemented to "offset" them is concerning. That conclusion does not spell out the negative effects. It gives no consideration to the costs of or probability that any mitigations will actually occur.

Bellevue is being ruled (and ruined) by the directives of the state's density demands. Already our traffic is back to unbearable as the tech companies have initiated "back to office" policies. The downtown core is all hardscape -- hot and harsh concrete, little greenery or shade aside from Downtown Park. It is inconvenient for residents because basic amenities within close proximity are limited, so many residents must drive to them (eg. only two grocery stores west of 405, with the QFC about to be "developed" into a highrise). The growth alternatives proposed will further expand those highrise towers and hardscape without any specific "mitigations" required to preserve air quality and other environmental impacts, or quality of life aspects (greenery, shade). No consideration is made in the study for the impact of increased demand for air conditioning and heating from all of these structures and the costs we will bear for that infrastructure.

The study concludes in most cases that impacts from increased development will be neutral because they can be "mitigated" -- see quotations below. I find that conclusion unbelievable; a band aid "trust me" statement to push off legitimate concerns to consideration later so that development can proceed. Those mitigations listed would have to be designed, studied, approved, funded and then completed. That list is expensive to implement, especially the air quality aspects! The likelihood of the mitigations being put in place to fully offset the environmental impacts of the development plans is highly unlikely. Where will the funding come from? Who will have the political nerve to pass those measures?

**Missing from the study is any assessment of the likelihood of mitigations being applied to each alternative (i.e. assuming 100% application of mitigations). If probabilities were applied, then the impacts of development would be much higher. (That likelihood would also be impacted by the costs of the mitigations and funding sources.)**

I hope that the City of Bellevue will reconsider its interpretation of the EIS as part of its growth planning. A more realistic view of the results should include discounting for the probability of mitigations being made and the timeframe and costs for doing so. **This study looks only through "rose-colored glasses"! It's hard to trust that the outcome will be so rosy.**

See the quoted areas of the study, below, for more specific concerns.

Sincerely,

Martha Freitag  
 104011 SE 19th St.  
 Bellevue, WA 98004

#### Quotation from EIS summary conclusions (Table) -- bold added

In all alternatives, additional growth would result in impacts on the built form citywide, particularly in Mixed Use Centers, and, under the Action Alternatives, in Neighborhood Centers and near transit. This growth will, in turn, have significant adverse impacts from shadows, views, and light and glare. These impacts are to be expected as Bellevue continues to grow, especially in the context of regional transit investments and development interests. **With the application of mitigation measures, no significant unavoidable adverse impacts on views or from shadows, light, and glare are expected.**

#### Citywide and Wilburton Study Area

Mitigation measures could include:

- ☐ Regulations around Public Spaces. Bellevue could add requirements for shadow studies, height limits, maximum floorplate size, separation of high-rise building massing, floorplate reductions, and modification of high-rise tower location and orientation for development adjacent to some key parks and public spaces.
- ☐ Ground-Level and Upper-Story Setbacks. Bellevue could require all areas with higher heights to have ground-level or upper-story setbacks, which would preserve access to light, limit shading, and limit height and bulk.
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- ☐ Streetscape Vegetation. The city could require vegetation on major streets to screen development and enhance the pedestrian experience.

#### Effects of building/construction

**Long-Term:** 1. A variety of air and GHG mitigation measures can be implemented to reduce the exposure of residents. The following measures could be applied to any of the alternatives to reduce air exposures: ☐ Land use buffers and project-specific mitigation measures to help limit exposures to emission sources such as high-capacity roadways. ☐ Implement mitigation strategies, including reducing VMT, retrofitting diesel vehicles, electrifying the city's fleet, transit-oriented development, land use buffers, improved urban design, roadside barriers, decking or lids over highways, and building design strategies. Land use buffers could include designating areas near high-impact areas as industrial or other nonresidential zones to ensure distance between these areas and residences. Bellevue could also limit residential uses within a certain distance of freeways. ☐ Promote the use of high-efficiency ventilation on residential facilities that are within 1,500 feet of major roadways. Limit sensitive uses in multi-story buildings for the floors that are at or near roadway level. ☐ Enhance the air monitoring network in Bellevue to enable the community to characterize their exposures more accurately. Prioritize highly burdened regions such as the Wilburton study area. ☐ Continue to prioritize low emissions transportation modes through the development of additional bike/walk pathways, rideshare programs, and other travel demand strategies. ☐ Identify opportunities to use roadside barriers to reduce exposure to air pollution and to provide the related benefit of reduced noise. ☐ Decking and lids over highways may also reduce exposures by consolidating emissions releases to certain locations or limiting releases in certain areas. ☐ Produce air quality-specific policies that promote a uniform approach to reducing exposures in Bellevue's future developments.



**From:** maryjo acker <mjacker@hotmail.com>  
**Sent on:** Saturday, June 3, 2023 6:47:45 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:**

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Developers have to have sufficient parking spaces allotted for units built.  
Emergency vehicles would have a difficult time getting through many of the side streets if cars were parked on both sides of the street  
Occasionally, there are cars parked on both sides of 124 Ave NE and I am concerned in a toyota Corolla. Additionally, there are no sidewalks  
Consider pedestrian and residents' safety.  
mja



# DUWAMISH TRIBE

dx<sup>w</sup>dəwʔabš

06/01/2023

City of Bellevue

2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Environmental Impact Statement

Dear Elizabeth Stead,

Thank you for the opportunity to comment on the draft environmental impact statement for the above named project. Bellevue, particularly Kelsey Creek and Meydenbauer Bay, are culturally significant places for the Duwamish and other tribes. Near the outfalls of the Mercer Slough and Coal Creek was a village site along the shores of Lake Washington. Prior to the creation of a permanent cut between Lake Washington and Lake Union and the Ballard Locks, the shore of Lake Washington filled in what is now the nature park at Mercer Slough. These areas were places where the Duwamish canoed, fished, hunted and gathered resources for food and materials to make clothings, mats, shelter and tools to hunt and fish.

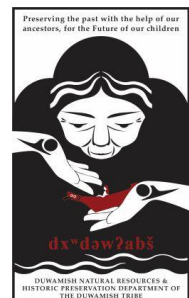
The following elements of the environment from Table 1-2 were of most concern to the Tribe; air quality, noise and aesthetics. The Tribe would support Alternative 0 for those elements of the environment and Alternative 1 for transportation.

Element of the Environment	Alternative 0	Alternative 1	Alternative 2	Alternative 3
Air Quality	✓	X	X	X
Noise	✓	X	X	X
Summary of aesthetics including urban form, viewsheds, shadows, light and glare	✓	X	X	X
Transportation	X	✓	X	X

In addition, the density of net housing capacity was of concern for Alternatives 1, 2 and 3. These projections illustrated by the maps put additional environmental stress on streams and wetlands and their buffers. If impervious surfaces replace these environmentally sensitive areas, this decreases native vegetation for humans, native aquatic life, wildlife, birds and pollinators while potentially increasing seasonal urban flooding.

Thank you,

Duwamish Tribe Cultural Preservation



**From:** pat amador <patsyamador@gmail.com>  
**Sent on:** Saturday, June 3, 2023 12:56:15 AM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** New plan

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Just weighing in to say that any tower over 5 stories is not a great look for the property at QFC Village. Right up against 100th and blocking any views, not to mention all of the traffic for barely wide streets will make this a very congested area. Also, the building of the proposed 8 story tower on Main Street is terrible, Again too many stories and not enough road space to let traffic by. Also, what did happen to Old Main Street? It is definitely NOT the old Main that we knew 40 years ago and wish we still had that old town vibe. Bellevue is growing, but the boxes that are being built do not add any charm or good feel to our city. Please think about this. We were living in Vuecrest when the old 20 year plan was proposed, and it is now taking shape but back then, I could not imagine all of the tall buildings. We could look out our window and see the cascade mountains and the big Christmas Tree with the lights on. Now all you can see is new building. Keep the buildings low, with parking underneath and have some green spaces to add the human element.

Thank you,  
Pat Amador  
Resident of Park Place Apartments in Lochleven

Sent from my iPhone

Sternoff LLC  
[SandyAllen2017@Outlook.com](mailto:SandyAllen2017@Outlook.com)  
206-743-4006

June 8, 2023

Via Email: [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Elizabeth Stead  
City of Bellevue  
Land Use Director and SEPA Responsible Official

Re: City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision  
Implementation EIS  
*Comments from Sternoff LLC*

Dear Ms. Stead:

Thank you for the opportunity to submit comments on the City's DEIS for the 2024-2044 Comprehensive Plan Periodic Update.

The Sternoff family has owned property and operated businesses in the City of Bellevue for several decades. We are invested in the community and in the future growth of the City. One of our family companies, Sternoff LLC ("Sternoff"), owns real property located within the study area at 1750 124<sup>th</sup> Ave NE 98005 ("Sternoff Property"). We submit these comments on its behalf.

#### **A. Property and Neighborhood Characteristics**

The Sternoff Property is approximately 116,203 square feet. It is improved with industrial warehouse space that was constructed in or around 1982 and the entirety of the site is covered by impervious surface. The Sternoff Property is zoned BelRed—Office/Residential and is within the Bel-Red Subarea. It is within short walking distance of the Spring District Light Rail Station (less than 1,000 feet) and is adjacent to the developing Spring District.

Given the tremendous growth the region and the City have witnessed and the forecasts for future growth it is imperative that the land use policies the City selects for the Bel-Red area, ***especially those properties that are within walking distance of high-capacity transit***, maximize density. The Sternoff Property and many of the surrounding properties are presently developed with light industrial warehouse uses. As the City notes in the Bel-Red Subarea Plan, and as we have witnessed, Bel-Red's light industrial past has seen significant declines.<sup>1</sup> Existing land use regulations are aimed at accommodating this trend and seek to transition the area away from light industrial to an urban environment. Recent investment in the addition of high-capacity light rail and the success of the Spring District will expedite that transition. It is likely that the remaining properties in the Bel-Red Subarea with light industrial uses will re-develop under the plans and policies the City is considering in this DEIS. Once redeveloped, the opportunity to re-

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<sup>1</sup> Bel-Red Subarea Plan at 11.

shape development of the area will not arise again until the useful economic life of the buildings has expired.

**B. The DEIS Should Consider Alternatives With Even Greater Density Within Walking Distance of High-Capacity Transit**

The City should not miss the opportunity to capitalize on the investment made in light rail and should be considering policies that would allow even greater density for parcels within walking distance of high-capacity transit than what is presently considered in the DEIS. As noted above, many if not all the remaining light industrial properties proximate to high-capacity transit will be redeveloped under the policies and regulations the City implements as part of this process. High-capacity transit is a significant, once-in-a-lifetime investment in the transportation network for the City and region. The new land use policies should reflect that.

We applaud the City for recognizing the need to capitalize on this investment as evidenced by its focus on the BelRed Look Forward to increase density around light rail. We believe the City should consider even greater density for properties proximate to these stations than what is presently under review. Allowing even greater density in these areas will serve a number of local and regional planning goals including, but not limited to, reducing housing costs via supply and demand, providing more opportunity for affordable housing, and focusing growth around transit. Perhaps most importantly, allowing higher density options around transit centers will help the City minimize the impact of accommodating future growth beyond this planning cycle. If properties proximate to transit are underdeveloped the City will need to upzone surrounding neighborhoods where high-capacity transit does not exist to accommodate future growth projections. This could have significant impacts that are not reviewed or assessed in the DEIS. In short, the City should be considering policies for properties proximate to high-capacity transit, like the Sternoff Property, that will accommodate growth over the next 60 years, not 20.

**C. In the Event that City does not Propose Higher-Density Options, the City Should Select Alternative 3 as the Preferred Alternative Because It Most Closely Aligns with Regional and Local Planning Goals and Policies**

As noted above, the City should consider higher-density options for areas within walking distance of high-capacity transit. In the event the City elects not to consider higher-density options, the City should identify Alternative 3 as the preferred alternative because it most closely aligns with the needs of the region and the City. As noted above, the addition of high-capacity light rail fundamentally changes the demands on land in the Bel-Red sub-area. The City's land use policies and regulations must be updated to address those demands.

A significant component of Vision 2050 is the regional development of high-capacity transit to manage impacts associated with growth. Vision 2050 focused on the "unprecedented" investment the public has made for a regional transportation network. Vision 2050 focuses on transportation centered land use policies recognizing that commercial and housing density proximate to high-capacity transit further quality-of-life goals, climate goals and social-equity promises. To that end, Vision 2050 establishes a goal that 65% of the region's population growth and 75% of the region's employment growth be located in regional growth centers and within walking distance of access to high-capacity transit. As of 2019, less than one-third of housing units within the City of Bellevue were in transit proximate areas. (DEIS 7-30).

Allowing more density near light rail stations will help guide future growth into efficient and climate-friendly sites while reducing the pressure on existing neighborhoods, particularly in light of the recent passage of HB 1110, the so-called missing middle housing bill. Alternative 3 is the only alternative that proposes high density employment and residential designations for parcels within walking distance of transit stations to achieve those goals.

**D. If the City Elects An Alternative Other Than Alternative 3 as the Preferred Alternative, it Should Maintain the Alternative 3 Land Use Designations for Properties Within Walking Distance to the Light Rail Station Like the Sternoff Property**

If the City does select an alternative other than Alternative 3 as its preferred alternative, the City should maintain the Alternative 3 designations for properties within walking distance to high-capacity transit stations. The alternative impacts assessed in the DEIS assess impacts of an alternative as a collective whole across the City and does not assess impacts on a localized basis. Thus, while Alternative 3 may generate higher impacts in some areas City-wide, those impacts are not as great in specific areas like Bel-Red. For example, while Alternative 3 has a higher risk of housing displacement across the City, the risk for displacement in the BelRed area is "low to moderate". (DEIS at 7-27). Likewise, Alternative 3 is identified as having an adverse impact to Land Use Compatibility. (DEIS at 3-83). The discussion, however, suggests that this impact is most attributable to land use changes proposed in areas of the City outside of the Mixed-Use Centers. Thus, if the impacts cause the City to select an alternative other than Alternative 3 as the preferred alternative, it should maintain the Alternative 3 designations for properties within walking distance of high-capacity transit.

**E. Affordable Housing Regulations Should be Incentive Based and the DEIS Does Not Assess How Mandatory Affordable Housing Might Impact Redevelopment Goals**

The alternatives discussion state that mandatory affordable housing will be required in the "Mixed-Use Centers" while incentive-based affordable housing would be available in "other locations." The DEIS does not explain why affordable housing will be mandatory in Mixed Use Centers but incentive-based elsewhere. To the extent the City is aiming to develop more affordable housing in the Mixed-Use Centers it should assess voluntary inclusionary housing incentives as well as mandatory incentives in Mixed Use Centers.

Mandatory affordable housing policies, if not properly balanced can undermine the redevelopment goals the City seeks to achieve with this update.<sup>2</sup> Portland witnessed unintended impacts including a drop in multi-family housing projects following implementation of mandatory affordable housing policies.<sup>3</sup> Seattle's ongoing experiment with mandatory affordable housing has produced less

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<sup>2</sup> The lawfulness of mandatory affordable housing regulations is also an open question. A case challenging Seattle's application of its MHA ordinance is pending in US District Court for the Western District of Washington. *Adams v. City of Seattle*, Western Washington District Court Cause No. 2:22-cv-01767.

<sup>3</sup> <https://cityobservatory.org/inclusionary-zoning-portlands-wile-e-coyote-moment-has-arrived/>

affordable units than those created under incentive based affordable housing policies like the multifamily tax exemption (MFTE) program.<sup>4</sup>

If the aim is to generate actual affordable units in Mixed Use Centers incentive-based programs are more likely to achieve that end over mandatory programs. Under both Portland and Seattle's mandatory affordable housing programs developers have overwhelmingly elected to pay a fee instead of constructing affordable units. The DEIS should prioritize incentive-based affordable housing policies in Alternative 3 or, at a minimum, consider land use regulations and policies that would permit developers to utilize an incentive-based affordable housing program to satisfy affordable housing requirements.

Finally, in balancing its affordable housing incentive program, the City should also take into account the total costs of development including impact fees, utilities and transportation infrastructure, updated building and energy codes, and the costs of development standards and other desired community benefits to ensure the program will result in development and achieve its residential density goals.

**F. The DEIS Should Consider Limited Policy Amendments to Exclude Existing Impervious Surfaces from Buffer Setbacks for Redevelopment of Properties Within Walking Distance of High-Capacity Transit**

Maximizing density within walking distance of high-capacity transit is a primary goal of regional and local planning policies. As part of its update the City should consider limited amendments to its critical areas code to ensure that existing developed parcels within walking distance of high-capacity transit may be fully redeveloped within the existing developed footprint. As currently written, the Bellevue Code excludes the footprint of a "structure" from the critical area buffer. That exclusion does not, however, extend to ancillary development like sheds, garages or impervious surfaces that support the structure. And expansion of the structure into the buffer may only be allowed subject to a Critical Areas Report.

Application of the code could disincentivize redevelopment of developed lots within walking distance of the light rail station or result in an underutilization of the existing built environment. The City should consider limited amendments to its critical areas code to exclude a structure and any lawfully constructed supporting improvements (including impervious surfaces) from the buffers for streams and wetlands for parcels within walking distance of transit. This amendment will allow for full utilization of the existing built environment in areas within walking distance of high-capacity transit.

**G. The City Should Consider Transit-Oriented Policies in Addition to Density**

The City should consider other transit-oriented policies in addition to increasing density for properties proximate to the transit stations. For example, the City should assess reducing or eliminating mandatory parking requirements for properties within walking distance to high-capacity transit stations. Not only would such policies encourage transit use (and reduce the load on the road network) it would help minimize housing costs by reducing or eliminating the need for subgrade, structured parking.<sup>5</sup>

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<sup>4</sup> See Roger Valdez, Series: Challenging Mandatory Inclusionary Zoning, *Forbes* available at: <https://www.forbes.com/sites/rogervaldez/2023/01/11/series-challenging-mandatory-inclusionary-zoning/?sh=1609507b4b5c>

<sup>5</sup> . One study found that a single unit of structured parking adds an average of \$50,000 in costs per-unit. <https://www.brookings.edu/research/parking-requirements-and-foundations-are-driving-up-the-cost-of-multifamily-housing/>

Likewise, the DEIS should assess and consider adjusting development regulations that limit density like prescriptive floorplate sizes, tower step-backs and setbacks and lot coverage limits. Application of these regulations could work to undermine the City's density goals under each alternative.

We look forward to working with the City to do our part to increase residential density near light rail stations. Thank you for considering these comments.



Sandy Sternoff-Allen

Cc: JT Cooke (via email)  
Campbell Mathewson (via email)



**From:** Sarah Bauman <s.a.pistorese@gmail.com>  
**Sent on:** Tuesday, June 6, 2023 2:43:15 AM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** EIS Comprehensive Plan comments

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello,

I am a Bellevue resident, homeowner, and work for a local non-profit. I am aware of the City's efforts to update the Comprehensive Plan and the work to plan for the next 20 years of Bellevue's growth. I have reviewed the draft EIS and would like to share some thoughts. Primarily, Bellevue is a wonderful place to live, raise a family, and offers a tremendous number of amenities. The City and amenities continue to improve as the city becomes more dense and welcomes more neighbors and workers. Bellevue should encourage density and has plenty of room to accommodate the growth, like Bel-Red. It is exciting to see the light rail coming to Bellevue, and areas like Bel-Red are perfectly suited to build-up around these stations. I'd encourage the EIS to study even more density, housing and job potential in Bel-Red and around other transit nodes. Hopefully these nodes will develop into dense, walkable neighborhoods, free of cars, with lots of people living, working, shopping, and enjoying their lives all in one place. Imagine what Bel-Red could be in 20 years!

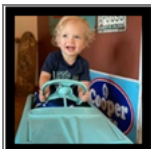
Thank you for consideration of my comments in the Comprehensive Plan EIS process.

With thanks,  
Sarah Pistorese

**From:** Sue Harms <sueharms@comcast.net>  
**Sent on:** Tuesday, May 23, 2023 12:45:42 AM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** NO MORE GROWTH!

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Stop the GROWTH! WE DON'T HAVE THE INFRASTRUCTURE FOR ANY MORE BUILDING!!!!!! I have been a resident of Bellevue for over 67 years, and due to the congestion and crime no longer think Bellevue is a livable city anymore!



**SUE HARMS**

**425-221-5450**



**From:** Thomas Colombo <tomcolombo@hotmail.com>  
**Sent on:** Tuesday, June 6, 2023 5:13:54 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** EIS comments

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello -

I am an engaged citizen and active member of the surrounding community. I have been following the Comp Plan and EIS process and am providing these comments on the Draft EIS. I am encouraged by the EIS's focus on increasing density throughout the City and echo the emphasis to concentrate density around the soon to open light rail stations. Bel-Red is the most logical neighborhood to concentrate this growth since it will have two light rail stations, is made up of low-density buildings ripe for redevelopment, and will have little impact on existing single-family neighborhoods due to the existing barriers of 520 to the north and Bel-Red road to the south. The final EIS should expand the study of Bel-Red, however, to prioritize pedestrian and bicycle travel, and de-prioritize vehicle travel. This could involve eliminating any future street grid expansion, limiting parking requirements around light rail stations, and encouraging property owners to build pedestrian corridors and bike paths through their properties.

Thank you!  
Tom C

## Comments Comprehensive Plan DEIS #2

**This is a second and separate submission from me.**

Barbara Braun - 13609 SE 43<sup>rd</sup> Place

The City's commitment to reducing greenhouse gas emissions by 50% by 2030 is not sufficiently analyzed or addressed in the Comprehensive Plan.

The Washington Department of Commerce's Climate Element Review Group has been working on an optional Climate Element section guideline for Comprehensive Plans that should be included in the final EIS for Bellevue. [Link](#)

From the Department of Commerce's website:

"The Washington Department of Commerce is developing a model element to help cities and counties address climate change in their comprehensive plans. The model element will include mitigation (greenhouse gas reduction) and resilience (climate impacts preparedness, response, and recovery) planning guidance, as well as a model chapter with goals and policies (Menu of Measures) that communities may voluntarily adapt or adopt into their comprehensive plans as part of their periodic update. The model element — described in the [2021 budget \[Section 129 \(126\)\]](#) — must be completed by **June 2023** and must integrate input from fellow state agencies and other partners."

The draft Guideline and development timeline can be found here:

1. [Draft Guideline](#) – post as of May, 2023
2. [Development Timeline](#) - The initial products – the model elements – are due by June 30, 2023.

Bellevue should adopt this guideline into our Comprehensive Plan even if this requires us to be a pilot city. The preferred Alternative should be analyzed on its ability to meet our climate goals using this Guideline and appropriate mitigations should be outlined in the Final EIS.

Included in the Final EIS should be numerical estimates of future GHG emission metrics along with the key actions and mitigations that will enable us to achieve those measurable targets.

The final Comprehensive Plan should not be adopted without full confidence that our climate goals will be met. The timing of the final EIS should be modified to allow time for the inclusion of this planning element, and the schedule for completing and adopting the Comprehensive Plan should be modified accordingly.

Bellevue should stand out as a large municipality who is taking climate action seriously.

Thank you!

**From:** TJ Woosley <tj@woosleyproperties.com>  
**Sent on:** Thursday, May 25, 2023 12:11:35 AM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** DEIS comment

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

I commented earlier this afternoon via email but would like my comments replaced with:

1. The City's Comprehensive Plan's Transportation Element Policy TR-2 calls for accommodating trips. Cancelling a long-planned arterial that will serve not only Willburton, but Downtown and BelRed, would be contradictory to this goal, as well as Bellevue's need for multi-modal capacity.
2. This policy, which would effectively kill the NE 6th Street Extension from 116th to 120 Avenues NE, should be tabled until a more appropriate time. It belongs in the Transportation Element, not Natural Environment element.
3. The City's \$300,000,000 BelRed Transformation projects system shows the N.E. 6th Street Extension as part of the planned and envisioned grid. <https://bellevuewa.gov/city-government/departments/transportation/projects/belred-street-improvements>
4. Overall, the City has the opportunity to build the last complete street project of any significance anywhere in Bellevue. Don't repeat the mistake we made when we didn't build a grid system in Downtown, and got stuck with superblocks that make travel difficult for all modes.

Thank you,

T.J. Woosley  
3015 124<sup>th</sup> Ave. NE  
Bellevue, WA 98005



June 9, 2023

City of Bellevue Development Services Department  
Attn: Liz Stead, Director and SEPA Responsible Official  
Reilly Pittman, Environmental Planning Manager  
Bellevue City Hall  
450 110th Avenue NE  
Bellevue, WA 98004

Via email to [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Re: *SEPA Comments on File No. 22-116423 LE, the City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement for 1150 124th Avenue NE in Bel-Red*

Dear Director Stead and Mr. Pittman:

This letter is submitted on behalf of Swire Coca-Cola (“Swire”) as part of the public comment process for the City of Bellevue (“City”) 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement (“DEIS”). We recently provided written and oral testimony to the Planning Commission on the DEIS and appreciate the opportunity to expand upon our testimony in this Comment Letter. We are asking the City to identify the BR-OR-H-2 designation for our property in the FEIS Preferred Alternative because of its size and proximity to transit, as further explained below. If zoned correctly, our property presents a truly transformational development opportunity representing several billion dollars of investment that would benefit the City for the next hundred years.

As anticipated in our written testimony to the Planning Commission, this Comment Letter is supplemented by a detailed study by our architect, NBBJ, which demonstrates the potential future development opportunity on our property with BR-OR-H-2 zoning (attached as Exhibit 1, 23-30). Building on that study we offer the following DEIS comments.

## **I. Background**

Swire Coca-Cola sells and distributes Coca-Cola products throughout the Intermountain West. As a member of the Swire Group of companies, we are part of a larger business that has operations around the world in industries as diverse as property, beverages, and aviation. Our properties division is a leading developer, owner and operator of mixed-use, principally commercial properties.





Swire owns the Coca-Cola bottling plant property at 1150 124th Avenue NE in Bel-Red (the “Site” or the “Swire Site”). The Swire Site is the single biggest underdeveloped site in Bel-Red totaling over 20 acres, and it is one of the largest sites in the City for potential redevelopment. It is located immediately across 124th Avenue NE from The Spring District. The entire property has excellent transit access on Bel-Red road, and is within a 10-minute walkshed from both The Spring District/120th Sound Transit light rail station and the Bel-Red/130th station. (See DEIS Fig. 11-14).

Swire originally purchased the Site in 2017 with no plans for redevelopment. Since then, the City has proceeded with its Comprehensive Plan Periodic Update, that will pave the way for the long-awaited Bel-Red “Look Forward” to align zoning with modified future land use map designations. We recognize the community is changing and we want to be good partners with Bellevue as it plans for future growth. With so much potential for change in Bellevue in the coming years, we now view the Site for potential development. To better serve customers in every community across the growing region and to be a good partner in achieving Bellevue’s growth plans – Swire Coca-Cola recognizes our business may operate more optimally from other areas in Washington.

## **II. DEIS Comments**

### **1. The Preferred Alternative should identify the BR-OR-H-2 designation for the Swire Site due to its large size and transit proximity.**

The City’s three action alternatives in the Draft EIS would allow additional density on the Swire Site compared to current zoning, but none of them go far enough to capture the Site’ full development potential. The Site is nearly the size of the adjacent Spring District, and, if zoned correctly, could deliver several thousand housing units, more than a million square feet of commercial office or life sciences space, and more than a hundred fifty thousand square feet of public open space adjacent to a city park. To achieve this, the Preferred Alternative in the FEIS should identify the Swire site for BR-OR-H-2 future land use map designation with a 24-story-plus height limit and supporting density to facilitate a robust development incorporating high rise residential towers, office buildings, retail, infrastructure and services.

The BR-OR-H-2 designation is particularly appropriate for the Swire Site given its proximity to light rail and other dense, mixed-use development (both realized and anticipated development). The BR-OR-H-2 zoning designation will provide appropriate flexibility in uses, including a robust mix of commercial and residential buildings. This designation is also more consistent with the Comprehensive Plan vision that promotes a healthy mix of office and residential uses in this node proximate to the 120th light rail station. Further, a single zoning designation for the Site is preferable to split zoning and ensures it can be master planned effectively to construct infrastructure across multiple phases, respond appropriately to site conditions, and plan for adjacent uses.

NBBJ’s study captures what development of the Site could look like with BR-OR-H-2 zoning. A mixed-use community is envisioned with office buildings on the west side of the Site to complement The Spring District





and residential towers on the east side surrounding a significant central open space park. The development heights envisioned range within the maximum story height, and would complement identified 14-story lower height to the east because of sloping topography. *See Exhibit 1* at 26. Based on the high-level metrics provided, such a project could fit within the BR-OR-H-2 designation's 24 story height limit, and deliver 3,200 housing units and nearly 6,000 jobs based on a 60% residential / 40% office split. If the MFTE program is used, then 640 of the housing units could be affordable workforce housing.

**2. The FEIS Preferred Alternative should disclose density assumptions and should study FARs that will achieve efficient development at the heights envisioned.**

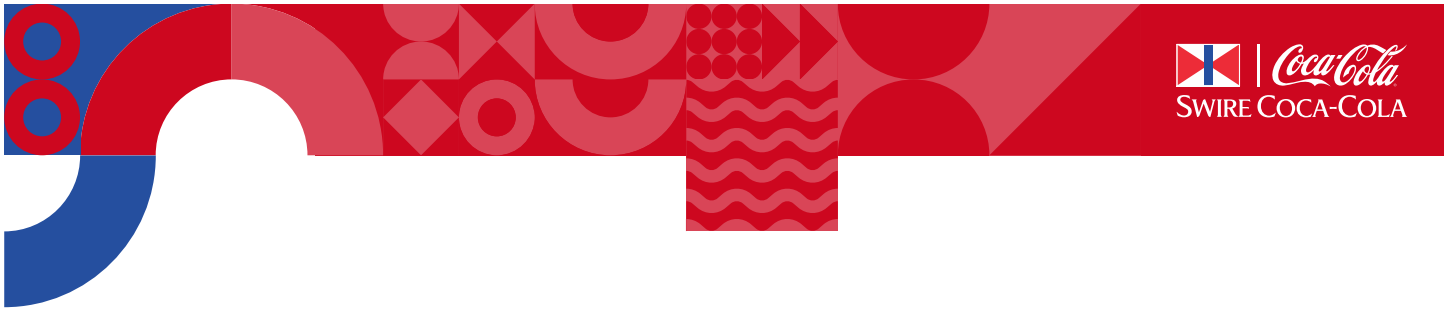
The DEIS does not identify the Floor Area Ratio ("FAR") or dwelling unit per acre limits assumed as part of the zoning designations that will implement the City's identified future land use map designations. This is a significant shortcoming of the DEIS analysis. Most zoning in the City currently regulates development intensity with both height and FAR or dwelling unit per acre limitations. The DEIS only discloses an assumed number of stories that corresponds to an assumed height limit (DEIS Appendix B notes "story" heights are around 10 feet for residential uses and 12 feet for commercial development), but does not identify any other development standard limits assumed. In order to validate that the assumed heights/stories are achievable in future development, the City should identify the FAR or dwelling unit per acre and other development standards proposed.

Further, the City should consider revising all dwelling unit per acre limits to a FAR measurement City-wide. The dwelling unit per acre standard is outdated and more appropriate in a suburban jurisdiction as it encourages larger dwellings rather than dense, urban development. The DEIS acknowledges that the City needs to grow three times faster in the next two decades than in the prior two decades and so it must move away from suburban standards.

Similarly, the City should also consider removing a FAR limit for residential uses. It is difficult to precisely calibrate residential heights and FARs because of unique site conditions. Removing a FAR limit as an additional barrier to housing production will ensure residential development is maximized to the heights envisioned. As part of removing a specific FAR limit for residential development, the City should also study recalibrating its incentive system in the Preferred Alternative in two ways: (1) modifying the incentives themselves to reflect current City priorities, including affordable housing, sustainability measures, and parks and opens spaces, and (2) moving to an incentive system that requires participation based on development above a "trigger height" similar to Downtown zoning. Such a system would ensure development delivers public benefits that reflect the City's greatest needs and priorities. An incentive-based system is also better than a mandatory inclusionary housing scheme (identified as a component of Alternative 3) because it does not carry the risk of foreclosing all development if calibrated improperly.







**3. New Bel-Red developments should be granted latitude to identify appropriate multi-modal infrastructure within the block limit, and Bellevue should support the use of service alleys (and larger service alley networks) as the City continues to densify.**

A historic problem with the existing Bel-Red zoning is a rigid local street grid. We were pleased to see that the City's transportation analysis for Bel-Red does not appear to rely on additional, prescriptive, local street connections. This approach should be carried forward in the Preferred Alternative study in the FEIS. Large development sites like the Swire Site should be granted flexibility to plan internal streets, pedestrian, bicycle, and service connections in the manner that best fits the site conditions, surroundings, and development objectives. The NBBJ study reflects one such way connections could be planned, but there are numerous. *See Exhibit 1* at 15.

Swire further requests that the City support the use of private service alleys and alley networks in new master-planned developments and study the use of service alleys in the FEIS transportation analysis. Currently, the City does not have a concept of alleys in its street manual—instead, the lowest street type are private streets that require sidewalks on both sides. These private streets are wider than what is efficient for a service alley. The result of this is that back of house services cannot be efficiently consolidated and coordinated with adjacent buildings, and essential utility functions must be accessed from streets, which can increase congestion.

The proposed alley network on the Swire Site envisions alleys as service-oriented and providing increased functionality of the street network. *See Exhibit 1* at 15. These are 20-foot-wide service-focused only and do not provide cut-through vehicle and pedestrian connections. Bellevue should embrace alleys, especially on the Swire Site, as a way to improve efficiency and create a more modern, urban and streamlined streetscape. The City should identify alleys in the FEIS mitigation measures for general land use and transportation impacts. It is one more tool in the land use toolbox to create expanded service connections and lessen congestion on our streets that should be supported in the City.

Last, we note that the identified mitigation measures in the City's transportation analysis place a primary focus on Transportation Demand Management rather than building additional street capacity. (DEIS at 11-117). We applaud the City for this focus and request the City carry-forward this prioritization in the FEIS for Bel-Red. We believe best way to reduce transportation impacts and congestion is to place density near transit and to complete robust multi-modal improvements. The potential Swire Site development will do both if zoned with BR-OR-H-2 zoning: it will complete an internal infrastructure system that will move pedestrians and bicycles in and through the site, and it will also place appropriate density within a 10 minute walk of two regional light rail stops. This is the right approach to adding density and it should be incorporated into the FEIS Preferred Alternative.





**4. The FEIS should include increased floor plate sizes in the Preferred Alternative to promote more efficient and flexibly designed buildings in Bellevue.**

Like FAR assumptions, the City must disclose other development standard assumptions in the FEIS for the Preferred Alternative to validate the development capacity assumed. Alongside this, the City should study increased floor plate sizes compared to floor plates in existing zoning and disclose those figures in the FEIS. Larger floorplates will result in more efficient building forms, more design flexibility, and reduce bulk and scale at the neighborhood level through efficient site design and planning.

As written, it is unclear what floor plates sizes have already been assumed by the City in the DEIS alternatives. Disclosing this analysis, and considering increased floor plate sizes in the FEIS compared to current zoning standards, is essential to confirm the City's development assumptions are feasible. More specifically, *the City should study floor plate sizes of up to 14,000 sq. ft. for residential uses between 85' and up to 240' and include this figure in the FEIS shadow analysis.* Swire believes that a 14,000 sq. ft. floor plates maximum for residential buildings strikes the correct balance between much needed efficiently constructed density to hit housing targets while also maintaining thoughtful building design. The City should also increase the flexibility for connected floorplates in all buildings up to 160' or 180' using light gauge steel or cross-laminated timber construction types.

**5. The City should identify revisions to its Critical Areas Ordinance to align its steep slope provisions with best available science.**

The Swire Site is burdened by naturally occurring and man-made steep slopes, both of which are currently recognized as environmentally critical areas under the Bellevue Land Use Code ("LUC") in the Critical Areas Ordinance ("CAO"), LUC 20.25H. *See Exhibit 1* at 12. As written, the CAO fails to distinguish between manmade and naturally occurring steep slopes, and both require buffers, setbacks, and reduce development capacity (the "CAO development penalty"). Manmade steep slopes should not be subject to the CAO development penalty: they do not warrant protection in order to maintain geologic stability. Subjecting development on properties with manmade steep slopes to the CAO reduces development capacity solely because of existing development the City agreed was safe and authorized in historic permits. This does not make sense and is not justified by best available science. This circumstance further adds cost to development and results in an unnecessary burden on City resources through needless permit processing to modify manmade slopes, setbacks and buffers, and ultimately delays development. This should be avoided. The FEIS should study, at minimum, modification to the CAO to remove man-made slopes from regulation.

Additionally, steep slope areas which are revegetated through redevelopment to become "active" outdoor spaces such as courtyards, lawns, or parks (regardless of whether they are manmade or naturally occurring) *should not count towards impervious surface calculations.* Once revegetated, these spaces no longer meet the Bellevue City Code's definition of impervious surface, and they functionally infiltrate stormwater. *See BCC 24.06.040.I.* ("Impervious surface" means nonvegetated surface area that either prevents or retards the entry of water into





the soil mantle as under natural conditions prior to development.”). Sites with such features should not be further penalized in impervious surface calculations, and this code change should similarly be studied in the FEIS.

These common-sense and limited revisions to the CAO will significantly ease the burden on new development from slopes while maintaining the highest level of protection for environmentally critical areas that serve environmental goals. Again, the City should identify these changes and study their impacts in the FEIS.

### **III. Conclusion**

Thank you for the opportunity to comment on the DEIS. Swire commends the City for proposing action alternatives in the DEIS which address Bellevue’s housing challenges through well-managed growth while prioritizing a high quality of life and balanced job growth. But, with respect to the Site, the alternatives do not go far enough to identify an appropriate level of density and the City should identify the BR-OR-H-2 map designation for the Site in the Preferred Alternative.

Swire looks forward to engaging with the City and working with staff as the comprehensive planning process continues. As a longtime resident of Bellevue, Swire is enthusiastic about partnering with the City to achieve Bellevue’s vision for a mixed-use, transit-rich future and that with the suggested changes, the Preferred Alternative in the FEIS could achieve this vision should the company transition operations in the future. Please let us know if we can answer any questions or provide additional details on these comments.

Sincerely,

Jon Yearsley  
Vice President, Manufacturing and Engineering



## DITTY PROPERTIES

*Part of Bellevue since 1928*

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June 8, 2023

City of Bellevue Development Services Department  
Attn: Liz Stead, Director and SEPA Responsible Official  
Reilly Pittman, Environmental Planning Manager  
450 110th Avenue NE  
Bellevue, WA 98004

*Via email to [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)*

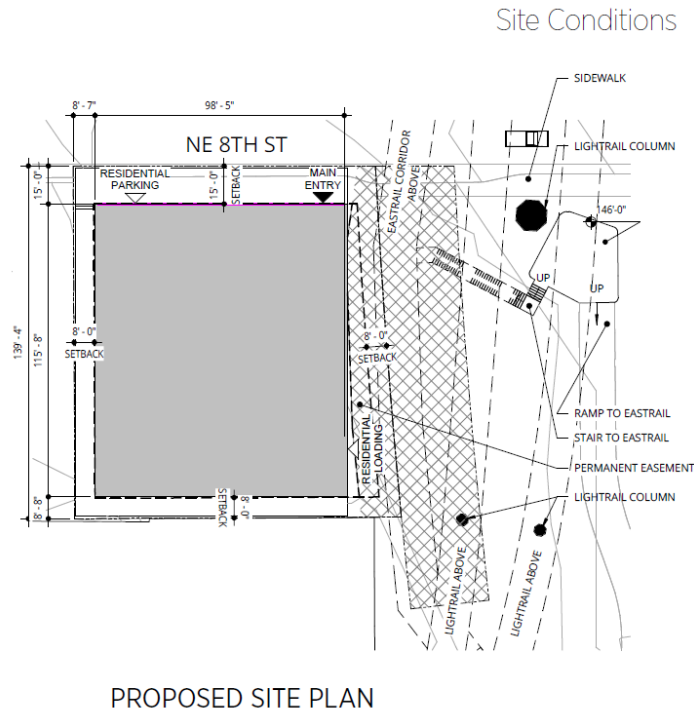
*Re: Bellevue 2044 Comprehensive Plan DEIS Comments*

Dear Liz and Reilly,

We appreciate the opportunity to build on our scoping comment letter (a copy of which is attached) with additional follow-up comments that we have prepared on the City of Bellevue's (the "City") Draft Environmental Impact Statement ("DEIS") for its 2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation. Our family owns property at 11635 - 11647 NE 8th Street, which is located in the heart of the Wilburton Study Area, approximately 200 feet south of the future Wilburton light rail station across the new NE 8th Street Eastrail bridge, and abutting Eastrail (the "Midlakes Site" or "Site"). This Site is also convenient to Overlake Medical Center, Kaiser Permanente and the I-405 on- and off-ramps. The City has identified the Site for MU-H-3 zoning in Alternative 3 and this designation should be carried forward to the Preferred Alternative.

We hope to redevelop the site for high-rise residential use, which would be consistent with the MU-H-3 designation and help activate and complement Eastrail. For us, the Site represents the continuation of a nearly century-long legacy of family engagement in Bellevue's development. The site is at the intersection of the Eastrail bike and pedestrian route, the Grand Connection, and the new Wilburton light rail station; and provides an unparalleled opportunity in the City for high-density residential development. It could house workers from the immediate area—for instance medical workers from Overlake and Kaiser—or from across the region who will have convenient access to transit.

To better understand the Midlakes Site's capacity to provide new housing, we commissioned an architectural feasibility study. In case it is helpful for your reference, an excerpt of that study, showing a proposed site plan for housing, is provided below. This study has informed our enclosed comments on the DEIS.

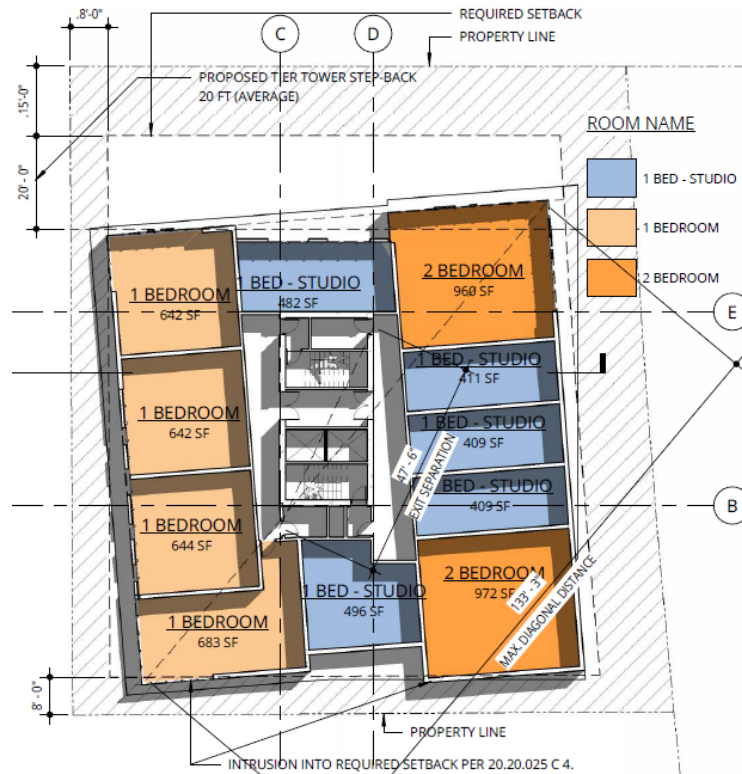


**1. The FEIS Should Adopt Alternative 3 as the Preferred Alternative to Support Clean Air, Transit-Oriented Development, and Housing Supply through the Highest Possible Densities in Wilburton.**

As the City knows, Wilburton is unique in the region. It is located at a true confluence of transportation modes, surrounded by Link Light Rail, Eastrail, the Grand Connection, I-405, and the Eastside's only existing bus rapid transit line on NE 8th Street. Wilburton presents one of the best opportunities in the state for transit-oriented development. Its location provides the City an opportunity to embrace and enhance the good work done by the CAC, especially now that Light Rail and Eastrail are nearly open and the City, County and State are all focused on how to create new transit-oriented density for housing at all income levels. Wilburton's central and connected location makes it the obvious site for new multifamily homes that can efficiently and sustainably integrated with the City and region's multi-billion dollar investments in transit, bike, and pedestrian infrastructure.

For the City to truly realize the transit-oriented, residential density it is targeting, it should adopt Alternative 3 as its Preferred Alternative for Wilburton in the Final EIS. This Alternative appropriately designates the central portion of Wilburton MU-H-3, which will allow a mix of high-rise uses, including high-rise residential towers up to 450'. If the City chooses not to adopt Alternative 3 in its entirety as its Preferred Alternative, then it should retain the MU-H-3 designation for the central portion of Wilburton located between NE 8th Street to the north, NE 4th Street to the south and Eastrail to the east, including the Midlakes Site. This area is the heart of Wilburton and it is appropriate to locate the highest density and intensity of uses here where the surrounding streets and transportation facilities provide natural buffers to surrounding lower density areas.

Wilburton also represents the City's greatest opportunity for housing supply to meet growth targets. The City will need to grow three times faster in the next 20 years compared to the last 20 in order to meet the identified housing targets. The City will only be successful in doing so if it provides sufficiently zoned land for robust residential development. Locating some of the highest density zoning in Wilburton is a necessary step to achieve this growth.



*Based on our concept study shown above for every 10 feet of height, 11 or 12 additional units could be created, and the gap between the potential yield in Alternative 1 and 2 with a MU-H-2 designation for the property that allows 25 stories versus MU-H-3 at 45 stories is as many as 300 units. Given the City's ambitious housing targets and its limited supply of infill transit-oriented land, the FEIS Preferred Alternative should incorporate and not foreclose the highest densities for central Wilburton and it should include MU-H-3 zoning on the Midlakes Site.*

## 2. The FEIS Should Disclose Development Standard Assumptions and Study Modifications of Current Standards

Beyond building heights, we are concerned with the lack of potential development standards disclosed in the DEIS. Development standard assumptions should be disclosed in the FEIS. For residential development in particular, the City should move to a form-based code that allows specific building forms rather than a traditional zoning code that regulates height, bulk, and FAR. The FEIS should also evaluate the negative environmental and housing impacts of additional constraints that are implicated by prescriptive floorplate sizes, tower step-backs and setbacks, multifamily play areas, lot coverage limits, and similar development standards. Such standards all constrain transit-oriented development and add cost to new residential density at both market and affordable rates.



Instead, the City should specifically incorporate the study of removing an FAR limit in the FEIS. Residential building form should be governed by height, flexible floorplate limits that correspond to efficient building forms (upper limits no less than 12,500 square feet for 450' residential towers and not less than 13,500 for 240' residential towers), and modest setbacks that are consistent with IBC fire code separation requirements. These standards should be studied as alternatives to the City's typical current standards in the FEIS. The City should also study removal of its multifamily play area requirement and instead implement a residential amenity standard and include a children's park and play area incentive as part of the incentive zoning structure.

### **3. Provide Off-Ramps and Alternative Standards for Small Sites.**

The City should also acknowledge in the FEIS that development standards alternatives should be considered for small sites less than 40,000 square feet to ensure development can occur. Alternative development standards should apply to these sites, and they should be exempt from requirements like upper-level setbacks because towers will not be able to shift elsewhere onsite. In addition, the City should allow administrative departures from all development standards aside from height through Design Review to ensure that standards can be applied efficiently on a site-specific basis.

### **4. Deploy Bold Incentives for Affordable Housing, Instead of Inflexible Mandates that Stifle Growth.**

Next, incentivizing construction of workforce and affordable housing through an incentive system in Wilburton will encourage the housing mix we need at the locations where people can commute by bus, train, and foot rather than by car. Specifically, the FEIS Preferred Alternative should incorporate an affordable housing program that: (A) is incentive-based above a base height (increase or remove current limits to allow more affordable housing using provisions), (B) includes an in-lieu fee option, and (C) accounts for the total cost of development including the City's requirements for other community amenities in development, impact fees, changing building codes, and utilities and transportation infrastructure. Such a program will best ensure that the code is workable in response to evolving market conditions.

The City's density and affordability goals depend on builders delivering a robust supply of housing at a rate higher than the City has seen before. For such a supply to incorporate market-rate and affordable housing in the face of market uncertainty it must be calibrated to incentivize development overall at a baseline and offer incentives for affordable housing that are meaningfully accretive to projects. The City must consider and plan for the economy's effects on housing goals and it should not adopt programs that compound negative economic news and force building plans onto the shelf.

Recent studies have shown that in the areas where Seattle has chosen an affordability mandate, a chill on new residential units has resulted.<sup>1</sup> Unfortunately, the DEIS not only fails to discuss this

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<sup>1</sup> Krimmel, Jacob and Betty Wang. *Upzoning with Strings Attached: Evidence from Seattle's Affordable Housing Mandate*, Furman Center for Real Estate & Urban Policy (New York Univ.) (May 5, 2023). [https://furmancenter.org/files/publications/Upzoning\\_with\\_Strings\\_Attached\\_508.pdf](https://furmancenter.org/files/publications/Upzoning_with_Strings_Attached_508.pdf) ("new construction fell in the upzoned, affordability-mandated census blocks. Our quasi-experimental border design finds strong evidence of

effect; it appears to take for granted that the City will pursue just the kind of program that has been shown to stifle new housing. *See, e.g.,* DEIS at 1-26 (“Citywide Impacts”); Chapter 2, *passim*; Chapter 3 (in discussion of residential displacement); 7-38 through 7-39; 7-41.

*Bellevue’s FEIS must study the likelihood that continuation and expansion of a top-down affordability mandate would result in significant negative environmental impacts by chilling the development of housing in the most sustainable and transit-oriented locations. The biggest risk with such a program is that it is ill calibrated and has a chill on development at a time when the City needs the exact opposite; incentive programs are proven to respond better to changing market conditions as they do not carry risk that development will not occur. Instead of mandates, the Preferred Alternative should focus on incentive-based affordable housing programs.*

The FEIS should acknowledge what the data shows: inclusionary mandates result in unintended consequences such as losses in density and transit-oriented development, which will directly counteract the City’s goals for new housing, less pollution, and relieved congestion.

#### **5. Properties on Eastrail Should be Encouraged to Integrate with this Community Amenity.**

The City should encourage trail-adjacent development to activate and integrate with the trail. For properties with private agreements with the County, this should include building cantilevers over the trail level at a height of at least 20’ that can provide some weather protection to the trail. For other developments, the incentive system should encourage small, trail-adjacent retail spaces as activating uses that provide opportunities for local businesses.

#### **6. Parking Mandates Enable and Incentivize Congestion and Pollution, and Should Be Discouraged – Especially Near Transit.**

To reduce the traffic and air-quality impacts of the new units needed in Bellevue, the FEIS should review and acknowledge that multi-modal neighborhoods like Wilburton provide a great opportunity to build new homes while still minimizing air pollution and traffic impact.

*Specifically, the FEIS should study whether decreasing or eliminating mandatory parking will improve the affordability of city living and keep the air cleaner for all of us, and if so, adopt a preferred alternative that embraces the modern approach with no minimum parking requirements.*

By encouraging and enabling true transit-oriented development and density in Wilburton and similar neighborhoods like Bel-Red, the City can take its best available opportunities to reduce and offset traffic and air quality impacts, by directly helping more residents and commuters embrace Light Rail, BRT, the Eastrail, and the Grand Connection. Doing so would reduce the greenhouse gas (“GHG”) emissions and other pollutants in the air we breathe, reduce the congestion on our street networks, and reduce reliance by workers and families on expensive commutes by motor vehicle. The DEIS identifies significant air quality impacts of growth from GHG emissions, but it does not measure the benefit of eliminating parking minimums and creating true transit-oriented neighborhoods as mitigation measures. The FEIS should include this study. Zero parking requirements are essential for affordable housing, where the cost of

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developers strategically siting projects away from MHA-zoned plots—despite their upzoning—and instead to nearby blocks and parcels not subject to the program's affordability requirements.”)



building parking is high, and use by residents is low, especially where light rail is located so nearby.

Thank you for taking the time to review and consider our comments, and for all the work you have done and continue doing to plan the greatest possible future for the City of Bellevue. Again, we endorse and encourage the City to adopt Alternative 3 as the Preferred Alternative, or short of that, continue to designate our site and the surrounding area MU-H-3. I appreciate your consideration of our comments.

Sincerely,

*RK Mathewson*

R. Kirk Mathewson

Cc: Emil King, Planning Director  
Janet Shull, Senior Planner  
Thara Johnson, Planning Manager  
Abigail DeWeese and Josh Friedmann, HCMP  
Campbell Mathewson, CMRE Partners

ND: 23171.002 4864-1421-0660v3

**From:** p johnston <pamjjo@msn.com>  
**Sent on:** Friday, May 26, 2023 1:36:21 AM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** 22-116423-LE Bellevue 2044 DEISFIGURE 7-11 Housing Units within Transit-Proximate Areas is flawed

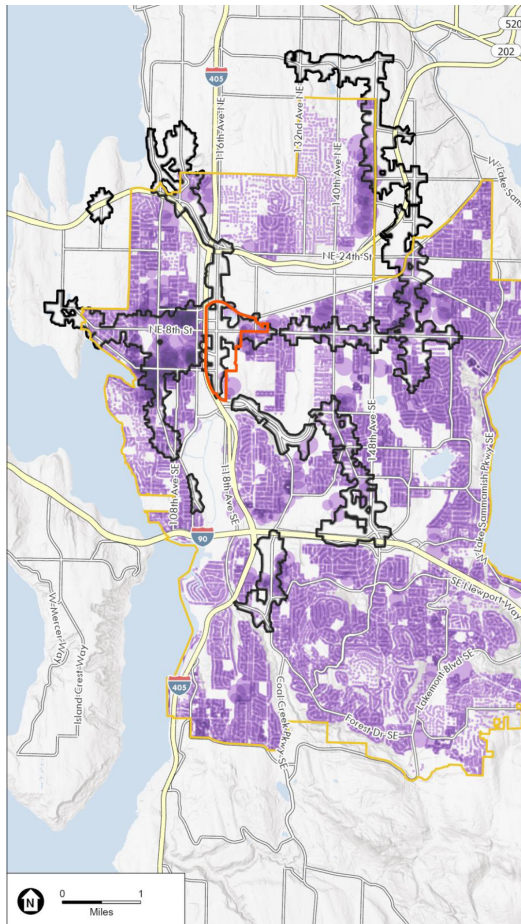
**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

My home is 3741 122<sup>nd</sup> Ave NE

My home is not Transit-proximate --within ¼ mile of the frequent transit network (defined as frequent bus service at least every 15 minutes during the daytime and early evening).

When I use the King County Trip Planner, the result is always "⚠️ A trip plan could not be completed. Make sure your origin/destination is within 1 mile of a valid transit stop. Please try a different location, visit Metro Online, or call 206-553-3000 during business hours."

"FIGURE 7-11 Housing Units within Transit-Proximate Areas" is flawed.



SOURCE: City of Bellevue 2023; BERK 2023

**FIGURE 7-11 Housing Units within Transit-Proximate Areas**

Draft Environmental Impact Statement  
 April 2023

### Trip Planning

⚠️ A trip plan could not be completed.  
 Make sure your origin/destination is within 1 mile of a valid transit stop. Please try a different location, visit Metro Online, or call 206-553-3000 during business hours.

[Start Over](#)

**From:**  
 ADDRESS LANDMARKS  
 3741 122ND AVE NE, Bellevue

**To:**  
 ADDRESS LANDMARKS  
 Bellevue City Hall

**When:**  
 05-25-2023

Departing 8:00 AM

**From:** p johnston <pamjjo@msn.com>  
**Sent on:** Thursday, June 8, 2023 5:24:55 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** DEIS 2044: Table 1-2

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

First column text is  
3. Land Use Patterns and Urban Form"

Issue  
Table 1-2 starts with 3. What happened to 1 and 2.

Suggest  
Chapter 3. Land Use Patterns and Urban Form  
And so on

Cordially,  
*-pamula johnston*  
425-881-3301

**From:** p johnston <pamjjo@msn.com>  
**Sent on:** Tuesday, June 6, 2023 1:26:45 AM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** table of contents and footnotes and links

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Please make items that link to other content hot in the electronic version. Everything in the table of contents does not link

Cordially,

*-pamela johnston*

425-881-3301

**From:** Skip Slavin <slavin@incityinc.com>  
**Sent on:** Wednesday, June 7, 2023 3:44:55 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Bellevue Comp Plan - Comments

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello – I am writing to provide feedback on the draft EIS for the 2044 Comp Plan update. As I have learned from prior Comp Plan updates, the key goal should be to think BIG! The amount and type of growth the city will experience over the next 20 years is unlikely to look exactly as we expect sitting here today. The Comp Plan update should be broad enough to allow different types of growth to occur, while still providing a smart framework for the growth to occur within.

I understand that this EIS is the first phase of the Comp Plan update, intended to study the impacts of various growth alternatives. With this in mind I offer the following comments:

1. The EIS should study maximizing growth around the Light Rail Stations. When the stations open, the Bel-Red and Wilburton districts will be some of the most transit connected neighborhoods on the west coast. We should not squander this feature by limiting growth.
2. These station areas should allow a wide range of uses, both housing and office. Great neighborhoods have a mix of uses to attract all sorts of different people at different times of the day. This also creates memorable retail/shopping districts. The EIS should study allowing this mix of uses around all stations.
3. The best neighborhoods are pedestrian focused. Study limiting car traffic, rely on the light rail transit network, and create more pedestrian only streets rather than typical vehicular arterials.
4. Bel-Red is a blank slate with unlimited potential to become a great destination neighborhood. The EIS should study concentrating growth here. Create destinations by using the largest sites as neighborhood hubs and gathering spots.
5. The City, specifically Bel-Red, is full of drainage ditches masquerading as streams. Encourage the revitalization of these “streams.” Work with property owners to allow creative solutions to transform these “streams” into an amenity, rather than adhering to the existing, counter-productive critical area setbacks.
6. Based on the DEIS, Alternative 3 is the most favorable, and provides the most flexibility for future growth

Thank you to the City for all the time spent on this to date. Looking forward to Bellevue continuing its rise as one of America’s great cities!

Skip Slavin

# BELLEVUE'S DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Sachin Lande & Neha Lande

811 132<sup>nd</sup> Ave NE Bellevue WA 98005

June 12 2023

Dear Ms. Stead:

## **Please include me as a party of record.**

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. The Wilburton subarea and its residents are dedicated to protecting, restoring, and enhancing the character and liveability of Wilburton, including the Kelsey Creek Watershed system. Natural elements play a vital role in enhancing the quality of life for Wilburton residents, and the Kelsey Creek Watershed Basin system, and all of its other basin streams such as Goff stream, sub-tributaries, and wetlands flowing throughout Wilburton. King County's DRNP Water Quality Index rated Kelsey Creek at NE 8th with a "Moderate" score, and its Oxygen levels, a "Poor" rating score.

As a resident of Wilburton, I support the inception of the Wilburton/NE 8th Subarea Plan Goals:

### **"Wilburton/NE 8th Subarea Plan Goals**

- **To separate residential, recreational, and open space areas from commercial areas and to protect space.**
- **To improve pedestrian accessibility and attractiveness of commercial areas for residents of Bellevue.**
- **To support the provision of commercial services in Wilburton that complement Downtown..."**

and:

**"...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues."**

I also support the following **Land Use Policies** and aligning with the Wilburton/NE 8th Subarea Plan:

**"...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas.**

and are committed to supporting policies protecting and preserving Wilburton's **Natural Determinants Policies**. The natural environment in our Wilburton neighborhood plays a crucial role in providing a sense of well-being.

#### **Natural Determinants Policies:**

#### **"Policies**

**POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin.**

**POLICYS-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek.**

**POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan."**

Wilburton is home to many animals that fall into Washington Fish and Wildlife's priority and endangered habitat and species. They include the Great Blue Heron, the Bald Eagle, Chinook Salmon, Coho Salmon, Sockeye Salmon, Steelhead, bats, owls, hawks, and a variety of different birds.

The City's Determination of Non-Significance is not aligned with the conservation of the City of Bellevue's Critical Areas Regulations for Streams and Riparian Areas, Wetlands, and Habitats for Species of Local Importance including the Kelsey Creek Watershed Report and the City's efforts to protect and maintain the health of Wilburton's critical areas.

[https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2021/KelseyCreek\\_Assessment\\_Report\\_2021\\_1130.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2021/KelseyCreek_Assessment_Report_2021_1130.pdf):

**"The Kelsey Creek Watershed is a vital ecosystem that supports numerous species of wildlife and provides essential ecological services to the surrounding communities. The proposed development of density in these areas including private properties has the potential to significantly impact the delicate balance of the ecosystem,..."** including water quality, habitat fragmentation, increasing runoff, and effects of water temperatures with decreasing tree canopies. Young trees cannot make up for the shade and protection offered by 100-plus-year-old trees. Decreasing tree canopies result in increased water temperatures and may be detrimental to priority animals, as well as the endangered Chinook, Coho, and other salmon. The Greater Kelsey Creek Watershed historically provides extensive spawning and rearing habitat for a larger number of other salmon species such as Chinook, Sockeye, Coho, Cutthroat Trout, Peamouth Minnows, and Steelhead.

The DEIS's Determination of Non-Significance does not align with the City's efforts to restore and protect critical areas in the Kelsey Creek Watershed System (KCWS) due to the limited factors being taken into account. The DEIS was written before House Bill 1110, HB 1337, HB 1181 were passed into law. It also does not include the impact of Covid on the workplace resulting in increased remote employment, Bellevue's pending tree code ordinance, and the impact of the different housing target strategies on the Kelsey Creek Watershed, impervious surfaces, and their effect on endangered species of local importance. The loss of century-old tree canopies and their effect on water and air temperatures, the increasing air and land pollution with increasing traffic, and the decreased habitat and food sources. Also, incentives should not be seen as a substitute for effective stormwater management. Wilburton's watershed and ecosystem require

proper stormwater management measures to mitigate the risks of flooding and water pollution caused by toxic runoff.

Moreover, according to a technical report by Golder Associates and the Watershed Company, the city of Bellevue's DEIS falls short of utilizing the best available science and existing conditions. This critique addresses the impacts of this inadequacy:

1. Information related to traffic and site conditions is incomplete and potentially inaccurate, which hinders environmental evaluations.
2. Protecting the environment leads to the long-term sustainability of the community and its people. It is essential for their health, safety, and quality of life. For example, in the case of Kelsey Creek, the watershed provides critical ecosystem services that directly support the community's health and well-being, such as clean water, clean air, and flood control. Prioritizing the environment can help prevent harm to low-income communities of color, and indigenous people who are disproportionately affected by harmful environmental conditions. Environmental equity addresses these inequalities and provides equal protection and access to clean, and healthy communities.
3. The report encourages low-impact development and retrofits that improve stormwater runoff. Untreated run-off causes pre-spawn mortality on Coho salmon, and depending on future rates of urbanization, localized extinction of Coho salmon could occur within a matter of years to decades.
4. According to the report, Bellevue is in the process of updating its Shoreline Management Act. Under the proposed update, shorelines themselves are not regulated as critical areas, and critical areas within shoreline jurisdiction would be regulated under LUC Part 20.25H. Bellevue has not identified all critical areas in the city.
5. The City of Bellevue's Greater Kelsey Creek Watershed's riparian corridor across all of the sub-basins includes both approximately 90% private properties and 10% publicly owned properties and is critical to species of local importance, aquatic animals, and other wildlife, Peregrine Falcon, Bald Eagles, Red-tailed Hawks, Blue Herons, Pileated Woodpecker, Great Blue Heron, cardinals, hummingbirds, bats, opossums, beavers, bobcats, deer, coyotes, and many others. The diverse range of animals needs to be managed, protected, and maintained as part of the existing riparian corridor structure and function within the entire sensitive ecosystem. This ecosystem provides shelter, food, and protection, and maintains temperatures critical to their survival.
6. Adopting green infrastructure practices to maximize the achievement of objectives, these efforts are expensive and limited.
7. With 90% of the riparian corridor on private properties, the city has not been able to keep up with tracking damages in and near open streams.
8. The City's options are insufficient. The City's plan mitigates some of the side-effects of water overflow. The new plan should focus on preventing runoff from the source, increasing impervious surfaces caused by development. Unanticipated cleanup efforts with increased stormwater runoff may suggest that the city may end up footing the bill, and cause tax-payer runoff plan liability. We need solutions that offer long-term sustainability.























9. Wilburton's Kelsey Creek has the greatest amount of impervious surface areas. Increasing mixed-use developments, multi-unit dwellings, increasing cars and toxic waste from their tires, and increasing construction will cause even greater impervious surface areas with increasing toxic stormwater runoff.

Subbasin	Commercial/ Office (%)	Highway (%)	Industrial (%)	Mixed- use (%)	Multi- Family (%)	Park (%)	Single- family (%)	Total (ac)
Richards Creek	13.3%	1.9%	8.1%	4.8%	17.0%	10.2%	44.8%	1380
Sunset Creek	5.6%	6.3%	1.0%	2.4%	1.6%	4.0%	79.2%	854
West Tributary	8.4%	2.4%	0.0%	26.2%	4.4%	9.2%	44.2%	958
Goff Creek	8.4%	0.8%	0.0%	10.3%	0.0%	4.4%	76.2%	529
Valley Creek	7.2%	2.0%	0.0%	5.0%	15.0%	10.0%	60.8%	1300
Sears Creek	32.7%	3.0%	0.0%	21.8%	9.8%	0.0%	32.8%	355
Greater Kelsey Creek Watershed	11.8%	2.9%	1.7%	8.4%	11.0%	11.3%	51.8%	10376

Table 7 compares the change in canopy cover and impervious surfaces between 2006 and 2017 for the nine subbasins and the Greater Kelsey Creek Watershed (HRCd 2021). The Sears Creek Subbasin and the Sturtevant Creek Subbasin experienced the largest tree canopy loss and impervious surface increase of all the subbasins in the Greater Kelsey Creek Watershed.

**Table 7. Change in Tree Canopy and Impervious Surfaces from 2006 to 2017 in the Greater Kelsey Creek Watershed**

Subbasins	Tree Canopy Loss (2006 – 2017)		Impervious Surfaces Increase (2006 – 2017)		Primary Agent of Change
	Change	Trend	Change	Trend	
Goff Creek	0.4 %		0.5 %		Development
Kelsey Creek	1.0 %		1.0 %		Development
Mercer Slough	1.5 %		1.1 %		Development
Richards Creek	1.5 %		1.1 %		Development
Sears Creek	3.9 %		3.4 %		Development
Sturtevant Creek	2.2 %		3.8 %		Development
Sunset Creek	0.5 %		0.7 %		Development
Valley Creek	0.5 %		0.2 %		Tree removal
West Tributary	1.2 %		0.7 %		Development
Total Greater Kelsey Watershed	1.2 % (133 acres)		1.2 % (125 acres)		Development

data source: <https://hrcd-wdfw.hub.arcgis.com/>

Based on changes in tree canopy and impervious area data, since 2006 there has been a large amount of development in the majority of the Watershed's subbasins. Table 7 shows the decrease in tree canopy and increase in impervious surfaces associated with rapid development and urbanization—where development indicates the conversion of a vegetated lot or parcel into a built lot or parcel, and redevelopment indicates building on a previously developed lot. With development across so much of the Greater Kelsey Creek

10. Recommendation: Require the Washington Department of Ecology and the Washington Fish and Wildlife to work together to form Natural Determinant Land Use Policies for Wilburton and all of Bellevue's critical areas, and create policies regarding impervious surface areas.

**As noted below, the impervious surface areas in the Kelsey Creek Watershed are increasing due to development.**

Greater Kelsey Creek Watershed and its connecting tributaries is a critical urban watershed for the City of Bellevue. It is one of the few watershed areas in a city the size of Bellevue remaining in the entire USA. As described in the 2003 Bellevue Critical Areas Update Best Available Science Paper: **Wildlife, forested steep slopes, and riparian areas comprise the majority of Bellevue's remaining habitat corridors and linkages.** It must be managed carefully over the next few decades to protect and preserve its unique aquatic and terrestrial values. Once developed and the 100-year-old trees felled for development, all inhabitants in the watershed that relied on the natural environment for survival will be gone forever from Wilburton."

Greater Kelsey Creek Watershed and its connecting tributaries is a critical urban watershed for the City of Bellevue. It is one of the few watershed areas in a city the size of Bellevue remaining in the entire USA. As described in the 2003 Bellevue Critical Areas Update Best Available Science Paper: **Wildlife, forested steep slopes, and riparian areas comprise the majority of Bellevue's remaining habitat corridors and linkages.** It needs to be managed carefully over the next few decades to protect and preserve its unique aquatic and terrestrial values. Once developed and the 100-year-old trees felled for development, all inhabitants in the watershed that relied on the natural environment for survival will be gone forever from Wilburton.

#### Other Considerations:

**Control Totals:** On January 23, 2023, Dave Andersen, managing director of the Growth Management Services unit presented one of many sessions on getting periodic update planning right. He identified having the same control total targets for each alternative as critical. The growth strategy is to determine what are different ways of achieving the growth target. We find the DEIS has a wide range of targets. Bellevue Residents understand higher targets have higher impacts. This does not result in an understanding or critique of the strategy. In addressing this deficiency, the City will need to address the same target in each of the alternatives and show how all alternatives would meet the same need, including the "no change" alternative.

**House Bill 1110 Increasing Housing Supply and Density:** On May 8, 2023, Governor Jay Inslee signed House Bill 1110, which legalizes duplexes and fourplexes in most neighborhoods in nearly every city in the State of Washington, including the City of Bellevue, which was intended to increase the state's housing supply. House Bill legalizes six-plexes near transit and for affordable housing. House Bill 1110 [overrides local zoning rules](#) that have long kept large areas in cities for only single-family homes. The new law will not ban the construction of single-family homes, but it will stop cities from requiring neighbourhoods to have only single-

family homes. However, this DEIS was prepared prior to passage of House Bill 1110, and Bellevue residents have no idea how the House Bill will affect any of the alternatives. It is likely that fewer new multi-family units will be needed as shown in Alternatives 1, 2, and 3. The no-action alternative will also need to address application of House Bill 1110 since the state law will now allow continued expansion of housing in Bellevue without application of the proposed alternatives. In addressing this deficiency, the City will need to either develop a new alternative or address this House Bill in each of the alternatives, which may result in an increase or decrease in the number of housing units needed.

**House Bill 1337 Expanding Housing Options.** This bill expands housing options through easing barriers to the construction and use of accessory dwelling units, and was partially vetoed by the Governor. However, the primary components of the bill would remain, thus, affecting the number of new housing units that may be needed to accommodate new employment in any given city within Washington State. Thus, the number of new housing units for the City of Bellevue would need to be determined. An example of how this bill could affect housing would be in the State of California whereby the bill was passed and fewer new homes were needed as a result. Thus, HB 1337 has a strong potential of affecting the no-action alternative, along with Alternatives 1 to 3.

**House Bill 1181. Climate change and resiliency.** This bill includes a climate change and resiliency component that is required to be included in city comprehensive plans. The bill is intended for cities to mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles travelled; prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental economic, and human health and safety; and advance environmental justice. Much of this is already included in the DEIS in Appendix G (Relationship of Climate Change Vulnerability to the Alternatives) but specific compliance with the bill is not included because Governor Inslee only signed the bill on May 3.

**2023 Legislative Session:** The Growth Management Policy Board states that these bills result in significant changes to the Growth Management Act and will impact local plans. The Board received a will receive a detailed recap of the 2023 legislative session which highlights these bills on June 1, 2023. Thus, the impact of these bills has not yet been well understood or could have been included in the DEIS. We cannot expect our Bellevue residents to have an understanding of these bills at the time.

**Covid:** The Covid-19 pandemic sparked a new [working-from-home economy](#) where many workers have the flexibility to work remotely from home. This unprecedented shift to remote work will be occurring in some form over the next 20 years. Now, roughly six-in-ten U.S.

workers who say their jobs can mainly be done from home (59%) are working from home all or most of the time. Working from home results in changes in office use and transportation resulting in a declining need to live in Bellevue when working in Bellevue. This is a fundamental flaw where the DEIS is not addressing employment and residency adequately based on recent changes to office uses. Many employees are now moving outside of the city and then commuting to their workplace only once or twice a week. The DEIS should be revised to reflect this change in how employees will work and live in Bellevue in the housing, office, and transportation components of the DEIS. See also Attachment D

**Updated Tree Code:** The City of Bellevue plans to update its tree code in 2023, which will have significant effects to new construction. This tree code may, hopefully, provide better protection for significant trees and require contractors and builders to redesign multi-family and single-family homes to protect these trees. The Tree Code may also deter contractors from building on sites with significant trees. Thus, BTCC is requesting that the DEIS Comprehensive Plan describe how the tree code will affect planned protection of significant trees. The City of Bellevue Urban Tree Assessment (July 2022) stated that land use changes are an important factors of the urban environment and can contribute to changes in citywide canopy numbers. As described in the Urban Tree Assessment, it is important for the City to use this assessment to inform future investments in the urban forest so that all those who live, work, and play in Bellevue can benefit from the urban forest. The City must proactively work to protect the existing urban forest and replenish the canopy with additional native trees. Nowhere in the DEIS do the alternatives address how the existing urban forest will be protected. We are hoping that the DEIS will address replacing lost trees with native trees, and that the Comprehensive Plan show synchrony with its Urban Tree Assessment, as well with the planned updated tree code. Which alternatives may be best for protecting our urban trees?

**Homelessness.** Finally, the City must address how homelessness will be avoided or minimized under the each alternatives of its comprehensive plan. Although the City is investing in facilities such as shelters, transitional housing and affordable housing units for those living in vehicles or unsheltered in the community, how will these additional housing units affect homelessness and will some units be available to homeless people? If the City of Bellevue's notes that affordable housing, especially in the lowest income brackets, is critical to help individuals transition out of homelessness and maintain housing, then why is this not discussed on the DEIS?

**Historic Resources:** Bellevue's historic Wilburton neighbourhood is an enclave of single-family and multifamily housing known for its rich history and its parks and wooded areas with close proximity to downtown Bellevue. Wilburton is also home of the acclaimed Bellevue Botanical Gardens, and the largest watershed in Bellevue.

It is nearly impossible to keep up with every possible land use bill and in the annual legislative session. These bills passed in this legislative session are important for the comprehensive plan in any city, and if not covered under this DEIS then an amendment would be needed. An amendment would take more time and it would be more costly to the City of Bellevue. We

recognize the significant effort already undertaken for this DEIS but we also desire to review a complete DEIS that includes passage of bills and regulations that have occurred in 2023.

Thank you for the opportunity to comment and we look forward to working with you and your staff in creating a City of Bellevue comprehensive plan that is complete, meaningful, and applicable for immediate use.

Sincerely,

*Sachin Lande and Neha S Lande*



June 12, 2023

Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Re: Bellevue 2044 Comprehensive Plan DEIS Comment  
Bellevue Technology Center – Support for Alternative 3 with Mixed-Use Midrise

Dear Reilly:

On behalf of Bellevue Technology Center, we appreciate the opportunity to comment on the City's Comprehensive Plan Draft Environmental Impact Statement (DEIS). As you know, the Bellevue Technology Center is the heart of the City's BTC Area neighborhood center in Northeast Bellevue. Bellevue Technology Center is also identified as a Transit Proximate Area.

The DEIS notes that diverse land uses in the Transit Proximate Areas can "reduce vehicle miles traveled, encourage physical activity for residents and employees, and improve equitable access to amenities and community gathering spaces." DEIS, pg. 3-37. We strongly agree.

We encourage the City to adopt a Mixed-Use Midrise designation as the Preferred Alternative to support infill transit-oriented development at the Bellevue Technology Center.

The City must ensure that development under the Mixed-Use Midrise designation is achievable, including supporting the variety of residential uses contemplated with these zones. The DEIS does not disclose or evaluate Northeast Bellevue subarea policies that are inconsistent with a mixed-use designation, such as Policy S-NE-7 that prohibits multifamily uses at Bellevue Technology Center, along with nearby parcels in Northeast Bellevue Districts 1 and 2. The Land Use Code currently allows for senior housing and other residential uses in these Northeast Bellevue districts. The Preferred Alternative must also allow the full variety of residential uses.

As always, thank you for your consideration. Please contact me with any questions.

Sincerely,  
s/Jason Espiritu



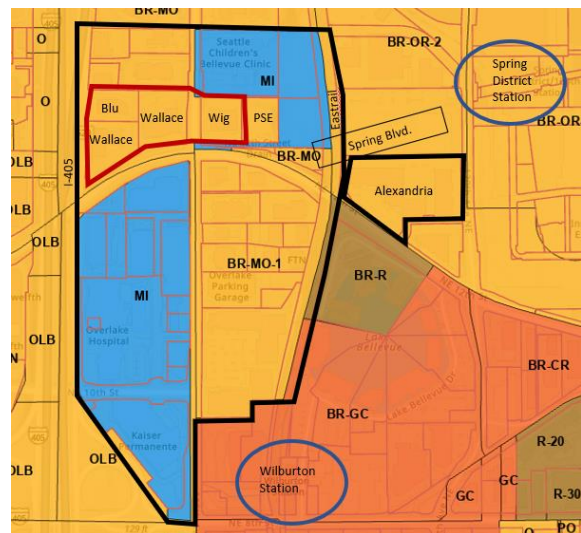
June 12, 2023

Reilly Pittman  
 Planning Manager  
 City of Bellevue  
 Department of Community Development  
 450 110<sup>th</sup> Avenue NE  
 Bellevue, WA 98004  
 Via Email: [compplan2044eis@bellevuewa.gov](mailto:compplan2044eis@bellevuewa.gov)

Re: 116<sup>th</sup> Avenue Coalition Comment Letter to Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement (DEIS), Issued April 27, 2023

Dear Reilly:

Thank you for the opportunity to comment on the Draft EIS for the Bellevue 2044 Comprehensive Plan Update. The 116<sup>th</sup> Avenue Coalition is submitting comments on behalf of property owners representing the privately owned land adjacent to the north side of NE 12<sup>th</sup> Street between I-405 and Spring Boulevard, located at the addresses in the table below, and outlined in red in the map (collectively, the **“Property”**). On October 31, 2022 we provided a letter explaining that the existing zoning for the Property precludes any viable redevelopment, requesting an extension of the future BR-MO-1 zoning north to include the Property and the other parcels outlined in black in the drawing, and explaining that enabling this increase in allowed development density is justified given the proximity of the Property to the soon-to-be-opened light rail stations at Spring District and Wilburton (*see current zoning map above*).



Address	Parcel	Owner
1407 116 <sup>th</sup> Ave. NE	292505-9023	Wallace Properties – Washington Park LLC
1414 116 <sup>th</sup> Ave. NE	282505-9105	Wig Properties LLC – Bell3
1417 116 <sup>th</sup> Ave. NE	292505-9307	Wallace Properties – Washington Park LLC
1427 116 <sup>th</sup> Ave. NE	292505-9329	Blu Compass LLC



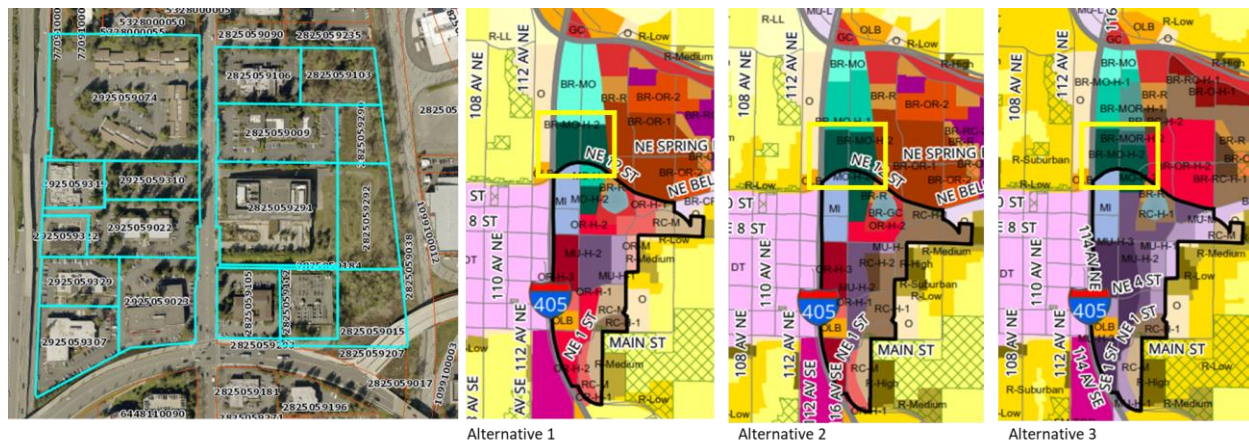
June 11, 2023

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In this letter, we:

- Continue to request that the Property receive the same future Comprehensive Plan designation and zoning as our neighbors to the south.
- Support the City's designation of the Property as BR-MO-H-2 (which is the same designation as our neighbors to the south) in all three Alternatives in the Citywide study.
- Request that the FEIS include the Property in the Wilburton Study Area as well.
- Provide the results of our studies as to the suitability of the heights called for in Alternatives 2 & 3 to development of the Property and cohesiveness with the surrounding area. The studies are provided for reference in **Attachment A**.
- Provide additional comments to the DEIS and recommendations for improvements to the land use code to support of viable redevelopment of the Property and a competitive medical and life sciences district.

The drawing below shows the parcel map that corresponds to the yellow-highlighted area on Alternatives 1-3 Citywide zoning maps in Appendix B. All three alternatives designated the Property as BR-MO-H-2, which is described on Appendix B's Land Use Map Key as "Medical office & life sciences with ground floor active uses in highrise towers up to around 24 stories."<sup>1</sup> We also support the inclusion of the parcels north of the Property in the same zone, and refer to the Property and these additional parcels as the **"Expansion Area"**.



As it pertains to the rest of the corridor, Alternative 1 would produce an odd stepdown of the land to the south (BR-MO-H-1) by permitting only 16 story buildings south of NE 12<sup>th</sup> Street but 24 story buildings to the north. Alternative 1 would also leave the land to the north of the Expansion Area (BR-MO) inappropriately underzoned as well.<sup>2</sup> In terms of building heights and transition, we support either Alternative 2 or 3, as they provide the same zoning to the south and a reasonable

<sup>1</sup> Appendix B is incorporated into the DEIS document in **Section 1.6, Additional Analysis**, where it states that Appendix B relates to Chapter 3 and provides additional information on zoning designations and overlay districts. **Section 3.1, Introduction**, refers to Appendix B.

<sup>2</sup>The current BR-MO zone has a maximum FAR of 1.0, which effectively precludes development of all but raw land. The City should consider updating the zoning at the north end of the corridor to something that is viable for redevelopment, and entirely eliminating BR-MO from the code, or attributing much more significant FAR to BR-MO.



June 11, 2023

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transition point to the north where the scale of building heights, and presumably density, reduces for the land outside of the light rail stations' 15-minute walkshed.

We appreciate the City's continued support for medical and new focus on life sciences, which is appropriate for the area given the presence of Overlake Hospital, Childrens Hospital and Kaiser Permanente, and the proposed life sciences project at the intersection of Spring Boulevard and 120<sup>th</sup> Ave. NE. Extension of the Hospital District in this manner, and proposing zones that facilitate efficient medical office and hospital development (discussed below), will support the existing hospitals and enable growth of medical and life sciences jobs on the Eastside. Doing so supports the City's economic development goals and diversifies its jobs base, all consistent with the City Council's Economic Development Vision, and consistent with other planning goals.

In the FEIS, we ask that the City amend the Wilburton Study Area to include the Expansion Area. From a planning standpoint, the 116<sup>th</sup> corridor has a stronger relationship with the properties included in the Wilburton subarea to the south of NE 12<sup>th</sup> Street than the Bel-Red Area to the east. The BR-MO-1 properties to the south of NE 12<sup>th</sup> Street are included in the Bel-Red Study Area, but they have also been added to the Wilburton Study Area. The Expansion Area should be included as well. As we indicated in our previous letter, treating the Property the same as the currently-zoned BR-MO-1 properties to the south is appropriate because the siting and completion of the light rail stations and Spring Boulevard brings the Property within the walkshed of the stations. This is true of the Expansion Area parcels if the 15-minute walkshed is used. The current 1.0 maximum density for the Property precludes redevelopment of the land. We would like to have the ability to start planning for development under zoning that matches the property to the south as soon as possible, and would prefer not to have to wait for the Bel-Red update to be completed.



Last year we asked the City if we should submit for a site-specific rezone or participate in the current Comp Plan Update, and were asked to do the latter. If the Property is not going to be included in the Wilburton Study Area we would like to see provisions that make it easier for us to complete a site-specific rezone to the same land use designation as the property to the south; as such, we ask that the FEIS study the Property as the same land use designation as the property to the south.

June 11, 2023

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**Please consider the following code provisions for the Property zone (BR-MO-H-2 or otherwise):**

- Allow multifamily residential as a permitted use (not currently allowed in BR-MO-1). Vertically integrated mixed use buildings with medical services on the ground floor and residential above are viable. Wallace Properties is currently building an apartment project in Green Lake with a Swedish Medical Clinic on the ground floor. Horizontally integrated projects, such as the Alexandria/Burnstead project on Spring Boulevard, with life sciences and apartment buildings on the same site, are also viable. Permitting this flexibility can help realize both the job and housing goals stated in the Comp Plan Update. Residential or hospitality in close proximity to hospital uses serves patients and hospital workers alike.
- Allow restaurants, retail, professional services, R&D, and computer programming as permitted uses. Current BR-MO-1 zoning does not permit restaurants, many types of retail or professional services, other, computer programming or R&D services. The increased density in the new zone creates the opportunity for integration of retail uses with medical. Projects should not be prohibited from leasing space to non-medical professional services tenants. The new focus on life sciences means that computer programming and R&D should be permitted. Hospitals and life science uses thrive in areas where supportive services to hospital patients and workers are permitted outright; doctors, patients, lab workers and nurses need places to eat and drink, and places to buy things.
- Dimensional requirements. The zone should include the following:
  - For non-residential buildings, allow 30,000 GSF/F Floor Plates to 150' and 24,000 GSF/F above, with floorplate averaging. BR-MO-1 currently allows 28,000 GSF/F up to its height limit of 150'. The 30,000 GSF/F floorplates will improve the viability and competitiveness of life sciences buildings. 24,000 GSF/F is consistent with the floorplate limits for highrise buildings in Downtown zones, such as O-1 and OLB, and is important for highrise office viability.
  - For residential buildings, a 9,000 GSF/F limit is too small. Consider the 13,500 limit in downtown, and a 20,000 GSF/F limit for buildings 150' and below.
  - The impervious surface limits for the Washington Park and Blu Compass parcels are problematic because the grade of the existing street is so much higher than the existing land. Ideally we would build a level parking structure across the site and provide outdoor plaza at the street level. Impervious surface and lot coverage should be increased to 100% in all urban areas; stormwater codes and landscaping requirements can account for stormwater and aesthetic mitigation.
  - Please measure height in feet, not stories (we understand this is how the zoning will be drafted). The height of this zone should be at least 250' to allow for a 17-story R&D or hospital building.
  - Our studies show the maximum FAR will need to be approximately 8.0 to support buildings of this scale on the Property.
  - The existing parking minimums in 20.25D.120 are too high to be viable for highrise, high density development. Please analyze the required parking needs and set the minimums appropriately. Within these light rail walksheds, consider reducing parking minimums to zero and allowing the market to dictate parking supply.

June 11, 2023

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**Section Comments.**

<b>Section</b>	<b>Comment</b>
1.3	Include the Expansion Area in the Wilburton Study Area.
1.7	The analysis of the elements listed in this summary for Wilburton would not change if the Expansion Area were included. Since the Expansion Area is already being analyzed as BR-MO-H-2, the Land Use Patterns and Urban Form, Aesthetics, Housing, Air Quality, Noise, Public Services and Utilities and Transportation all have the same outcomes whether the Expansion Area remains only in the Citywide analysis or is included in the Wilburton Study Area.
2.1	<i>As it pertains to the Mixed-Use Centers</i> , we support Alternative 2 or 3 to be adopted as the Preferred Alternative in the FEIS. Either of these alternatives produce an aggressive amount of new growth by historical standards. Whether to pursue an outcome close to 2 or 3 depends on the ability to mitigate recognized impacts, particularly transportation impacts.
2.2	Include the Expansion Area in the Wilburton Study Area.
2.3	Modifying the Expansion Area to BR-MO-H-2, or a zone consistent with the property to the south, is consistent with the Bellevue City Council Principles for the Wilburton Study Area – particularly the goal of integrated station area planning, since the Expansion Area is within the station area/walkshed of the Wilburton and Spring District light rail stations, and economic vitality, given the opportunity to create jobs. The location of the Expansion Area does not pose adverse impacts on any nearby residential neighborhoods.
2.3.3	The Changes to Alternatives as a Result of Scoping Comments provides, “Expansion of the [BR-MO-1] node in all three alternatives reflecting similar changes to the BelRed Medical Office (BR-MO-1) density south of NE 12 <sup>th</sup> Street.” This expansion of the node has led to the Expansion Area being designated BR-MO-H-2, which is appreciated. This decision also justifies inclusion of the Expansion Area in the Wilburton Study Area.
2.3.4-2.3.7	We support the proposal in Alternatives 1, 2 and 3 to zone the Property as BR-MO-H-2, or a matching zone to the south, provided that residential, retail, R&D, and restaurants are permitted uses. Either of Alternatives 2 or 3 are acceptable for the Expansion Area. Alternative 0 does not meet the goals stated in the DEIS and Alternative 1 is not favored because it would produce an odd reduction in height (15 stories) for the properties south of NE 12 <sup>th</sup> , while leaving the Expansion Area height limit at 24 stories.
3.2	Placing the Expansion Area within the Wilburton Study Area may result in some need to revise the statistics in this section, but the overall impact to Wilburton would be nominal.
3.2.2	As shown in the map below, the Expansion Area is subject to a number of critical areas, particularly steep slope critical areas, that may hinder redevelopment if current City code requirements continue to apply. The City must study the Plan’s impacts to steep slope areas, and the Critical Areas Ordinance’s impact on the delivery of density, or risk an inadequate EIS. The DEIS does not include adequate analysis of the Plan’s potential impacts to critical areas, including streams and steep slopes. The lack of analysis renders the EIS potentially inadequate. As part of this analysis, the City should analyze the impacts of the Critical Areas Ordinance on the deliverance of density such that decisionmakers can understand the impacts the steep slope

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	regulations and stream buffers may have on density. The DEIS portrays areas as “developable” when the opposite is true due to the application of the steep slopes portion of the Critical Areas Ordinance. Manmade steep slopes currently impact our properties; these manmade steep slopes are currently regulated just as a true steep slope hazard area on a natural cliff would be. The City must study the impact of the ordinance on density and disclose impacts such that decisionmakers are aware of the potential that proposed density may not be feasible under current regulations. Please incorporate such analysis into the Preferred Alternative in the FEIS.
3.3	Including the Expansion Area in the Wilburton Study Area and rezoning to BR-MO-H-2, or the same zone to the south would further the ability to meet the growth targets. The large land areas in the Expansion Area would enable appropriate transitions between zones, and this issue could be further ameliorated by including the entire 116 <sup>th</sup> corridor in the Wilburton Study Area. Displacement and access to community assets is not affected by including the Expansion Area in the Wilburton Study area.
Ch. 4	Including the Expansion Area in the Wilburton Study Area has no impact on this Chapter.
Ch. 5	Including the Expansion Area in the Wilburton Study Area has no impact on this Chapter.
5.4.3	Mitigation measures related to business displacement should be carefully studied in the FEIS and such impacts disclosed to decisionmakers. Requiring displaced businesses be given a “right to return” or requiring Community Benefit Agreements in a development raises troubling legal and procedural questions. If the City determines it should act to assist displaced businesses, it should incentivize small businesses with bonuses in the Land Use Code, and it should do other things to encourage ease of movement for small businesses like no parking minimum for a relocated business, streamlined tenant improvement permits for small businesses, and consider an increase in SEPA thresholds for relocated businesses so that relocation does not require onerous SEPA review. The City’s idea of an “MFTE” program for small business location is a creative idea that could actually result in small business retention. The City should first review policies and procedures that currently exist in Bellevue that reduce the ability of a business to locate and operate in the City of Bellevue before reducing redevelopment opportunity. The impact of such mitigation measures should be studied and disclosed in the FEIS.
Ch. 6	The Expansion Area is surrounded by commercial properties north and south, I-405 to the west and the rail corridor and PSE substation to the east. This means there would few, if any, aesthetic impacts to the surrounding area from its redevelopment in a manner consistent with the proposed BR-MO-H-2 zoning, from making the modifications to the BR-MO-1 code that we request on pages 3-4 above, nor from inclusion of the Expansion Area within the Wilburton Study Area. Redevelopment of these sites would not interfere with any viewsheds, cast undue shadows on homes, and the buildings would be designed to reduce/eliminate light and glare impacts. Including the Expansion Area within the Wilburton Study Area would enable the City to impose the same standards on the Expansion Area as the remainder of the BR-MO-H-2 zoned land.
Ch. 6	The DEIS states that additional transition measures or other measures to reduce Aesthetic Impacts could be considered as mitigation. We strongly suggest that such mitigation measures be limited for the BR-MO-H-2 zone. As stated above, the property that the DEIS proposes to receive this zoning designation is surrounded by I-405, the rail corridor and other commercial

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	<p>properties. Accordingly, the transition measures should not be applied. Allowing flexibility in design is important such that buildings are constructed per market needs—i.e., medical office buildings and technology buildings should be allowed larger floor plates. Street or upper level setbacks should not be required in a dense urban environment surrounded by two freeways. Shadows on private property should not be regulated. Views from freeways, and private views, should not be regulated. Any protected public views should be very clearly and narrowly defined. Please include this analysis in the FEIS.</p>
Ch. 7	<p>Alternatives 2 and 3 both contain concerning language about the need for “deeper affordability” to receive a majority of new units that are affordable to &lt;80% AMI. We request that the City closely study the economic and legal issues surrounding housing affordability requirements. Any proposed affordable housing program must be legal, meaning it cannot require a disproportionate share of affordable housing/payment for affordable housing beyond a project’s impacts to affordable housing. Any program must be consistent with HB 1220, which requires “honest planning” to achieve required housing targets. Assuming it is structured reasonably, we support the notion of a “voluntary inclusionary affordability program” in Mixed Use Centers and Neighborhood Centers as stated in Alternative 2 and oppose a “mandatory inclusionary affordability program” in Mixed Use Centers as stated in Alternative 3. Bellevue’s current program for incentivizing 80% AMI affordable housing production, and creating more units through the use of MFTE, should continue. Achieving affordable housing targets below that level, particularly in the 0-30% and 30-50% AMI ranges is not viable through an inclusionary housing program aimed solely at developers. Instead, the City must study and consider the full range of the tools currently available to the City to provide housing at these AMI levels, and ensure that any program does not negatively impact the production of jobs or housing in Bellevue. Such tools to produce a large number of 0-50% AMI units could include a housing levy, a fee-in-lieu program, and housing vouchers. Please disclose these tools to decisionmakers and include this analysis in the FEIS.</p>
Ch. 8	<p>The long-term benefits of redeveloping existing buildings with new projects that are mandated by State code to provide high quality HVAC systems should be considered. In other words, enabling new development is a long-term benefit to air quality. Including the Expansion Area within the Wilburton Study Area has no impact on air quality.</p> <p>“Air quality buffers” from pollution-generating streets impact density production and their impacts must be properly analyzed and disclosed to decisionmakers. The mitigation measure is not well-defined; based on Wilburton’s location, most of Wilburton could qualify for being located in a high air pollution area given its location proximate to I-405 and other major arterials. The City also suggests requiring very expensive air handlers for residential projects near freeways that would significantly increase the cost of housing in Bellevue. The City should carefully study what would happen to its density projections if such a mitigation measure is adopted, and instead the City should consider recommending less severe mitigating measures such as some of those stated in the DEIS: constructing air pollution buffers along freeways and arterials, and reducing Vehicles Miles Traveled (“VMT”) through transportation mitigation measures. Reducing the source of pollution as much as possible should be the first mitigation measure. Please study the impact of inclusion of this mitigation measure in the FEIS.</p>
Ch. 9	<p>The Property, and much of the Wilburton Study Area, lies in proximity to I-405. Bellevue’s current standards for noise control in BCC 9.18.045B.A requires incorporation of sound</p>

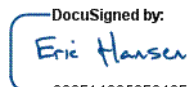
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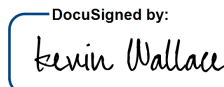
Page 8 of 8

	<p>attenuation measures intended to reduce interior noise levels to 40 dba in sleeping areas near areas with 65 decibel exterior ambient noise levels, as opposed to the 45 dba stated in the DEIS. The 40 dba level is out of step with similar cities, has resulted in excessively expensive housing costs and will lead developers to seek nonresidential development options for sites near the freeway. We encourage the City to research and implement a more appropriate decibel level.</p> <p>Including the Expansion Area within the Wilburton Study Area has no impact on noise issues.</p> <p>Noise mitigation from existing sources of noise such as roads should not be considered in a dense urban City. Requiring interior noise requirements along noisy arterials of 45 dBA or lower will place a significant cost burden on new projects that will be passed along to tenants. These onerous requirements could impact the ability of a Hospital District to form. Please study the impact a potential noise buffer area and other excessive noise mitigation requirements would have on the ability for transit-oriented density to be achieved in the Hospital District. The impact of such mitigation measures should be disclosed in the EIS.</p>
Ch. 10	Including the Expansion Area within the Wilburton Study Area has no impact on public services and utilities.
Ch. 11	The Property is located adjacent to two primary arterials, within the walkshed of two light rail stations, and is well served by bus transit, bicycle and pedestrian facilities. Changing the zoning to BR-MO-H-2, or zoning to match the properties to the south, will not result in undue transportation impacts. Including the Expansion Area within the Wilburton Study Area has no impact on transportation.

In summary, we appreciate your work in the DEIS, would appreciate the property being considered for inclusion in the Wilburton Study Area, and if inclusion is not possible we would appreciate studying a zone that allows a site-specific rezone to a similarly dense zone to occur more quickly than the Bel-Red look forward. Thank you for the opportunity to comment. We look forward to working with you in the future.

Sincerely,

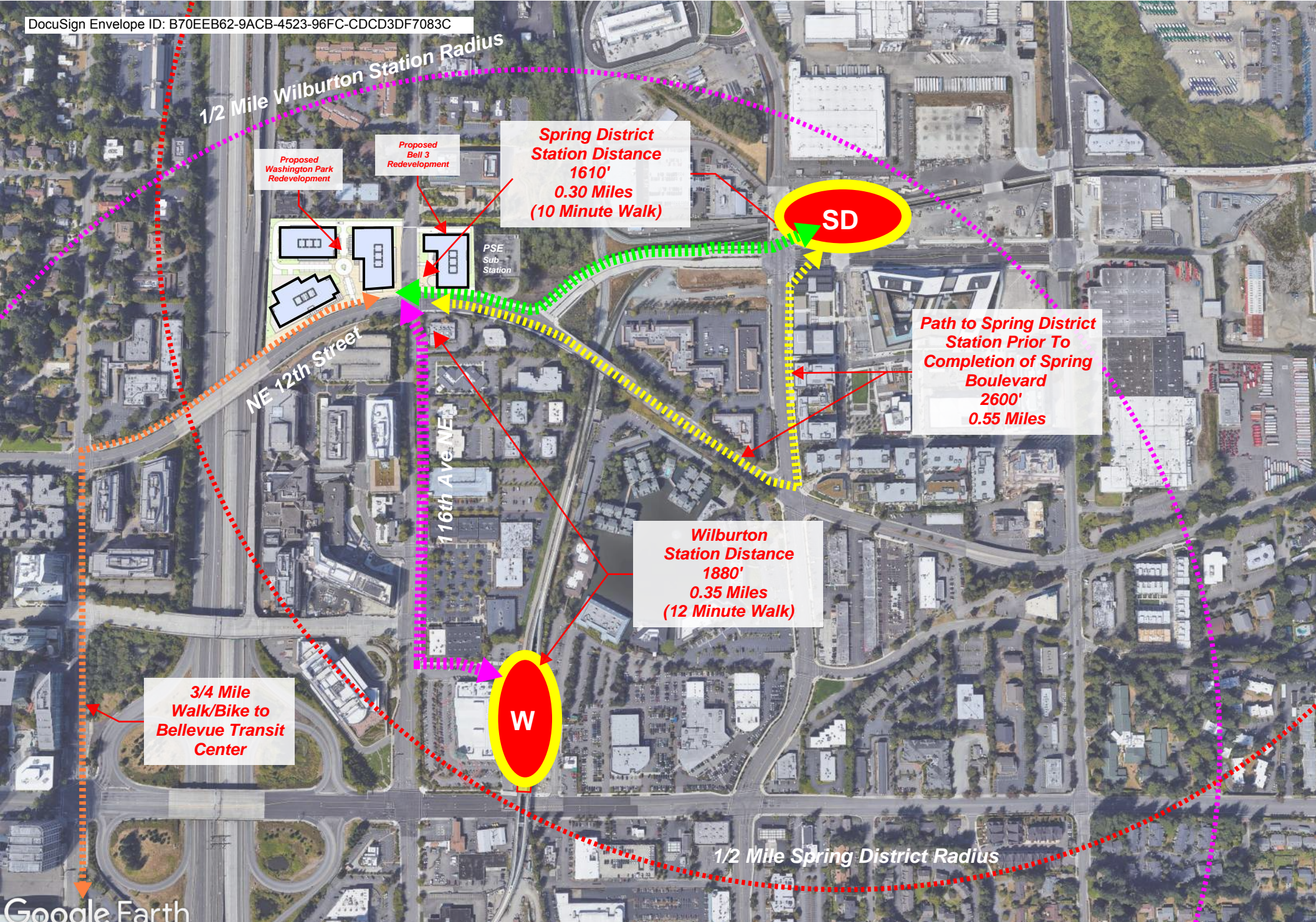
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 Kevin Wallace  
 Manager,  
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 Washington Park LLC

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 Leshya Wig  
 Partner/Managing Director,  
 Wig Properties LLC

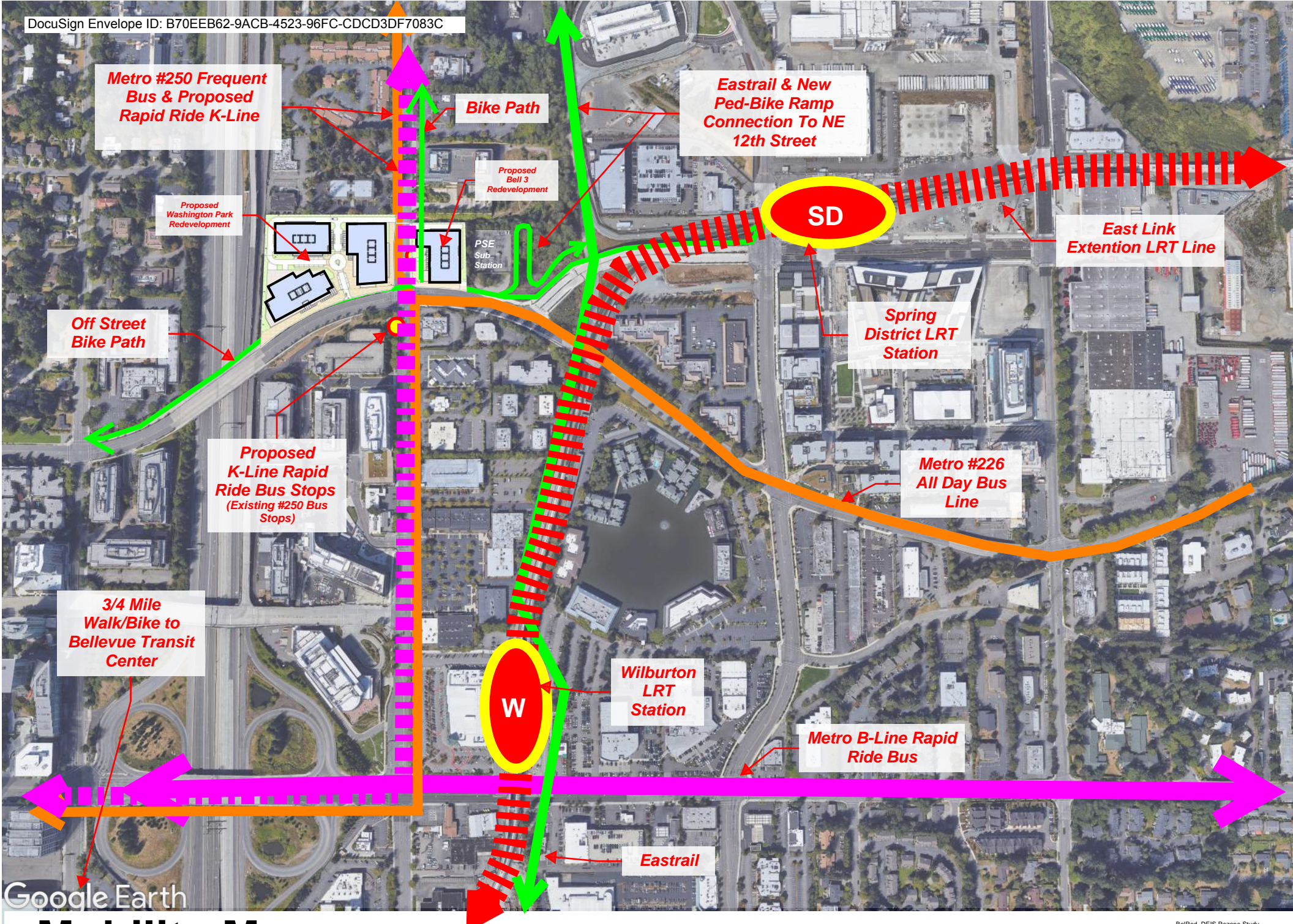
Attachment A: Light Rail Station Proximity; Mobility Map; Light Rail Station Walkshed Maps;  
 Development Propensity Map and Views.





# Light Rail Station Proximity



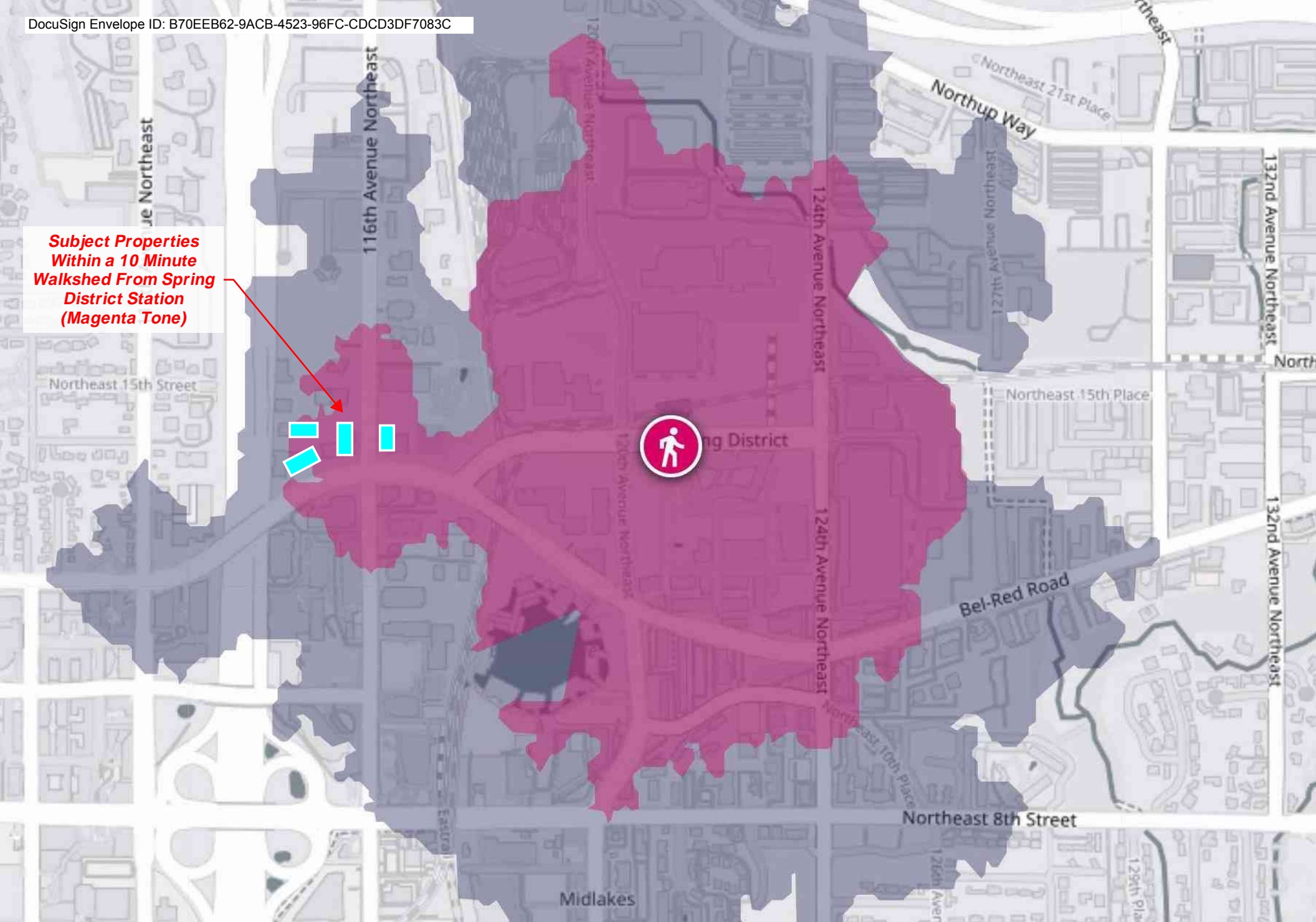






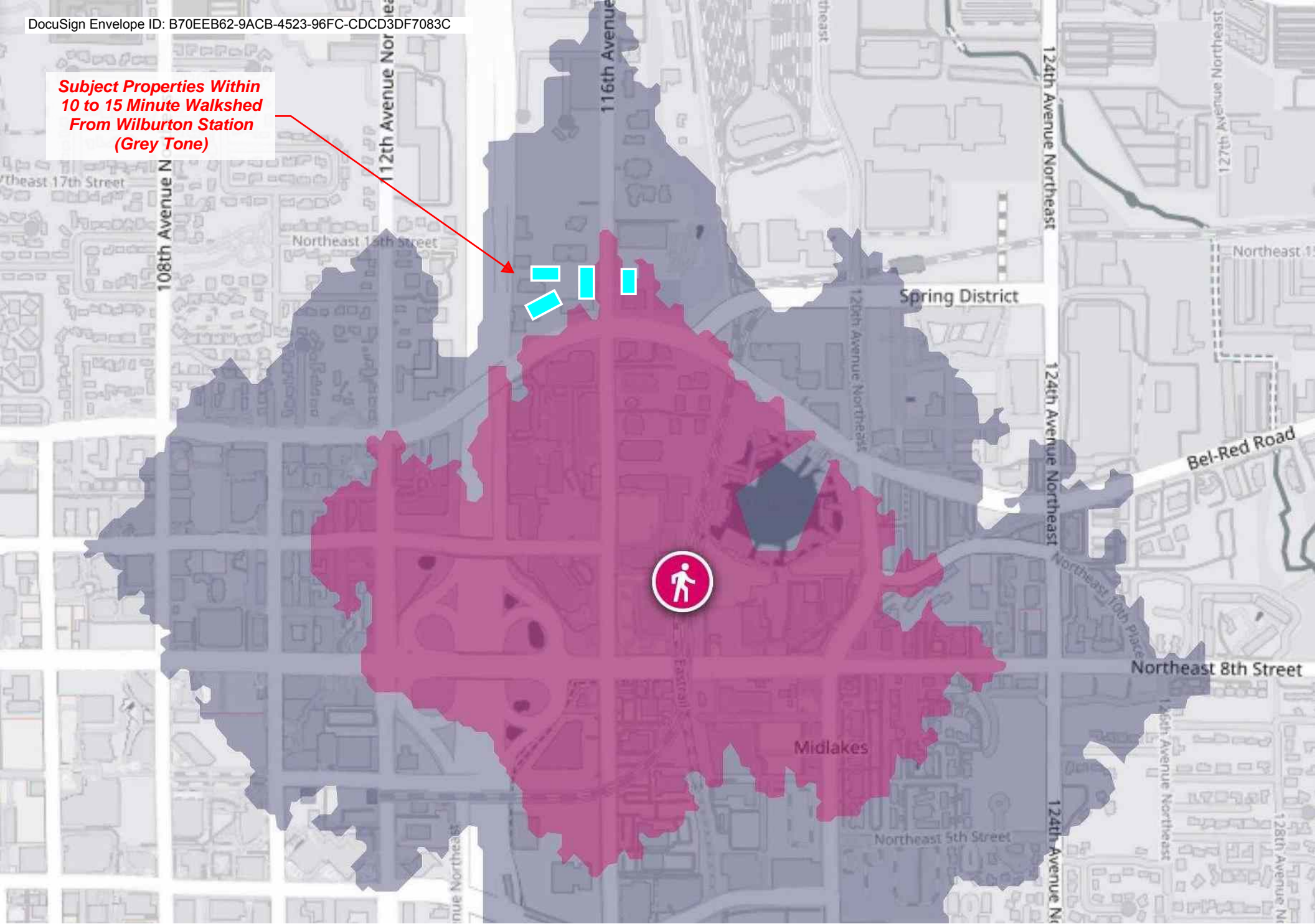


**Subject Properties  
Within a 10 Minute  
Walkshed From Spring  
District Station  
(Magenta Tone)**



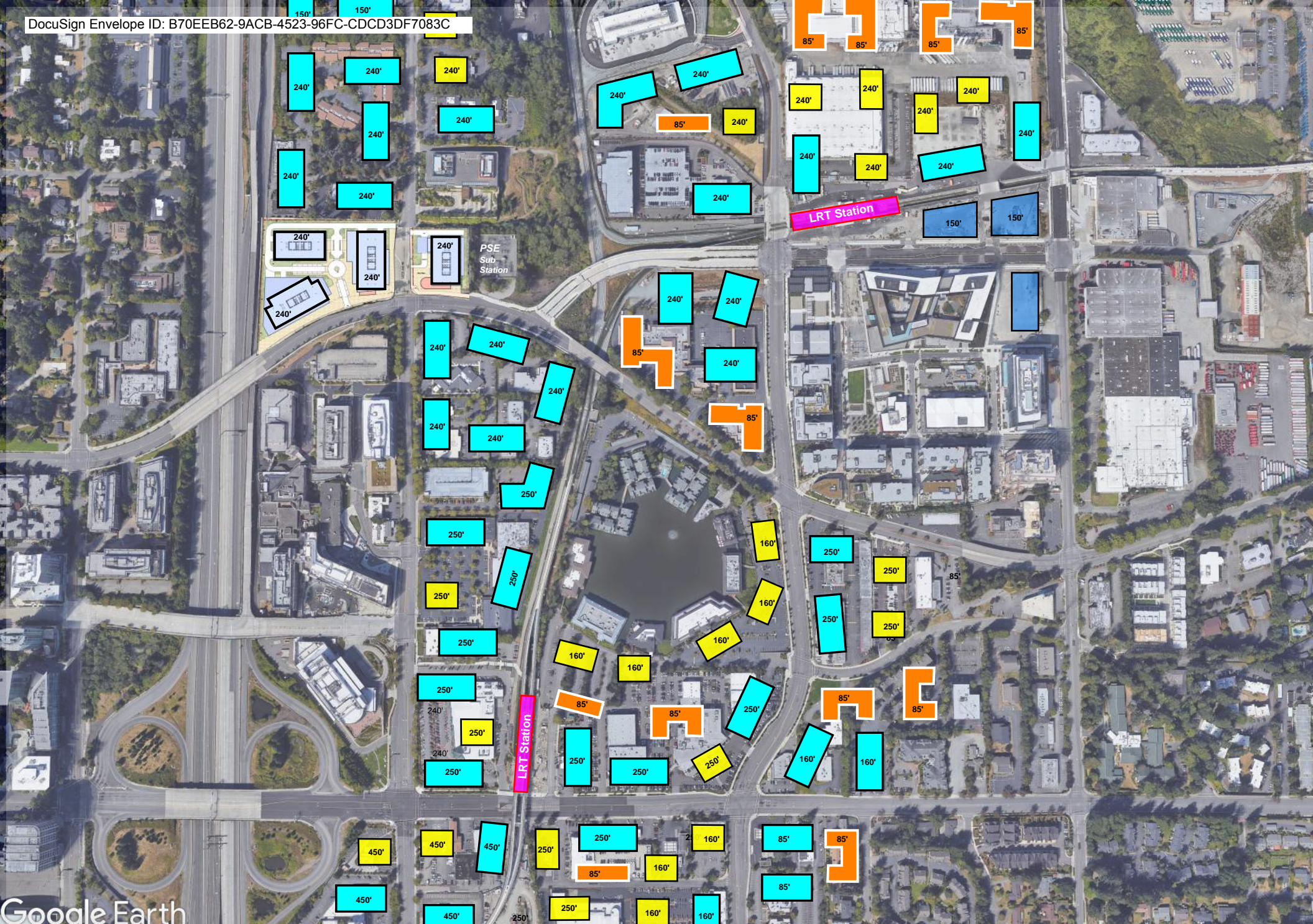
Walkshed 10 Minutes From Spring District Station

**Subject Properties Within  
10 to 15 Minute Walkshed  
From Wilburton Station  
(Grey Tone)**



Walkshed 15 Minutes From Wilburton Station





Google Earth

# Development Propensity Map





# Future Development Propensity Views

Note: This development propensity massing model represents potential urban form (height & building footprint) per Alternative 3 in the 2024-44 Bellevue Comp Plan Update/Wilburton Vision DEIS. Floor Area Ratio's and specific development standards were not assigned in the DEIS. For this study, FARs range from approximately 4.0 to 9.0 depending on height limits and parcel size. A minimum tower spacing of 60' was maintained and new development is generally placed on underutilized sites (low scale development without recent major improvements). This is a generalized visual representation of one potential outcome of urban form as it relates to the properties at 116th Ave NE & NE 12th street. This does not represent a detailed, property by property, feasibility study.

BelRed DEIS Rezone Study  
116th Ave NE & NE 12th ST

**M RÖWE**  
ARCHITECTURE  
& PLANNING LLC  
June 12, 2023



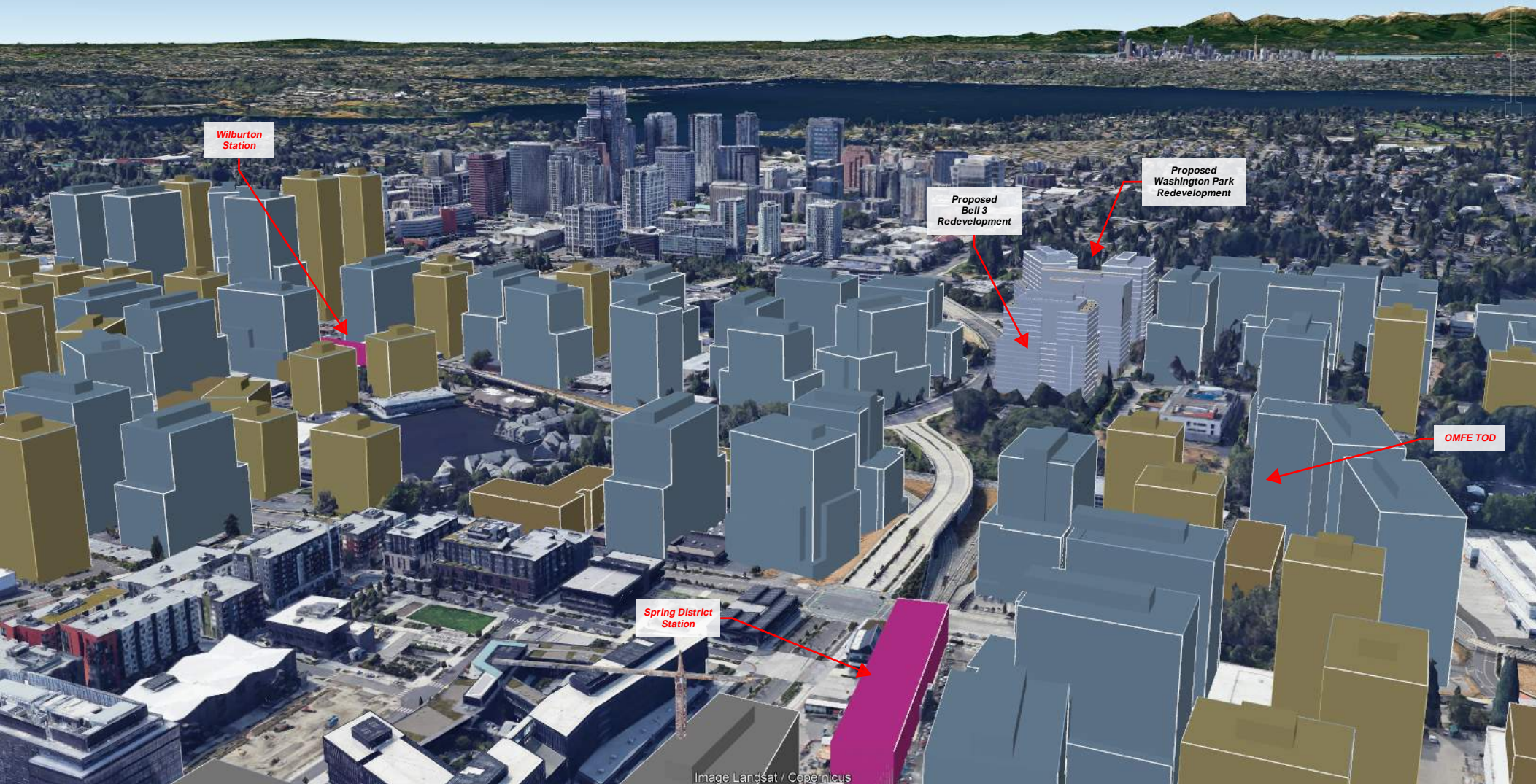


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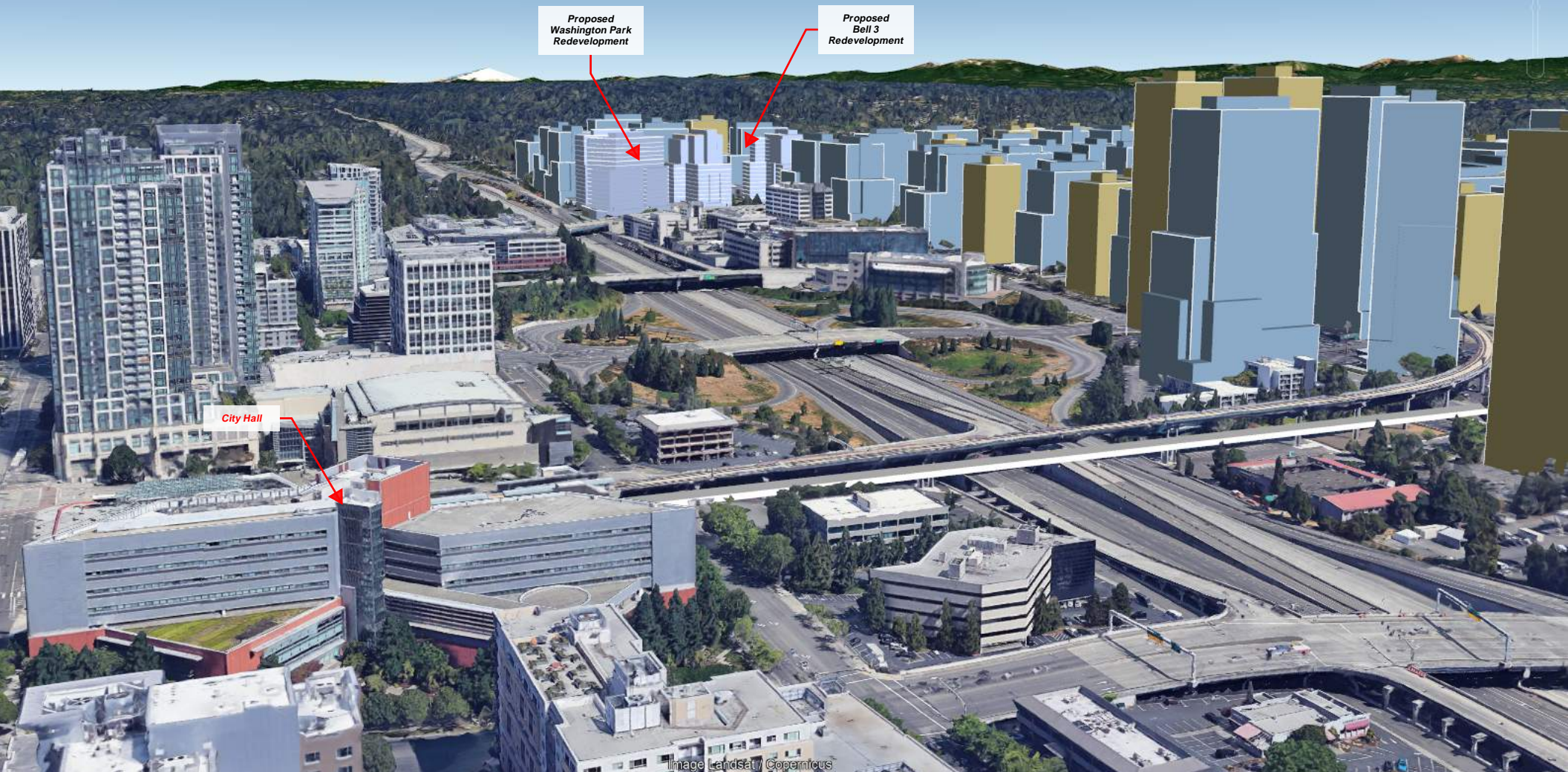
BelRed DEIS Rezone Study  
116th Ave NE & NE 12th ST





# Future Development Propensity Views





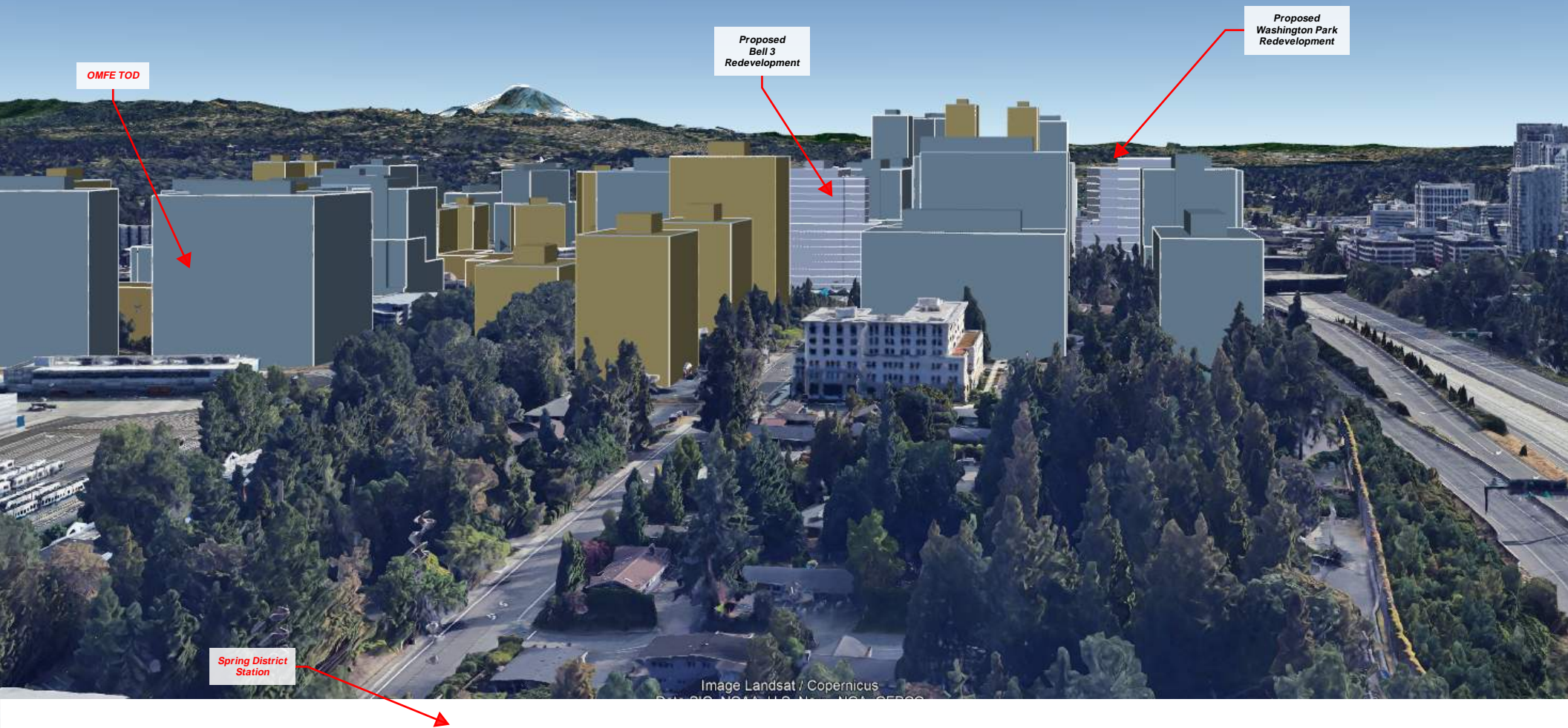
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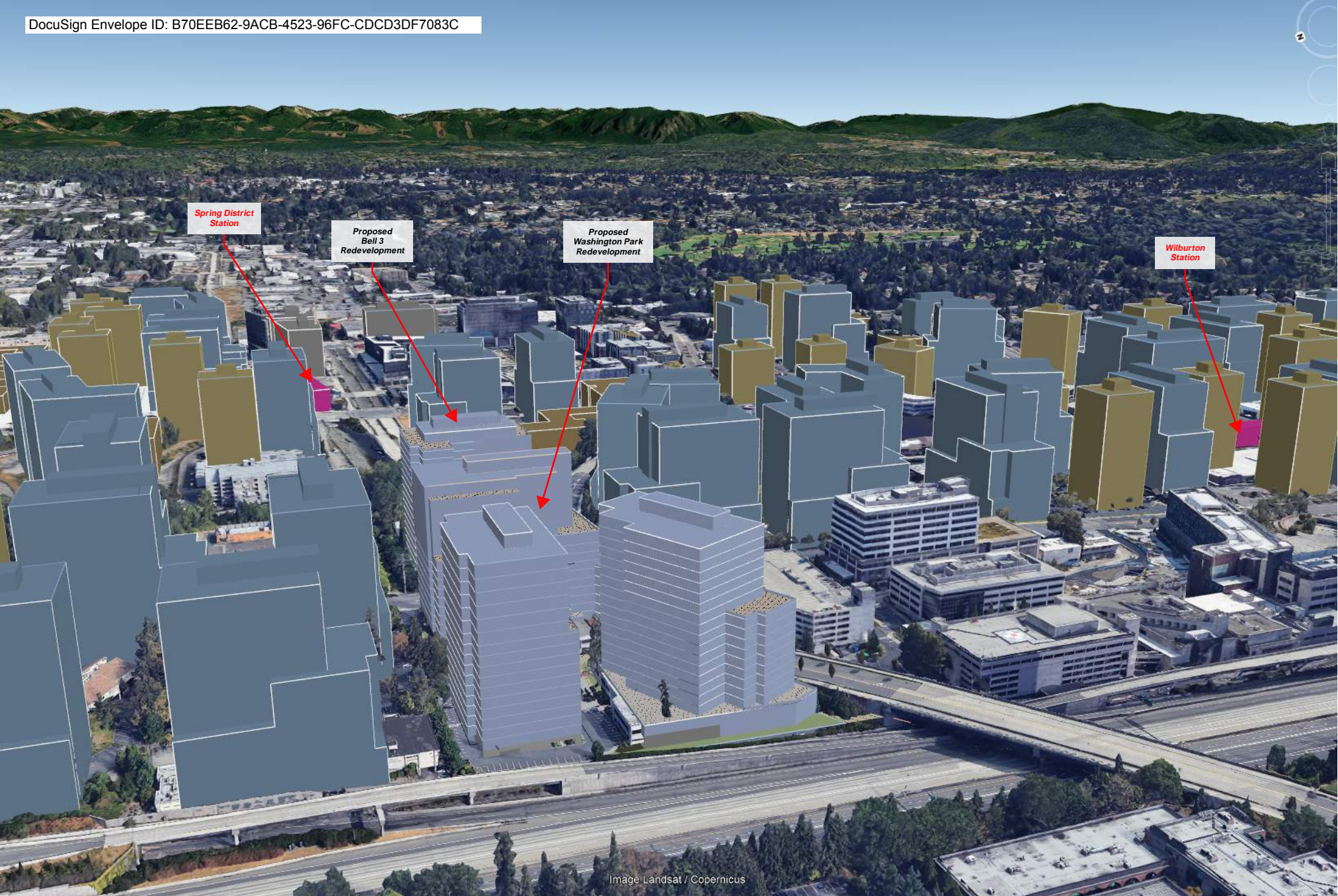
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& PLANNING LLC  
June 12, 2023





# Future Development Propensity Views





# Future Development Propensity Views

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116th Ave NE & NE 12th ST

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ARCHITECTS  
PLANNING LLC  
June 12, 2023





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BelRed DEIS Rezone Study  
116th Ave NE & NE 12th ST

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June 12, 2023



# **EASTRIDGE PARTNERS LLC**

11911 NE 1<sup>st</sup> St, Suite 101, Bellevue, WA 98005

Phone: 425-462-9400

June 12, 2023

VIA ELECTRONIC SUBMITTAL

Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Re: Bellevue 2044 Comprehensive Plan DEIS Comment  
Eastridge Partners, LLC – 11811 – 11911 NE 1<sup>st</sup> Street

Dear Reilly:

On behalf of Eastridge Partners LLC (Eastridge Partners), thank you for the opportunity to comment on the City of Bellevue's (City's) Bellevue 2044 Comprehensive Plan Draft Environmental Impact Statement. Eastridge Partners has been a participant in the visioning for the future of the Wilburton neighborhood since the CAC Committee between 2017-2020. We are pleased to see the City reach this key DEIS milestone in the process. We look forward to the City's Comprehensive Plan adoption and implementation of zoning that will bring this process to a successful conclusion.

## **Background.**

Eastridge Partners owns two parcels at 11811 - 11911 NE 1<sup>st</sup> Street in Bellevue between NE 1<sup>st</sup> Street and Main Street (Properties). The Properties total 5 acres. Each parcel is developed with a 1980s' era 3-story office building. The Properties are currently zoned Office and are within the Wilburton/ NE 8<sup>th</sup> Street Subarea.

### **Planning Principles.**

We continue to believe Wilburton is the City's best opportunity to accommodate dense growth. It is ideally located for dense growth, adjacent to Downtown, and served by all of the City's major transportation infrastructure. It is at the intersection of our major highways, and will soon be served by light rail. The City is also improving pedestrian infrastructure in Wilburton with plans for a walking amenity along the BNSF rail line, and the Grand Connection LID. While some infrastructure needs remain in Wilburton, tax revenue from development in the area will facilitate those needed improvements. To that end, the City should not limit block size in the Wilburton area nor impose a street grid to that end; such limitations stagnate market-led development and are impractical on a site-by-site basis. The City should continue to invest in multi-modal forms of transportation and focus on incentive-based regulations that facilitate mixed-use developments.

### **Comments on the DEIS.**

Eastridge Partners' comment on the DEIS are:

- **Alternative 3 should be the City's Preferred Alternative, with modifications.**

Alternative 3 best prioritizes smart growth within areas well served by transit. Currently, Alternative 3 shows the Properties as "Residential/Commercial Highrise 1" land use designation. While Eastridge Partners agrees the Properties and their vicinity are most appropriate for proposed designated use. Due to our proximity to the City's Arboretum and educational infrastructure we encourage the City to consider additional density if affordable housing is included in future developments of our property to help ensure that we meet the City's long term housing requirements.

The Preferred Alternative should allow for a variety of uses – residential, office, lodging, and retail, without restrictions on the maximum densities of use within the envelope. The City is planning for a 20-year growth horizon. The City should prioritize the flexibility of uses within the general development envelope.

This will allow for market conditions to determine the appropriate uses over time.

- **Wilburton’s circulation and permeability system requirements should be flexible and incentive-based to support viable future redevelopment.**

The Wilburton Draft Circulation and Permeability map (Figure 11-28) shows north/south non-motorized connection occurring on the eastern edge of the Properties and another running continuing east from the Properties along NE 1<sup>st</sup> Avenue towards Wilburton Elementary School. Eastridge Partners agrees that multimodal connectivity to the public and civic assets like Wilburton Hill Park and the Botanical Gardens is a positive for the City and current and future Wilburton residents, employees, and visitors. However, the City must ensure that any non-motorized connections that require access to private property be: (1) flexible in the ultimate design location and not overly prescriptive; (2) include reasonable, defined, and objective standards to provide predictability for future development; and (3) incentive-based to ensure that they are not disincentivizing future redevelopment.

- **Aesthetic mitigation in Wilburton should prioritize smart-growth density. Mitigation measures must be evaluated for impact on development viability.**

The DEIS states that mitigation measures for Aesthetic impacts in Wilburton may include, among other measures: (1) regulations around public spaces; and (2) viewshed regulations for “certain public views.” DEIS, pg. 6-62. We encourage the City’s Preferred Alternative to focus on aesthetic mitigation, if warranted, through building form and materiality regulations. Wilburton’s strategic positioning next to I-405 gives it the advantage of inward facing perspectives, a perfect and logical place to host density and not through prescriptive and excessive upper-story setbacks or new regulations around public spaces or creating viewsheds.

If the Preferred Alternative elects to include regulations around public spaces or viewshed regulations, the DEIS must fully disclose and evaluate those mitigation measures for their impact on the potential for development for affected properties. This will ensure that the City Council has adequate information to evaluate impact and make appropriate policy decisions. Aesthetic mitigation measures should not frustrate the purpose of the added density in Wilburton for housing and jobs by making redevelopment of properties infeasible due to additional regulatory burden.

- **Eastridge Partners agrees with the comments included in the Wilburton Owners' Coalition's comment letter and incorporates those by reference.**

Thank you for the opportunity to comment. We will look forward to the City's continuing work on the Comprehensive Plan and implementation. Please feel free to contact me with any questions.

Sincerely,

Eastridge Partners, LLC



s/Panfilo Morelli

Partner



s/Gardner Morelli

Managing Partner





June 11, 2023

City of Bellevue Development Services Department  
Attn: Elizabeth Stead  
450 110<sup>th</sup> Ave. NE  
Bellevue, WA 98004

RE: 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement

Dear Ms. Stead,

Thank you for the opportunity to comment on the City of Bellevue's Comprehensive Plan Periodic Update and Wilburton DEIS. We believe it is appropriate for the City to consider long-term development alternatives for the Wilburton area and support mobility and access across all modes in proportion to travel demand. Our comments and questions, as in the past, focus on transportation. In reviewing the transportation chapter in the DEIS, we have several questions and concerns about the plan's mitigation measures and lack of analysis and evidence to support its findings and conclusions.

Our primary concern is that the DEIS does not provide adequate or appropriate mitigation for traffic impacts in any of the proposed alternatives, resulting in a stated plan for intersection failure and gridlock. This is not acceptable.

Section 11.6 of the Comprehensive Plan DEIS focuses on Avoidance, Minimization and Mitigation Measures for the impacts of proposed alternatives. The impacts are entirely on system intersection V/C ratio, primary corridor speed, and state facilities (Table 11-40). Mitigation strategies listed do not include a discussion of capacity improvements that are needed to accommodate the City's projected increases in vehicle miles traveled (VMT), or address these significant performance target gaps. The previous Wilburton DEIS, released in 2018, pointed to several capacity improvements that would reduce the V/C ratio at intersections. Capacity solutions to decrease delay at intersections caused by upzoning should be explored in a similar fashion as in 2018.

The Mobility Implementation Plan (MIP) prioritization framework guides Bellevue's mitigation strategy. The DEIS states that, per the MIP, "some gaps (particularly related to System Intersections and Primary Vehicle Corridors) will remain because reducing intersection congestion and increasing vehicle speeds must be balanced against priorities including safety, environmental stewardship, land use impacts, etc." Reducing traffic congestion should not be seen as a separate or competing priority among others listed, but one that is directly related to public safety, environmental stewardship, and land use impacts.

For example, policy decisions that do not prioritize traffic congestion relief and allow vehicular delays to worsen may impact emergency response times and health outcomes for the public. In 2017, Harvard researchers examined 10 years' worth of patient records and analyzed death rates among Americans who had a heart attack or cardiac arrest near a major marathon where there were multiple street closures. They found that ambulance vehicles were delayed by an average 4.4 minutes on marathon days (32% longer than on days not delayed by marathons), which resulted in a spike of 15% higher likelihood of death among non-marathon patients admitted on race day. The researchers noted that every minute counts and while "the study findings do not establish cause and effect between street closures and greater mortality...many studies have shown that even very small delays in

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getting care could make the difference between life and death.”<sup>1</sup> This is an element of safety that is not at odds with reducing traffic congestion. How will DEIS policy choices that allow failed intersection and corridor speed performance targets to “remain,” considered alongside the City’s other transportation planning documents that guide future projects, cumulatively impact emergency response times in Bellevue?

The DEIS must include an honest and robust discussion of strategies that will measurably reduce traffic congestion, including existing City-supported transportation projects. This would align with 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”). TR-2 does not state that the City ought to merely look at or consider congestion impacts to all users, but aim to “reduce” congestion. WAC 197-11-060(1) requires the City to consider the “range of proposed activities, alternatives, and impacts” – this should include an analysis of mitigation strategies, like capacity improvements, that would result in reduced traffic congestion, and can be added to Section 11.6.

Rather than providing a complete list of mitigation strategies and evidence that they will produce meaningful results, the DEIS provides a partial list of mitigation measures that will be informed by Transportation Demand Management (TDM) strategies, transportation systems operation and management, agency partnerships, parking strategies, and safety strategies. What will each of these measures accomplish in accommodating or even shifting demand?

Specific to TDM, the DEIS references California Air Pollution Control Officers Association (CAPCOA) research, which suggests TDM programs will produce a 5-10 percent vehicle trip reduction, but the findings in that document are not context-sensitive to Bellevue, do not consider available US Census travel data specific to Bellevue, and are not explained in the DEIS.

For PMA 1, the DEIS recommends addressing intersection V/C ratios and primary corridor vehicle speeds that don’t meet performance targets by focusing “primarily on building out the pedestrian and bicycle network,” “exceptional TDM” requirements, Smart Mobility solutions, and parking code reforms. The notion that “primarily building out the pedestrian and bicycle network” will improve intersection V/C ratios and primary corridor vehicle speeds is not supported by any data or analysis in the DEIS. Bellevue’s own modal projections show minimal increases in walking, no increases in biking, and increases in SOV driving among both Bellevue workers and Bellevue residents when comparing the No Action Alternative to Alternative 3 (Table 11-33). It is not appropriate or reasonable to expect bike and pedestrian infrastructure to mitigate expected increases in VMT. The City needs to provide evidence that building out the pedestrian and bike network is an adequate mitigation strategy for higher levels of traffic congestion, or remove this from the mitigation strategies list. Evidence can be provided by showing whether targeted spending on bike and pedestrian infrastructure in Bellevue has, historically, produced intersection and corridor speed improvements in the area where the infrastructure was provided.

Those who commute to work in Bellevue by car (including workers in poverty, 60% of whom drive alone or carpool to work), as well as emergency responders and freight, will not benefit from bike and pedestrian infrastructure (which they do not use and which could increase traffic congestion in areas where the City plans to convert travel lanes to bike lanes).

Further straining the analysis contained in the DEIS is the assumption that proposed high-rise buildings densely placed between NE 4<sup>th</sup> and NE 8<sup>th</sup> (critical service corridors for emergency responders, freight and commuters) without planned capacity improvements will not have detrimental impacts on transportation in Bellevue.

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<sup>1</sup> “Delays in Emergency Care and Mortality during Major U.S. Marathons,” by Anupam B. Jena, M.D., Ph.D., N. Clay Mann, Ph.D., et al., The New England Journal of Medicine, April 13, 2017, at <https://www.nejm.org/doi/full/10.1056/NEJMs1614073>.



Given the lack of information in the DEIS on capacity improvements that would help mitigate some of the expected pressure on Bellevue's transportation network, it is not surprising to see Table 11-40 showing multiple intersections, primary vehicle corridor speeds, and state facilities that will be significantly impacted from all action alternatives and which will therefore not meet respective performance targets. It is, however, surprising that the DEIS simply dismisses this reality, stating that, "While incremental improvements in performance to some impacted facilities could be achieved, it is expected that some of the significant impacts on System Intersection V/C, Primary Vehicle Corridor travel speed, and state facilities would remain."

This is a plan for transportation failure, with proposed mitigation measures that are unlikely to mitigate the more significant traffic problems the DEIS projects will occur.

The City must propose adequate mitigation to reduce traffic congestion, comply with TR-2, and prevent intersection and corridor failure. We do not agree that it is acceptable for these significant adverse impacts to "remain" or to become exacerbated by the cumulative impacts of proposed changes in the comprehensive plan and other City planning documents.

Bellevue is a beautiful, growing city. The policy decisions made today can either improve or deteriorate future mobility and access, which is central to Bellevue's economic growth and success. For any growth alternative that is selected, please consider providing adequate transportation mitigation that expands arterials and strategically adds capacity to areas that are already gridlocked during peak hours of the day in order to accommodate the vehicular demand the City anticipates over the next two decades.

Sincerely,

Mariya Frost  
Director of Transportation  
Kemper Development Company

June 12, 2023

VIA ELECTRONIC SUBMITTAL

Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110th Avenue NE  
Bellevue, WA 98004

**RE: Bellevue 2044 Comprehensive Plan DEIS Comment  
North Towne Shopping Center – 2620 Bellevue Way NE**

Dear Reilly:

Thank you for the opportunity to comment on the City of Bellevue's 044 Comprehensive Plan Draft Environmental Impact Statement (DEIS). We are writing to comment on the DEIS evaluation related to the North Towne Shopping Center at 2620 Bellevue Way NE (Property), specifically, support for Alternative 3 with modifications to support more mixed-use opportunities.

The Property is approximately 3.2 acres along Bellevue Way NE and is abutting the City's Northtowne Neighborhood Park to the north and existing residential areas to the east and south.

Our comments on the DEIS are:

- **Alternative 3 should be the City's Preferred Alternative as modified for the Northtowne Shopping Center as a Mixed-Use Midrise land use designation.**

Alternative 3 best prioritizes smart growth within areas well served by transit. Currently, Alternative 3 includes the Property as "Mixed Use – Lowrise," which would support a mixture of residential and commercial uses at up to four stories.

We encourage the City's Preferred Alternative for the Property to be Mixed Use – Midrise, which would allow for densities of up to seven stories. We agree that the Property's future is best as a mixed-use center with flexibility modernization with a mixture of commercial and residential uses. As you know, North Towne Shopping Center is a destination shopping and services hub for the Northwest Bellevue area.

The Northwest Bellevue Subarea Plan provides, among other policies, that:

- Encourage new development to maintain and enhance the neighborhoods character of the individual sub-neighborhoods (S-NW-6); and
- Explore opportunities for small-scale commercial uses at key locations to improve access to goods and services throughout NW Bellevue (S-NW-7).

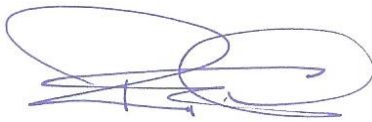
The City's Transition Area Design District regulations would apply to any redevelopment of the Property. Redevelopment at Mixed Use – Lowrise densities under Transition Area standards is unlikely to support sufficient capacity and flexibility to allow viable

redevelopment, particularly if a new project hoped to attract a destination grocer tenant to continue to provide services for Northwest Bellevue.

The City's Preferred Alternative should apply a Mixed Use – Midrise designation to the Property, which would provide more flexibility and opportunities to develop context sensitive mixed-uses projects with vibrant ground floor commercial uses, while still applying Transition Area standards for compatibility with residential uses.

Thank you for the opportunity to comment. Please feel free to contact me with any questions.

Sincerely,



Richard Leider  
Trinity Real Estate, LLC  
Member



Pete Stone  
Trinity Real Estate, LLC  
Member



Lex Wieneke  
Trinity Real Estate, LLC  
Member

# McCULLOUGH HILL, PLLC

---

June 12, 2023

Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004  
Via Email: [compplan2044cis@bellevuewa.gov](mailto:compplan2044cis@bellevuewa.gov)

Re: Bellevue 2024-2044 Comprehensive Plan Periodic Update DEIS  
McCullough Hill Bel-Red properties comment letter

Dear Reilly:

Thank you for your work on the Bellevue 2040 Comprehensive Plan DEIS. McCullough Hill represents several property owners in the Bel-Red area and would like to submit the following comments on their behalf.

- We endorse Alternative 3.
- The DEIS's FAR and density assumptions must be disclosed in the FEIS, as well as any economic analyses performed as part of the affordable housing discussion.
- The Comprehensive Plan appears to carry forward the City's current approach to the Future Land Use Map, which is to match implementing zones exactly. In the FEIS, study an approach that designates all Bel-Red properties as "BR" with a variety of implementing zones with locational criteria. This would simplify future planning and zoning efforts and allow for City and property owner flexibility in the future.
- The City should be less restrictive with uses in the Bel-Red area. Rather than being prescriptive about office, retail, and residential use, allow uses generally in this urban neighborhood.
- The City must review the land uses, heights, and densities being studied in the City of Redmond's Comprehensive Plan update for the Overlake neighborhood, and consider that information in the FEIS. Bellevue has limited heights and densities on its side of the border, while Redmond has fully embraced the transit-oriented development vision for the Overlake neighborhood. Much of the Bellevue side of the Overlake neighborhood is within walking distance to the Overlake station; densities should be planned in that area as if they were within walking distance of the Bel-Red or Wilburton stations.
- There is a large area in Bel-Red that remains designated "O" for Office. Office zones are not designated in Alternative 3 for any growth or more flexible uses. This is a lost opportunity in the 20-year horizon. Consider O zones as MU zones, or allow for significant additional growth in these O zones which are likely to redevelop in the 20 year horizon.
- Plan for future density along corridors that will likely have transit in the 20-year horizon. For example, the Northup Way corridor and the NE 24<sup>th</sup> corridor may have more transit in the future running locally between Bellevue/Kirkland/Redmond. BR-GC is 1-2 story strip center zoning and is

proposed to remain for the next 20 years in Bel-Red. This seems to be a lost opportunity. Consider the R-High designation or an MU designation along this and other similar corridors.

- The Preferred Alternative must repeal any existing subarea plan policies that restrict multifamily housing choice. As noted in Section 4.2.4, the City has 14 neighborhood subarea plans. Some of the existing subarea plans include policies that specify areas where certain uses are prohibited, such as Northeast Bellevue Subarea Plan Policy S-NE-7 and Crossroads Policies S-CR-63 and S-CR-80. These policies are inconsistent with the Growth Management Act regulations that encourage vibrant housing options in zones that allow for residential uses. The DEIS fails to disclose and evaluate the impacts of these Subarea Plan policies that restrict housing choices and frustrate the implementation of the 2044 Plan's vision and applicable housing laws, including HB 1220 and HB 1110. The Final EIS must evaluate the Subarea Plans for such inconsistencies, and where identified, repeal them with the 2044 Plan.
- **Critical Areas/Stormwater/Trees.** The EIS will be inadequate unless the City analyzes impacts to critical areas; the current 4-page memorandum in the Appendix is not enough. The City must study implementation of the following:
  - Exempting man-made steep slopes from critical areas requirements. The proposed alternatives show much growth in areas where it is currently impossible given man-made steep slopes such as rockeries. The City should study this so the code can be changed, this is a major impediment to urban development in Bellevue.
  - The "critical areas penalty" should not apply in any Mixed-Use Center. Currently the penalty does not apply in downtown. If it applies in the City at all, the penalty should only apply in low density zones; it is inappropriate given the stringent stormwater codes and other regulations that we now have in Bellevue that protect critical areas, and a reduction of density on top of critical areas regulations and buffers is not necessary. Please include this analysis in the study such that future rezones can utilize the environmental review.
  - The current Bel-Red neighborhood plan includes a policy that seeks to incentivize daylighting of creeks. However, the incentives within the land use code are weak and do not properly incentivize developers to daylight and improve creeks. Please study an incentive in which a 20-or 30-foot buffer and building setback could occur with daylighting of currently piped creeks, with restoration of ecological function. Impacts/outcomes of such an approach should be disclosed to decisionmakers. There is no possible way the City can afford the massive daylighting undertaking that should occur, and developers will not be able to accomplish this unless buffers are appropriately set and do not prevent redevelopment. If daylighting is properly incentivized, developers will build creek daylighting into their projects, and the City's current comp plan goal can be achieved. A similar study should be undertaken for Sturtevant Creek in Wilburton, and other streams that run underneath urbanized areas in Bellevue.
  - Tree Ordinance: Since the DEIS does not assume or address any new tree standards or regulations, we recommend not implementing any revised tree regulations until the DEIS's subsequent LUCA amendments are in place. All Mixed-Use Centers should be exempt like downtown is exempt.
  - Impervious Surfaces. The City's requirements of substantial pervious surfaces in dense urban environments runs contrary to the infill goals of Alternative 3 of the DEIS. The requirement of significant pervious areas on dense urban sites should not be a part of future Bel-Red regulations. Most other urban jurisdictions have identified ways to address storm water quality without the need to impose major penalties on site usability. Bellevue should update its regulations accordingly.

- **Housing Affordability**
  - Any approach to affordable housing must be legal, and should consider the velocity at which residential units can be developed. The FEIS should analyze any affordable housing program in the context of existing and contemplated Bellevue zoning regulations—affordable housing is just one portion of the incentive “stack,” and projects cannot afford to provide every incentive. For example, in Bel-Red, properties are often burdened by stream buffers and road requirements. Adding affordable housing requirements to this mix may create an unbuildable project.
- **State Legislation Analysis / General SEPA**
  - Please analyze the recently passed state laws related to SEPA thresholds, design review, permitting reform and the like, to ensure that these new regulations can be implemented as soon as possible in Bellevue.
  - Mitigation is not required as part of an FEIS; it is
- **Transportation:**
  - The transportation analysis presumed 100% buildout, which is an exceedingly conservative study. We support the City’s reliance on the mitigation strategies disclosed in the DEIS related to bicycle and pedestrian improvements and the use of transportation demand management strategies.
  - We believe that the existing “required” road grid in Bel-Red should be studied and reconsidered. It has been exceedingly difficult to build a road grid in Bel-Red after 10 years of zoning implementation, again due to the fact that the proposed road grid had no regard for property boundaries, steep slopes, or cost or ability to build-out. Please study whether the road grid is necessary from a transportation standpoint, and if not, reconsider whether adding additional cars and congestion is necessary. Much has changed in Bellevue (including the building of light rail) since the Bel-Red code was adopted, and we would like to see a study of the Bel-Red grid system with the transportation policies stated in M-TR-1 through M-TR-4 in mind.

We appreciate this opportunity to comment and look forward to working with you in the next stages of Comprehensive Plan adoption and implementation.

Sincerely,

McCullough Hill, PLLC



# WEBER THOMPSON

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June 12, 2023

City of Bellevue Development Services Department  
Attn: Liz Stead, Director and SEPA Responsible Official  
Reilly Pittman, Environmental Planning Manager  
450 110th Avenue NE  
Bellevue, WA 98004

Via email to [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Re: *Bellevue 2044 Comprehensive Plan DEIS Comments*

Dear Liz and Reilly,

We are writing in reference to the 2044 comp plan and specifically the DEIS on the Wilburton upzone. Weber Thompson is a 70-person interdisciplinary design firm focused on multifamily housing, with a huge portfolio of projects at scales from two story townhomes to 50 story towers in Bellevue and Seattle. Our team have designed a large portion of the residential towers in Seattle over the last two decades, have conducted hundreds of feasibilities, and just finished the first fully affordable housing high-rise in Seattle in the last 50 years. We are devoted to multifamily housing in the region and would like to leverage our expertise and thoughts on the current draft to help the City of Bellevue realize their vision and goals for housing. Our hope is that the City can evolve their zoning standards to create a new model for the region that encourages a mix of housing types, density, and bold design to set a precedent for the region and nation. A few of our suggestions from decades of work are below; we hope to be a part of the discussion in the future:

Should you have the signature here? If not, you need it at the end.

**1. Create a variety of scales, density and building types around nodes and stations in lieu of blanket upzoning.**

We realize the current DEIS was performed years ago and does not reflect the current landscape of the City, but we hope you consider re-evaluating the zoning alternatives to create varieties in scale and zoning heights for Wilburton. While Alternative 3 best represents the right direction, it places the highest density near I-405 and separated from bike and rail routes by several major roads. The absolute highest density should ideally be located around the new light rail stations and Eastrail bike corridor, and not around I-405 and major streets that are hurdles for pedestrians. Bellevue is built around the

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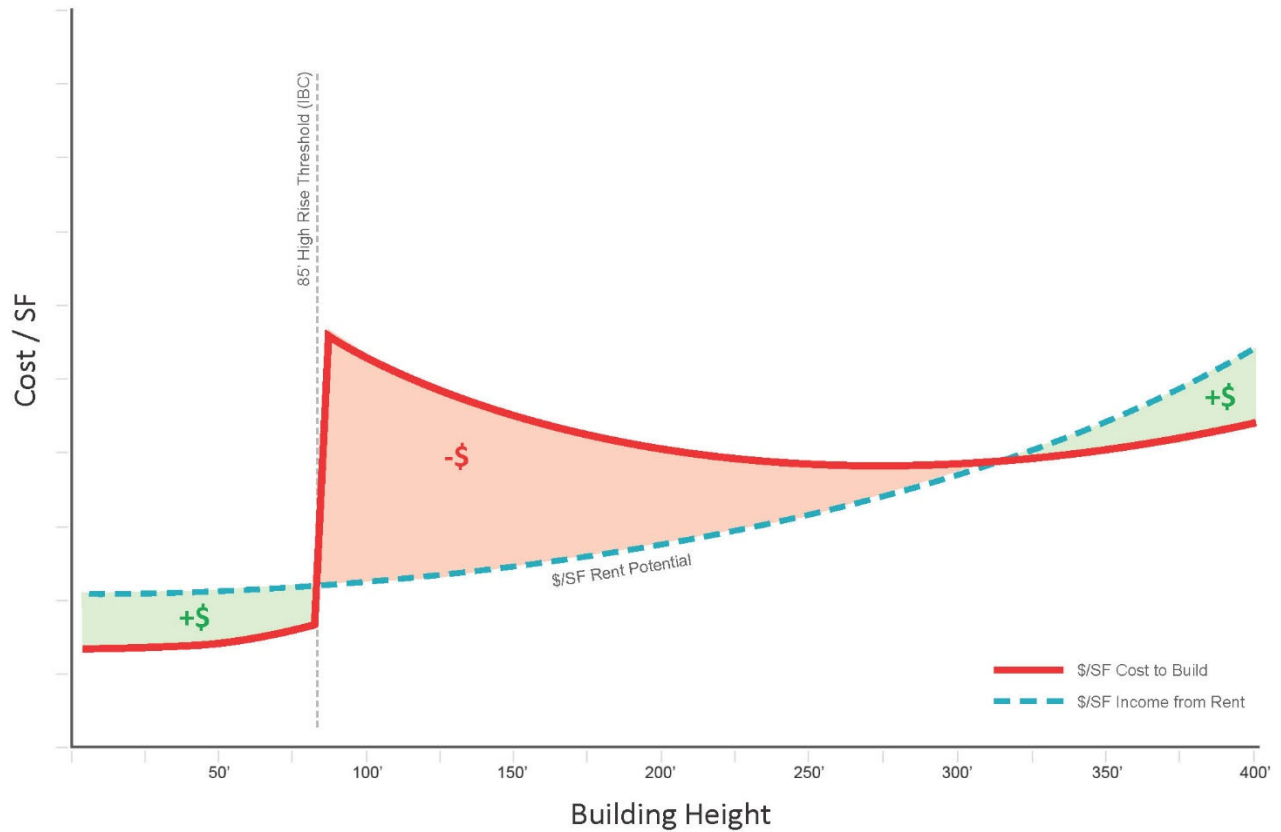
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automobile, and this kind of planning only furthers that. Putting density near the grand connection over I-405 is good but should be maximized near public transport. Locating the highest density adjacent to light rail stations – a model Burnaby, Surrey and Brentwood, BC have all embraced – has been highly successful in encouraging density where needed. Added density around the Wilburton station, not several blocks away, is critical for safety and ease of use. To further the concept, density should be re-distributed near other major corridors and nodes of development, encouraging mixes of uses instead of large fields of mid-rise buildings. The Spring District should be acknowledged as a dense work hub, with increased density and height between it and Lake Bellevue to create a mix of building scales and uses. Recognize the new East Main developments, light rail and zoning to connect over I-405 to that station and development. At the edges and farther from those stations, reduce density to blend scales and create a larger mix of housing types. Please refer to the attached diagram.

## **2. Align zoning heights with real building standards and codes to optimize value.**

The 90'-160' building height is challenging for developers from a financial standpoint; it is the main reason very few projects pursue that height. Per the IBC (International Building Code), which Bellevue uses as the basis for its building code, any structure over 75' from the highest occupied floor (which typically results in a building height of about 85') requires high-rise building systems. These systems quickly increase the cost of a building, and severely limit their viability until the buildings reach a height where the added efficiency and rent premiums justify those costs. The graph below explains the current cost curve for multifamily buildings and why that scale is difficult to build and finance. With Type IV-B mass timber construction that can reach 180' we are starting to see major interest in the scale between 160'-180', so considerations for this new low carbon building typology should be accommodated and incentivized.

## Cost vs. Height for Multifamily Construction



### Recommended zoning heights:

- **45'-55'** is a good boundary zone height and allows 4-5 floors with a 15' retail floor at the base to allow activation.
- **70-85'** are the max for Type III-A and Type V-A wood construction (typically referred to as "5 over 2" or "podium-style" buildings).
  - Allow adequate overrun heights above this for elevators and mechanical equipment which are the only things allowed to exceed those heights. 16' minimum.
- **160-180'** is the max for Type IV-B mass timber with exposed wood structure. This is what we foresee as the next big building typology in the region as it uses far less carbon than concrete, creates warm natural, inviting wood spaces, and can be constructed much faster.
  - Create incentives to encourage this new innovative building type.

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- To make these financially feasible, they need larger floorplates. Allow this building typology to exceed tower floorplates and go up to 16-20k.
- **240'** is the next trigger where development of buildings changes. At 240' a tower needs to go through structural peer review, increasing both the process, time and cost to build.
  - Allow large floorplates beyond 15,000 SF
  - These are a great height and provide excellent efficiency for high-rise affordable housing. The larger floorplates create more value for affordable projects and allow a lower \$/SF.
    - Perhaps consider allowing additional floor plate size for affordable housing
- **450'** is an ideal height for high-rise residential, and it allows for a standard shear core design.
  - Remove FAR for the highest density residential zones. FAR requirements create massive assemblages of sites to create a single tower, drastically increasing land costs (driving up rent), while creating sprawl and disconnected ground planes with buildings separated by long distances.
    - The metrics of office vs. residential are very different, and if treated equally like in the current downtown zoning code, you end up without a mix of building types and uses like in the current Bellevue downtown pipeline.
    - Residential towers in Downtown Seattle are FAR exempt, and many times would have a FAR over 35 if actually calculated.
  - The varying trigger height provisions are almost always just averaged since stepping a tower form is difficult, costly, and inefficient. If these are removed, and there is a defined limit for towers over 240', that trigger height won't make the floorplate size different on every site.
    - A 12,500 SF plate is ideal for this height range with a shear core, two stairs, a single perimeter line of columns and optimal unit depths. This number should be allowed to be averaged to increase flexibility for unique design. This achieves both the slender buildings the city desires and allows for predictable, efficient plates.
  - 20' for mechanical is not enough for towers this height; elevator over-runs for this height are typically 40'.
  - To make these towers more energy efficient, allow incentives for energy performance beyond PV, the small footprint and massive mechanical requirements typically take the full roof area of these structures.
    - Consider special incentives for district and shared energy systems.
    - Consider incentives for façade-mounted or -integrated PV, which has a very high cost threshold.

### **3. How can zoning create a more viable affordable housing market, what have we learned on over a dozen projects and how can zoning and policy change that:**

- How F.A.R. hurts affordability:
  - Every comparable size of building still has to meet building codes and has the same structure, waterproofing, fire systems, egress, ADA requirements, etc. The only variable is the finishes, so with an equal FAR for different rent profiles the highest \$/SF is nearly always the financially viable option. There needs to be significant area incentives to make projects affordable and justify lower \$/SF rent. The costs for construction vary little between market rate and affordable.
- Parking requirements have deterred residential development, especially affordable housing, in Bellevue for years. With the cost to build a parking stall frequently over \$50k each, it creates a huge burden on developing housing in Bellevue. Considered allowing market forces and housing types to dictate parking. In Seattle's downtown for example, where zero parking is required, the market still demands a roughly 0.6 per stall ratio for market rate apartments, but low income requires none. Allow that money to go towards actual housing, not parking garages.
  - Why require any parking next to a hub of light rail stations, bus routes and bike + pedestrian corridors?
- 80' tower floorplate restrictions should to be removed and instead a tiered approach should be adopted. Allow 18-20k floorplates up to 160', and then incrementally step down. As stated above, the cost to construct a short tower in the 100'-240' is a tough financial proposition due to the high-rise systems required and limited floor area to generate rent to pay for them. The cost for towers is not linear, and the highest dollar per square foot is for the shortest tower (anything over 75' to the highest occupied floor is technically a high-rise by the International Building Code and requires all the associated systems). Allow dynamic sizing to accommodate, see the graph in Section 1.
- No one building type is perfect for affordable housing, create diversity in scales so that different approaches can be used to address this issue.
- Remove MDP requirements if a developer wants to add both a market rate and affordable building on their site; they just adds cost and make the project less affordable. All of the same planning can be part of the ADR.

### **4. Other notes and comments to consider:**

- Provide provisions and incentives for innovative and carbon lowering building practices like modular construction, mass timber construction, and flexibility for new systems as they are developed.

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- Incentivize open space instead of making it a burden for small sites and affordable housing. Current codes contradict each other with build-to lines and massive open space requirements that planners request along the street fronts.
- Encourage mixed uses that allows reduced travel and encourages walking and biking, and complements and supports multiple transit options.
  - Remove residential FAR in high density zones to encourage residential over office or hotel, one example of true mixed-use.
  - Allow connections above grade, so buildings can create a horizontal network of spaces at multiple levels and allow easier pedestrian access over roads, alleys, etc.
  - Create incentives for public uses beyond the ground level, imagine how can high-rise buildings create an interconnected network of spaces rather than only private spaces. Is t
    - Retail should be exempt anywhere in the building, not just at grade.

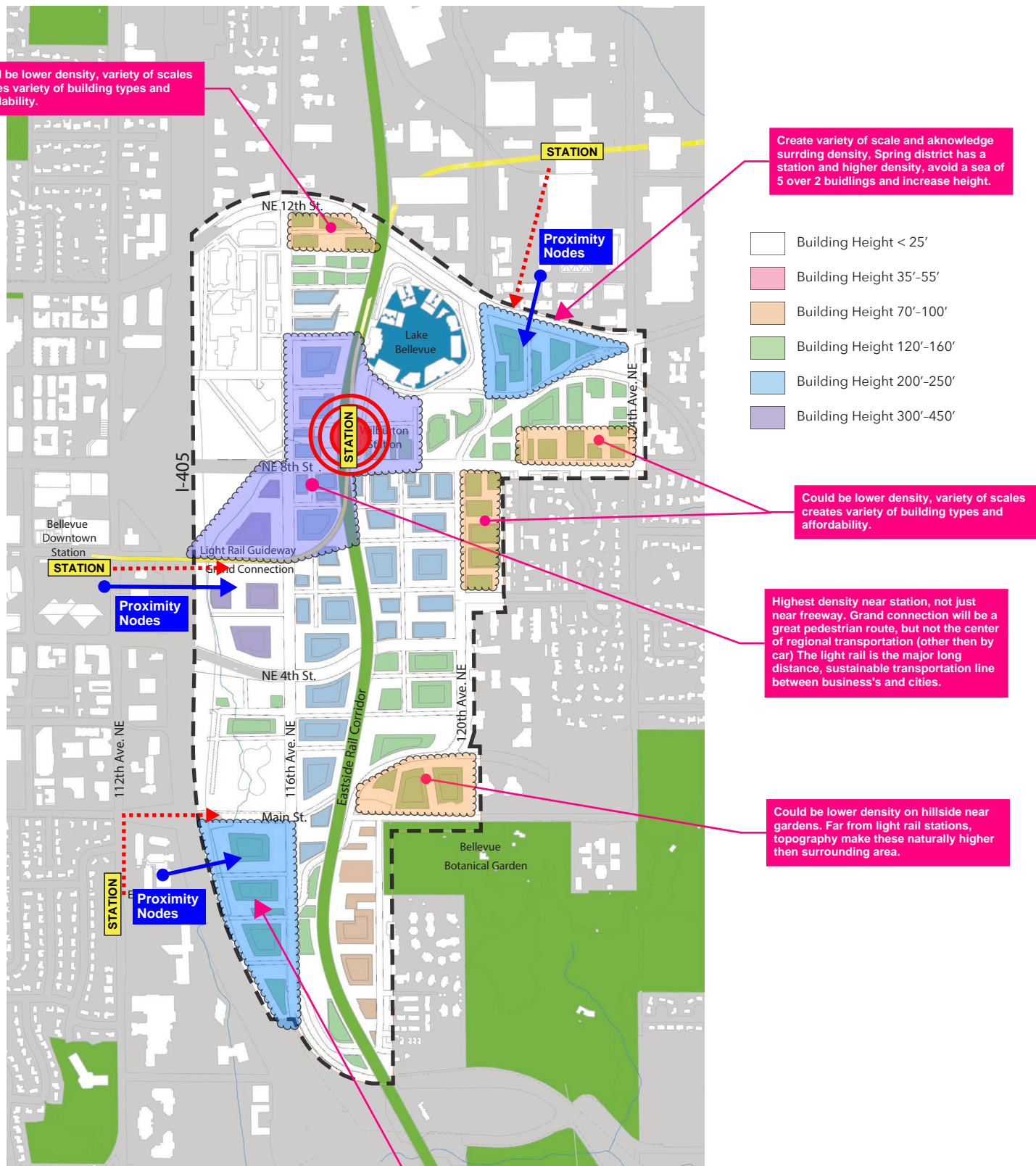


Exhibit 2-4 Alternative 2 Plan View

Source: NBBJ, 2017



From: David Cagle [davidc@clearfocusengineering.com](mailto:davidc@clearfocusengineering.com)  
12911 SE 1<sup>st</sup> Street, Bellevue WA

Sent Monday June 12, 2023

To: City of Bellevue

Subject: Comments on the City of Bellevue 2024-2044 Comprehensive Plan Draft Environmental Impact Statement dated 2023.

I recently learned of the City of Bellevue's proposed changes to its 2024-2044 Comprehensive Plan that would dramatically change the zoning for a portion of the Wilburton neighborhood. A Draft Environmental Impact Statement was published April 27, 2023 with a 45-day public comment period. Please include my comments below to the responses received from the public.

### 1.7 Summary of Key Findings, Impacts, and Potential Mitigation Measures

This section evaluates "Citywide Impacts" and "Wilburton Study Area Impacts" for the four alternatives. Nowhere does it specifically address impacts to the Wilburton Neighborhood (Census Tract 236.01) that is not part of the study area. The changes proposed to the by Alternatives 1-3, immediately adjacent to the Wilburton single-family residential neighborhood is likely to be impacted much more severely than the Citywide Impacts. Implied by the DEIS is that impacts to residences immediately to the East of the Study Area would be equivalent to the citywide impacts.

#### 1.7.6 Aesthetics

Alternative 1-3 Citywide Impacts are claimed to be essentially equivalent to Alternative-0:

*In all alternatives, additional growth would result in impacts on the built form citywide, particularly in Mixed Use Centers*

*"With the application of mitigation measures, no significant unavoidable adverse impacts on views or from shadows, light, and glare are expected."*

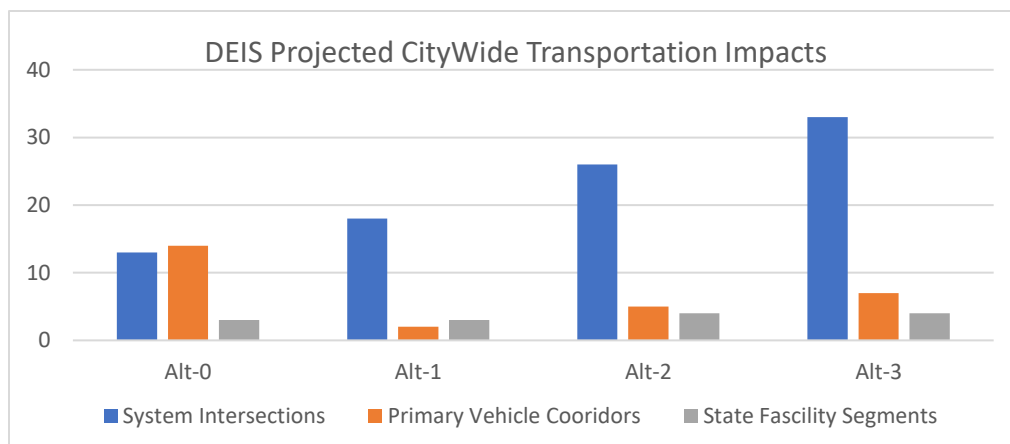
Alternatives 1-3 propose building heights up to 16 stories immediately adjacent to the Wilburton neighborhood. How will they not make adverse impacts on views and from shadows? What mitigation measures are envisioned that would result in no adverse impacts?

#### 1.7.11 Transportation

Alternative 1-3 Citywide Impacts are claimed to be essentially equivalent Alternative-0:

*All alternatives are expected to have significant impacts on System Intersection volume-to-capacity (V/C), Primary Vehicle Corridor travel speed, and state facilities (with other potential impacts expected to be at a less-than-significant level).*

Reformatting the data presented in the table results in plot below. It shows Alt-1 essentially the same as Alt-0, while Alt 2-3 are represented as somewhat worse for system intersection impacts.



Mitigation Measures are then broken down by metric referred to as Performance Management Areas (PMA) but all are essentially different flavors of:

- continue to partner with King County Metro and Sound Transit
- focus primarily on building out the pedestrian and bicycle network
- continue to implement countermeasures reducing risks to vulnerable pedestrians and bicyclists.
- mitigate on-street parking demand with existing curbspace programs and Curb Management Plan.
- ensure codes, standards, regulations, and Transportation Plans are adopted to address impacts

With a couple of mitigation measures for state facilities as:

- coordinate and partner with SDOT on transportation investments.
- Consider exceptional TDM (transportation demand management)

The DEIS doesn't reflect the likely impacts specifically to the Wilburton neighborhood. The Wilburton neighborhood has limited access roads, primarily 124<sup>th</sup> Ave NE, SE 7<sup>th</sup> Pl, 129<sup>th</sup> Pl NE, and 131<sup>st</sup> Ave NE. These 4 routes currently experience high volumes of cut-through traffic Monday thru Friday during the morning and evening rush hours. The cut-through traffic routinely creates a bottle neck at the Main St / NE 1<sup>st</sup> Street intersection and the SE 7<sup>th</sup> Pl / Lake Hills Connector intersection.

The DEIS should provide a much more fine-grained analysis of the traffic impacts to the Wilburton community, specifically to its access intersections that already encounter large impacts. The analysis should anticipate likely changes to Bellevue's roads that will be necessitated by development in the Wilburton Study Area and analyze those impacts as well. Finally, the DEIS should analyze likely impacts to fire and medical response times to the Wilburton community.

### **General Comment on the Wilburton Vision proposed Alternatives 1-3.**

To this 25+-year resident of Wilburton, all three alternatives appear extreme and ill conceived. The King County Planning Policy specifies 2019-2044 housing target of 35'000. What motivates zoning changes to the Wilburton area that represent 26% - 40% (9'200 – 14'300) of that total?

As of 2020, the census tract for Wilburton (236.01) had a population 4,412 (2.9% of the Bellevue's 151'584 total). It would seem that any of Alternatives 1-3 would direct 26% - 40% of Bellevue's future population growth into an area that currently comprises less than 3% of Bellevue's population. If the City of Bellevue must shoulder the burden imposed by the Growth Management Act, why is it indiscriminately forced on the Wilburton community?

The traffic impacts created by any of Alternative 1-3 will fall unfairly on the Wilburton Community. In this reader's opinion, the traffic impacts are downplayed and under analyzed. The mitigation measures are anemic and ineffectual. The Wilburton community currently encounters large volumes of cut through traffic due to its close proximity to Bellevue's urban core. At times, ingress and egress to the community is currently severely restricted. If adopted, any of Alternative 1-3 will exacerbate and already painful situation.

With their focus on mid- and high-rise office towers, Alternatives 1-2 seem to envision a pre-pandemic world with large numbers of white-collar office workers together in offices. To this reader, that seems ill-conceived. The emphasis on housing of Alternative-3 seems preferred, but Alternative-3 also has the highest building heights adjacent to the Wilburton community to the east.

For these reasons, I implore Bellevue City to select Alternative-0, No Change. A much lower impact zoning change is warranted, especially to the east of the new light rail. I'm sure that there are lower impact solutions that meet our housing and job requirements without the heavy-handed burden imposed on the Wilburton community.



June 9, 2023

City of Bellevue Development Services Department  
Attn: Liz Stead, Director and SEPA Responsible Official  
Reilly Pittman, Environmental Planning Manager  
Bellevue City Hall  
450 110th Avenue NE  
Bellevue, WA 98004

Via email to [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Re: *SEPA Comments on File No. 22-116423 LE, the City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement for 1150 124th Avenue NE in Bel-Red*

Dear Director Stead and Mr. Pittman:

This letter is submitted on behalf of Swire Coca-Cola (“Swire”) as part of the public comment process for the City of Bellevue (“City”) 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement (“DEIS”). We recently provided written and oral testimony to the Planning Commission on the DEIS and appreciate the opportunity to expand upon our testimony in this Comment Letter. We are asking the City to identify the BR-OR-H-2 designation for our property in the FEIS Preferred Alternative because of its size and proximity to transit, as further explained below. If zoned correctly, our property presents a truly transformational development opportunity representing several billion dollars of investment that would benefit the City for the next hundred years.

As anticipated in our written testimony to the Planning Commission, this Comment Letter is supplemented by a detailed study by our architect, NBBJ, which demonstrates the potential future development opportunity on our property with BR-OR-H-2 zoning (attached as Exhibit 1, 23-30). Building on that study we offer the following DEIS comments.

## **I. Background**

Swire Coca-Cola sells and distributes Coca-Cola products throughout the Intermountain West. As a member of the Swire Group of companies, we are part of a larger business that has operations around the world in industries as diverse as property, beverages, and aviation. Our properties division is a leading developer, owner and operator of mixed-use, principally commercial properties.





Swire owns the Coca-Cola bottling plant property at 1150 124th Avenue NE in Bel-Red (the “Site” or the “Swire Site”). The Swire Site is the single biggest underdeveloped site in Bel-Red totaling over 20 acres, and it is one of the largest sites in the City for potential redevelopment. It is located immediately across 124th Avenue NE from The Spring District. The entire property has excellent transit access on Bel-Red road, and is within a 10-minute walkshed from both The Spring District/120th Sound Transit light rail station and the Bel-Red/130th station. (See DEIS Fig. 11-14).

Swire originally purchased the Site in 2017 with no plans for redevelopment. Since then, the City has proceeded with its Comprehensive Plan Periodic Update, that will pave the way for the long-awaited Bel-Red “Look Forward” to align zoning with modified future land use map designations. We recognize the community is changing and we want to be good partners with Bellevue as it plans for future growth. With so much potential for change in Bellevue in the coming years, we now view the Site for potential development. To better serve customers in every community across the growing region and to be a good partner in achieving Bellevue’s growth plans – Swire Coca-Cola recognizes our business may operate more optimally from other areas in Washington.

## **II. DEIS Comments**

### **1. The Preferred Alternative should identify the BR-OR-H-2 designation for the Swire Site due to its large size and transit proximity.**

The City’s three action alternatives in the Draft EIS would allow additional density on the Swire Site compared to current zoning, but none of them go far enough to capture the Site’ full development potential. The Site is nearly the size of the adjacent Spring District, and, if zoned correctly, could deliver several thousand housing units, more than a million square feet of commercial office or life sciences space, and more than a hundred fifty thousand square feet of public open space adjacent to a city park. To achieve this, the Preferred Alternative in the FEIS should identify the Swire site for BR-OR-H-2 future land use map designation with a 24-story-plus height limit and supporting density to facilitate a robust development incorporating high rise residential towers, office buildings, retail, infrastructure and services.

The BR-OR-H-2 designation is particularly appropriate for the Swire Site given its proximity to light rail and other dense, mixed-use development (both realized and anticipated development). The BR-OR-H-2 zoning designation will provide appropriate flexibility in uses, including a robust mix of commercial and residential buildings. This designation is also more consistent with the Comprehensive Plan vision that promotes a healthy mix of office and residential uses in this node proximate to the 120th light rail station. Further, a single zoning designation for the Site is preferable to split zoning and ensures it can be master planned effectively to construct infrastructure across multiple phases, respond appropriately to site conditions, and plan for adjacent uses.

NBBJ’s study captures what development of the Site could look like with BR-OR-H-2 zoning. A mixed-use community is envisioned with office buildings on the west side of the Site to complement The Spring District





and residential towers on the east side surrounding a significant central open space park. The development heights envisioned range within the maximum story height, and would complement identified 14-story lower height to the east because of sloping topography. See Exhibit 1 at 26. Based on the high-level metrics provided, such a project could fit within the BR-OR-H-2 designation's 24 story height limit, and deliver 3,200 housing units and nearly 6,000 jobs based on a 60% residential / 40% office split. If the MFTE program is used, then 640 of the housing units could be affordable workforce housing.

**2. The FEIS Preferred Alternative should disclose density assumptions and should study FARs that will achieve efficient development at the heights envisioned.**

The DEIS does not identify the Floor Area Ratio ("FAR") or dwelling unit per acre limits assumed as part of the zoning designations that will implement the City's identified future land use map designations. This is a significant shortcoming of the DEIS analysis. Most zoning in the City currently regulates development intensity with both height and FAR or dwelling unit per acre limitations. The DEIS only discloses an assumed number of stories that corresponds to an assumed height limit (DEIS Appendix B notes "story" heights are around 10 feet for residential uses and 12 feet for commercial development), but does not identify any other development standard limits assumed. In order to validate that the assumed heights/stories are achievable in future development, the City should identify the FAR or dwelling unit per acre and other development standards proposed.

Further, the City should consider revising all dwelling unit per acre limits to a FAR measurement City-wide. The dwelling unit per acre standard is outdated and more appropriate in a suburban jurisdiction as it encourages larger dwellings rather than dense, urban development. The DEIS acknowledges that the City needs to grow three times faster in the next two decades than in the prior two decades and so it must move away from suburban standards.

Similarly, the City should also consider removing a FAR limit for residential uses. It is difficult to precisely calibrate residential heights and FARs because of unique site conditions. Removing a FAR limit as an additional barrier to housing production will ensure residential development is maximized to the heights envisioned. As part of removing a specific FAR limit for residential development, the City should also study recalibrating its incentive system in the Preferred Alternative in two ways: (1) modifying the incentives themselves to reflect current City priorities, including affordable housing, sustainability measures, and parks and opens spaces, and (2) moving to an incentive system that requires participation based on development above a "trigger height" similar to Downtown zoning. Such a system would ensure development delivers public benefits that reflect the City's greatest needs and priorities. An incentive-based system is also better than a mandatory inclusionary housing scheme (identified as a component of Alternative 3) because it does not carry the risk of foreclosing all development if calibrated improperly.





**3. New Bel-Red developments should be granted latitude to identify appropriate multi-modal infrastructure within the block limit, and Bellevue should support the use of service alleys (and larger service alley networks) as the City continues to densify.**

A historic problem with the existing Bel-Red zoning is a rigid local street grid. We were pleased to see that the City's transportation analysis for Bel-Red does not appear to rely on additional, prescriptive, local street connections. This approach should be carried forward in the Preferred Alternative study in the FEIS. Large development sites like the Swire Site should be granted flexibility to plan internal streets, pedestrian, bicycle, and service connections in the manner that best fits the site conditions, surroundings, and development objectives. The NBBJ study reflects one such way connections could be planned, but there are numerous. *See Exhibit 1* at 15.

Swire further requests that the City support the use of private service alleys and alley networks in new master-planned developments and study the use of service alleys in the FEIS transportation analysis. Currently, the City does not have a concept of alleys in its street manual—instead, the lowest street type are private streets that require sidewalks on both sides. These private streets are wider than what is efficient for a service alley. The result of this is that back of house services cannot be efficiently consolidated and coordinated with adjacent buildings, and essential utility functions must be accessed from streets, which can increase congestion.

The proposed alley network on the Swire Site envisions alleys as service-oriented and providing increased functionality of the street network. *See Exhibit 1* at 15. These are 20-foot-wide service-focused only and do not provide cut-through vehicle and pedestrian connections. Bellevue should embrace alleys, especially on the Swire Site, as a way to improve efficiency and create a more modern, urban and streamlined streetscape. The City should identify alleys in the FEIS mitigation measures for general land use and transportation impacts. It is one more tool in the land use toolbox to create expanded service connections and lessen congestion on our streets that should be supported in the City.

Last, we note that the identified mitigation measures in the City's transportation analysis place a primary focus on Transportation Demand Management rather than building additional street capacity. (DEIS at 11-117). We applaud the City for this focus and request the City carry-forward this prioritization in the FEIS for Bel-Red. We believe best way to reduce transportation impacts and congestion is to place density near transit and to complete robust multi-modal improvements. The potential Swire Site development will do both if zoned with BR-OR-H-2 zoning: it will complete an internal infrastructure system that will move pedestrians and bicycles in and through the site, and it will also place appropriate density within a 10 minute walk of two regional light rail stops. This is the right approach to adding density and it should be incorporated into the FEIS Preferred Alternative.





**4. The FEIS should include increased floor plate sizes in the Preferred Alternative to promote more efficient and flexibly designed buildings in Bellevue.**

Like FAR assumptions, the City must disclose other development standard assumptions in the FEIS for the Preferred Alternative to validate the development capacity assumed. Alongside this, the City should study increased floor plate sizes compared to floor plates in existing zoning and disclose those figures in the FEIS. Larger floorplates will result in more efficient building forms, more design flexibility, and reduce bulk and scale at the neighborhood level through efficient site design and planning.

As written, it is unclear what floor plates sizes have already been assumed by the City in the DEIS alternatives. Disclosing this analysis, and considering increased floor plate sizes in the FEIS compared to current zoning standards, is essential to confirm the City's development assumptions are feasible. More specifically, *the City should study floor plate sizes of up to 14,000 sq. ft. for residential uses between 85' and up to 240' and include this figure in the FEIS shadow analysis.* Swire believes that a 14,000 sq. ft. floor plates maximum for residential buildings strikes the correct balance between much needed efficiently constructed density to hit housing targets while also maintaining thoughtful building design. The City should also increase the flexibility for connected floorplates in all buildings up to 160' or 180' using light gauge steel or cross-laminated timber construction types.

**5. The City should identify revisions to its Critical Areas Ordinance to align its steep slope provisions with best available science.**

The Swire Site is burdened by naturally occurring and man-made steep slopes, both of which are currently recognized as environmentally critical areas under the Bellevue Land Use Code ("LUC") in the Critical Areas Ordinance ("CAO"), LUC 20.25H. *See Exhibit 1* at 12. As written, the CAO fails to distinguish between manmade and naturally occurring steep slopes, and both require buffers, setbacks, and reduce development capacity (the "CAO development penalty"). Manmade steep slopes should not be subject to the CAO development penalty: they do not warrant protection in order to maintain geologic stability. Subjecting development on properties with manmade steep slopes to the CAO reduces development capacity solely because of existing development the City agreed was safe and authorized in historic permits. This does not make sense and is not justified by best available science. This circumstance further adds cost to development and results in an unnecessary burden on City resources through needless permit processing to modify manmade slopes, setbacks and buffers, and ultimately delays development. This should be avoided. The FEIS should study, at minimum, modification to the CAO to remove man-made slopes from regulation.

Additionally, steep slope areas which are revegetated through redevelopment to become "active" outdoor spaces such as courtyards, lawns, or parks (regardless of whether they are manmade or naturally occurring) *should not count towards impervious surface calculations.* Once revegetated, these spaces no longer meet the Bellevue City Code's definition of impervious surface, and they functionally infiltrate stormwater. *See BCC 24.06.040.I.* ("Impervious surface" means nonvegetated surface area that either prevents or retards the entry of water into







the soil mantle as under natural conditions prior to development.”). Sites with such features should not be further penalized in impervious surface calculations, and this code change should similarly be studied in the FEIS.

These common-sense and limited revisions to the CAO will significantly ease the burden on new development from slopes while maintaining the highest level of protection for environmentally critical areas that serve environmental goals. Again, the City should identify these changes and study their impacts in the FEIS.

### **III. Conclusion**

Thank you for the opportunity to comment on the DEIS. Swire commends the City for proposing action alternatives in the DEIS which address Bellevue’s housing challenges through well-managed growth while prioritizing a high quality of life and balanced job growth. But, with respect to the Site, the alternatives do not go far enough to identify an appropriate level of density and the City should identify the BR-OR-H-2 map designation for the Site in the Preferred Alternative.

Swire looks forward to engaging with the City and working with staff as the comprehensive planning process continues. As a longtime resident of Bellevue, Swire is enthusiastic about partnering with the City to achieve Bellevue’s vision for a mixed-use, transit-rich future and that with the suggested changes, the Preferred Alternative in the FEIS could achieve this vision should the company transition operations in the future. Please let us know if we can answer any questions or provide additional details on these comments.

Sincerely,

Jon Yearsley  
Vice President, Manufacturing and Engineering



Kelsey Creek Center LLC  
15015 Main Street, Suite 203  
Bellevue, WA 98007

June 12, 2023

VIA ELECTRONIC SUBMITTAL

Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Re: Bellevue 2044 Comprehensive Plan DEIS Comment  
Support for Alternative 3 with Mixed-Use Midrise Densities at Kelsey Creek Center

Dear Reilly:

I am writing on behalf of Kelsey Creek Center LLC, who owns the 16.7-acre Kelsey Creek Center at the southeast corner of Main Street and 148<sup>th</sup> Avenue Southeast (Kelsey Creek Center).

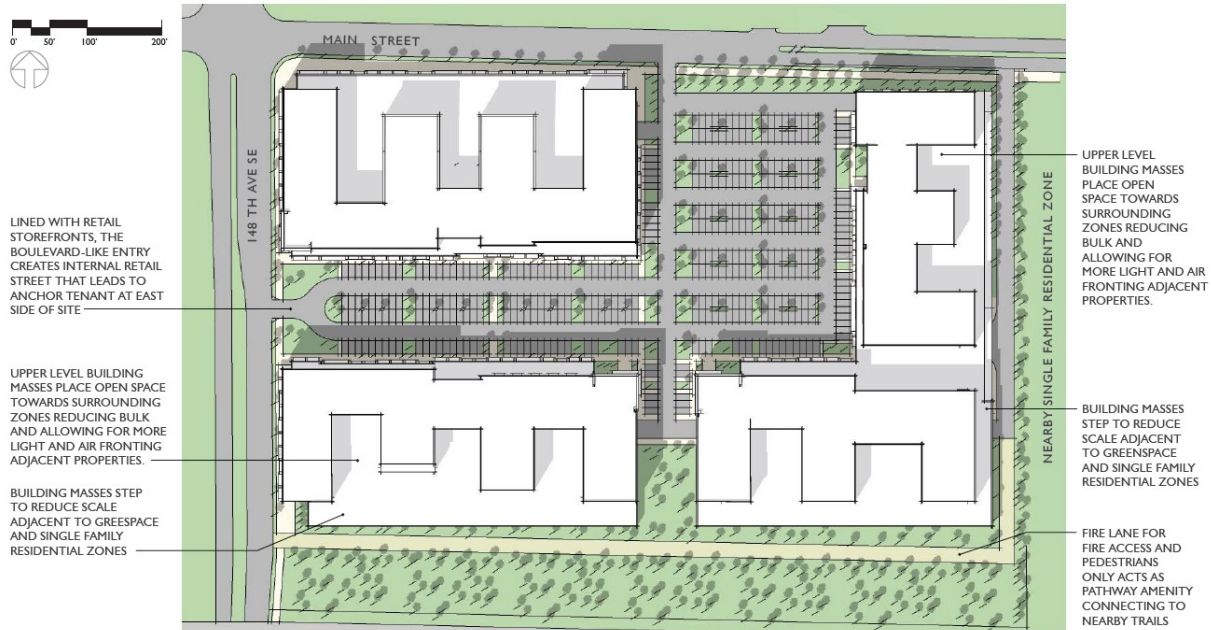
As you know, Kelsey Creek Center is classified as a Neighborhood Center and serves the surrounding neighborhood with a variety of commercial and office uses. We appreciate the opportunity to comment on the City of Bellevue's Comprehensive Plan Draft Environmental Impact Statement (DEIS) for the 2044 Comprehensive Plan (2044 Comp Plan). Our comments are:

- **Preferred Alternative should be Mixed-Use Midrise for Kelsey Creek Center.**
  - All Alternatives show Kelsey Creek Center as Mixed-Use Lowrise, which would support commercial and residential uses of up to four story densities.

This is a missed opportunity. We encourage the City's Preferred Alternative for Kelsey Creek Center to be Mixed-Use Midrise, which would allow for densities of up to seven stories. Kelsey Creek Center is well served by transit. It is a destination amenity for East Bellevue for restaurants and shopping. It is adjacent to the Lake Hills Greenbelt Park and the 150-acre Kelsey Creek Community Park. We agree that Kelsey Creek Center's future is as a modernization of a mixed-use center with vibrant commercial and residential uses. **A Mixed-Use Midrise designation is most appropriate for Kelsey Creek Center to support redevelopment as a vibrant center.**

We have envisioned a conceptual plan for Kelsey Creek Center below at a midrise density with surface and above-grade parking. This could allow for approximately 1400 residential units and over 125,000 sf. of new retail and commercial uses. The Mixed-Use Midrise designation best supports the redevelopment of vibrant, modern neighborhood center for East Bellevue.

## POTENTIAL SITE PLAN



The Mixed-Use Lowrise densities and application of the Transition Area standards is unlikely to support sufficient capacity and flexibility to allow viable redevelopment, particularly if a new project wished to retain a destination grocer and fitness user, among other uses. In order to support the redevelopment of the area and retain key anchor uses, **the Preferred Alternative must be a Mixed-Use Midrise for Kelsey Creek Center.**

- **Preferred Alternative should allow for range of uses in Neighborhood Centers.**
  - The City's planning for uses should be less restrictive in the Neighborhood Centers, including eliminating the minimum parking requirements for residential units and relaxing parking standards for retail and restaurant uses.

The City should allow the market to decide parking standards for neighborhood centers. The Preferred Alternative should allow for above-grade parking at Kelsey Creek Center due to the existence of environmental constraints like Kelsey Creek that make below-grade parking infeasible.

- **The Preferred Alternative must evaluate – and where necessary – repeal existing concomitant zoning agreements inconsistent with the new zoning.**

The Kelsey Creek Center was originally developed in 1969 as part of the Lake Hills annexation. Since then, it has been redeveloped with a site-specific rezone and series

of concomitant zoning agreements, including in 1987, 2000, 2004, 2010, and most recently, in 2013 with Ordinance 6127. These antiquated zoning agreements do not reflect the City's transit-oriented development concepts in the 2044 Plan. When implementing the new zoning with the 2044 Plan update, the City should ensure that the adopting ordinance repeals all antiquated concomitant zoning agreements and conditions that are inconsistent with the preferred Mixed-Use Midrise designation.

- **The Final EIS must include economic analysis to evaluate viability of redevelopment for neighborhood center sites in the Phase 2 LUCA.**

- We understand that the 2044 Plan EIS analysis will help inform the Phase 2 Land Use Code Amendment (Phase 2 LUCA) considerations of increased height and density in neighborhood centers, including Kelsey Creek Center.

A Mixed-Use Midrise designation, allowing up to 10 stories, allows for maximum flexibility and economy in site planning and construction types.

The Final EIS should evaluate and disclose the impacts of any inclusionary zoning requirements – including on-site or fee-in-lieu affordable housing – on the viability of redevelopment to ensure that any mandates are economically balanced to provide true incentives for private participation.

Thank you for the opportunity to comment. Please feel free to contact me with any questions.

Sincerely,

s/Brian Franklin  
Kelsey Creek Center LLC



PO Box 3558, Federal Way, WA 98063

June 12, 2023

City of Bellevue Development Services Department  
Attn: Liz Stead, Director and SEPA Responsible Official  
Reilly Pittman, Environmental Planning Manager  
Bellevue City Hall  
450 110th Avenue NE  
Bellevue, WA 98004

*Via email to [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)*

*Re: SEPA Comments on File No. 22-116423 LE, the City of Bellevue 2024-2044  
Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft  
Environmental Impact Statement for 1500 124th Avenue NE*

Dear Director Stead and Mr. Pittman:

This letter is submitted on behalf of Alco Spring District LLC ("Alco") as part of the public comment process for the City of Bellevue ("City") 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement ("DEIS"). We have reviewed the DEIS, and are impressed by the City's thoughtful approach to density changes that maximize public transit investments. This approach provides the best opportunity to move workers and residents away from single-occupant vehicle use, and is a clear way to avoid associated traffic, GHG emissions, and other impacts from density.

Alco purchased the property at 1500 124th Avenue NE in 2023 (the "Site"). The site is immediately west of The Spring District, and within 1/4 mile of the future 122nd Sound Transit light rail station. Given this proximity to transit, we agree with the direction in the DEIS action alternatives to identify the Site for additional future density. We support Alternative 3, which identifies the BR-RC-H-2 designation for the Site, and request this designation, or a similar mixed-use designation be carried forward in the Preferred Alternative. We also offer the following additional DEIS comments:

- I. The Preferred Alternative should allow heights of 250-feet plus on parcels in Bel-Red within 1/4 mile of light rail stations to maximize future housing production.**

As noted above, we agree with the BR-RC-H-2 designation for the site identified in Alternative 3 because it would allow up to 25 stories of height. We think this is an appropriate height for future development that will provide riders for the nearby light rail line. Alternatively, we would support the BR-OR-H-2 designation that is proposed with nearly the same height limit and that

appears to provide greater flexibility in uses. We view the Site primarily for residential future development and have commissioned a theoretical capacity study that shows how 850 large (800 sf average) residential units could be accommodated on the site. The study is attached and is incorporated herein by this reference.

Although we view the site primarily for residential development currently, we do not have any immediate development plans, and flexibility in future use is vital to ensure redevelopment can occur in light of unknown future market conditions. The City should not prescribe specific uses for the Site and it should provide zoning that supports building forms for a variety of uses. Instead of carrying forward the “Office/Residential” and “Residential/Commercial” designations in current zoning, in the FEIS, the City should study creating a “Bel-Red Mixed” zoning designation that would allow 250 feet of height, but not restrict specific uses.

**II. Any potential affordable housing program in the Preferred Alternative should be incentive-based and account for the additional cost of high-rise construction.**

We note that the different DEIS alternatives all appear to identify different affordable housing programs, yet the DEIS does not disclose any assumptions on affordable unit production or economic information on how such programs would be calibrated. Any affordable housing program in the Preferred Alternative should have an incentive-based structure, similar to current Bel-Red zoning. This program has yielded results in recent years, and shows promise if replicated and calibrated appropriately. Appropriate calibration is the most important part of any program, and the FEIS should disclose robust economic information detailing assumptions and demonstrating how such a program would work to encourage housing development overall while also delivering affordable units or in-lieu fees, and taking into account high-rise construction costs and current economic conditions.

**III. The Preferred Alternative should study revised development standards in the densest areas of Bel-Red within 1/4 mile of light rail stations.**

We have reviewed the development standards in the current RC zoning designation with our architects, and have significant concerns that some of the standards appear suburban and not aligned with the City’s future vision outlined in the DEIS. Further, any changes to development standards beyond height are not clearly called out in the DEIS. We recommend the City study the following development standard adjustments in the Preferred Alternative, and clearly state how standards would be modified in the FEIS:

- a. FAR to support 250 feet of height should be identified.** Current FAR limits are low. Even the densest areas of Bel-Red have a maximum FAR of 4.0. The FAR limit should increase considerably in order to support true high-rise development. The City should consider FAR limits of at least 8.0 on large sites to support tower development. The FEIS should also study removing a residential FAR limit altogether.

- b. **100% lot coverage and impervious surface should be allowed.** Current RC zoning contains lot coverage and impervious surface limits. These standards should be removed or adjusted to 100% in the Preferred Alternative. Similar to Downtown, areas within 1/4 mile of light rail should not have these additional restrictions on density. In order to meet the City's sustainability goals, the City could study introducing sustainability standards as an incentive or a flexible green factor limit.
- c. **Larger residential floorplates should be allowed.** Current RC zoning limits upper-level residential floorplates to 9,000 square feet, which are too small to create an efficient high-rise floorplate. Our architects advise a 10,500-12,000 average upper-level floorplate is more efficient, and our capacity study assumes these larger floorplates. The Preferred Alternative should incorporate similar larger floorplate size limits.
- d. **Eliminate residential parking minimums.** The Preferred Alternative should shift from residential parking minimums to parking maximums, especially for sites within 1/4 mile of light rail stations.
- e. **Eliminate multifamily play area requirements.** The City should replace its current multifamily play area requirement with a more typical residential amenity requirement in future zoning changes. The City should also identify parks infrastructure investments and funding sources as part of the FEIS, as it is more efficient for families with children to use a few large park amenities compared to smaller piecemeal parks that are not public. The City's focus should be on enhancing its current park resources to benefit all current and future Bellevue residents.
- f. **Eliminate the block length requirement.** Our Site does not currently have any required local streets identified. Because of the Site's location between the light rail tracks on the north and Spring Boulevard on the south, any additional streets would be redundant and the Preferred Alternative should not study expansion of the local street grid. In addition, the City should not require the Site to be broken up based on any rigid block size or length requirement. Rigid requirements will undercut the ability for a future development to plan the Site in the most efficient manner that connects with contemporary surrounding uses.

**IV. The Preferred Alternative should retain the existing framework in Bel-Red that allows historic industrial uses to continue.**

Finally, while we are excited about development on the Site at some future date, it is currently used as a bottling plant and that use will continue for at least the next decade. Current Bel-Red zoning allows the existing manufacturing use to continue and for upgrades to occur without having to phase out on any specific timeline. We encourage the City to retain this existing use framework that is workable and fair. Development and progress occur over a long time horizon.



The DEIS has a twenty-year view, and we are certain Bel-Red will look considerably changed by then, but the City should not outlaw existing industrial uses as this could just lead to property sitting vacant and becoming a target for property crime.

Thank you for this opportunity to comment. We congratulate the City on its hard work to date. You have set out a compelling vision for the future for a City that is dense, highly amenitized, and connected by transit. We look forward to being a part of that future vision.

Sincerely,

Adam Rosen  
Portfolio Manager  
Alco Investment Company, Sole Member of Alco Spring District, LLC

Cc: Emil King  
Thara Johnson  
Abigail DeWeese, HCMP



**1500 124th Ave NE, BELLEVUE, WA 98005**

## BelRed Expansion Vision

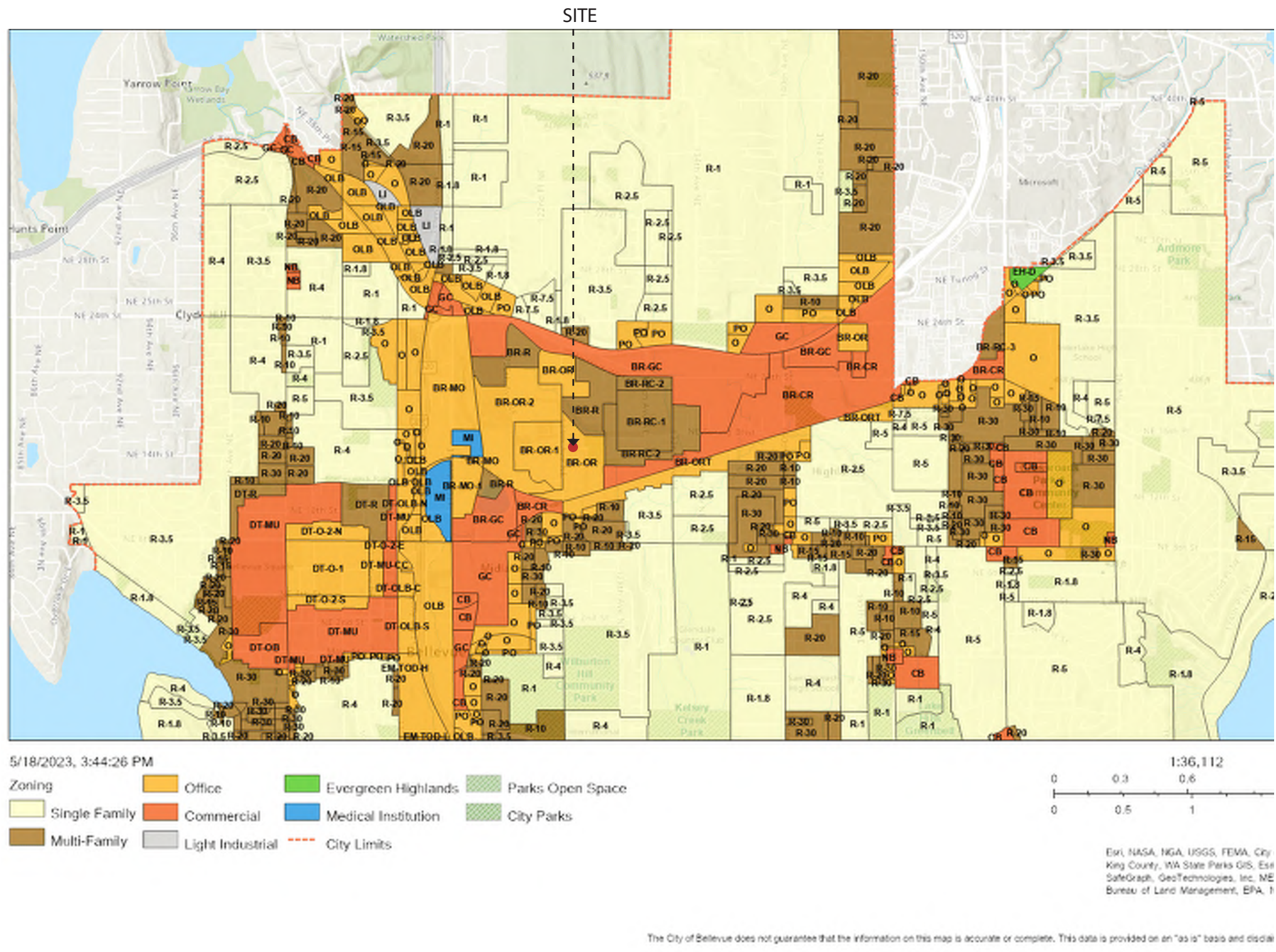
JUNE 2023

PREPARED FOR: ALCO INVESTMENT COMPANY

PREPARED BY: STUDIO MENG STRAZZARA



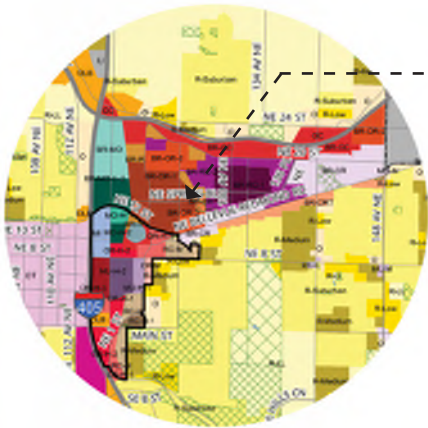
CURRENT ZONING MAP



ZONING

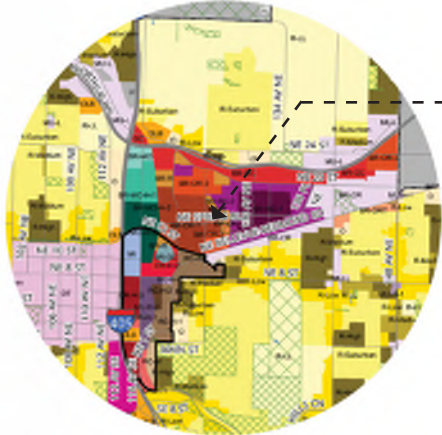
The current zoning of the site is BR-OR (BelRed Office Residential). The purpose is to provide a mix of office, housing, and retail with office being the predominant use. However the limited FAR does not support the intended future growth as per City of Bellevue Comprehensive Plan 2044.

Following diagrams show comparison of the potential FAR of site under 3 alternatives mentioned in the Comprehensive Plan.



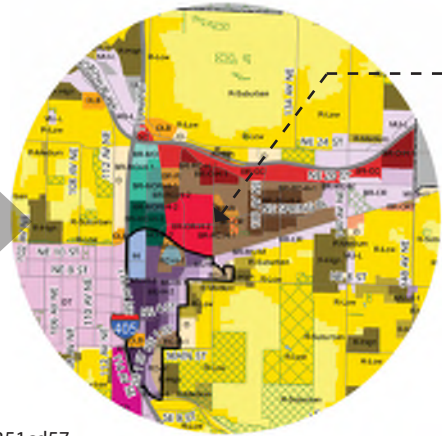
SITE

ALTERNATIVE 1  
BR-OR-1  
FAR for 12 to 14 stories



SITE

ALTERNATIVE 2  
BR-OR-1  
FAR for 12 to 14 stories



SITE

ALTERNATIVE 3  
BR-RC-H-2  
FAR for up to 25 stories

PREFERRED  
OPTION

SOURCE: <https://cobgis.maps.arcgis.com/apps/>

SOURCE: <https://bellevuewa.gov/city-government/departments/community-development/planning-initiatives/comprehensive-planwebappviewer/index.html?id=e1748172d4f34f1eb3710032a351cd57>

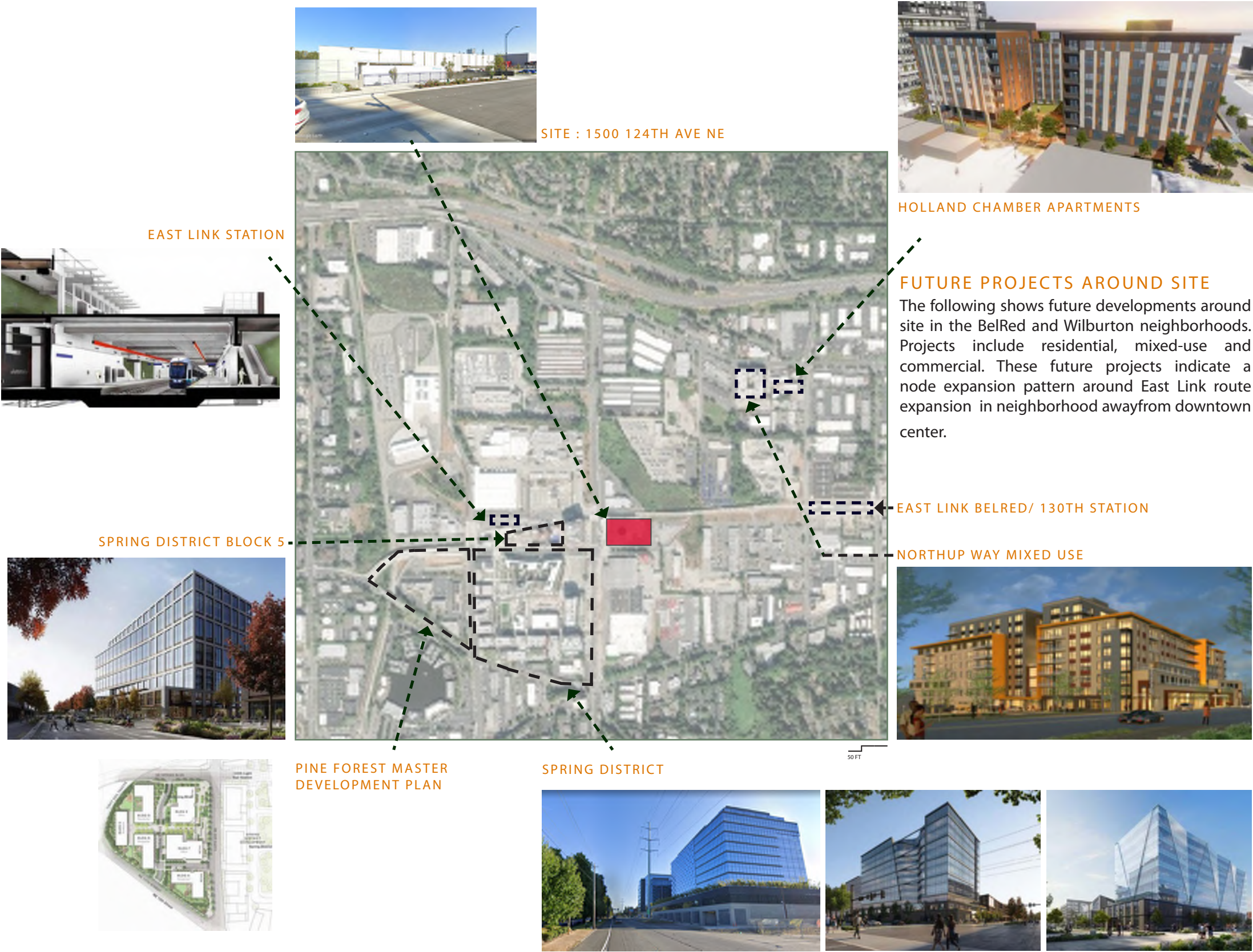
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BLOCK STUDY - FUTURE DEVELOPMENT



SOURCE: [https://bellevuewa.gov/sites/default/files/media/pdf\\_document/2020/Major%20Projects%20BelRed%20District\\_0.pdf](https://bellevuewa.gov/sites/default/files/media/pdf_document/2020/Major%20Projects%20BelRed%20District_0.pdf)

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# VISION, OPPORTUNITIES AND DESIGN GOALS

## VISION AND DEVELOPMENT PRIORITIES

Our vision is to prepare the Belred neighborhood for the Comprehensive Plan proposed by the City of Bellevue to accomodate the growing need of jobs and housing by the year 2044. As the City aspires growth in housing, it generates the need for a variety of live , work, and play spaces.

Some of the goals enlisted by the The Growth Management Act (GMA) adopted by Washington State include urban growth, reducing urban sprawl, protecting the environment, economic development, and accomodating housing affordable to all economic segments.

We propose Alternative 3 as the most favourable zoning option that can be adopted under the Bellevue Comprehensive Plan 2044 as it aligns with these goals.

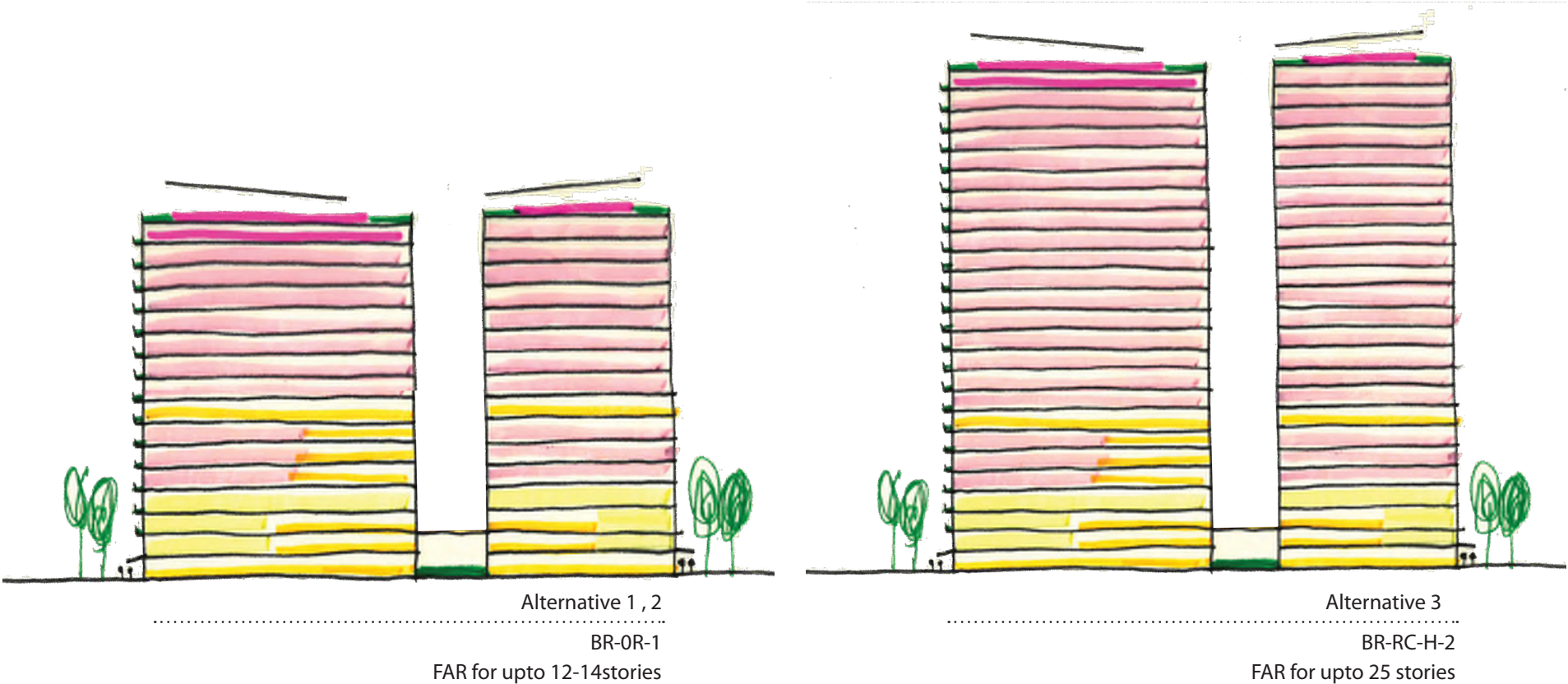
We believe up zoning plays an important role in increasing the density of future cities. It gives the opportunity to condense modules of live work spaces in a smaller footprint while opening the potential to explore dynamic spaces for parks and recreation. Dense mixed-use development near areas of public transit ensure walkability and high influx of population into neighborhoods. Easy and walkable access to amenities in neighborhood centers also helps reduce carbon emissions.

This alternative focuses on the development of existing Neighborhood Centers and areas near public transit as well as encouraging development of new Neighborhood Centers. It aligns with our vision to create self sustaining neighborhood within the city. New development promotes local businesses to thrive, thus encouraging economic development.

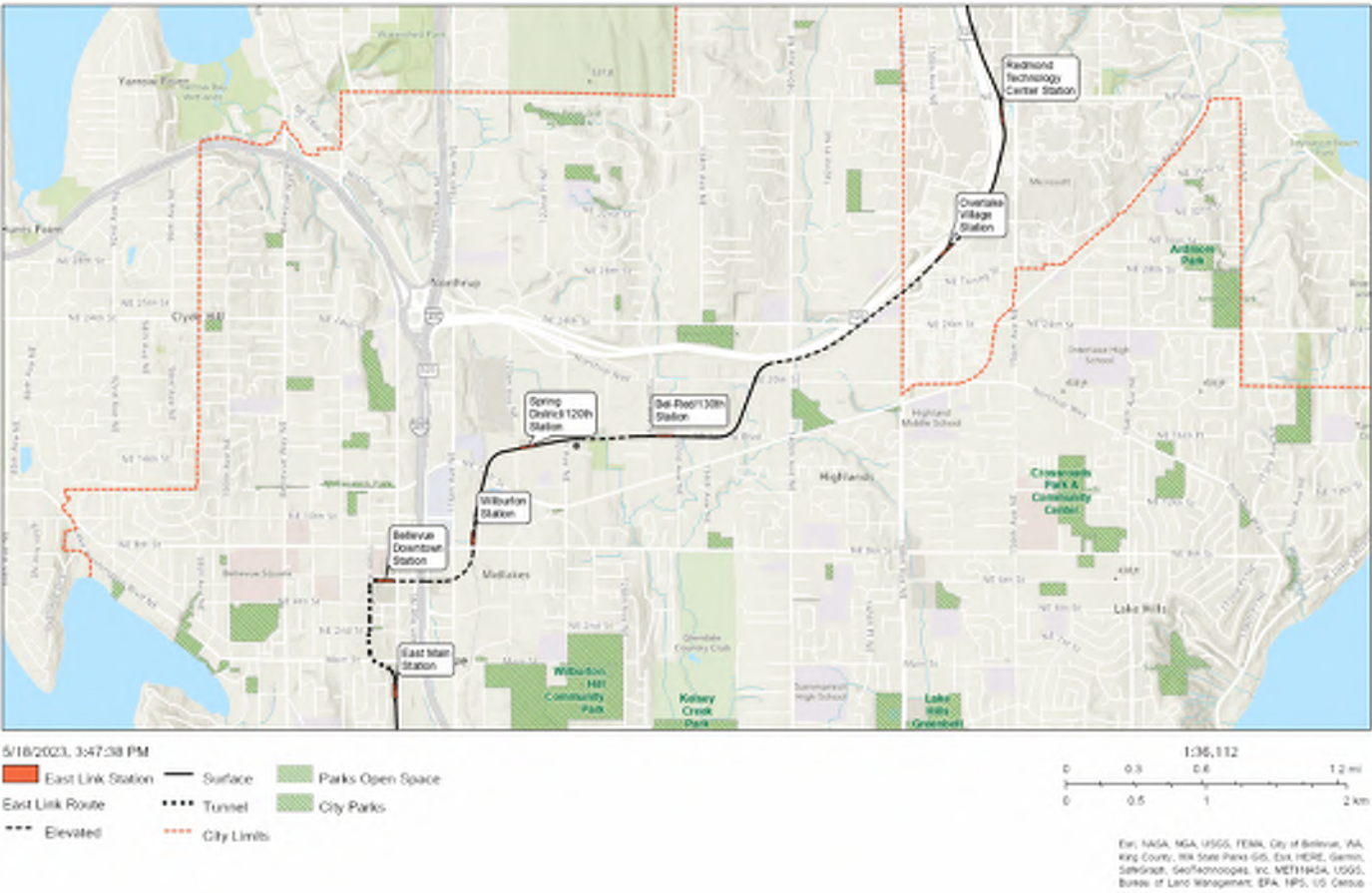
Alternative 3 proposes an increase in housing typologies across the city, ensuring inclusionary affordability in mixed use centers. This promotes equitable distribution of live , work and play environments within the neighborhood to meet State wide and global standards of sustainability.

## DESIGN GOALS

An effective way to achieve a sustainable growth of a dense housing and mixed use neighborhood is to create pedestrian-friendly and welcoming environments around buildings and areas of public transit. Our design focuses on creating interactive plaza spaces for ground level businesses to thrive, along with providing walkable destinations and evolving human-centric work environments. The idea of density brings newer dimensions of how buildings can be designed.







THE SITE

The site is located at the intersection 124th Ave NE and NE Spring Blvd in the BelRed Neighborhood of Bellevue. It falls under Mixed Use areas per current zoning.

This is a strategic location only a few blocks away from downtown Bellevue, next to the Spring District area and walking distance away from 2 major stations in the East Link route of the transit expansion. The site is in one of the major employment centers (commercial parts of BelRed) in Belred and 0.7 miles away from the Wilburton Neighborhood study area as mentioned in the comprehensive plan. These areas will have the highest density of growth under Alternative 3.



Site 0.7 miles from Wilburton study area

TRANSIT PROXIMATE AREA

Alternative 3 proposes major development in transit proximate areas which are 0.2 miles in the radius of transit network. The proximity to the transit stations will bring a major population into the BelRed neighborhood on a daily basis. Future residential and mix-use projects developing around the site give us the opportunity to envision self sustaining and dense residential neighborhood.



Site 0.2 miles away from 120th Station on East Link route (high capacity transit serving nodal development)

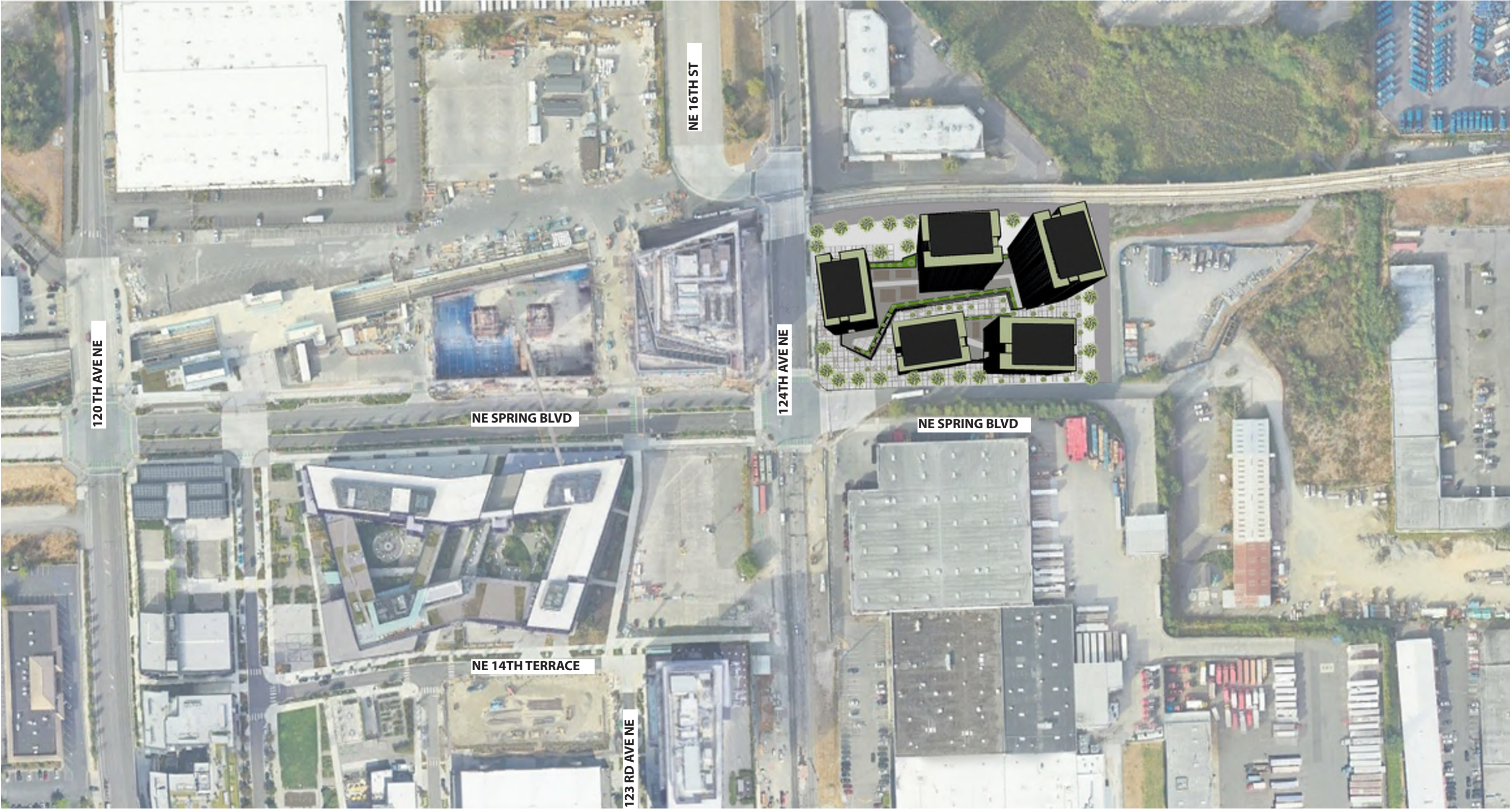
SOURCE: <https://cobgis.maps.arcgis.com/apps/>

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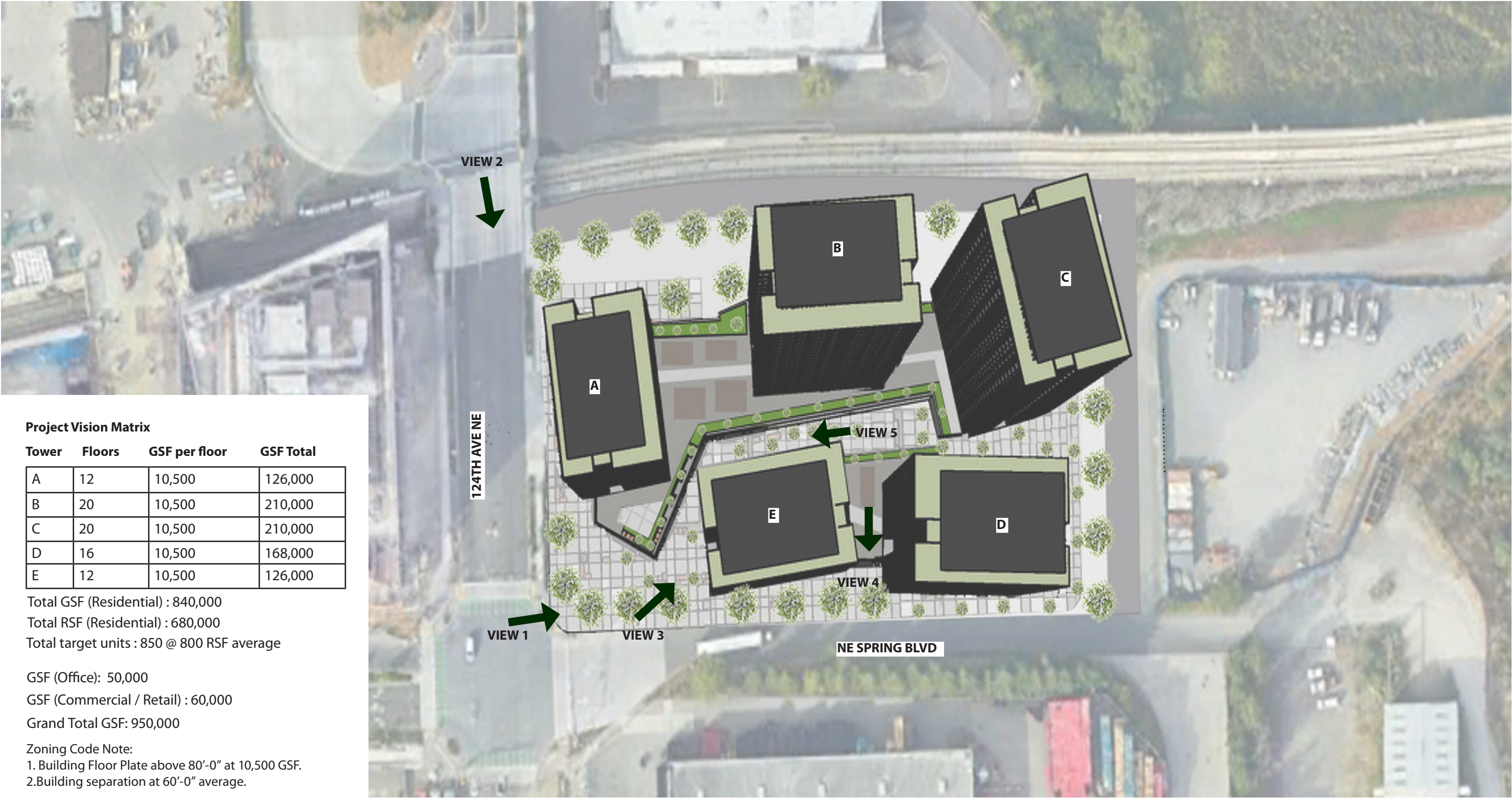


PROJECT VISION IN SITE CONTEXT





PROJECT VISION



Project Vision Matrix

Tower	Floors	GSF per floor	GSF Total
A	12	10,500	126,000
B	20	10,500	210,000
C	20	10,500	210,000
D	16	10,500	168,000
E	12	10,500	126,000

Total GSF (Residential) : 840,000  
Total RSF (Residential) : 680,000  
Total target units : 850 @ 800 RSF average

GSF (Office): 50,000  
GSF (Commercial / Retail) : 60,000  
Grand Total GSF: 950,000

Zoning Code Note:  
1. Building Floor Plate above 80'-0" at 10,500 GSF.  
2. Building separation at 60'-0" average.







View 1 from 124th Ave NE and NE Spring Blvd





View 1 from 124th Ave NE and NE Spring Blvd

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1500 124TH AVE NE BELLEVUE WA 98005| VISION STUDY| JUNE 2023

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studio  
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STRAZZARA  
ARCHITECTURE  
PLANNING  
CONSULTING





View 2 from 124th Ave NE looking south





View 3: Streetfront plaza





View 4: Deck





View 5: Courtyard



PROJECT VISION IN SITE CONTEXT



View looking SW



View looking NE



View looking NW



View looking NE



June 12, 2023

VIA EMAIL

City of Bellevue Development Services Department

Attn: Thara Johnson

450 110<sup>th</sup> Avenue NE

Bellevue, WA 98004

Email: [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Re: Public Comment  
City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and  
Wilburton Vision Implementation Environmental Impact Statement (EIS)  
File Number: 22-116423 LE

Dear Ms. Johnson:

We represent Roger White (“**Mr. White**”), owner of two properties in the City of Bellevue, the first located at Tax Parcel Nos. 282505-9103 and 282505-9290, and a separate site assigned Tax Parcel No. 262505-9217. We have reviewed the three Alternatives analyzed in the Draft Environmental Impact Statement (“**DEIS**”) as options for the 2024 Comprehensive Plan update. On behalf of Mr. White, we wish to provide the following comments.

Mr. White’s properties are strategically located in prime areas that boast convenient proximity near the future East Link Light Rail Stations. Parcel Nos. 282505-9103 and 282505-9290 are located along 116th Ave NE and currently zoned BelRed Medical Office (“**BelRed Medical Property**”). Parcel No. 262505-9217 is located on Bel-Red Rd. and currently zoned Office (“**NE 20<sup>th</sup> Office Parcel**”).

Mr. White’s NE 20<sup>th</sup> Office Parcel currently allows for multifamily housing under the Office zoning, albeit at a low density. However, the land also falls under Planning District B of the Crossroads Subarea overlay, and standalone housing is not permitted within District B. Under all three alternatives proposed by the City for the 2024 Comprehensive Plan update and analyzed in the DEIS, the property will continue to be zoned Office. At this time, it is unclear whether or not the City intends to lift the Planning District B limitation and unclear what uses will be allowed under the new Office zoning. The existing zoning classification, in a building and area which primarily caters to retail establishments, poses significant challenges when it comes to leasing the property. Therefore, any new zoning designation for Mr. White’s Office Parcel that fails to include additional use flexibility, including allowing housing would be a missed opportunity.

Mr. White's NE 20<sup>th</sup> Office Parcel is less than 1-mile from the future Overlake Village Link Light Rail Station. This advantageous positioning, coupled with its proximity to Highland Middle School, grocery stores, shopping centers, and housing-supportive businesses, makes it an excellent opportunity for residential development. Providing for broad, flexible uses on Mr. White's NE 20<sup>th</sup> Office Parcel is especially appropriate when analyzed through the lens of neighboring lands. Nearby parcels benefit greatly under the proposed alternatives for the 2044 Comprehensive Plan, while Mr. White's property does not. For example, nearby properties on Bel-Red Rd. are planned to be rezoned to Mixed Use – Midrise (“**MU-M**”) zoning under Alternative 1 and Mixed Use – Highrise – 1 (“**MU-H-1**”) under Alternatives 2 and 3. The proposed zoning change for the NE 20<sup>th</sup> Office Parcel will align with the preferences of neighboring property owners in the area, and the City's proposed zoning for the area. We recommend that Alternative 3 be modified to extend the MU-H-1 zoning classification including to Mr. White's NE 20<sup>th</sup> Office Parcel, and that Alternative 3 be the Preferred Alternative analyzed in the Final EIS.

Mr. White's BelRed Medical Property does not currently allow for housing under the existing zoning classification. Under the alternatives presented in the DEIS for the 2024 Comprehensive Plan update, Alternative 3 provides for the greatest flexibility and best possible outcome with respect to housing. Under Alternatives 1 and 2, Mr. White's property would be rezoned to BelRed – Medical Office Highrise – 2 (“**BR-MO-H-2**”). While it is unknown precisely what uses this zoning classification will allow, Alternatives 1 and 2 do not appear to prioritize housing in this location. Under Alternative 3, Mr. White's property would be rezoned to BelRed – Medical Office/Residential Highrise – 2 (“**BR-MOR-H-2**”). The DEIS describes this zoning as mostly medical office with some housing, retail & services, in highrise towers up to around 24 Stories. We urge the City to prioritize flexibility in housing and acknowledge current market conditions related to office development. The potential residential uses associated with housing for medical center staff and patients' relatives, combined with the maximum height and density allowances, would greatly complement the adjacent Bellevue Children's Hospital and utilization of the area. We recommend that Alternative 3 be clarified to ensure it includes sufficient flexibility as to housing and office uses, and that Alternative 3 be the Preferred Alternative analyzed in the Final EIS.

In conclusion, Mr. White's properties should be designated to allow for highest density and flexibility related to housing development. The properties have excellent access to transit with future Link Light Rail Stations nearby and the properties can accommodate multi-story multifamily development that help meet the City's housing needs. Thank you for your time and thoughtful consideration.

Very truly yours,



Nancy Bainbridge Rogers

NBR:alw

June 12, 2023

Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

VIA UPLOAD

Re: Bellevue 2044 Comprehensive Plan DEIS Comment  
1811 156<sup>th</sup> Avenue NE – Crossroads Mixed-Use Center

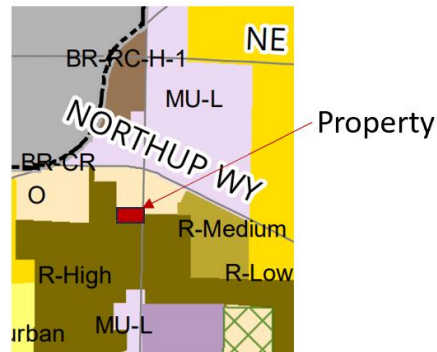
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Dear Reilly:

Thank you for the opportunity to comment on the City of Bellevue's 2044 Comprehensive Plan Draft Environmental Impact Statement (DEIS). We are writing to comment on the DEIS evaluation related to the property located at 1811 156<sup>th</sup> Avenue NE (Property). The Property is approximately 1.6 acres along 156<sup>th</sup> Avenue NE in the Crossroads Mixed Use Center. The Property is abutting residential uses to the south and west and office uses to the north.

Under all Alternatives, the Property appears to remain as an "Office" land use designation. The Property is in the Crossroads Mixed Use Center (Figure 3-9). The Property also is in or immediately adjacent to the City's defined Transit Proximate Areas (Figure 3-11).

Under Alternative 3 (shown below), the Property is an isolated node of Office designated land between areas of Residential High and Mixed-Use land use designations. This pocket of office designated area is especially isolated and small when considering that the one large Office designated parcel in this node east of 156<sup>th</sup> Avenue NE is occupied by a church.



**SEATTLE**

411 1<sup>st</sup> Avenue South, Suite 650, Seattle, WA 98104 **Phone:** (206) 728-6500 **Fax:** (206) 625-9133  
Intracorp NW, LLC

INTRACORPHOMES.COM



- **The Preferred Alternative for the Property should study – and then apply – a Mixed-Use designation to provide max flexibility for potential redevelopment.**

We support Alternative 3 as the best option for the City's future growth. **The Preferred Alternative should designate the Property with a Mixed-Use Lowrise or Mixed-Use Midrise designation.** The Property is within the Crossroads Mixed Use Center. It is surrounded by Residential High to the south and west and Mixed-Use designations to the north and northeast across Northrup Way. Under either of those two designations, new residential and mixed-use developments would be allowed and encouraged at heights up to six stories.

An Office designation is not anticipated to support growth or redevelopment.

The Property is located on a frequent transit corridor and within proximity to multimodal transit options. The Property is at the edge of the Crossroads Mixed-Use Center and isolated from the commercial/mixed use core of the Mixed-Use Center further south along 156<sup>th</sup> Avenue. An Office designation does not provide sufficient flexibility to respond to changing conditions over the next 20 years. The Mixed-Use designation will support transit-oriented redevelopment options.

- **Preferred Alternative should allow for range of uses in Mixed-Use Centers.**

The City's planning for uses should be less restrictive in the Mixed-Use Centers. Allow all uses within the Mixed-Use Center rather than being prescriptive with where to promote (or discourage) specific uses within the Mixed-Use Centers.

- **The Preferred Alternative must evaluate – and where necessary – provide mitigation for subarea plan policies that frustrate the goals of the 2044 Plan.**

As noted in Section 4.2.4, the City has 14 neighborhood subarea plans. Some of the existing subarea plans include policies that specify areas where certain uses are prohibited. The Crossroads Subarea Plan prohibits multifamily uses at the Property, along with nearby parcels, as currently defined by Policy S-CR-63.

This is a missed opportunity for vibrant, transit-oriented redevelopment of aging low-density office buildings, including the potential for mixed-use housing types.

The DEIS fails to disclose and evaluate the impacts of Policy S-CR-63 and other restrictive Subarea Plan policies which will frustrate the implementation of the 2044 Plan's vision. The Final Environmental Impact Statement must evaluate – and where necessary – mitigate for these Subarea Plan policies that are inconsistent with the intent of the 2044 Plan by repealing such contrary policies.



Thank you for the opportunity to comment. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'BB', with a long horizontal flourish extending to the right.

Brandon Burrowes  
IS Property Investments LLC



June 12, 2023

VIA EMAIL

City of Bellevue Development Services Department

Attn: Thara Johnson

450 110<sup>th</sup> Avenue NE

Bellevue, WA 98004

Email: [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Re: Public Comment  
City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and  
Wilburton Vision Implementation Environmental Impact Statement (EIS)  
File Number: 22-116423 LE

Dear Ms. Johnson:

We represent Aegis Senior Communities, LLC (“**Aegis**”), owner of land in the Lake Hills neighborhood, Tax Parcel No. 883890-0271 (the “**Parcel**”). The City of Bellevue has established ambitious objectives that focus on housing for its 2044 Comprehensive Plan update. We applaud the City’s endeavors to upzone areas within the City that will pave the way for future growth and development in the coming decades. On behalf of Aegis, we hereby request that the City include in its 2044 Comprehensive Plan Update and in the Final EIS analysis, provisions that more directly drive market-feasible housing development in the Lake Hills neighborhood.

The Aegis Parcel is located near the intersection of 145<sup>th</sup> Pl SE and SE 16<sup>th</sup> St in the Lake Hills neighborhood. The Parcel is currently zoned Neighborhood Business (“**NB**”). Aegis initially acquired this land to develop an assisted living facility. Unfortunately, that development plan did not pencil out. Now, as an investment asset, Aegis seeks to sell the property for its highest and best use. The highest and best use plainly is multifamily housing, particularly given the current housing constraints and affordability crisis in Bellevue and the overall Puget Sound region. Unfortunately, under the current NB zoning, residential developers are uninterested in the Parcel. This is because the NB zoning limits new housing to only development of low-rise mixed-use buildings with retail or office on the ground floor and just one story of housing above. This product type is not economically feasible and, therefore, many areas in Bellevue that are zoned NB sit un-developed or under-developed, all while the City faces a housing crisis.

In the City’s Draft EIS for the 2044 Comprehensive Plan update, all three Alternatives would rezone Aegis’ Lake Hills property from NB to Mixed-Use Lowrise (“**MU-L**”). In general, all lands within the City’s existing NB zones would be rezoned to the new MU-L zoning classification. MU-L zoning is described,

generally, as providing for a mix of residential and commercial use in low-rise buildings between 2 and 4 stories. However, no specific details are provided as to the uses to be allowed in the MU-L zone. For example, it is unknown if townhomes would be allowed, or if stand-alone apartment buildings will be allowed.

We ask that the strategy for the 2044 Comprehensive Plan be updated so as to provide market-feasible development potential for the Aegis Parcel, and for all land in the current Lake Hills Neighborhood Business zone. Simply carrying forward the existing uses allowed in the NB zone into the new MU-L zone will not result in new housing production on the Aegis Parcel or similarly situated lands. Even prior to the fundamental shift in retail and office uses brought on by the Covid-19 pandemic, development of low-rise mixed-use buildings with retail or office on the ground floor and just a few stories of housing above was not feasible. No one is actively building these types of structures because it is too difficult to find viable tenants for the commercial component, and the meager amount of residential development allowed above the commercial uses is not enough to ensure the project will break even or make a profit with vacant commercial space on the ground floor.

The vital need for housing in the City of Bellevue is no secret. According to the 2021 buildable lands report, the City is currently projected to achieve only 79% of its previous goal. To ensure the City remains on course to meet its future housing targets outlined in the 2044 Comprehensive Plan, it is imperative that the City adopt a preferred alternative that facilitates significantly higher residential unit growth throughout the City. We ask the City to craft the Preferred Alternative in the FEIS to assure that the specific permitted uses for the Aegis Parcel including the following: multi-family housing, including either townhomes up to three stories, or stand-alone apartment buildings with at least 5 stories, together with allowances for separate commercial structures, and that the new zoning classification allow development or re-development of projects that are 100% residential. In our view, such an allowance also makes sense when applied to all lands in the current NB Zones which the DEIS targets for rezoning to MU-L.

We commend your forward-thinking approach in acknowledging the necessity for additional housing units in Bellevue and in ensuring that the zoning code effectively directs future growth for the coming decades. We are delighted to offer our assistance to the City in any capacity possible. We appreciate your time and consideration. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read "Nancy B. Rogers", followed by a long horizontal line extending to the right.

Nancy Bainbridge Rogers

NBR:alw

June 12, 2023

VIA EMAIL

City of Bellevue Development Services Department

Attn: Thara Johnson

450 110<sup>th</sup> Avenue NE

Bellevue, WA 98004

Email: [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Re: Public Comment  
City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and  
Wilburton Vision Implementation Environmental Impact Statement (EIS)  
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In the City’s Draft EIS for the 2044 Comprehensive Plan update, all three Alternatives would rezone Aegis’ Lake Hills property from NB to Mixed-Use Lowrise (“**MU-L**”). In general, all lands within the City’s existing NB zones would be rezoned to the new MU-L zoning classification. MU-L zoning is described,

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Very truly yours,

A handwritten signature in black ink, appearing to read "Nancy B. Rogers", followed by a long horizontal line extending to the right.

Nancy Bainbridge Rogers

NBR:alw

## Comments Comprehensive Plan DEIS #2

**This is a second and separate submission from me.**

Barbara Braun - 13609 SE 43<sup>rd</sup> Place

The City's commitment to reducing greenhouse gas emissions by 50% by 2030 is not sufficiently analyzed or addressed in the Comprehensive Plan.

The Washington Department of Commerce's Climate Element Review Group has been working on an optional Climate Element section guideline for Comprehensive Plans that should be included in the final EIS for Bellevue. [Link](#)

From the Department of Commerce's website:

"The Washington Department of Commerce is developing a model element to help cities and counties address climate change in their comprehensive plans. The model element will include mitigation (greenhouse gas reduction) and resilience (climate impacts preparedness, response, and recovery) planning guidance, as well as a model chapter with goals and policies (Menu of Measures) that communities may voluntarily adapt or adopt into their comprehensive plans as part of their periodic update. The model element — described in the [2021 budget \[Section 129 \(126\)\]](#) — must be completed by **June 2023** and must integrate input from fellow state agencies and other partners."

The draft Guideline and development timeline can be found here:

1. [Draft Guideline](#) – post as of May, 2023
2. [Development Timeline](#) - The initial products – the model elements – are due by June 30, 2023.

Bellevue should adopt this guideline into our Comprehensive Plan even if this requires us to be a pilot city. The preferred Alternative should be analyzed on its ability to meet our climate goals using this Guideline and appropriate mitigations should be outlined in the Final EIS.

Included in the Final EIS should be numerical estimates of future GHG emission metrics along with the key actions and mitigations that will enable us to achieve those measurable targets.

The final Comprehensive Plan should not be adopted without full confidence that our climate goals will be met. The timing of the final EIS should be modified to allow time for the inclusion of this planning element, and the schedule for completing and adopting the Comprehensive Plan should be modified accordingly.

Bellevue should stand out as a large municipality who is taking climate action seriously.

Thank you!

**From:** Barbara Hughes <barbara\_hughes@hotmail.com>  
**Sent on:** Monday, June 12, 2023 6:33:50 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Draft EIS

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Good Morning,

I would like to be **added as a party of record** and I also adopt the comments, concerns, and objections articulated by the Bridle Trails Community Club in their emailed letter dated June 11, 2023 (emailed to you today).

Thank you,

Barbara Hughes  
13709 NE 48<sup>th</sup> Pl  
Bellevue 98005



**From:** Betsi Hummer <betshummer@yahoo.com>  
**Sent on:** Monday, June 12, 2023 7:14:16 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Party of Record

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

**Dear Planners:**

**For such a crucial decision for the future of our city I would like to be included as a party of record on this matter.**

**Thank you,**

Betsi Hummer  
14541 SE 26 St  
Bellevue WA 98007

425.591.4784 betshummer@yahoo.com

**From:** Yahoo <cpauljohnson@yahoo.com>

**Sent on:** Monday, June 12, 2023 1:55:07 PM

**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>

**Subject:** Comments on the Draft Environmental Impact Statement (DEIS) City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello,

We are home owners in Bridal Trails R-1 and have reviewed the DEIS and the zoning alternatives being considered.

Our family is in support of easing restrictions to allow additional housing around the city including in our own neighborhood. We would welcome an expansion of ADU's, the allowance of DADU's, and some duplexes.

We hope that as the city works through the comprehensive plan that it supports growth throughout the city and avoids placing any new restrictions on construction.

Bellevue needs housing that families can afford and every neighborhood should contribute to that including ours. As evidenced by the consolidation of Wilburton and Eastgate elementary schools due to under enrollment (while Lake Washington school district is over enrolled) we have a very long way to go. A city of neighborhoods needs children and that means housing.

Thank you,  
- C Paul Johnson  
12210 NE 39th St  
Bellevue

**From:** Candice Boyd <ckhboyd@gmail.com>  
**Sent on:** Monday, June 12, 2023 3:06:31 AM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Party of Record

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Please add me as a party of record.

Thank you,

Candice Boyd

**From:** Plummer David F. <pdf3@comcast.net>

**Sent on:** Monday, June 12, 2023 4:09:59 AM

**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>

**CC:** Onebellevue@googlegroups.com; Rebecca Maskin <rmaskin@kingcounty.gov>; Nesse, Katherine <KNesse@bellevuewa.gov>

**Subject:** City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Environmental Impact Statement

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

City of Bellevue Development Services Department

Attn: Reilly Pittman  
450 110th Avenue NE  
Bellevue, WA 98004

Hello Mr. Pittman!

During the 2022 meetings of the City's 2044 Strategy Team, the Team members apparently cast their votes indicating their preference for a housing unit 'target' to be considered for incorporation into the City's 2024 update of the City's comprehensive plan; the Team members were presented with 6 possible choices: 35,000 (13), 45,000 (6), 55,000 (4), 65,000 (2), 70,000(4), and more than 70,000 (3); the number of 'votes' for each value is given in the parenthesis following each value, as shown in the illustration illustration below. This information became known to the Bellevue staff about 20 September 2022 (reference "Mentimeter Notes, 2022.09.20.xlsx", accessed 10 June 2023).

Using a place-holder value of 75,000 for each of votes cast for a greater-than-70,000-value, the average of all 33 votes is about 50,000 housing units, far in excess of the King County specified value of 35,000 for the City's 2024 update of the Comprehensive Plan. In addition, in the City's 2024-2044 Comp. Plan update DEIS, the City has failed to identify the HU values for the (draft??) 2024 Comp. Plan; further, the DEIS housing-unit **target values** for the 4 alternatives are not identified, though the **predicted capacity values** are very much higher than the Team-preferred value (ca 50,000) and the King County targets specified in the 2021 King County Countywide Planning Policies, Table DP-1; in addition, no rationale is provided for why Comp Plan changes have been postulated for the 3 "Action" alternatives that result in HU capacities far in excess of the King County specified targets given in Table DP-1.

Sincerely,

Would you please confirm your receipt of a readable copy of my comments?

David F. Plummer  
David F. Plummer

14414 NE 14th Place  
Bellevue, WA. 98007

1	<b>Note: there are more sheets in this document</b>			
2	Each session is found on its own sheet below. There is a session for each time you have renewed these questions.			
3	Date	Session	Voter	
4	2022-09-20	1	1	55,000
5	2022-09-20	1	2	55,000
6	2022-09-20	1	3	70,000
7	2022-09-20	2	4	35,000
8	2022-09-20	2	5	35,000
9	2022-09-20	2	6	35,000
10	2022-09-20	2	7	45,000
11	2022-09-20	2	8	55,000
12	2022-09-20	2	9	35,000
13	2022-09-20	2	10	55,000
14	2022-09-20	2	11	45,000
15	2022-09-20	2	12	More than 70,000
16	2022-09-20	2	13	
17	2022-09-21	2	14	70,000
18	2022-09-21	2	15	70,000
19	2022-09-21	2	16	35,000
20	2022-09-21	2	17	65,000
21	2022-09-21	2	18	35,000
22	2022-09-21	2	19	35,000
23	2022-09-21	2	20	45,000
24	2022-09-21	2	21	
25	2022-09-21	2	22	45,000
26	2022-09-21	2	23	45,000
27	2022-09-21	2	24	35,000
28	2022-09-21	2	25	70,000
29	2022-09-21	2	26	35,000
30	2022-09-21	2	27	65,000
31	2022-09-21	2	28	45,000
32	2022-09-21	2	29	More than 70,000
33	2022-09-21	2	30	More than 70,000
34	2022-09-21	2	31	35,000
35	2022-09-21	2	32	35,000
36	2022-09-21	2	33	35,000
37	2022-09-21	2	34	35,000
38	2022-09-21	2	35	
39				
40				
41				
42				

Voters Session 1 Session 2 +

Normal View Ready

# HEARTLAND

---

June 12, 2023

City of Bellevue Planning Commission  
c/o Thara Johnson

Send via email:

[CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Thara Johnson: [TMJohnson@bellevuewa.gov](mailto:TMJohnson@bellevuewa.gov)

Re: DEIS Comment Letter-Neighborhood Centers & Newport Hills Shopping Center

Planning Commissioners:

Heartland LLC is a Seattle based real estate advisory firm that has been engaged by Rainier Northwest, the owner of Newport Hills Shopping Center (NHSC) to help them reposition their property to be the vibrant center of the Newport Hills neighborhood for generations to come.

We appreciate the hard work that City Staff and the Planning Commission have put into the Comprehensive Plan process so far and look forward to working collaboratively to ensure that NHSC contributes to the City's ability to achieve its long-term goals. This letter provides some important background about the NHSC and offers some observations and recommendations for the City to consider as it moves forward with the FEIS and the formation of zoning and development standards.

The following summarize our findings, which are discussed in more detail in the body of the letter:

- Revitalization of the NHSC has been a stated objective of the City for decades. The current, low-density NB zoning has been cited by City commissioned studies and several private developers as one of the major obstacles to realizing the vision for a vibrant mixed-use neighborhood center. The other major impediments to redevelopment include the limited growth of new households in the surrounding neighborhood and fundamental shifts in retail over the last 40 years.
- While we support growth Alternative 3 in principle, it only just begins to address the need for more households to support retail in Newport Hills by modestly increasing housing options surrounding the NHSC. As discussed below, the proposed MU-L zoning is entirely insufficient to support mixed use redevelopment and provide desperately needed housing outside of the expensive, high-density growth centers of Wilburton and the Bel-Red. The MU-M zoning designation provides the bare minimum residential density necessary to support redevelopment of NHSC and we encourage the Planning Commission to consider it for NHSC.
- At almost 6 acres, NHSC is a unique opportunity to convert a downtrodden 1960s strip center into a true mixed-use neighborhood center. Large sites like this offer flexibility to configure buildings to incorporate public amenities that can have a profound impact on placemaking (e.g., public plazas) and are otherwise unachievable on typical sites. In addition to the densities allowed in the MU-M zoning (Base FAR), we encourage the Planning Commission to apply an incentive zoning system to MU sites in Neighborhood Centers, that are greater than 4 acres so

that the neighborhoods can benefit from the type of site-specific development standards and process employed in other parts of the city.

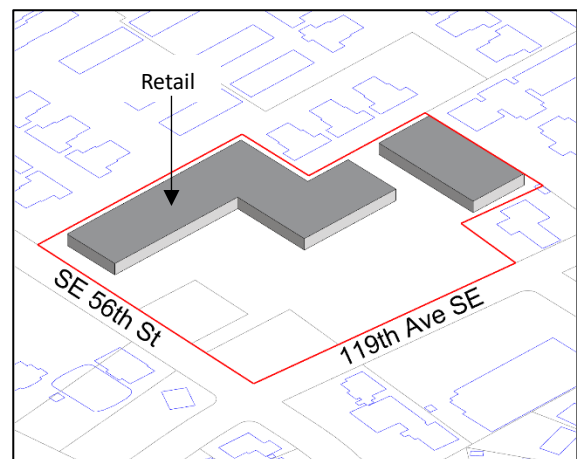
### Context:

Located at the intersection of 119<sup>th</sup> Ave SE and SE 56<sup>th</sup> St, NHSC is a 5.89 acres (256,583 SF) site. Three of four buildings on the property were built in 1963 totaling to a gross building area of 55,310 SF. The vacant retail store at the northwest corner of the site was built in 1977 with a gross building area of 6,128 SF. The property is dominated by surface parking at 53% followed by buildings at 24%. The existing tree canopy is approximately 5% of the site area and almost 95% impervious surface.



### Existing Zoning and Policy:

The site is currently zoned Neighborhood Business District (NB). NB zones are small scale, mixed-use commercial areas that provide housing opportunities, retail, and service businesses for the surrounding residential community. Though NB zoning encourages a mix of uses, the combination of a 20 feet height limit, maximum lot coverage of 35% and restrictions against locating residential uses on ground level has made redevelopment of this site infeasible. The existing shopping center maxes out the current development capacity making potential for redevelopment of site unattractive.





In its Threshold Review of the 2018 Comprehensive Plan Amendment Application, city staff summarized the ineffectiveness of the City’s land use policy on NHSC over the last two decades:

*While passage of time is not a significantly changed condition, the Comprehensive Plan anticipated that Neighborhood Business would be up to the task of revitalizing this aging neighborhood commercial center. Instead, the history of revitalization attempts including land use and feasibility analyses, proposed code changes, Bill Pace’s farmers market tenure, two (2) ten-year GMA updates of the general Plan, development applications, and now two comprehensive plan amendments, demonstrate the unanticipated consequence of the marginal success of NB. Lacking the intent to deliver on three promises of Subarea Plan policy, the designation has failed to bring these revitalization efforts together: 1) mixing in housing as a new ingredient; 2) sustaining local business; and 3) maintaining the “third place” role of the center in the community.*

*The Neighborhood Business designation and zoning on the Newport Hills Shopping Center site were established with the 1993 Newport Hills annexation and 1994 adoption of the Newport Hills Subarea Plan. The subarea has seen nine comprehensive plan amendment actions since then.*

Application	Proposal	Date	Outcome
Newport Hills Subarea	Plan adoption	October 1994	Resolution 5823
West Ravine	SF-L to SF-UR and SF-H	October 1995	Ordinance 4803
Olson Coal Creek	SF-M to MF-M	December 1998	Ordinance 5118
Wittman Open Space	Open Space Taxation designation	May 1998	Withdrawn
The Oaks	Delete trail requirement	December 1998	Denied
113th Pl SE	West Ravine SF-UR to O	December 2001	Denied
Dana	SF-H to MF-L	October 2003	Denied
Lakevue Luxury Storage	West Ravine SF-UR to LI	April 2004	Withdrawn
Newport Hills Village	NB to MF-M and NB	June 2016	Withdrawn
Newport Hills Shopping Center Redevelopment	NB to NMU	January 2018	Withdrawn

The Newport Hills Subarea Plan supports the overarching goal of a vibrant, mixed-use redevelopment at NHSC:

*Redevelopment opportunities in the Newport Hills commercial district could include a mixed-use component where retail and housing are integrated. Introducing housing to this neighborhood business area may help support a greater variety of retail uses.*

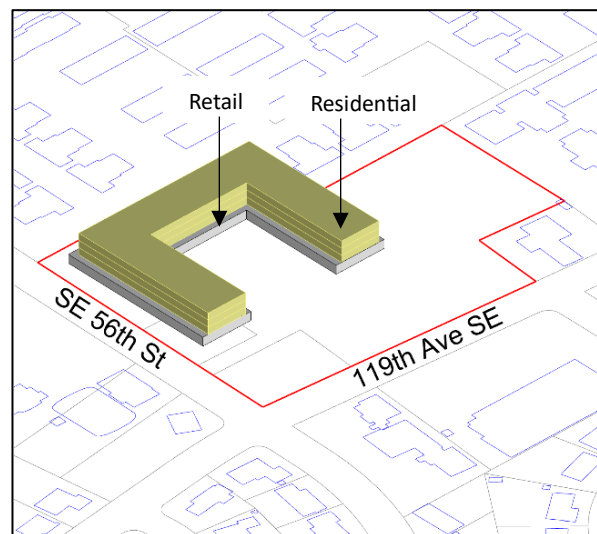
- *POLICY S-NH-10. Support development proposals that include housing opportunities in all Neighborhood Business (NB)-zoned land in the Newport Hills commercial district.*
- *POLICY S-NH-25. Recognize the Newport Hills commercial district as a neighborhood center, now, and in redevelopment efforts.*
- *POLICY S-NH-26. Emphasize unique retail uses which enhance Newport Hills identity in a redeveloped shopping and commercial district.*
- *POLICY S-NH-27. Encourage new commercial and residential development and redevelopment to minimize impervious surfaces.*
- *POLICY S-NH-28. Ensure that all new development and redevelopment includes measures to protect and enhance surface water quality.*

- *POLICY S-NH-50. Include the following elements in a redeveloped commercial district:*
  - *street tree beautification plan;*
  - *pedestrian access from streets to shops that is separated and buffered from auto areas;*
  - *parking which is convenient and accessible, but which is in back or to the side of new buildings;*
  - *new commercial buildings at the street edge;*
  - *a consistent architectural identity, including facades, materials, signs, seating areas, street lighting, and Metro bus stop shelters; and*
  - *an outdoor information kiosk.*

The 2044 Bellevue Comprehensive Plan is the opportunity to create the conditions necessary to support redevelopment at NHSC and finally achieve these policy objectives for the benefit of the residents of Newport Hills.

### **Proposed Comp Plan Designation:**

The densest alternative in the Bellevue Comprehensive Plan Update DEIS proposes the single-family areas around NHSC to be designated as Residential Low (R-Low) which may, over time, result in some infill housing units. While all new housing units are helpful to support neighborhood retail, this modest allowance for incremental change cannot alone make redevelopment of NHSC feasible. The DEIS calls for NHSC to be rezoned to Mixed Use–Lowrise (MU-L), which is defined as “a mix of residential & commercial use in lowrise buildings between 2-4 stories.” The housing density range in each alternative is assigned at 8 – 30 du/acre. At 30 du/acre the site yields approximately 175 units.



The existing buildings at NHSC are long past their usefully life so the vision for Newport Hills outlined in the comprehensive plan and subarea plan cannot be achieved without redevelopment. The MU-L zoning will not support redevelopment of the NHSC in a manner that is consistent with the objectives in the Comprehensive Plan in large part because housing drives the economics of mixed-use projects, not the retail which is, at best, a break-even component of the project. Where substantial amounts of retail space is required (and the high parking demand that comes with it) there must be sufficient residential for the project to be economically viable. Additional housing density is also needed to fund extraordinary public amenities. In the case of Newport Hills, both the retail and amenities are crucial to placemaking therefore a reasonable baseline of housing density needs to be allocated as well as a process for securing bonus density to fund the public amenities that will emerge from future site planning process.

The ownership of NHSC is committed to working collaboratively with the City and neighborhood stakeholders throughout the comprehensive planning process to formulate a land use designation and master planning process that will finally allow for redevelopment of NHSC.

Sincerely,

HEARTLAND LLC

A handwritten signature in blue ink, appearing to read "Matt Anderson", is enclosed in a thin black rectangular border.

Matt Anderson  
Principal & Senior Project Director

**From:** Cindy Xintong Bi <xintongbi@gmail.com>  
**Sent on:** Monday, June 12, 2023 5:50:50 AM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** ask to be a party of record

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Greetings  
Please add me for being a party of record.

Thanks,  
Cindy

June 9, 2023

VIA ELECTRONIC SUBMITTAL

Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Re: Bellevue 2044 Comprehensive Plan DEIS

Dear Mr. Pittman:

We are the operators of the Coast Hospitality property at 625 116<sup>th</sup> Avenue NE and we are writing to provide comments on the Draft Environmental Impact Statement (“DEIS”) prepared by the City of Bellevue (“City”) for the Bellevue 2044 Comprehensive Plan Update. Our comments are as follows:

- We support Alternative 3 to be adopted as the Preferred Alternative in the FEIS. Alternative 3 provides the most flexibility in future uses in the Wilburton subarea and is consistent with the direction provided by the City Council for future development in Wilburton. However, the maximum zoning in the core of Wilburton in Alternative 3 should be extended north to NE 8<sup>th</sup> Street on 116<sup>th</sup> Avenue. NE 8<sup>th</sup> Street is characterized by large-scale urban development throughout downtown, and the urban pattern should be no different in Wilburton immediately west of I-405. In addition, NE 8<sup>th</sup> Street is an extraordinarily wide right-of-way, so there is no need to reduce the scale of development adjacent to it (as is evidenced Downtown).
- The EIS alternatives should provide the most flexibility possible for future development of sites to follow market conditions. Therefore, all urban uses should be permitted in the core of Wilburton, including residential, office, hotel, entertainment, and research & development uses. The plan for the core of Wilburton should mimic the existing regulations for Downtown.
- NE 6<sup>th</sup> Avenue should terminate at 116<sup>th</sup> and should not be extended to 120<sup>th</sup> Avenue NE. Alternative 3A considers the possibility of this extension of NE 6<sup>th</sup> Avenue to 120<sup>th</sup> Avenue NE. The DEIS properly identifies the adverse impacts associated with this alternative.

- Figure 11-28 shows the “Wilburton Study Area Draft Circulation and Permeability” network, which appears to propose a street grid. In the core of Wilburton, public streets extending east or west of 116<sup>th</sup> Avenue NE make no sense, since such streets would not connect to any network. Pedestrian connections throughout the core of Wilburton should be promoted, but not vehicular connections.
- Affordable housing in the core of Wilburton should be based on an incentive program, allowing additional floor area for the development of affordable housing, and not as a mandatory element. It would be important to allow such affordable housing to be developed off-site, at other locations in the Wilburton subarea.
- The “air quality buffers” along pollution-generating arterials referred to in the DEIS should be eliminated. No such buffers exist in the Downtown on the west side of I-405, so it would be inappropriate to impose them in the core of Wilburton. Furthermore, indoor air quality in new development is easily provided based on state-of-the-art air circulation systems.
- The DEIS is wrong to suggest that mitigation related to “Aesthetic Impacts” could be appropriate in the core of Wilburton. The scale of development proposed in Alternative 3 on the east side of I-405 is comparable to the development currently allowed and under application on the west side of I-405 Downtown. No aesthetic impacts were identified in connection with the Downtown rezoning in 2017, so it would be improper to manufacture new impacts in the Wilburton core.
- The city must study the Plan’s impact to Critical Areas and should consider amendments to the Critical Areas Ordinance (CAO). Bellevue’s CAO reflects a focus on suburban development. In order to implement the Alternative 3 plan in the DEIS (or any of the other alternatives, for that matter), the CAO must be revised to allow a more flexible approach to urban development. This is particularly the case with regard to steep slopes, which can easily be addressed in the context of urban development without risks to the environment. Conversely, the City’s failure to update the CAO to be consistent with the new Wilburton Plan will simply interfere with the implementation of the plan, and in that case the adverse impacts of the CAO should be disclosed in the DEIS. There is, after all, a reason that the Downtown area is not subject to the CAO. The approach in Wilburton should be the same.
- Requiring interior noise requirements along noisy arterials of 45 dBA or lower will place a significant cost burden on new projects that will be passed along to tenants. This will impact the developability of housing and affordable housing. Again, the regulations of urban development on the east side of I-405 should not be different from the Downtown.
- The Final EIS should consider a broader range of incentives for affordable housing. This would include a revision to the City’s multifamily tax exemption program to make it more



June 9, 2023

Page 3 of 3

usable for a broader range of affordability.

- The City of Bellevue has traditionally limited the use of development agreements as an entitlement tool. This means that the city is unnecessarily limiting its ability to achieve even higher-quality urban development and public benefits in its growth centers. The Final EIS should discuss making the development agreement process generally available for projects in the City's growth centers like Wilburton.

We appreciate the City's undertaking of Bellevue 2044 and the City's vision in planning for growth in the next 20 years. Please do not hesitate to contact us if you have questions about our comment. Thank you for the opportunity to comment.

Sincerely,



Douglas Rigoni  
President/CEO  
Coast Hospitality LLC

**From:** Robert x <rocobutenko@gmail.com>  
**Sent on:** Monday, June 12, 2023 5:47:11 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** Board@bridletrailscommunity.org  
**Subject:** party of record

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Planners:

For such a crucial decision for the future of our city I would like to be included as a party of record on this matter.

Furthermore I think for such a crucial decision some sort of approval, like a community by community election should be considered.

Thank you,

E. Robert Butenko  
13250 NE 55th Pl  
Bellevue, WA 98005  
425-785-4467

**From:** Albert T <alt7072@hotmail.com>  
**Sent on:** Monday, June 12, 2023 8:41:01 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Comp Plan Update 2044 DEIS

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Pls add me as a party of record.

Albert Ting  
[Alt7072@hotmail.com](mailto:Alt7072@hotmail.com)

Thx,  
AlbertT

June 12, 2023

VIA ELECTRONIC SUBMITTAL

Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Re: Bellevue 2044 DEIS Comments/Bellefield Office Park  
Dear Mr. Pittman:

We are writing to provide comments in response to the Draft Environmental Impact Statement (DEIS) prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan. For reference, Talon owns and manages the Bellefield Office Park, generally located at 1450 114<sup>th</sup> Avenue SE (“property”). The buildings on the property are 1-3 story office buildings with surface parking located on the edge of Mercer Slough. The property is located approximately halfway between the South Bellevue light rail station, and the East Main light rail station. As with many office properties in the City of Bellevue, leasing has been challenging, particularly in aging office buildings. The City should look to properties like ours as potential infill and redevelopment opportunities that can help achieve a better environmental outcome for the City in the next 20 years as the City grows into a regional center.

We support Alternative 3, though it must be amended to attribute appropriate growth to the property. Alternative 3 maintains the property as “Office,” which appears to allow only 1-2 stories of office without adding additional growth opportunity or flexibility of use. Given the proximity of the property to two light rail stations, and along 112<sup>th</sup> which is a good bike/pedestrian corridor, and the likelihood that the buildings are suitable for creative infill or redevelopment in the near term, we believe more growth needs to be studied in the Office designation along 112<sup>th</sup>. Either consider significant additional growth attributed to the Office designation, or consider this area for an MU-M designation. Please study this potential in the FEIS.

We have the following additional comments to the DEIS:

**Land Use**

- Uses/Designations. The potential Comprehensive Plan designations studied in the DEIS still appear to run property-by-property and would be very zone specific. Consider designating areas along major arterials like the property as “Mixed

Use” areas broadly, such that any mixed use zone could implement the Comprehensive Plan designation.

- Consider a broader mix of uses in the Office designation (residential, retail, hospital), or redesignate the property as MU-M in the Comprehensive Plan.
- Development Agreements. State law broadly authorizes the use of development agreements by cities, but the City of Bellevue has traditionally limited the availability of the entitlement tool. As a result, the City is foregoing opportunities to achieve even higher-quality urban development and public benefits in its growth centers. The Final EIS should discuss making the development agreement process generally available for projects in the City.

### **Transportation**

- Parking requirements. Parking ratios in urban areas like the property should also be lowered. The property is between two light rail stations and currently high parking ratios limit infill or redevelopment of the property. Allow the market to decide parking ratios. Please study no minimum parking in areas like our property in the FEIS.

### **Critical Areas**

- The “critical areas penalty” would currently apply to any redevelopment of the property and prevents any redevelopment of the property to something more environmentally friendly. Currently the property reflects the time in which it was built and is very auto-oriented with surface parking lots draining into Mercer Slough. It would not be possible to upgrade this system without fully redeveloping the property. Consider eliminating the critical areas penalty altogether, and consider allowing for reduction of wetland buffer, buffer averaging, and wetland mitigation banking to allow for this property to redevelop in a way that is consistent with current stormwater codes. Doing so would result in an environmental benefit on the property and would allow current property owners to right old “wrongs” of developments constructed prior to critical areas and stormwater regulations. The FEIS should consider this type of flexible regulatory environment.

We appreciate the City’s work on Bellevue 2044. Please do not hesitate to contact us if you have questions about our comment. Thank you for the opportunity to comment.

Sincerely,

Wende Miller  
Managing Director  
Talon Private Capital

**From:** Andrey Proskurin <andrei.proskurin@gmail.com>  
**Sent on:** Monday, June 12, 2023 8:08:52 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Add party on record for Bridle Trails up-zone discussion

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

To Whom it may concern,

We write to you with the comments below:

1) Among the four Alternatives, we consider Alternative 3 the most unfriendly to our Bridle Trails neighborhoods.

2) Please add us to be **a party of record**

Thanks.

Andrey Proskurin

Aleksandra Proskurina

5508 132nd Ave NE, Bellevue, WA 98005.

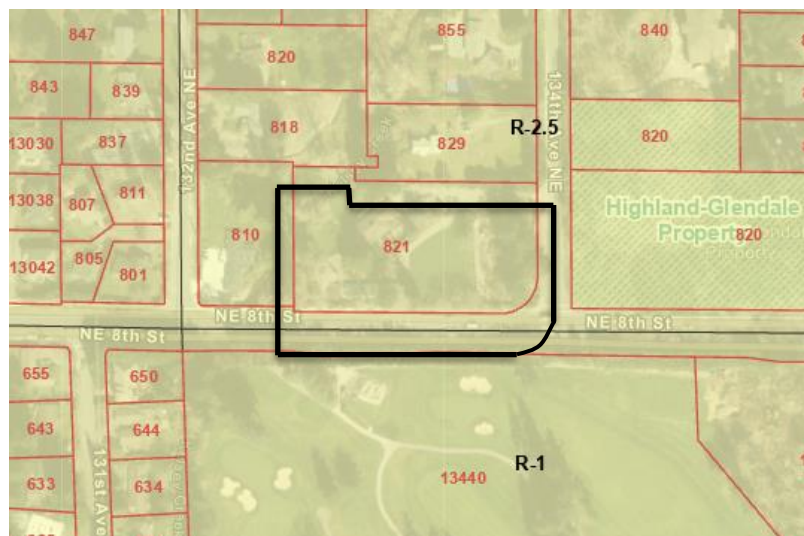


VIA UPLOAD

**RE: Support for high-density multifamily opportunities along NE 8<sup>th</sup> Street and Alternative 3**

The Edson family owns property located at 821 134<sup>th</sup> Avenue NE, Bellevue, parcel 067210-0081 (“Property”). Our family has resided in the City of Bellevue (“City”) since 1962. We support Alternative 3 as the most viable option to address the City’s housing needs, but ask the City to consider denser multifamily in certain Transit-Proximate Areas.

The Property is within the Wilburton-NE 8<sup>th</sup> Subarea and is currently zoned R-2.5. It is currently designated SF-M in the Comprehensive Plan. It is adjacent to NE 8<sup>th</sup> Street between 132<sup>nd</sup> Avenue NE and 134<sup>th</sup> Avenue NE, across from Glendale Country Club and adjacent to a City park, shown below.



The Property is approximately 101,771 s.f. in size (2.34 acres) but developed with only a single dwelling unit. It is ideal for multifamily redevelopment given its size, proximity to transit, and adjacency to the City park. **The Property is underutilized and is better suited to further the City's goal to increase multifamily housing options.** Since the City's last comprehensive update, NE 8<sup>th</sup> Street has become a major transit corridor connecting east Bellevue to Downtown. The Rapid Ride now has stops on both sides of the street directly adjacent to the Property; it is an ideal location for transit-oriented multifamily housing.

**The City has already zoned much of NE 8<sup>th</sup> Street for mid-rise multifamily.** The Property is located in a "gap" of low-density zoning along the corridor, as shown below. The R-Low designation in this location is a missed opportunity. The Comprehensive Plan update should address this gap in density given the emergence of NE 8<sup>th</sup> Street as a major connection to Downtown.

The City faces a pressing housing affordability crisis. We support the City's goal to provide "missing middle" housing for our teachers, police officers, firefighters, young families, and others who constitute a critical part of our community. As the work to update the Comprehensive Plan proceeds, we are happy to provide more specific information about the Property as a potential site for multifamily development. Please do not hesitate to contact me with any questions you may have about the Property.

Sincerely,

Linda Edson

Email: [allegrofabrics@yahoo.com](mailto:allegrofabrics@yahoo.com)

**From:** Ann Surbridge <ann\_surbridge@yahoo.com>  
**Sent on:** Monday, June 12, 2023 8:26:01 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Bellevue - Draft EIS comments

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello,

I am submitting these comments for the draft EIS based on my review and discussions with various stakeholders. These additions to the FEIS will improve its scope and make it more flexible for the various policy discussions that will come as part of the Comp Plan update.

- Endorsement of Alternative 3
- FEIS should explore the utilization of large plots surrounding transit stations as catalysts for neighborhood development, encompassing employment, housing, retail, and communal spaces. Large plots should serve as focal points for the community, while smaller plots are ideal for infill housing.
- FEIS should include additional research on increasing density and allowing a range of uses (residential, commercial, retail, etc.) in the vicinity of Light Rail Stations, particularly in Bel-Red. Emphasize the importance of a wide range of uses to accommodate the many future directions growth may take.
- FEIS should investigate a reduced emphasis on car transportation near Light Rail Stations. Avoid expanding the street grid further and prioritize pedestrian and bicycle circulation.
- The FEIS should evaluate the impact of Critical Areas on housing density. Assess the negative effects of Critical Area and stream setbacks on potential housing density and quantify the findings.

Thank you,  
Ann

Kevin Naficy

June 12, 2023

Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

VIA UPLOAD

Re: Bellevue 2044 Comprehensive Plan DEIS Comment  
Parkay Investments, LLC – 15700 Bel-Red Road

Dear Reilly:

We write on behalf of Parkay Investments, LLC ("Parkay"), which owns the property located at 15700 Bel-Red Road in Bellevue ("Property"). Parkay Investments is a local, family-owned business. We are long-time residents and business owners in the City of Bellevue. We wanted to provide our comments on the Comprehensive Plan Draft Environmental Impact Statement (DEIS). The Property is in the BTC Area neighborhood center. It is located within a Transit-Proximate Areas (Figure 3-11). We agree that land uses in the Transit Proximate Areas can "reduce vehicle miles traveled, encourage physical activity for residents and employees and improve equitable access to amenities and community gathering spaces." DEIS, pg. 3-37.

Under all action Alternatives, the Property is shown as a Mixed-Use Low designation.

Our comments on the DEIS are:

- **The Preferred Alternative for the Property should be as a Mixed-Use Midrise designation to support transit-oriented development and more housing choices.**

We support Alternative 3 as the best option for the City's future growth. **The Preferred Alternative should designate the Property as Mixed-Use Midrise, which makes the designation of the properties to the east along Bel-Red Road.**

**Kevin M. Naficy DMD, MSD,**  
*Diplomate American Board of Orthodontics  
Practice limited to Orthodontics and Maxillofacial  
Orthopedics for children, teens and adults*

Member  
American Association of  
Orthodontists



DIPLOMATE  
AMERICAN BOARD  
OF ORTHODONTICS



*Bellevue Eastside Orthodontic Center  
15700 Bel-Red Road Bellevue, Washington 98008*

**425-881-8180**

**[www.drnaficy.com](http://www.drnaficy.com)**



The Property is located on a frequent transit corridor and within proximity to multimodal transit options, including within the walkshed of future light rail. The existing structures on the site are primed for redevelopment. A Mixed-Use Midrise designation would support a more diverse range of uses and encourage ground-floor commercial development and true transit-oriented development.

- **The Preferred Alternative must evaluate – and where necessary – provide mitigation for subarea plan policies that frustrate the goals of the 2044 Plan.**

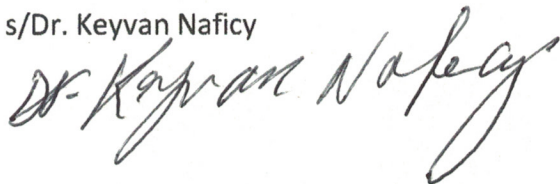
As noted in Section 4.2.4, the City has 14 neighborhood subarea plans. Some of the existing subarea plans include policies that specify areas where certain uses are prohibited. The Northeast Bellevue Subarea Plan Policy S-NE-7 prohibits multifamily uses at the Property, along with nearby parcels in "District 1 and 2".

Northeast Bellevue Subarea Policy S-NE-7 is inconsistent with the Growth Management Act regulations that encourage vibrant housing options in zones that allow residential uses. The DEIS fails to disclose and evaluate the impacts of Policy S-NE-7 and other restrictive Subarea Plan policies which will frustrate the implementation of the 2044 Plan's vision and housing regulations, including HB 1220 and HB 1110. The Final Environmental Impact Statement must evaluate – and where necessary – mitigate for these Subarea Plan policies that are inconsistent with the intent of the 2044 Plan by repealing such contrary policies.

Thank you for the opportunity to comment. Please feel free to contact me with any questions.

Sincerely,

s/Dr. Keyvan Naficy

A handwritten signature in black ink, appearing to read "Dr. Keyvan Naficy", written in a cursive style.

**From:** Austin Ross <austin.ross@comcast.net>

**Sent on:** Monday, June 12, 2023 8:21:27 PM

**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>

**Subject:** Public Comment to the Bellevue Environmental Impact Statement Draft

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello,

I am a resident of the City of Bellevue and live a few hundred yards from a new planned development in downtown Bellevue. As I read over draft impact statements, I am concerned that we have not addressed high impact noise concerns with rooftop helicopter pads (we should not have them) and additionally we appear to lack additional focus on parks or dog park access areas for some of these high density developments. If we fail to identify and address these kinds of high impact conditions we will regret the impact for many years into the future.

Thank you for your focus on the future of Bellevue...

Austin Ross  
1036 Evergreen Drive  
Bellevue, WA 98004  
206-849-1614



June 12, 2023

Draft Environmental Impact Statement Comments  
City of Bellevue Development Services Department  
Attn: Liz Stead, Director and SEPA Responsible Official  
Reilly Pittman, Environmental Planning Manager  
450 110th Avenue NE  
Bellevue, WA 98004

Via email [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

*Re: SEPA Comments on the 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement, File Number: 22-116423  
LE for EGBW38R Owner LLC*

Dear Director Stead and Mr. Pittman,

On behalf of EGBW38R Owner LLC, we submit the following SEPA comments on the City of Bellevue ("City") Draft 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement ("DEIS"). We are deeply appreciative of the hard work of city staff that is reflected in the DEIS, and we are excited about the bold future for Bellevue envisioned in the document. This comment letter builds upon the initial written testimony we provided during the scoping process last fall. In these SEPA comments, we now ask the City to clarify our property should be zoned Office and Limited Business District 2 ("OLB2") within the Office Limited Business ("OLB") land use map designation in the Final Environmental Impact Statement ("FEIS") Preferred Alternative due to its large size and central location. Additionally, we respectfully request that the City consider additional density and height in the OLB2 designation to allow midrise residential use up to 85 feet or greater. Both SEPA comments are further explained below.

As you know, EGBW38R Owner LLC acquired the former Boeing Computer Office Campus in Eastgate located at 2525-2810 160th Avenue SE (the "Site") in 2021. Since then, we have taken several initial steps to reposition the Site for more modern office use. We have submitted permit applications for a new parking garage to make progress on existing parking deficits, and we have tenant and landscape improvement work planned. We have not solidified our long-term plans for the Site beyond these preliminary permit submittals in hopes that the changes reflected in the FEIS and implemented in the Comprehensive Plan update and Land Use Code Amendments allow for greater flexibility and appropriate development potential.

### **1. The FEIS Preferred Alternative should designate the Site as OLB2.**

Given its large size and campus setting, the Site presents an incredible opportunity for measured growth, but it is near its development capacity limit under current zoning. In all three Action Alternatives proposed in the DEIS, the future land use designation for the Site is OLB, which can support OLB, OLB2, and OLB-OS zoning. The Site is currently zoned OLB, which is less dense than OLB2. More specifically, the OLB2 District "has greater intensity and a larger mix of

uses than the OLB District.” Bellevue Land Use Code 20.10.285. Additional density provided through the OLB2 designation is particularly appropriate here because: (1) the Site is currently buffered from nearby residential areas by a significant landscape buffer that is protected by covenants and functionally cannot be removed, (2) access and circulation is provided to the south through office developments and higher-density zones, not residential uses, and (3) the Site includes significant underutilized land area in surface parking. Therefore, in order to provide future flexibility for redevelopment, we request the City identify a rezone of the site to OLB2 the FEIS Preferred Alternative. As drafted in the DEIS, it is impossible to determine whether the OLB2 zone is contemplated for the Site since the OLB future land use designation is all that is reflected in the DEIS. Additional zoning clarity in the FEIS is necessary to fully understand the City’s plans for density and future growth.

**2. The City should consider additional density and height in the OLB2 zone.**

In order to realize the full development potential of the Site, we ask that additional density and height, specifically up to 85 feet or greater for midrise residential use and supporting FAR (or unlimited residential FAR), be considered for the OLB2 designation. This modest 10-foot increase in height (current OLB2 height is 75 feet) can provide the flexibility needed to provide appropriate siting, bulk, and design of potential future buildings on the Site. Additional height would allow even greater flexibility. The bold future envisioned for Bellevue in the DEIS requires corresponding development standards that make the implementation of the vision possible and heights should correspond to efficient building forms. Eighty-five feet, the height limit for Type IIIA construction in the IBC, is commonly accepted as one of the most efficient building forms, and the City’s zoning should at least align with this building typology.

Thank you again for this opportunity to comment on the DEIS. We look forward to continuing to engage with you in the next steps of the City’s planning process. If you have any questions, please do not hesitate to contact us.

Sincerely,



Diego Rico, Vice President for EGBW38R Owner LLC

cc: Thara Johnson, Comprehensive Planning Manager, [tmjohnson@bellevuewa.gov](mailto:tmjohnson@bellevuewa.gov)  
Emil King, Planning Director, [eaking@bellevuewa.gov](mailto:eaking@bellevuewa.gov)  
Abigail DeWeese, HCMP, [abigail.deweese@hcmp.com](mailto:abigail.deweese@hcmp.com)

June 7, 2023

Development Services Department  
City of Bellevue  
Attn: Reilly Pittman  
450 110th Avenue NE  
Bellevue, WA 98004

Re: Bellevue 2044 DEIS comment letter

Dear Reilly:

Henbart and Gorlick own several properties across the street from the 132<sup>nd</sup> Light Rail Station, near the intersection of 132<sup>nd</sup> and Spring Boulevard (the "Property"). Together, the Property totals 202,952 square feet. We write to provide comments in response to the 2044 Comprehensive Plan DEIS. Please see the attachment for a depiction of the referenced properties ("Property").

- Alternatives/Uses/Urban Form
- We Support Alternative 3, with the following items that should be studied:
  - The Property is designated as BR-RC-H-2, which is "Bel-Red Residential/Commercial Highrise-2; Residential highrise towers including ground floor active uses up to around 25 stories." While we appreciate the height and apparent density being contemplated for this area, we also believe that a variety of uses should be studied. It is true that today the office market would not support new development, but that might not be the case in the 20-year horizon. Consider allowing more flexible uses in all of the Bel-Red zones generally. Please study this in the FEIS.
  - We do not believe the Alternatives 1 and 2 that designate the property as BR-RC-1 (Mostly housing, with limited office, retail, and services in buildings between 2-14 stories) is adequate density within ¼ of a light rail station. We do not support Alternatives 1 or 2.
  - Consider a broader "Bel-Red" comprehensive plan designation that allows many zones to implement the plan. Please study this in the FEIS.
  - Please disclose the FARs utilized to achieve the density model used by the DEIS. A minimum of a 6 FAR should be allowed within ¼ mile of a light rail station. We encourage the City to "go big" on FAR as this is a 20-year plan.
  - As the City is considering the Bel-Red code and the various mitigating measures under aesthetics, revise floor plate restrictions to 28,000 below 85', and 13,500 above 85'. Attached is a buildout scenario for our property. As you can see, larger floor plates still result in appropriate light and air and a developable

scenario. Under current zoning, upper level setbacks and floor plate limitations have created an unbuildable situation.

- Eliminate lot coverage and impervious surface limitations. This is an urban area and should be treated as such. The result is appropriate urban development next to light rail.
- Reduce setbacks and eliminate upper level setbacks. Again, this is an urban area. Design review can provide for modulation and articulation of larger building facades.
- Provide incentives for residential development, without imposing restrictions on commercial uses within the available development envelope.
- Exempt below-grade areas from FAR. This will maximize positive urban development above-grade.
- Allow FAR to be freely allocated within a master-planned site, without requiring upgrades to remaining nonconforming conditions. In an evolving urban environment, retained uses and structures will likely redevelop in the near term. Allowing continued economic use of such structures without the need for major capital re-investment will promote the immediate redevelopment of other portions of the master-planned site.
- Maximum residential heights in TOD areas should not be less than 250 feet, in order to support viable high-rise development as well as low-rise (5-8 story) development. Historical experience has shown that the extraordinary costs imposed in high-rise development are best amortized at heights above 250 feet. Below 250 feet, high-rise development is difficult to underwrite in these urban centers. We appreciate the City's inclusion of 25 stories on our property and believe it is appropriate height and density.
  - We understand the City's focus on affordable housing in all areas of the City. We note that properly-calibrated incentive zoning, combined with the ability to utilize MFTE, has resulted in affordable housing being provided in other cities in the region, and is beginning to produce more market-created affordable units in Bellevue. We encourage the City to review these policies and calibrations to determine an appropriate outcome in Bellevue. High rise development should not be written off as "not affordable," because with the correct policies, it can create on-site affordable housing units, and/or fees-in-lieu for lower levels of affordability that would not be constructed on-site.
- Appropriately-scaled upper-level connections between buildings should be allowed and should be exempt from maximum floorplate limitations. Above-grade connections make urban development more efficient and provides an opportunity to connect tenants, user and residents more directly. The code should promote these kind of connections.
- Tower spacing should be limited to 40 feet, as in the Downtown.
- Allow a wide range of uses consistent with urban center and TOD locations; avoid the restriction of uses within the available development envelope, which only reduces development capacity and flexible future proofing of buildings.

- Provide flexibility to allow nonconforming uses and structures to continue and maintain necessary investment. Such sites will redevelop over time, but prior to redevelopment they can provide useful services in the urban environment.
- Avoid being prescriptive about timing, sequencing and scale of different uses; allow the market to dictate development over time. In the past, the city has at times restricted the development of certain uses, in an effort to force the market. The city would be better positioned to allow all uses, but incentivize those that are preferred.
- Allow interim, low-intensity uses in master-planned sites, such as parking and low-intensity commercial uses, so that sites may remain financially productive as development is being phased in. Allowing such interim uses will help to support the sooner urban development of other portions of master-planned sites. The future code should endorse such measures to promote near-term development in accordance with the new plan.
- Critical Areas/Trees
  - The DEIS does not adequately study the impact of the Critical Areas Ordinance on the density portrayed in the different alternatives. For example, the “critical area penalty” does not appear to have an impact on any of the density presumed in the DEIS. Critical areas should be mapped and the penalty should be applied, and the results should be disclosed to the public and decisionmakers. Please include this specific analysis in the DEIS.
  - The DEIS should also study an alternative that includes no critical area penalty in any urban center, including Bel-Red, and disclose the impacts to density when the critical areas penalty is removed.
  - The DEIS should study the impact of the steep slope critical area and buffers on the density portrayed in the different alternatives. Many sites are shown as including towers when towers may not be able to be built due to the presence of a man-made steep slope. Decisionmakers should be made aware of the impacts of the application of the critical areas ordinance to man made steep slopes so that they can make decisions accordingly. Please include this study, as well as an alternative that specifically removes manmade steep slopes from the critical areas ordinance, in the FEIS.
  - A revised tree ordinance is being contemplated by the City. Bel-Red should be exempted from tree regulations, as in downtown. Requiring a reasonable tree replacement / tree planting ratio may lead to an expansion of the urban tree canopy rather than pitting trees against urban development across from light rail. Consider also a fee-in-lieu system that will assist the City in planting right-of-way trees and park trees when trees cannot fit in a right-of-way or on a project site (see Seattle’s recent tree ordinance).
- Bel-Red Grid System
  - The DEIS transportation analysis should look at whether the currently-required Bel-Red road grid system is needed to reduce traffic congestion in Bel-Red. Please run the transportation model with either no grid system or a significantly reduced grid system. The Bel-Red grid system currently bisects properties in an

inefficient manner that has hampered property developers' ability to construct the network, and the City has not participated in most of the grid buildout. Please also run a model that includes pedestrian and bicycle connectivity rather than car connectivity in areas of the grid system.

- Transportation Mitigation/Approach

- We applaud the City's proposed transportation mitigation measures stated in M-TR-1 through M-TR-4. The City rightfully cites the land use/transportation connection as the best way to mitigate transportation impacts. Specifically, the City states that Alternative 3 has "inherent transportation benefits compared to the No Action Alternative." We agree; in a dense urban environment, focusing on TDM strategies, encouraging transit use, and building out pedestrian and bicycle networks are the best way to move more people more efficiently. Creating a more walkable and bikeable area (not driveable area) also adds vibrancy to a neighborhood and supports ground level uses and neighborhood businesses, and supports light rail use.
- We note that the transportation model presumes 100% density build-out; this is an extremely conservative model as 100% density build-out is almost impossible in the 20-year horizon. We appreciate the City utilizing a conservative model to ensure that all impacts are properly studied.

- Parking

- Parking is no longer an "element of the environment" under SEPA as of January 2023. We strongly recommend eliminating minimum parking standards. The market should decide parking requirements; it is very effective at determining parking need and demand.
- Eliminate parking requirements for street-level retail and restaurant spaces. Code requirements for such uses are so excessive that they are an obstacle to the development of such uses. Ample street parking should be available to support street-level retail and restaurant spaces; on-street parking adds to vibrant street life and calms traffic by potentially narrowing roads.
- Eliminate parking requirements for changes of use. This allows uses to be reused more easily should they become vacant.
- On-site loading standards should be made more flexible. In urban environments, loading can be accomplished with a variety of vehicles and times of day and does not need to occur entirely within a structure. Code requirements should reflect this. The FEIS should analyze these parking issues in a similar way to the discussion in the transportation section.

- Affordable Housing

- Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options, avoid mandatory inclusionary requirements. Alternative 3 should be studied with an affordable housing goal in mind, and an economic analysis should be completed that shows how an incentive system can create the highest number of market rate and affordable housing requirements.



- Avoid utilizing market-rate developers as the only “solution” for creating affordable housing. The City is an important partner in the affordable housing discussion. The EIS assists decision makers in making future zoning decisions. Please discuss and study in the FEIS the wide variety of tools in the affordable toolkit that the City could deploy to address housing affordability. These tools could include a housing levy, housing vouchers, and other funding sources to help build affordable housing.
- Aesthetics:
  - In urban centers, transition zones should not be utilized. In a City, it is expected that buildings will be large.
  - If viewpoints/views are protected as a mitigation measure, they should be very closely defined. Private views are not protected under SEPA and protection of public views is limited.
- Air quality:
  - The air quality discussion appears to be an “environmental health” discussion rather than an air quality discussion. Ironically, if “air quality buffers” are incorporated around freeways and major arterials, more growth will be pushed farther away from transportation systems, and more auto-oriented emissions will occur. We do not support an “air quality buffer” and believe the impacts of the mitigation on density should be adequately studied in the FEIS such that decision makers can make an informed decision.
- General: The FEIS should include a guide for decision makers related to their policy choices. When an FEIS is completed, SEPS does not require decisionmakers to mitigate impacts below a level of significance. Rather, mitigation is at the option of the decisionmakers. Currently, the DEIS infers that mitigation is “necessary” when it actually is optional. Please include additional information regarding this process for the public and decision makers.

We appreciate the opportunity to make comments, and we look forward to working with you through the Comprehensive Plan process.

Sincerely,

Mark Craig



President, Henbart, LLC





# 132nd Bel-Red Assemblage

*Building Up Bel-Red's Vision*

Prepared for:  
**Henbart LLC. and Gorlick Properties**

Prepared by:  
**Graphite Design Group, LLC**  
1809 7th Avenue  
Suite 700  
Seattle, WA 98101

October 31, 2022



# Project Goal and Development Priorities

## Goal

To ensure site development within the Bel-Red area will meet Bellevue’s long term housing needs and anticipated job growth.  
This document shows what the current code allows on the project sites, and a vision for more dense development to the help achieve the goal statement.

## Development Priorities

### 1. Increased Development Density

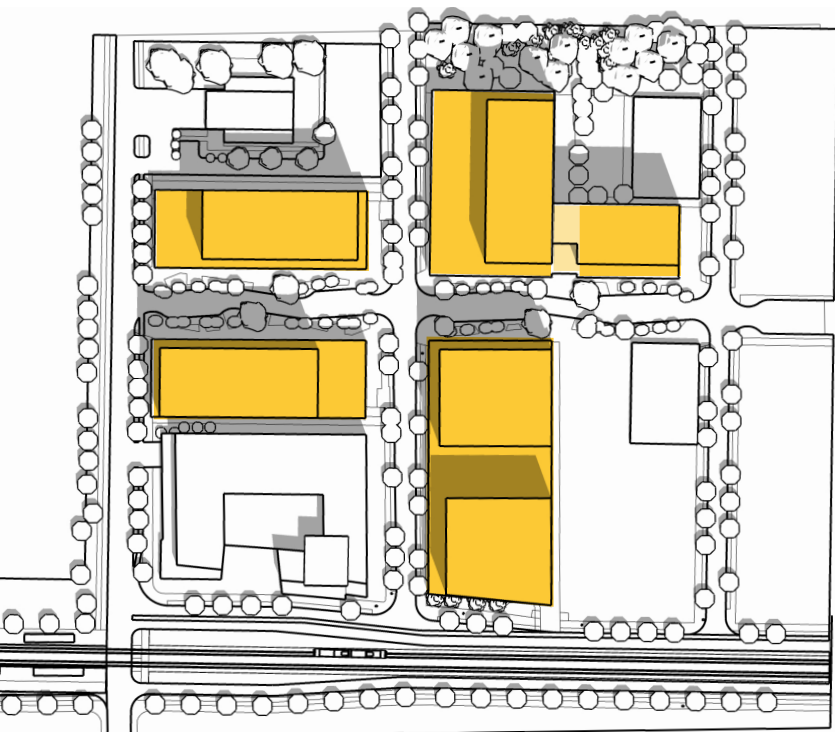
Increase development density throughout the Bel-Red sub area, further progressing toward Bellevue’s Growth Targets.

### 2. Leverage Proximity of 132nd Link Station

Increase development adjacent to Link Stations, promoting mass transit use and reducing single occupant vehicles.

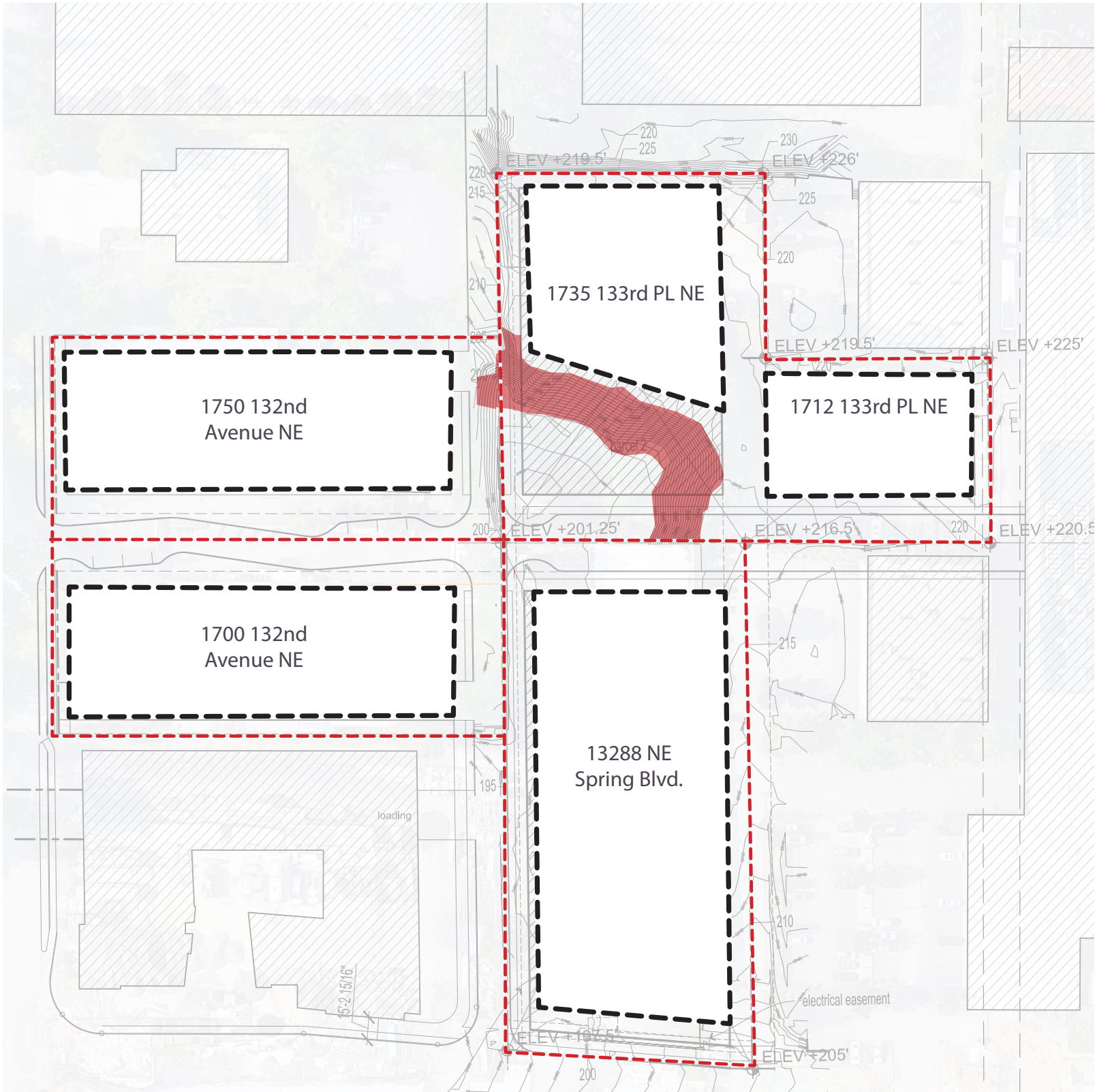
### 3. Increase Flexibility in BelRed Zoning

Allow projects to propose sensible zoning modifications in response to varying site constraints.





# Site Plan With Critical Areas



Site Plan

North

Critical Area/Buffer  
(Steep Slope)

Buildable Area

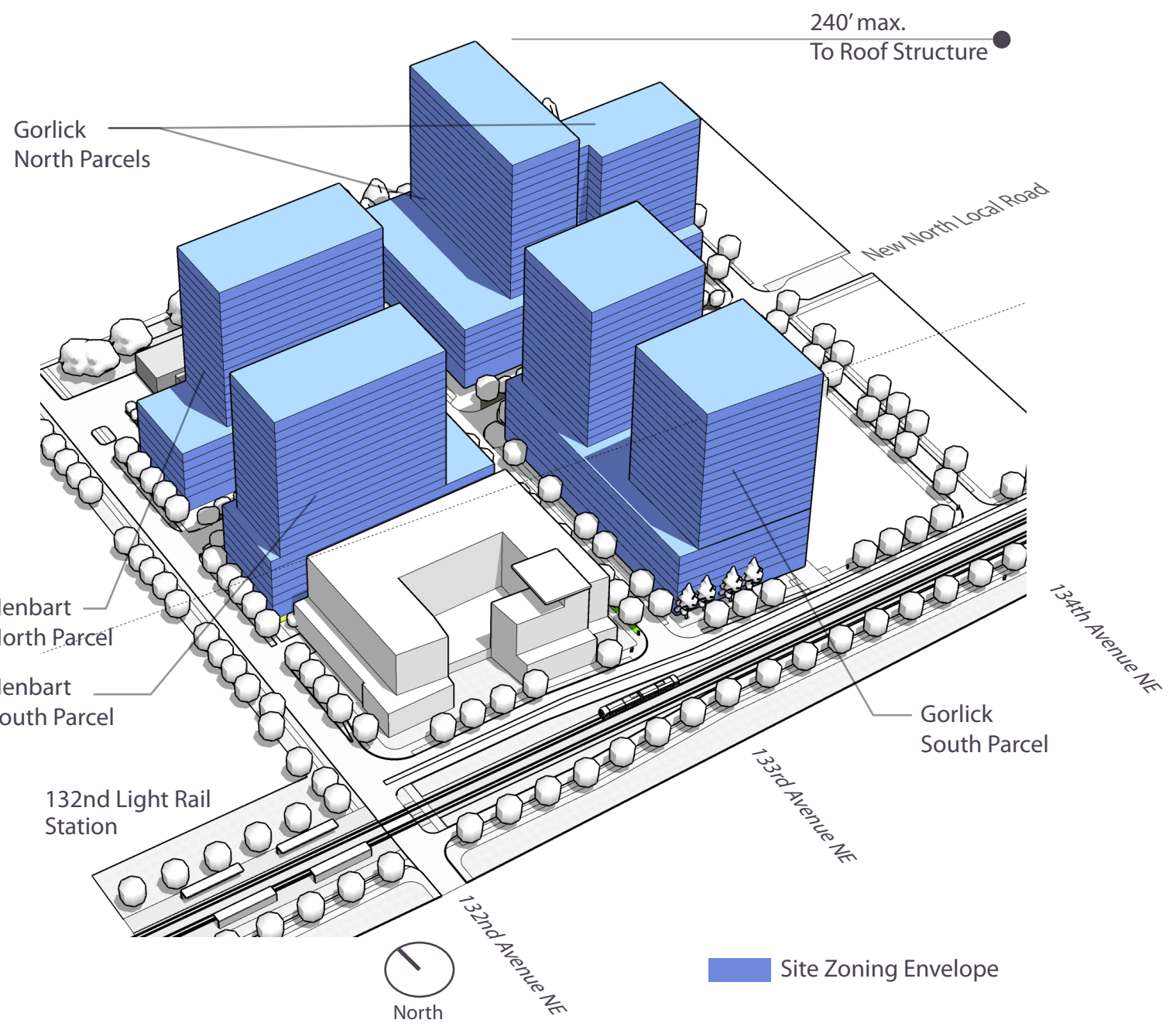
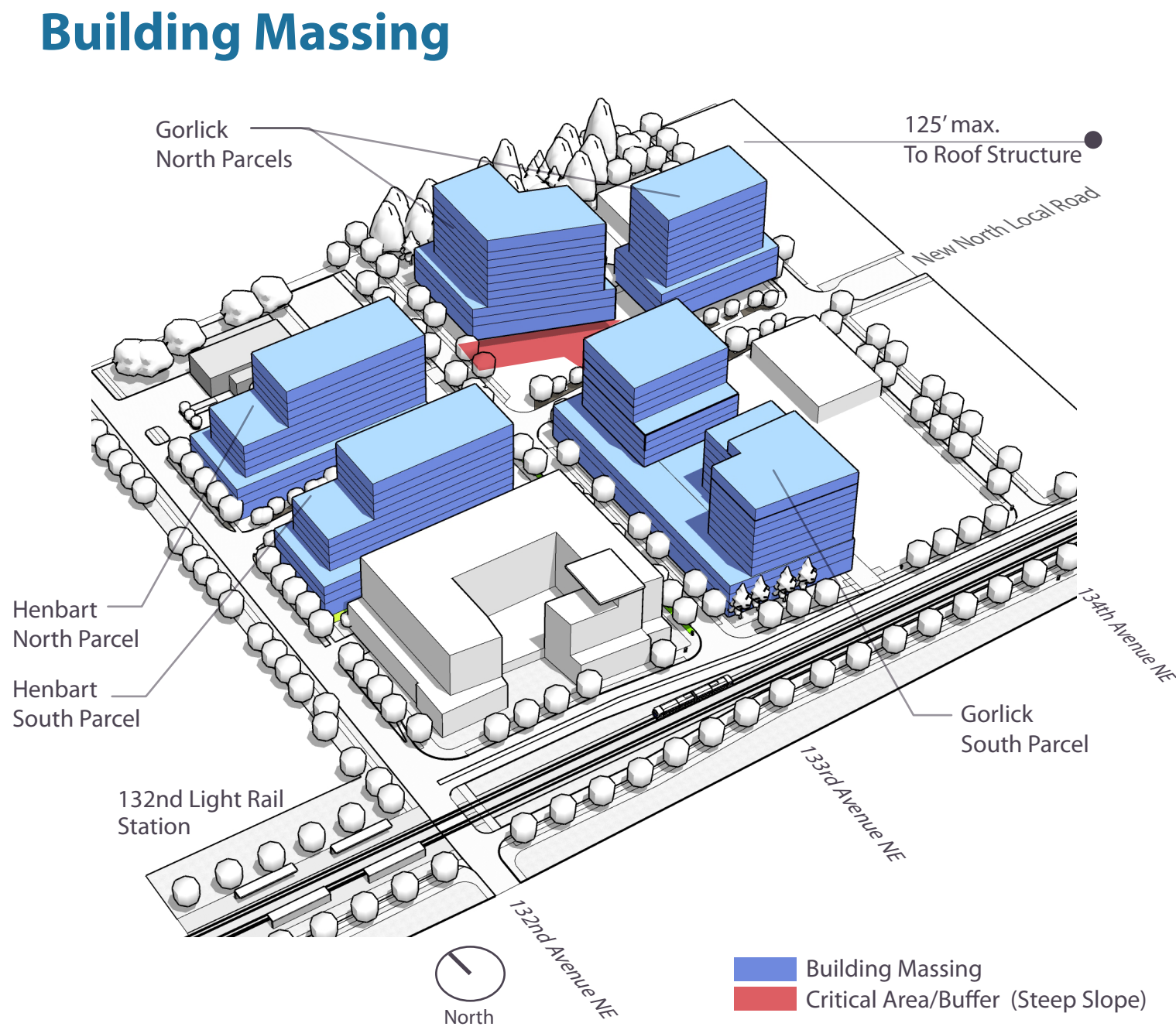
Property Line

## Critical Areas:

- Exempt Bel Red from the Critical Areas Ordinance, similar to Downtown
- Where the Critical Area Ordinance applies in urban centers and TOD areas:
  - Eliminate the critical area density penalty entirely. In a dense urban environment, the density penalty does nothing to protect critical areas – it only reduces the long-term opportunity for TOD. Critical areas can be well-protected without reductions in on-site density.
  - Provide for an exemption from (steep slope) critical areas, in cases where new development will provide properly-engineered construction to maintain the stability of the slope. Seattle has employed this exemption to good effect for many years. Preservation of isolated slope areas in a dense urban environment only creates orphaned, unusable land that could be put to better urban uses.



# Building Massing



## Current Zoning

Zone:	BR-RC-2
FAR Max.	4
Building Height:	45' base, 125' max.
Front Setbacks:	15' at 40' height
Side and Rear Setbacks:	25' at 40' height
GSF above 40':	28,000 GSF Commercial 12,000 GSF Residential
GSF above 80'	28,000 GSF Commercial 9,000 GSF Residential
Lot Coverage Max:	75%

## Current Zoning Data

Combined Total Area:	202,952 GSF
(All 4 Parcels)	
Total Residential Area:	<b>629,070 GSF</b>
Approx. Total Residential Units:	<b>744 units</b>
(@650 SF/Unit)	

## Proposed Zoning

FAR Max.	4 Commercial Unlimited Residential
Building Height:	85' base, 240' max.
Front Setbacks:	10' at 85' height
Side and Rear Setbacks:	10' at 85' height
GSF up to 85':	28,000+ GSF Commercial 28,000+ GSF Residential
GSF above 85':	28,000 GSF Commercial 13,500 GSF Residential
GSF 85' to 240':	13,500 GSF Residential
Lot Coverage Max:	100%

## Proposed Zoning Data

Combined Total Area:	202,952 GSF
(All 4 Parcels)	
Total Residential Area:	<b>1,572,320 GSF</b>
Approx. Total Residential Units:	<b>1,935 units</b>
(@650 SF/Unit)	

# Development Challenges and Opportunities

## Challenges and Requests:

Zoned **BR-RC-2** (*Bel-Red Residential/Commercial Node 2*), the project property’s multi-parcel development capacity is currently underutilized given the projected job growth for The City of Bellevue and the Puget Sound Region as a whole. Increasing the project’s development potential supports Bellevue in achieving their growth targets.

### 1. Zoning Standards - FAR, height limits, and development standards must be calibrated to achieve appropriate density.

• **Density** - Request the City of Bellevue to consider the following density approaches:

- Maximize heights and densities within ½ mile of light rail stations
- Provide incentives for residential development, without imposing restrictions on commercial uses within the available development envelope
- Exempt residential uses from FAR. This is the single most effective way to promote residential development in new development regulations.
- Exempt below-grade areas from FAR. This will maximize positive urban development above-grade.

• **Floor Plate Sizes and Tower Standards**

- Maintain appropriately-sized residential floor plates above 85 feet, while permitting residential floor plates larger than 28,000 s.f. below 85 feet. The objective should be to maximize housing development opportunities, which means larger floor plates below 85 feet and smaller ones in towers above.
- Appropriately-scaled upper-level connections between buildings should be allowed and should be exempt from maximum floor plate limitations. Above-grade connections make urban development more efficient and provides an opportunity to connect tenants, user and residents more directly. The code should promote these kind of connections.

• **Incentive Amenity System** should allow development to achieve maximum density and heights above a base with flexible amenity options like affordable housing, flexible open space, and sustainability measures. The incentive system should allow fees-in-lieu in addition to on-site and off-site performance options for all amenities.

• **Critical Slope Areas** - Allow flexible solutions like building structure to help mitigate slope impact and remove additional buffer requirements currently required within the zoning code.

### 2. Flexible Development Envelope - Reduce and/or remove some of the current Zoning Envelope Requirements

- **Podium Height** - Allow podiums to have flexible programs and increased height, maximizing development at lower levels.
- **Tower Spacing** - Determine reasonable tower separation standards. Tower spacing should be variable on multiple tower sites. Also, consider towers to be connected at upper levels so as to share usable spaces. (not just corridors)

- **Upper-level Setbacks** - Do not implement arbitrary upper-level podium setbacks that require a “wedding-cake” design.
- **Ground-level Setbacks** - Consider flexibility in required ground level setbacks beyond development R.O.W’s
- **Site Coverage and Impervious Surface Req’s.** - Urban centers and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on LID and hard surface coverage regulations, similar to Downtown.

### 3. Parking Density - Eliminate minimum parking standards. The market should decide parking requirements, it is very effective at determining parking need and demand.

## Opportunities:

The Project’s vision supports Bellevue’s current and future development goals. As a flexible, multi-use, urban in-fill developments it achieves economies of scale, creates a synergistic neighborhood, and reduces the need to consume natural resources.

#### 1. Multi-Parcel Neighborhood

The combined sites affront newly created streets, creating a 4 corner neighborhood with residential lobbies and retail adjacent the pedestrian walkway creating engaging and synergistic connections between the 4 development sites.

#### 2. Mass Transit Proximity

The sites are well positioned to fully utilize mass transportation networks given proximity to the Link Rail Station.

#### 3. Dwelling Unit Demand

Potential delivery of more than **1,900** housing units to help meet the City’s demand for housing and growth targets. In order to achieve this, Bel-Red zoning will need to be flexible rather than prescriptive in development standards and uses.

#### 4. Sustainability

Environmental sustainability through high density residential development near jobs reduces impacts on public infrastructure and sprawl.

Higher-density development lessens consumption of undeveloped land and reduced carbon emissions and fossil fuel consumption by residents.

New buildings provide opportunities for sustainable construction and technology like Mass Timber.

In addition, ground-level landscaping and “Woonerf” strategies create a unique, safe, and engaging ground level experience furthering the City’s ethos to be a “City in a Park”.





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June 12, 2023

Draft Environmental Impact Statement Comments  
City of Bellevue Development Services Department  
Attn: Liz Stead, Director and SEPA Responsible Official  
Reilly Pittman, Environmental Planning Manager  
Bellevue City Hall  
450 110th Avenue NE  
Bellevue, WA 98004

Via email to [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

*Re: SEPA Comments on the 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement, File Number: 22-116423 LE for Alexandria Center for Science and Technology – Bellevue*

Dear Director Stead and Mr. Pittman:

On behalf of Alexandria Real Estate Equities, Inc. (“Alexandria”), we submit the following SEPA comments on the City of Bellevue (“City”) Draft 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement (“DEIS”). As a major stakeholder in Bellevue, Alexandria was pleased to see the City’s strategic vision for growth in the DEIS and we are optimistic for a bright future for Bellevue.

We have a successful track record of creating life sciences “clusters” that house some of the world’s most important companies doing cutting-edge research to benefit all of humanity. We are excited to bring this model to Bellevue with our proposal for the Alexandria Center for Science and Technology—Bellevue (“ACST-Bellevue”) in Bel-Red. We are seeking the City’s partnership to make this potential development a success, and have identified in this letter Comprehensive Plan and future zoning topics that should be addressed in the FEIS Preferred Alternative to advance this effort.

### **I. Background**

Alexandria is the leading owner, operator, and developer of collaborative campuses for life science, agtech, and technology companies in the nation’s top innovation centers. The

Alexandria Real Estate Equities, Inc.

400 Dexter Avenue North, Suite 200 | Seattle, CA 98109

TEL 206.408.1550 | FAX 206.325.6348 | [www.are.com](http://www.are.com)



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trusted partner to over 850 tenants, Alexandria has a total market capitalization of \$33.0 billion and an asset base in North America of 75.6 million SF as of March 31, 2023, which includes 41.9 million RSF of operating properties and 33.7 million RSF of Class A properties undergoing construction, redevelopment or in design and entitlement for future development. Alexandria has a longstanding and proven track record of developing Class A properties clustered in life science, agtech and advanced technology campuses that provide our innovative tenants with highly dynamic and collaborative environments that enhance their ability to successfully recruit and retain world-class talent and inspire productivity, efficiency, creativity and success

The company is guided by its mission “[t]o create and grow life science ecosystems and clusters that ignite and accelerate the world’s leading innovators in their noble pursuit to advance human health by curing disease and improving nutrition.” Over almost three decades, Alexandria has created thoughtful cluster developments throughout the country, including in the Puget Sound Region working alongside the Fred Hutchinson Cancer Research Center, University of Washington Medicine, and the Bill & Melinda Gates Foundation.

The City of Bellevue has experienced significant growth over the past few years, but we continue to see an opportunity for Bellevue to diversify its jobs base with life sciences uses that are currently concentrated in elsewhere in this region like South Lake Union and Bothell. Science requires sophisticated facilities, and sensitive lab work cannot be done at home. This use is a valuable model that will bring in-office workers back to Bellevue and is a strong economic development driver.

Alexandria is deeply interested in the Action Alternatives contemplated in the DEIS as the owner of the property located at 1239 120th Avenue NE (the “Site”) where we plan to build ACST-Bellevue. The Site’s proximity to future Sound Transit Link light rail and The Spring District activity center, presents an exciting transit-oriented development opportunity to establish a new life science cluster connected regionally by light rail. We have advanced entitlements to support this effort, including an update to the existing Master Development Plan for 750,000 square feet of sophisticated lab space and extraordinary amenities, but we have also identified code issues that must be fixed in order to deliver the highest quality product for our future tenants. Our vision for this development is the first phase to ignite a true life sciences cluster in Bel-Red and that requires a thoughtful approach. We encourage you to consider our comments below so that the Preferred Alternative can be optimized for this opportunity.

Alexandria Real Estate Equities, Inc.

400 Dexter Avenue North, Suite 200 | Seattle, CA 98109

TEL 206.408.1550 | FAX 206.325.6348 | [www.are.com](http://www.are.com)



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**II. The proposed BR-OR-H-2 designation for the Site and Alternative 3 components should be advanced in the Preferred Alternative.**

We have carefully reviewed the Action Alternatives presented in the DEIS. Alexandria supports the BR-OR-H-2 designation for the Site identified in Action Alternative 3 as it includes the highest combined amount of future capacity among the three Action Alternatives. DEIS at 2-27. More broadly, we support Action Alternative 3 because it correctly focuses on growth in Mixed Use Centers and in areas of high opportunity with good access to transit and jobs or near Neighborhood Centers. DEIS at 2-26. We are encouraged that Action Alternative 3 would have capacity for an additional 95,000 housing units, 200,000 jobs, and 67.3 million square feet of commercial development. DEIS 2-27. Contemplation of large figures such as these is necessary if Bellevue is to appropriately develop over the next 20 years and diversify its industries. Action Alternative 3 best recognizes the positive growth that the City is experiencing and will continue to experience in the years ahead.

Alternative 3 also identifies specific future land use map designations relevant to life science users. Adjacent to the Site, the identified BR-MO-H-1 and BR-MO-H-2 designations suggest future zoning that will support life sciences to form a cluster catalyzed by our development. We support zoning under the BR-OR and BR-MO designations that clearly call out research laboratory and science-based functions as allowed and preferred uses and the FEIS should identify these use types specifically in the Preferred Alternative.

**III. The Preferred Alternative must incorporate study of development standards to support life science tenants.**

Additional analysis is needed in the FEIS to identify changes to development standards necessary to create an optimal built environment for life science users. Our tenants are not typical office users: they require higher floor-to-floor heights to accommodate dense mechanical space, specific structural systems to minimize vibration, and larger floorplates and special HVAC systems to support experiments. We have attached a study provided by our mechanical consultant detailing some of these unique needs further; please consider it incorporated into these comments by reference. Exhibit 1, GLUMAC Memorandum. The DEIS does not recognize these unique features, and they should be addressed in the FEIS to ensure future zoning can achieve the City's goals. We specifically recommend:



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- Increased height in the BR-OR-H-3 designation up to 350'+ to allow 16'+ floor-to-floor heights with the number of stories identified;
- At least 30 feet of additional height to accommodate typical life science mechanical equipment, and unrestricted additional height to accommodate mechanical equipment meeting sustainability goals like natural ventilation systems;
- Removing property line setbacks inappropriate to an urban environment and relying on building code fire separation requirements; and
- Maintaining at least the current 28,000 sf floorplate limit up to the new heights envisioned, and consider expanding floorplate sizes to 50,000 sf below 180'.

Given the unique nature of life science land uses and the infrastructure they require to operate, the FEIS must study these features to ensure a feasible future for life sciences development in Bellevue.

#### **IV. The Preferred Alternative should study creative economic development incentives for life science tenants to compete nationally.**

Life sciences in Bellevue is untested. We think there are strong reasons for companies to want to locate in the City, but nationally and internationally, many jurisdictions recognize the value of these companies as economic development engines and are competing aggressively to attract them. Massachusetts, for example, provides significant tax credits ranging from \$15,000-25,000 for each job created. San Diego similarly provides a tax rebate of 45 percent of the local sales tax paid in connection with local operations. The DEIS does not identify any similar economic development measures in Bellevue. The City should challenge itself to think creatively and include discussion of such measures in the future Comprehensive Plan and the FEIS so that Bellevue can foster the programs it needs to attract the world's top biotech companies.

#### **I. Conclusion**

Thank you for the opportunity to comment on the DEIS. We look forward to continued engagement in the comprehensive planning process, and support advancing Alternative 3 as the Preferred Alternative with a BR-OR-H-2 designation for the site and with the



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modifications and incentives to further support life science use. We remain excited about partnering with the City on ACST-B and look forward to further conversations on how the City can best compete nationally for the top life sciences companies. If you have any questions, please do not hesitate to contact us.

Sincerely,

Christian Gunter  
Senior Vice President – Development

cc: Thara Johnson, Comprehensive Planning Manager, [tmjohnson@bellevuewa.gov](mailto:tmjohnson@bellevuewa.gov)  
Emil King, Planning Director, [eaking@bellevuewa.gov](mailto:eaking@bellevuewa.gov)  
Abigail DeWeese and Holly Golden, HCMP, [abigail.deweese@hcmp.com](mailto:abigail.deweese@hcmp.com) /  
[holly.golden@hcmp.com](mailto:holly.golden@hcmp.com)

**From:** Adams (PXT), Eric <ecadams@amazon.com>

**Sent on:** Monday, June 12, 2023 2:47:04 PM

**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>

**CC:** Board@BridleTrailsCommunity.org; Cathleen Adams <cathleenadams@comcast.net>

**Subject:** Comments on the Draft Environmental Impact Statement (DEIS) City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

City of Bellevue,

As a resident of Bridle Trails Bellevue, this email serves 1) as a request to become a party of record and 2) to express complete endorsement of the thoughtful and detailed commentary provided by the Bridle Trails Community Board (below).

Thank you,

Eric and Cathleen Adams and Family

13813 NE 48<sup>th</sup> Place

Bellevue, WA 98005

Cell: 508.440.9048

-----  
June 11, 2023

Subject: Comments on the Draft Environmental Impact Statement (DEIS) City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation

To: Elizabeth Stead

City of Bellevue Community Development Department

450 110th Avenue NE

Bellevue, WA 98004

Dear Ms. Stead:

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. Bridle Trails Community Club (BTCC) is a 501c(4) nonprofit organization dedicated to protecting and enhancing the character and livability of Bridle Trails area near Washington's Bridle Trails State Park in Bellevue and Kirkland. BTCC has been in operation since 1978.

Bridle Trails has about 3,000 multifamily and about 2,000 single family homes of various densities. Per city records, Bridle Trails is second in affordable housing including low-income senior housing. Some larger lots support the 455-acre State equestrian park. Residents have many choices without having to move outside of Bellevue. Bridle Trails has been a leader in protecting tree canopy. Bridle Trails offers a diverse choice of housing densities. Parks, both public and private trails, and right-of-ways work as a network for people and animals. These are hallmarks of our neighborhood, which have been planned and nurtured over fifty years.

BTCC has concerns regarding the adequacy of the DEIS because substantial City of Bellevue issues have not been addressed in the document. We are requesting that the DEIS is revised to address this missing information and then re-sent as a revised draft. Only in this way can our Bellevue residents understand how the comprehensive plan addresses the most significant issues of our City. We find that the DEIS does not have a reasonable thorough discussion of the significant aspects of the following and described below:

- House Bill 1220, 2022
- Timeline of growth
- Rapid growth
- Management of growth, Dialing Growth in or up
- Neighborhood plans
- House Bills: 1110, 1337, and 1181
- Changes in employment and housing as a result of Covid and remote working
- Resources omitted in the analysis (parks and recreation and plants and animals; large and domestic animals)
- Urban Forest Ecosystem
- Water resources
- Salmon & Green space
- Tree Canopy
- Green Space & Streams
- Siting municipal development:
- Homelessness
- Historic Resources
- Accessible language

House Bill 1220 passed in 2022: This requires planning for housing for all. The analysis for King County Council targets are not included in the DEIS and have not been ratified. The targets for each AMI have not been incorporated into this DEIS.

(a) The inventory and analysis of existing and projected housing needs over the planning period, by income band as required in RCW 36.70A.070(2)(a) amended in 2021, WAC 365-196-410(2)(b) and (c) e.

(b) Identification of capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, etc. as required in RCW 36.70A.070(2)(c) amended in 2021, WAC 365-196-410(e) and (f). The targets need to be clarified as required or aspirational. The DEIS should be revised to reflect this analysis. Bellevue has a range of incomes and jobs. Jobs location impact transportation, housing, commercial building, and growth in general. DEIS should include the jobs profile change, the qualifications of Bellevue residents for the available jobs, what is the strategy for mitigation when income is lower than needs? The DEIS mentions sources for housing funding but does not adequately analyze the funding availability. The DEIS should be revised to reflect the targets and funding outlook for each alternative.

Timeline of growth: More growth means more impact. Less growth means less impact. The different alternatives are different ways of accomplishing the same amount of growth. The targets for 2044 are the same for all alternatives – 35,000 units of housing, 70,000 jobs. It is critical the EIS analyzes and accounts for the impact of and



**From:** Erin Powell <u2magpie@q.com>  
**Sent on:** Monday, June 12, 2023 8:23:44 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** board@bridletrailcommunity.org; pamjjo@msn.com  
**Subject:** Comments from Erin Powell and Bellecrest Neighborhood Association

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

City of Bellevue Comp Plan 2044 EIS Planning Department and Elizabeth Stead,

Submitting request to be a person and organization of record: Erin Powell, [u2magpie@q.com](mailto:u2magpie@q.com) and for our Neighborhood Association namely, Bellecrest Neighborhood Association for the Comp Plan 2044 EIS process. Also include Renay Bennett, [renaybennett@msn.com](mailto:renaybennett@msn.com) as an interested person of record.

Bellecrest Neighborhood Association and the individuals here support and agree with the Bridle Trails Community Club detailed letter of concerns and objects to Bellevue's Comp Plan 2044 EIS. Please refer to Bridle Trails Community Club letter of concerns as they reflect many of the same concerns we have within the Surrey Downs/Enatai area of Bellevue to which Bellecrest is identified as part of the West Bellevue area of town.

Thank you for your consideration,

Erin Powell  
[u2magpie@q.com](mailto:u2magpie@q.com)

Renay Bennett  
[renaybennett@msn.com](mailto:renaybennett@msn.com)

**From:** Erin Kenway <erin.kenway@icloud.com>

**Sent on:** Monday, June 12, 2023 4:38:25 PM

**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>; Comp Plan 2044 <CompPlan2044@bellevuewa.gov>

**CC:** Council <Council@bellevuewa.gov>; City Manager <CityManager@bellevuewa.gov>; Heilman, Mark <MHeilman@bellevuewa.gov>; McCormick-Huentelman, Mike <MMHuent@bellevuewa.gov>; p johnston <pamjjo@msn.com>; Cuthill, Theresa <TCuthill@bellevuewa.gov>; WCA Board <woodridgebellevue@gmail.com>

**Subject:** Re: DEIS and Registered Neighborhood Associations

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Please add the Woodridge Community Association to this list as well. Our neighborhood has not been informed of the DEIS and we are an interested party.

Erin Kenway, President  
Woodridge Community Association  
WoodridgeBellevue@gmail.com  
1861 123rd Ave SE, Bellevue, WA 98005

On Jun 10, 2023, at 11:40 PM, p johnston <pamjjo@msn.com> wrote:

The City has solicited neighborhood associations to be added to the Registered Neighborhood Associations. Yet, this is not used for the DEIS. How was the distribution list of organizations defined? Why was the Registered Neighborhood Associations list not be part of the distribution list?

Please add

Bridle Trails Community Club  
6619 132nd Avenue NE. #133  
Kirkland, WA 98033  
[board@bridletrailscommunity.org](mailto:board@bridletrailscommunity.org)

Cordially,  
*-pamela johnston*  
425-881-3301

**From:** Reid/Saaris <garcar@gmail.com>  
**Sent on:** Monday, June 12, 2023 5:35:10 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Comment on CompPlan2044

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

### Comments for Comprehensive Plan

Thank you for the opportunity to comment on your Comprehensive Plan covering the next 10 to 20 years. It certainly is an awesome task to guide the growth in Bellevue and maintain a quality environment.

My preference is for Alternative 3 plans. It addresses the largest growth size, which may or may not happen, but it also has the most citywide planning that needs to impact all of us. Developing new centers for living, working and shopping locally needs to be emphasized to reduce the single passenger city traffic. This style of living takes careful thought to develop and sell to the public. And the housing needs to accommodate a wide variety of income levels.

While the Comprehensive Plan focuses on the structures of growth, I don't see how the plan addresses the needed environmental impact that addresses global warming. Without a coordinated plan the Comprehensive Plan will not be achievable.

Again thank you for your time.

Gary Saaris

1684 152<sup>nd</sup> Ave NE #102

Bellevue, WA 98007

# Input Draft EIS Bellevue Comprehensive Plan

From 13-year residents of Bellevue with two kids who went to Bellevue Schools, and a multi-generation history in King County.

## Summary

The draft EIS and the draft Bellevue Comprehensive Plan 2044 “land uses” fail to make good use of opportunities to plan for growth and will result in a city with massive inequality, harmful health impacts to new residents, and inequitable destruction of our most environmentally friendly and affordable housing.

The land use map needs to be redrawn to:

- a) Avoid displacement of middle and lower income residents,
- b) Provide child and family-friendly backyard green space for multi-family residences,
- c) Avoid noise impacts,
- d) Stop the destruction of our existing environmentally friendly multi family housing.

The proposals to increase Bellevue’s growth need to be revised because they wrongly focus on redeveloping existing apartments and condos - the city’s most green and affordable housing. This would be destroyed and take many years to rebuild. The rebuilds will not be family-friendly and healthy if recent development is any example.



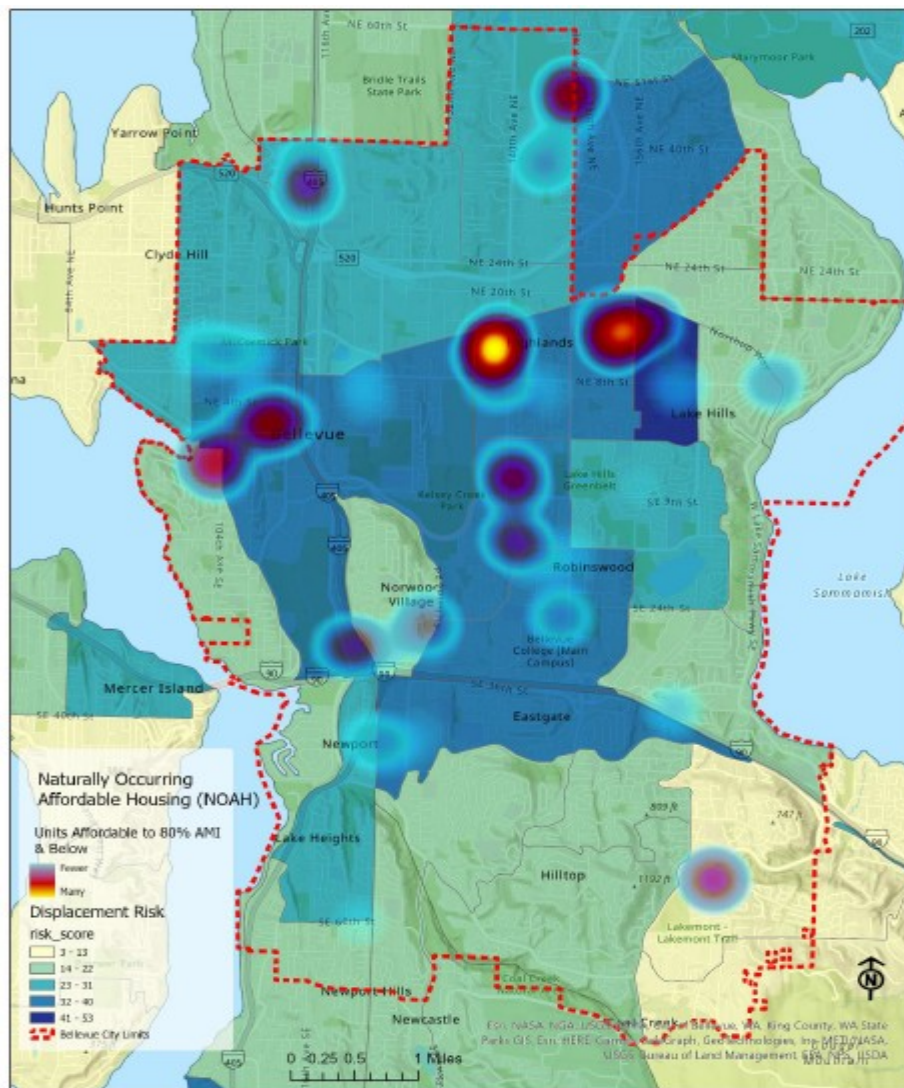
*Bellevue’s Woodland Commons*

## Draft EIS Higher growth alternatives rely on sacrificing our more affordable and eco-friendly housing

The reasons for draft EIS alternatives 2 and 3 are at best incomplete, and at worst are based on false justification. It is critical to address a false rationale for tearing down existing dense apartments. This rationale appears to be to build even higher density near transit. However, this logic falls apart when we examine closely how much more land Bellevue has near transit that is *not* proposed for rezone/upzone.

The real reason for a focus on tear-down and rebuild of existing multi-family appears to be political assumptions that: renters won't be as opposed or powerful; and a prejudice for a few home owners. The EIS does not even consider the true pros and cons. The alternatives, especially Alternatives 2 and 3 prioritize the wishes of the few large lot homeowners over the needs of the many. This is the kind of historical inequity that we want to stop because it makes poor outcomes for families and hurts us all.

The EIS contains a map showing the most affordable housing in Bellevue right now is our existing low-rise apartments. **Draft EIS page 334 of 1094 shows existing affordable housing and displacement risk:**



SOURCE: CoStar 2022; HUD CHAS Income Limits 2022; PSRC Displacement Risk Index, Data collected from American Community Survey (ACS), U.S. Census Bureau; Consolidated Housing Affordability Strategy (CHAS), U.S. Department of Housing & Urban Development (HUD); Google; County elections data; 2011 to 2018; CAI 2022.

**FIGURE 7-10 Naturally Occurring Affordable Housing (NOAH) and Displacement Risk, Citywide**

The EIS Alternatives propose to displace all the people in the existing affordable areas by rezoning for higher density in only those limited areas. This is proposed



even for apartments *not* located near transit. The common attribute for significant land use changes in the EIS Alternatives is that they are existing multi-family apartments or in some cases condos.

If we are densifying based on of transit-proximity, we would densify single family blocks along the entire train and “rapid ride” bus route, but that is not what the alternative land use maps propose.

*This is the definition of inequity and systemic bias. We plan to take existing affordable family-friendly areas populated by renters and affordable to those with medium income, and displace all of those people. In contrast, we won’t rezone existing houses on very expensive large lots.*

The draft EIS is wrong when it indicates displacement is the same under Alternatives 2 or 3 as under alternative 1. Alternative 1 clearly will result in less displacement because much of the existing dense residential would not be re-developed under Alternative 1. **Why are we choosing from alternatives that will tear down pretty much all of our affordable housing? Why don’t we put more residential in a few other locations?** Any Land Use Plans that encourage replacement of existing multi-family mean the city of Bellevue is proposing to destroy its best middle and lower income housing.

Most of these medium-density multi-family residential areas currently have green space and the proven health benefits that come with green space. These apartments also typically have environmentally-friendly electric heat. Keeping these apartments rather than tearing them down uses fewer resources.

A small selection of photos of Bellevue’s existing gems of dense, family friendly housing that we can keep and improve, not destroy:



**Hidden Creek:**





**Foothill Commons:  
Sandpiper East:**



## CityScape Bellevue:



## Washington State's new Missing Middle Housing Statute

It is important to address that state law recently changed to require the city to allow single family large lots to be developed into multiple units. That may address some of the concerns of density, but it is insufficient if the city also adopts a plan that upzones any of our existing more dense low-rise and garden-style apartments and condos. Those existing medium density multi-family units are our existing “missing” middle!

The state Missing Middle Housing bill does not address the problems of Bellevue's proposed growth plans because the EIS Alternatives propose to redevelop existing medium density residential or existing apartments and to higher density residential, In contrast, single family lots near transit are not being upzoned.

The City revealed real maps of proposed land use changes for the first time only in the last month, when it released the Draft EIS. Money has already been spent on the EIS and alternatives. Despite these sunk costs, we must go back and consider vastly revised land use maps and re-do the environmental evaluation of alternatives.

Until the detailed land use maps very recently released with the EIS, we did not have enough detail to give reasonable input. Many residents said there should be more housing and that they don't like how existing single-family homes are being torn down and replaced with 4000+ square foot mansions. Why don't we see more to address those issues?

The magazine *The Atlantic* recently encapsulated the problem of planning bias in an article where they wrote about planners making assumptions that don't disturb upper echelon socio-economic populations because they don't want to deal with the pushback. Therefore, they don't even give all the options to decision-makers. This is systemic bias at work, and we must not allow it to be part of our decisions.

## Our Schools and City's Future.

Bellevue has such limited single-family housing compared to the number of very high paying jobs that we are a city of extremes - we have either very high density or very low-density housing. This is a big reason for declining school enrollment. We want our schools to be full because we have excellent schools and we are geographically positioned near many jobs.

However, our high-density apartments have relatively few school students and our sprawling single-family residences, most worth \$2 million or more, also have very few students. This is for opposite reasons. One is that families prefer green space immediately available for their kids, selves, and guests to enjoy - like a backyard. High density as we have been building it does not have this green space. The other reason is that people who have the money for the single-family homes that most kids and parents prefer are not affordable to young people with young kids. (People need to work their way up in their career and save for a while and so they move to the far suburbs.) **How many more Bellevue elementary schools will close if we don't create family friendly housing? Densifying existing family friendly apartments will make the situation worse.**



The few single-family residences that contain people who might fight against rebuilding part of their neighborhood as denser housing will learn that their fight boomerangs against them. It will hurt neighborhoods as our neighborhood schools close. It's not as nice of a neighborhood if your kids can no longer walk to school. *From recent news coverage of Bellevue's school closures:*

Concerned parents, students and staff have rallied over the past few weeks after learning seven elementary schools would be considered for a [three-school consolidation plan due to declining enrollment](#), according to the BSD.

The seven elementary schools being considered are Ardmore, Eastgate, Enatai, Phantom Lake, Sherwood Forest, Woodridge and Wilburton.

The BSD said [these seven schools have the lowest enrollment](#) and are not forecasted to improve in those numbers in the near future.

The declining enrollment in the district is impacting student programming, financial stability and facility usage. According to the district, they are currently only utilizing 66% of space in classrooms and other facilities.

KING 5 attended a few of the district listening sessions and spoke to parents from several schools on the list for potential consolidation.

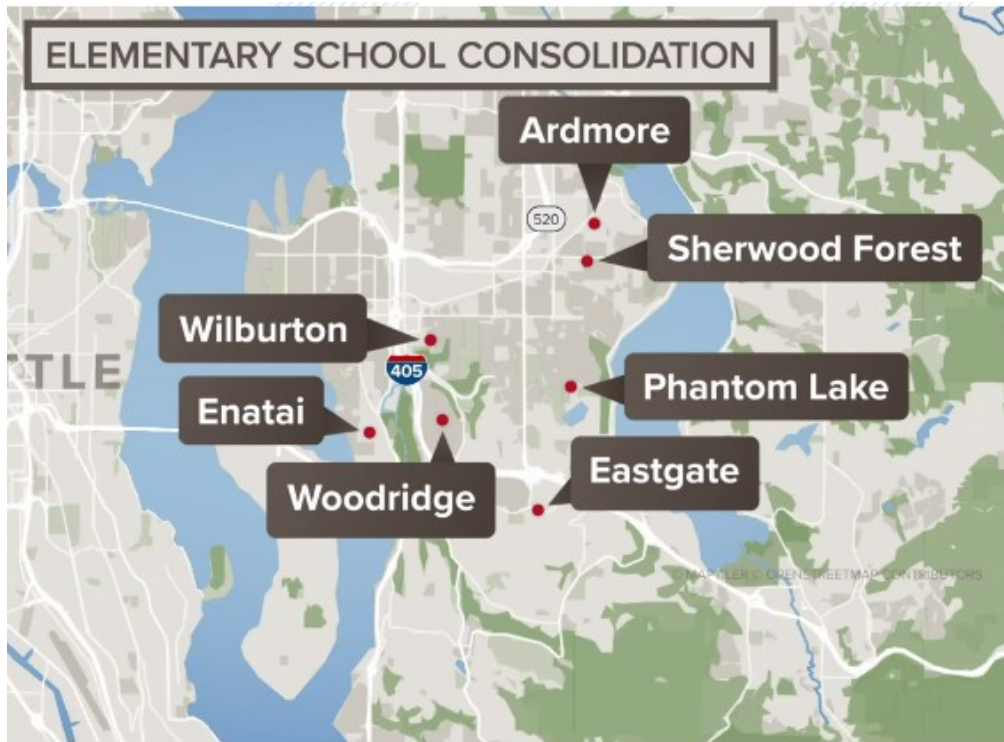
Many [parents say they are frustrated](#) by the speed at which the process to consolidate schools is happening. Several parents who have reached out to KING 5 said they moved to Bellevue specifically to send their kids to "neighborhood schools."

"We bought our house because it had a neighborhood school that our kids could walk to that they could have playdates with kids that were just down the street and where they're talking about sending our kids is not... not super close," said Nicole Holley, an Eastgate Elementary parent.

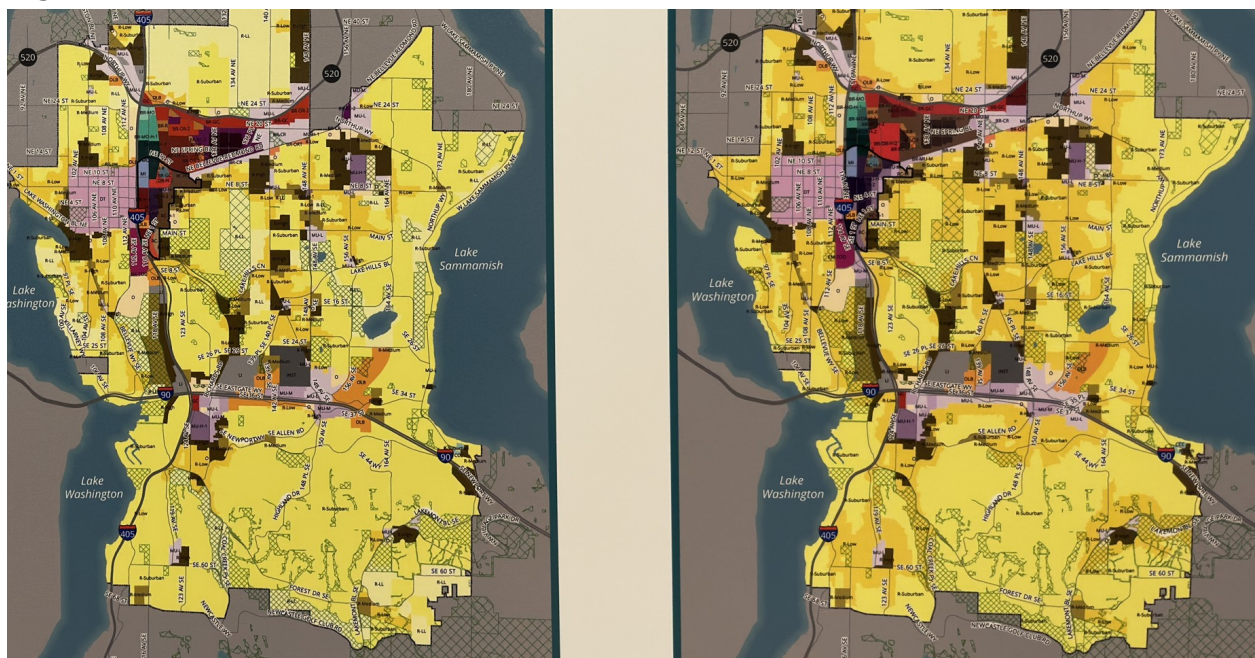
Source: <https://www.king5.com/article/news/education/bellevue-families-rally-school-consolidation-announcement/281-10790900-e923-4d1a-b90f-7096dcbc856a>

### [Improve, don't remove, existing medium density housing](#)

Our existing medium-density apartments are 20 to 30 per acre with a balance of green space and can be made even more attractive to families. Not every apartment that has green space has made it a nice place for kids or gathering with friends. Many apartments need a little bit of a change in the outdoor spaces to add play equipment or picnic tables, shrubs and greenery that break up the space that make people feel like they have both privacy and gathering spaces. The city should focus on this assistance, not on preserving existing large-lot housing that doesn't serve families or growth or the environment well.



Compare the above school map to Options 2 and 3 in the Comprehensive Plan Draft EIS:



The “tear-down-to-densify-already-dense-residential” draft EIS options were settled on before the elementary school consolidation issue with the school district was made public. It's time to go back to the drawing board.

## Noise.

Residential areas have a strong preference for peace and quiet. It is extremely important to have a low level of noise in your home, which is why many people like their homes set away from busy multi-lane roads. Apartment-dwellers are people, families, and human beings no different from homeowners in terms of their need for green space and low levels of noise.

A recent *New York Times* article pulled together the scientifically measured negative impacts of noise on health, showing how noise can take years off people's lives.

*"Noise Could Take Years Off Your Life. Here's How. We used a professional sound meter to measure the din of daily life and talked to scientists about the health risks it can pose." By Emily Baumgaertner, Jason Kao, Eleanor Lutz, Josephine Sedgwick, Rumsey Taylor, Noah Throop and Josh Williams June 9, 2023.*

The Bellevue plan options Alternative 2 and 3 that would put extremely high density next to busy streets and train stations only subjects all those residents to the kind of noise that will hurt their health or that they will move away from.

Noise-proofing buildings doesn't help much if outdoor spaces are very noisy, because, as alluded to above, we get a lot of health benefits from being outside in green spaces.

## Green Spaces Attached to Each Residential Development

If higher density is going to help our region and its broader housing goals, the alternatives in Bellevue's comprehensive plan draft that achieve density by tearing down existing multi-family of 20 or 30 units per acre to replace it with large buildings with minimal attached green space are doing it in one of the worst ways possible. We won't get the results that we want. We won't see families walking and healthier kids. We'll see kids inside all day with screens because there's no safe green space for them to go and even if they do go out it's too noisy to enjoy. Or, families will move out to distant suburbs and have hours-long commutes that both hurt the environment and family time.

We need to look closely at green space requirements. In recently built multi-family apartment blocks in Bellevue, green space requirements result in landscaping at the front near the street. This looks nice but is not usable for families. We are also losing trees when we need them most to counter excessive heat and air pollution.

Instead of back yards (yes, apartments can have back yards), many new Bellevue residents are limited to parks that require them to walk or drive. When we see kids at a park without their parents, it can be a cause for concern. But parents have a lot to do. Why can't they work in the house and look at their kids through the window in the yard? Most people with jobs don't have the option to spend a couple of hours driving kids to park and watching their kids every day so that their kids can be outside. (What was it like for you when you grew up? Did your mom or dad spend



your outdoor time with you or did they let you go in the backyard while they were busy in the house?)

A much better solution is to keep **all** of our existing low-rise apartments, which are extremely dense and have many transit riders. Then, carefully allow higher density on a smaller number of single family and commercial or undeveloped areas. Make sure this higher density is done with access to green space for everyone who lives there so that families don't move away.

Bellevue should create incentives to improve the family friendly aspects of existing apartments.

## Displacement not adequately analyzed

The draft EIS does not clearly include the numbers of residents that would be displaced if the existing apartments were torn down nor the number of school children that would be impacted. Mitigation suggestions like assistance moving do not account for figuring out where else in Bellevue people could move to?

The draft EIS does not count the number of residents in single family areas that are near high capacity transit and are not proposed for any land use change in. Without this data it is impossible to get a clear picture of the impact on existing Bellevue residents.

The current displacement mitigation plan in the EIS is laughable. The possible "right to return" for existing multifamily is a false option. Anyone evicted from their existing Bellevue multi-family is not going to wait many years to return, especially to a drastically different more crowded building. Their life will change during the years they must wait, and their kids will grow up.

## Transit and Parking

Our family takes the bus frequently. The "rapid ride" that serves many existing apartments has a lot of ridership. We don't need to tear down our existing apartments. We need to replicate them and search hard for areas where it makes sense to do so.

Multi-lane roads and parking lots are destructive to the benefits of walkable, attractive cities and our wildlife and health. But removing parking to force transit use ignores the huge life, opportunity, and happiness impacts on people who are forced out of having a car.

See this excellent article on the real world experience of such development in another, more transit-oriented city: <https://missionlocal.org/2023/05/no-parking-at-mission-affordable-housing-means-tenants-pay-the-price/>. As quoted in the article, a problem with lack of parking is, "it's hard to shuffle her kids to school on the bus. Policies meant to disincentivize cars are 'elitist,' she said. 'Rich people still keep their cars.'"

Services are spread out across land uses. Can people get their child to activities? Can people have friends come to visit on weekends or evenings, or does a lack of

parking prevent this? We need to first improve our transit networks first so that people voluntarily give up cars.



June 12, 2023

VIA ELECTRONIC SUBMITTAL

Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Re: Bellevue 2044 DEIS Comments / SRM 991 118<sup>th</sup> Ave SE comment letter

Dear Mr. Pittman:

We are writing to provide comments in response to the Draft Environmental Impact Statement (DEIS) prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

SRM owns the property located at 991 118<sup>th</sup> Avenue SE (“property”) and is currently contemplating a site-specific rezone to allow for additional residential density on the property. The property is well-located in a transit-rich area and accessible to two light rail stations (South Bellevue and East Main). The 118<sup>th</sup> Avenue corridor is proximate to downtown Bellevue and should be considered for growth opportunities. The following are SRM’s comments to the Comprehensive Plan:

#### **Land Use**

- SRM supports Alternative 3 for the Property, which includes an “MU-M” designation. It is unclear what residential density is allowed by this designation, we recommend at least an FAR of 4 to provide the ability to build a 5- or 6-over-2 residential product on the site.
- Development Agreements. State law broadly authorizes the use of development agreements by cities, but the City of Bellevue has traditionally limited the availability of the entitlement tool. As a result, the City is foregoing opportunities to achieve even higher-quality urban

development and public benefits in its growth centers. The Final EIS should discuss making the development agreement process generally available for projects in the City.

- The City has recently completed its Phase 1 affordable housing amendments, is studying its Phase 2 affordable housing amendments, and is looking at finalizing the C-1 amendments. SRM supports the creation of more affordable opportunities in Bellevue and supports these types of legislative efforts to increase affordable housing by incentivizing density.

### **Transportation**

- Parking requirements. Parking ratios in urban areas like the property should also be lowered. The property is between two light rail stations and currently high parking ratios limit infill or redevelopment of the property. Allow the market to decide parking ratios. Please study no minimum parking in areas like our property in the FEIS.

### **Critical Areas**

- The “critical areas penalty” would currently apply to any redevelopment of the property and may prevent any redevelopment of the property to something more environmentally friendly. The DEIS does not adequately study the City’s critical areas regulations and provide options to the decision-makers for consideration. Consider eliminating the critical areas penalty altogether, which would allow for development consistent with stormwater and critical areas codes, and a better environmental outcome than what currently exists on the property. The FEIS should consider this type of flexible regulatory environment.

### **Affordable Housing**

- As a housing developer in many jurisdictions, SRM is aware of the need for affordable housing. Any affordable housing requirements should not stymie the development of housing units and should instead incentivize development. There are currently not enough housing units in the region; incorporating a regulation that reduces the velocity at which units can be produced would be a mistake. The FEIS should disclose the various economic analyses that were performed as part of the DEIS and its study of affordable housing options, and it should disclose how many affordable units were produced as part of the housing programs presumed.

### **Other Issues**

- “Air quality buffers”. The DEIS suggests air quality “buffers” for development along arterials and requiring very expensive air handlers for residential projects near freeways, all of which would significantly increase the cost of housing in Bellevue. It would appear that the property would be subject to such an air quality buffer, which would prevent redevelopment into housing. It is unclear that the City could implement such an air quality buffer and meet its housing and development goals. The Final EIS should eliminate this recommendation.
- Impervious Surfaces. The City’s requirements of substantial pervious surfaces in dense urban environments runs contrary to the infill goals of Alternative 3 of the DEIS. The

June 12, 2023

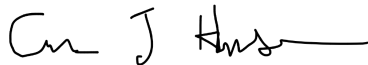
Page 3 of 3

requirement of significant pervious areas on dense urban sites should not be a part of future urban zoning regulations. Most other urban jurisdictions have identified ways to address storm water quality and lush landscaping without the need to impose major penalties on site usability. Bellevue should update its regulations accordingly.

- Views. The DEIS should acknowledge that future development will impact views and solar access. The Final EIS should acknowledge that redevelopment will inevitably impact view and shadows in this way. Redevelopment of the property and the City is not possible without creating some view and shadow impacts; but it is not likely that any of these impacts would be significant. The City should not protect views from I-405.

We appreciate the City's work on Bellevue 2044. Please do not hesitate to contact us if you have questions about our comment. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Conor J. Hansen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Conor J. Hansen  
Managing Principal, Affordable Housing  
SRM Development

June 12, 2023

VIA ONLINE PORTAL, EMAIL, AND U.S. MAIL

Elizabeth Stead  
Bellevue Development Services  
City of Bellevue  
450 110<sup>th</sup> Ave. NE  
Bellevue, WA 98004  
Email: [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Re: Wilburton Vision DEIS Comment

Dear Ms. Stead:

This Firm represents the Nine Lake Bellevue Owner's Association, which consists of members of the Nine Lake Bellevue Condominium (sometimes referred to as Nine Lake). On behalf of the Association, we submit this comment letter in response to the DEIS for the Bellevue Comprehensive Plan Periodic Update and Wilburton Vision Implementation.

The Nine Lake Bellevue Condominium contains a 25-unit office building on the west side of Lake Bellevue in the Wilburton study area. The Condominium also owns a surface-level parking lot south of the office building and southwest of the Lake. The Nine Lake parking lot is adjacent to the Link light rail Wilburton Station, which is anticipated to open in 2024 or 2025. Right next to the Station, the parking lot is a prime location for sustainable, transit-oriented development (TOD).

Per the [City website](#), the primary goals of the Wilburton Vision Implementation are to "facilitate redevelopment in the Wilburton study area, improve amenities, incentivize transit- and trail-oriented uses and establish a unique identity for the area." Similarly, the Scope of Work Summary for Wilburton Vision states that the City hopes to "realize the vision of a vibrant, inclusive and sustainable future for Wilburton." The broader DEIS touches on similar themes of sustainability, TOD, and increased housing capacity.

The Nine Lake Bellevue Condominium owners share the City's goal of building a sustainable future with vibrant neighborhoods, greater housing choices, and TOD. Thus, the owners were disappointed to learn that only Alternative 3 of the DEIS proposes upzoning on the Lake Bellevue properties, including the Nine Lake property (parcel no. 6093500000). Alternatives 1 and 2 show no upzoning to the Lake Bellevue properties. The DEIS does not explain why Alternatives 1 and 2 propose no upzoning around

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[jhempelmann@cairncross.com](mailto:jhempelmann@cairncross.com)  
direct: (206) 254-4400

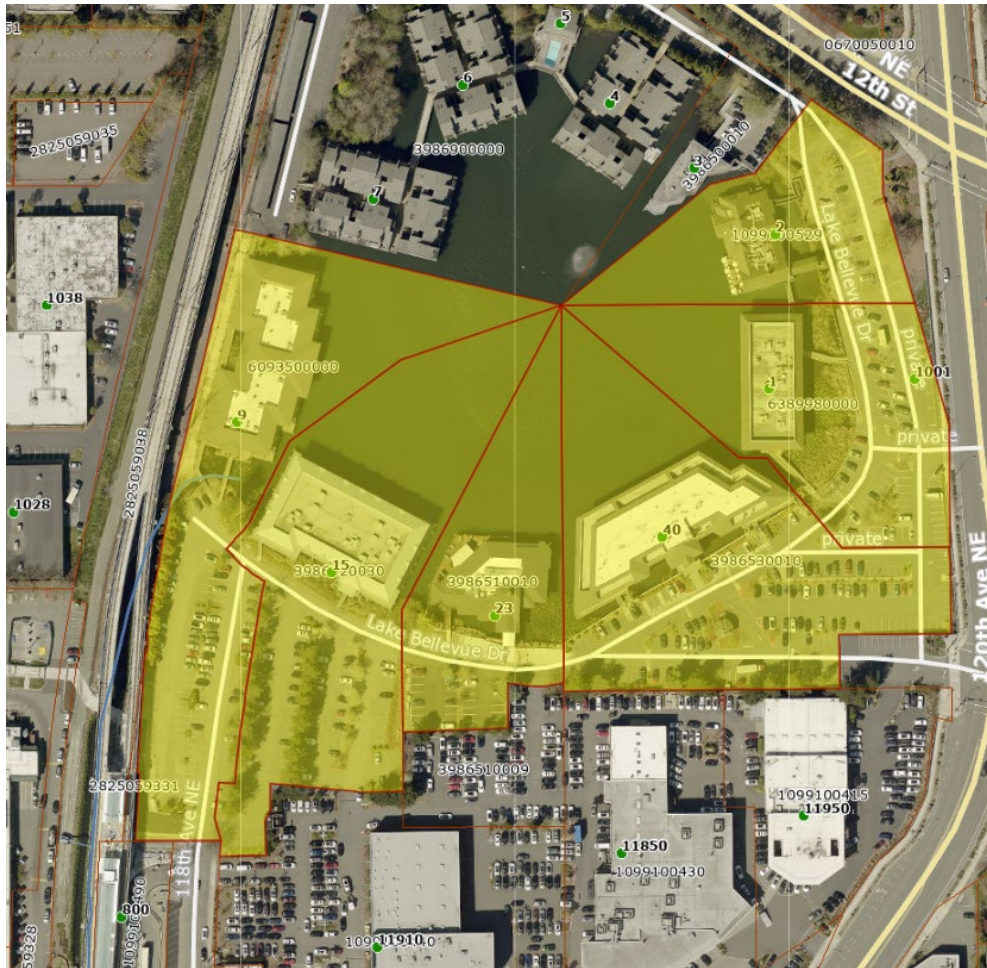
[mburke@cairncross.com](mailto:mburke@cairncross.com)  
direct: (206) 254-4497



Elizabeth Stead  
June 12, 2023  
Page 2

Lake Bellevue while Alternative 3 does propose upzoning. Given the many opportunities at Lake Bellevue for TOD adjacent to the new Wilburton Station, omitting TOD options in Alternative 1 and 2 makes no sense.

Almost all of the dry land on the Lake Bellevue properties consists of parking lots:



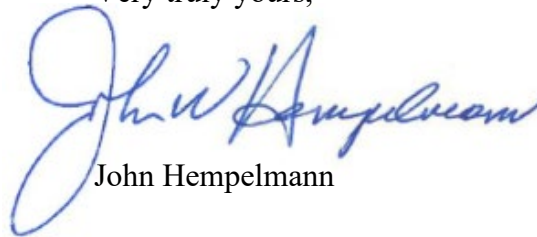
Failing to upzone the Lake Bellevue properties would most likely cause those parking lots to remain as such—parking lots—even though the Wilburton Station will be within a few minutes of level walking distance of those lots. That would be totally incongruent with the City’s stated goals of adding capacity for sustainable development, TOD, and housing.

Therefore, we respectfully request that **all** of the FEIS alternatives propose upzoning on the Lake Bellevue properties, including Nine Lake Bellevue.

Elizabeth Stead  
June 12, 2023  
Page 3

Thank you, and we look forward to working with you in building a vibrant and sustainable future.

Very truly yours,



John Hempelmann



Maxwell Burke

**From:** jack hirsch <jackhh1@hotmail.com>  
**Sent on:** Saturday, June 10, 2023 5:10:38 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Bellevue Comprehensive Plan

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I am commenting as a resident of the Bridle Trails neighborhood for 30 years. It is unique, perhaps in the country, as a large lot city neighborhood adjacent to a large State Park left in a natural state with trails for people and equestrians. It is a haven for wildlife that have been driven out of other Bellevue areas by development. This uniqueness has been recognized in multiple city documents concerning preserving the large lots and equestrian character of Bridle Trails. Families live here because of these characteristics. Changing the zoning to promote additional structures, duplexes etc, would adversely affect the entire nature of the neighborhood. Bellevue has multiple neighborhoods with better access to transportation and minimal impact to increasing housing density.

Thank you for considering these comments  
Jack H Hirsch  
3836 134th Ave NE

# McCULLOUGH HILL PLLC

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June 12, 2023

VIA ELECTRONIC SUBMITTAL  
[CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Re: Bellevue 2044 DEIS Comments

Dear Mr. Pittman:

We are writing on behalf of KG Investment Properties and Rockwood Capital to provide comments in response to the Draft Environmental Impact Statement (DEIS) prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, KG Investments and Rockwood Capital own 7 acres on the east side of 116<sup>th</sup> Avenue NE, between NE 4<sup>th</sup> Street and NE 6<sup>th</sup> Street (the “Property”) – the heart of the Wilburton subarea and the point at which the Grand Connection and Eastrail will one day intersect. A map of the Property is attached for your reference. The Comprehensive Plan update will be important to the future use and development of our property and the role it will play in Bellevue’s growth as a regional center.

## General

- We support Alternative 3 as the Preferred Alternative in the FEIS. Alternative 3 achieves the most amount of growth in an area well-served by transit and other means of transportation. It also provides the most flexibility in future uses in the Wilburton subarea.

## Land Use

- Uses. Like Downtown, the range of permitted uses in Wilburton zones should be very broad, including all typical urban uses. The Plan should not attempt to micro-manage land uses within the Subarea, but should instead allow flexibility for future development to follow market demand.
- Urban Form. Bellevue has traditionally used setbacks, building setbacks and floorplate restrictions to achieve an end result in the built environment. These types of prescriptive regulations create their own repetitious buildings as designers substitute these dimensional tables in place of creative and site-specific design solutions. These types of regulations increase the cost of construction, reduce building efficiencies and the marketability of the buildings. Since the DEIS is an evaluation and disclosure document, it should also explore other options to solve the issues of building massing, human scale proportionality, site permeability and design rather than limiting the analysis to prescriptive and strict dimensional requirements. Developers should be allowed flexibility in how they achieve these urban design goals in lieu of prescriptive numbers.
- Build-out of the Grand Connection and Eastrail. The Grand Connection overlays the existing Pedestrian Corridor downtown and in many ways represents an extension of this Corridor to the west and east. In Wilburton, Eastrail will extend the Grand Connection north and south throughout the region. The City created Code provisions decades ago to promote the dedication and development of the Pedestrian Corridor. These provisions have and continue to be successful in incentivizing the development of the Corridor, and these same approaches should be used for the extended areas of the Grand Connection and Eastrail. Specifically, we suggest that the Final EIS evaluate the use of the “superbonus” provided in the Downtown Code for the future dedication and development of the Grand Connection and Eastrail in Wilburton. As in Downtown, the dedication and development of the Grand Connection and Eastrail could create FAR amenity points at a 16:1 ratio and those bonuses could be used to develop floor area above the height and density limitations otherwise applicable in the Wilburton zone. This has been a successful approach to the build-out of the pedestrian corridor downtown, and its use in Wilburton would promote the implementation of the Grand Connection. [ In addition, we note that the State Legislature adopted SB 5452 in this year’s session, allowing transportation impact fee revenue to be dedicated to the development of bicycle and pedestrian facilities. The Final EIS should discuss the importance of making this new tool available to support the future development of the Grand Connection and Eastrail.
- City Property. The City-owned property on the west side of 116<sup>th</sup> Avenue NE near NE 6<sup>th</sup> Street (as extended) is a key element in formulating future land use patterns in Wilburton. Its location at the eastern end of the future Grand Connection I-405 Non-Motorized Crossing makes it an ideal location for potential public open space and community supportive facilities. We encourage the City to explore such options in the Final EIS.

- Unit Density. The maps outlining future housing density by alternative (see, for example, Figure 2-2) establish 141 units per acre as a maximum residential density. This figure is quite low for an urban center environment; one would expect actual average densities in core areas to be much higher. The Final EIS should discuss actual projected residential densities in these core areas and determine whether this adjustment requires a refinement to the analysis.
- Future Land Use Map. The DEIS depicts the City's Future Land Use Map (FLUM) in Figure 3-6. However, this depiction does not accurately reflect the City's FLUM. Figure 3-6 is instead a highly generalized version of the FLUM, aggregating dozens of different actual land use categories into more general buckets. This generalization may be helpful for the reader, but it tends to mask a significant shortcoming of the City's Comprehensive Plan which the Final EIS should discuss. Bellevue's Comprehensive Plan in many areas employs FLUM designations that effectively mirror the zoning, so that in many cases there can be only a single implementing zone for a FLUM designation. The result in these cases is to prevent a rezone from being approved with a corresponding and prior amendment to the FLUM. This substantially reduces the ability of the rezone process to be used as a tool for land use evolution in the periods between major Comprehensive Plan updates. The Final EIS should discuss converting the FLUM to a more generalized map, such as shown in Figure 3-6, to allow greater flexibility in zoning decisions going forward.
- Development Agreements. State law broadly authorizes the use of development agreements by cities, but the City of Bellevue has traditionally limited the availability of the entitlement tool. As a result, the City is foregoing opportunities to achieve even higher-quality urban development and public benefits in its growth centers. The Final EIS should discuss making the development agreement process generally available for projects in the City's growth centers like Wilburton.

## **Transportation**

- The DEIS Transportation Analysis is Excessively Conservative. It is appropriate for the DEIS to adopt a "worst-case" analysis of transportation impacts, but the DEIS far exceeds this standard. For all impact analysis, the DEIS adopts a "market factor" of 100%; that is, the DEIS assumes that the entire new zoned capacity identified in each alternative will be developed and placed in service within the next 20 years. The DEIS properly notes the conservatism of this analytical approach. However helpful this worst-case approach is for SEPA review purposes, it is important that the EIS also characterizes the likelihood of this worst-case scenario. Otherwise, the process of legislative policy review of the Plan will be infected by an unrealistic view of future impacts.

For example, the Downtown Plan adopted by the City in the 1980's never approached anything resembling full build-out over the ensuing 35 years. The Bel-Red Plan was adopted in 2010 and actual development over the succeeding 13 years has been only a small fraction of the theoretical full build-out. The Final EIS should note that the likelihood of such 100% build-out occurring for any alternative within the life of the Plan is essentially zero. To



ensure that the legislative policy discussion regarding the Plan is rooted in reality, the Final EIS should also provide comparative impact analysis for lesser build-out scenarios for each of the alternatives.

- NE 6<sup>th</sup> should terminate at 116<sup>th</sup> Avenue NE. Alternative 3A proposes an extension of NE 6<sup>th</sup> Street to 120<sup>th</sup> Avenue NE and the DEIS properly notes the reasons to reject this concept. We suggest that Alternative 3A be eliminated from the Final EIS. The extension of NE 6<sup>th</sup> Street to 120<sup>th</sup> Avenue NE would require an enormous investment of funding, resources and time. Introduction of yet another Eastrail crossing with thousands of vehicles each day would destroy the unique urban pedestrian junction where the Grand Connection meets Eastrail and dramatically undermine the pedestrian development potential and experience between NE 4<sup>th</sup> and NE 8<sup>th</sup>. The intersection of the Grand Connection with Eastrail is a special opportunity for trail-oriented development that could become the gateway to Bellevue from the regional trail system. We believe extending NE 6<sup>th</sup> Street with a termination at 116<sup>th</sup> Avenue NE is the best option for Wilburton for all of the reasons cited in the DEIS. Introducing another auto crossing of Eastrail does not meet the neighborhood or City vision for Eastrail and introduces significant safety issues to Eastrail (DEIS, p. 11-110). In addition, extension of SE 6<sup>th</sup> to 120<sup>th</sup> achieves nothing material in terms of transportation or circulation benefits (DEIS, p. 11-111).
- Street Grid. Figure 11-28 shows the “Wilburton Study Area Draft Circulation and Permeability” network, which appears to be a proposed road grid. No requirement of a “street grid” should be imposed on Wilburton. Grid streets can work well, as in Bel-Red, when they can be developed on generally flat or gently sloping topography and when they truly provide connections through and across a larger neighborhood to various destinations. Neither is the case here. The significant grades across the Property impair the use and activation of any such grid streets and those streets would not connect to any larger network – they would only dead-end into Eastrail or a retaining structure that supports it. The development of the Property can and should accommodate east-west pedestrian connections between 116th Avenue NE and Eastrail, but the introduction of vehicular access through the Property would be a mistake.
- Access from 116th Avenue NE. The Plan proposes to redevelop 116th Avenue NE into a new boulevard street. We endorse this design concept for 116<sup>th</sup> Avenue NE, but it must also be recognized that 116th Avenue NE will provide the only vehicular access for the high-density urban development sites adjoining it. Therefore, 116th Avenue NE must be planned and designed to satisfy these fundamental access requirements.
- Parking requirements. Required parking ratios should be flexible, demand-based and consistent with market requirements across other urban centers in Bellevue. Parking ratios that are too high or too low will only impede new urban development in this area. Furthermore, new development in Wilburton may reflect greater parking requirements than seen in Downton and Bel-Red, based on potential technology tenants. The DEIS should

address this reality.

- Grand Connection I-405 Non-Motorized/Bike/Ped Crossing of I-405. In April 2023, the City initiated the process of preliminary engineering design for the Grand Connection I-405 Non-Motorized Crossing (the “Grand Connection Crossing”). As we know, the Wilburton Subarea Plan includes an evaluation of the Grand Connection in general, which includes the Grand Connection Crossing. The vitality and design of future land uses in Wilburton will be significantly improved by the completion of the Grand Connection Crossing. The Final EIS should include a more thorough evaluation of the Grand Connection Crossing within the future transportation network. The Grand Connection Crossing should be identified as a key mobility mitigation measure both for Wilburton and the City as a whole.
- Transit Proximate Areas. The depiction of Transit Proximate Areas in the DEIS is based on current data as of 2023. This fails to account for the likely expansion of transit service throughout the City over the next 20 years. The Final EIS should evaluate the potential for such transit expansion and should recommend possible land use changes to accompany such expansions, if they occur.
- Eastrail Design. The DEIS should address the land use/urban design impacts of a grade-separated Eastrail crossing of NE 4th Street. In particular, the Final EIS should evaluate the potential impacts of a grade-separated alternative, including:
  - Minimum slopes required to allow accessibility and to achieve adequate crossing height over NE 4th Street will require approaches that stretch 500 feet north and south into key redevelopment areas under the Plan. Approximately 80% of the unique pedestrian experience along the Eastrail between 4th and 8th would be substantially degraded if these imposing ramp structures were to be implemented.
  - Such ramp structures will create a wall down the center of the Plan area and will divorce much of the Eastrail from adjoining development in precisely the area in which that connection is critical (i.e., the junction of the Grand Connection and the Eastrail).
  - The substantial cost of a grade-separated crossing will make its implementation unlikely and, in the best case, significantly delayed.

An at-grade crossing option for NE 4th Streets was supported by the Wilburton CAC and has no adverse transportation impacts. It also allows a much-improved relationship between the Eastrail and adjoining land uses and avoids the construction of a wall through the middle of the Plan area. The Final EIS must fully evaluate the at-grade option in all Plan alternatives and undertake a complete assessment of the impacts of the grade-separated alternative as well.

## Other Issues

- “Air quality buffers”. The DEIS suggests air quality “buffers” for development along arterials and requiring very expensive air handlers for residential projects near freeways, all of which would significantly increase the cost of housing in Bellevue. Based on Wilburton’s location, most of Wilburton could qualify as for such a buffer. Worse, these targeted arterials are also the City’s key transit corridors, so the implementation of such buffers would completely undermine the City’s urban density and mobility strategy for the Plan. More important, the DEIS does not demonstrate that actual air quality impacts would occur to nearby residents or employees; demonstrating such significant adverse impacts is a precondition to any discussion of mitigation. Further, the City’s 2017 rezone of Downtown and recent rezone of East Main – both located along I-405 – included no such mitigation requirements. Selective application of such unwarranted restrictions in Wilburton would only impair urban development in the area, without justification and in a manner inconsistent with regulation in similar areas. The Final EIS should eliminate this recommendation.
- Mitigation. The DEIS includes potential mitigation measures for many elements of the environment. It should be noted in the Final EIS that adoption of new comprehensive plan policies and zoning will be a legislative decision of the Bellevue City Council, and that since an environmental impact statement is being prepared, no mitigation is required under SEPA to address any adverse environmental impacts. The listing of potential mitigation measures in the DEIS only provides the City Council with options in the decision-making process. Ultimately, whether to adopt any mitigation measure identified in the DEIS lies in the sole discretion of the City Council.
- Critical Areas. Although the DEIS addresses a full comprehensive Plan update, it fails to address the City’s critical areas regulations. This is a significant omission. Bellevue’s critical areas regulations are outdated and inconsistent with the nature of urban development contemplated by the DEIS. The Final EIS should fully address this issue and identify revisions to the City’s critical areas regulations to promote urban development. These revisions for Wilburton would include:
  - Eliminating the density penalty included in the critical areas ordinance.
  - Rationalizing the ability of urban developments to address steep slope conditions with engineered retaining structures as an exemption to critical area ordinance compliance. This will be particularly important to ensure that development can occur alongside Eastrail and that the Eastrail experience can provide urban activation.
- Impervious Surfaces. The City’s requirements of substantial pervious surfaces in dense urban environments runs contrary to the infill goals of Alternative 3 of the DEIS. The requirement of significant pervious areas on dense urban sites should not be a part of future Wilburton regulations. Most other urban jurisdictions have identified ways to address storm water quality without the need to impose major penalties on site usability. Bellevue should

update its regulations accordingly.

- Views. The DEIS should acknowledge that future development will impact views and solar access. The DEIS evaluates the impacts of future development in Wilburton on views from public places and on shadows on other public places, such as Eastrail. The Final EIS should acknowledge that Wilburton redevelopment will inevitably impact view and shadows in this way. Redevelopment of Wilburton is not possible without creating such impacts; but it is not likely that any of these impacts would be significant. Furthermore, the Final EIS should note that amendment of existing Wilburton Plan policies regarding view issues may be inconsistent with the current planning effort, and that the existing Wilburton Plan may need to be revised as a result. The segment of Eastrail between NE 4th Street and NE 8th Street is a unique opportunity on the entire trail for activation and urban-scale trail-oriented development. While there will be outstanding opportunities for light and view along the full Eastrail system, this is the one location on the entire Eastrail where there is the opportunity for significant trail-oriented urban development. This opportunity should not be limited or lost in an effort to address views and shadows on this limited segment of Eastrail. In addition, shadows on private property should not be regulated, and if the City seriously considers this mitigation, adequate analysis should be completed to determine impacts to density related to such a regulation. Private views should also similarly not be regulated, and impacts to density should be reviewed. If public views are regulated, the City should specifically define a public view (from what viewpoint, views of which features are protected), and the impacts to potential density and the tradeoffs of protecting views and shadows in this manner should be adequately studied

The DEIS should also evaluate the ways in which Plan implementation will create new views and solar access. Implementation of the Plan will create enormous new areas of open space and pedestrian paths and connection, which in turn will offer new viewpoints and opportunities for solar access throughout the Plan area. The Grand Connection by itself will become perhaps the best and most unencumbered viewpoint in the City to take in views of Mt. Rainier, the cityscape and the Cascade Mountains. Further, the Plan will transform the Wilburton area from one that is currently hostile to pedestrians to an urban village with robust new pedestrian activity, meaning that thousands more will be able to enjoy the new views created by the Plan. These comparative impacts should be evaluated in the Final EIS.

- District Energy Solutions. The DEIS relies upon existing and future building and energy codes to reduce the impact of the listed future development alternatives. In addition, the DEIS relies upon the Eastside Electrification Project and Puget Sound Energy to provide the increased electrical capacity necessary for future development. But upcoming building and energy codes will shift to full electrification for building heating and increasing cooling loads as temperatures increase. Consistent with the City's published Environmental Stewardship Plan, the Final EIS should encourage and incentivize new developments to adopt strategies to reduce their greenhouse gas emissions and reliance upon electrification that goes beyond code while decreasing demand on the electrical grid through renewable

June 12, 2023

Page 8 of 8

energy alternatives and encouraging local development of district energy systems and infrastructure.

We appreciate the City's work on Bellevue 2044. Please do not hesitate to contact us if you have questions about our comment. Thank you for the opportunity to comment.

Sincerely,



John C. McCullough

cc: Rockwood Capital  
KG Investment Properties

**From:** James Bowles <jbowles206@gmail.com>  
**Sent on:** Monday, June 12, 2023 4:52:31 AM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Comments on the DEIS 2024-2044

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June 12, 2023

Subject: Comments on the Draft Environmental Impact Statement (DEIS) City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation

To: Elizabeth Stead

City of Bellevue Community Development Department

[450 110th Avenue NE](#)  
[Bellevue, WA 98004](#)

Dear Ms. Stead:

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. Bridle Trails Community Club (BTCC) is a 501c(4) nonprofit organization dedicated to protecting and enhancing the character and livability of Bridle Trails area near Washington's Bridle Trails State Park in Bellevue and Kirkland. BTCC has been in operation since 1978.

BTCC has concerns regarding the adequacy of the DEIS because substantial City of Bellevue issues have not been addressed in the document. We are requesting that the DEIS is revised to address this missing information and then re-sent as a revised draft. Only in this way can our Bellevue residents understand how the comprehensive plan addresses the most significant issues of our City. We find that the DEIS does not have a reasonable thorough discussion of the significant aspects of the following and described below:

- Management of growth
- House Bills:  
1110, 1337, and 1181
- Changes in employment and housing as a result of Covid and remote working
- Resources omitted in the analysis (parks and recreation and plants and animals)
- Homelessness



- LIST ALL

More growth means more impact. Less growth means less impact. The different alternatives are different ways of accomplishing the same amount of growth. The targets for 2044 are the same for all alternatives – 35,000 units of housing, 70,000 jobs. It is critical the EIS analyzes and accounts for the impact of and mitigations for the same amount of growth using different strategies over the same period of time (2024-2044). Growth is forecasted for 2044. The DEIS is not addressing the timeline of growth up to before 2044 and a “healthy” zone. The DEIS should be revised to reflect the growth rate compared with time for each alternative.

Rapid growth may strain the infrastructure leading to congestion (decreased productivity; negative impacts on air quality and greenhouse gas emissions; quality of life), other environmental effects such as soil and water contamination, service disruptions, waste management, increased waste, and increased vulnerability to failures or breakdowns. It also impacts the community in terms of healthcare, education, and public safety as well as impact community cohesion, resiliency, and well-being. Rapid growth may result in increased demand for housing, leading to rising prices and reduced affordability. Natural resources such as water and loss of natural habitats, deforestation, destruction of sensitive ecosystems may be strained. This can decrease the natural infrastructure, overcrowd recreational spaces, reduce access to nature, and decrease overall quality of life. DEIS is not addressing impacts of growth adequately over a short a period of time including the services and infrastructure sync with development. The DEIS should be revised to reflect the characteristics and mitigation of rapid growth on each alternative.

The DEIS is silent on the tools to manage growth vs time. There appears to be one big lever to pull: create capacity. The EIS is not addressing the tools the City Council has to manage the growth on an ongoing basis. The EIS should draw attention to the things that cannot be controlled directly and recognize what Bellevue has control over. The DEIS should be revised to reflect how does the current unused capacity get triggered, the required metrics, and the dials available to stimulate or deter growth. Each EIS strategy and the comp plan policy must address impact using a strategy.

“TABLE G-4 Climate Vulnerabilities and Comparison of Alternatives” has the many of the same conclusions for alternatives 1,2,and 3. However, 35,000 units of housing and 70,000 jobs could look very different. For example, some areas will be less and some more attractive to change. Compare the area SW of NE 24<sup>th</sup> St and Bellevue Way (call this area “N”)to the area “S” on north of

xxxxx between 112<sup>th</sup> Ave SE and 116<sup>th</sup> Ave SE. Areas N and S are the same zoning in all Alternatives. Both get up-zoned in Alternative 0 and 1 (Mixed use Center, Gentle Density Through-out strategy). Both get upzoned in Alternative 2 (Mixed Use Centers+ Neighborhood Centers+Transit/Job) and 3 (Mixed Use Centers+ Neighborhood Centers+Transit/Job+Nearby). Area N was built in the 1950-60s and is 0.1-0.4 miles from Northtown Center/Park area. Area S is a mid-80s townhouse PUD more than one mile to I-405.

For other areas, what is the criteria for triggering the right time and place for redevelopment? When would it be better to bank that growth to be used later?

**Bellevue must plan for that growth.. The EIS should create the City Council needs to have tools to manage the growth on an ongoing basis. The EIS should draw attention to the things that cannot be controlled directly and recognize what Bellevue has control over**

The DEIS must distinguish the alternatives based on time.

Equitable that all neighborhoods have their comp plans updated, s

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House Bill 1110 Increasing Housing Supply and Density: On May 8, 2023, Governor Jay Inslee signed House Bill 1110, which legalizes duplexes and fourplexes in most neighborhoods in nearly every city in the State of Washington, including the City of Bellevue, which was intended to increase the state's housing supply. House Bill legalizes six-plexes near transit and for affordable housing. House Bill 1110 **overrides local zoning rules** that have long kept large areas in cities for only single-family homes. The new law will not ban the construction of single-family homes, but it will stop cities from requiring neighborhoods to have only single-family homes. However, this DEIS was prepared prior to this House Bill 1110 and Bellevue residents have no idea how the House Bill will affect any of the alternatives. It is likely that fewer new multi-family units will be needed as shown in Alternatives 1, 2, and 3. The no-action alternative will also need to address application of House Bill 1110 since the state law will now allow continued expansion of housing in Bellevue without application of the proposed alternatives. In addressing this deficiency, the City will need to either develop a new alternative or address this House Bill in each of the alternatives, which may result in an increase or decrease in the number of housing units needed.

House Bill 1337 Expanding Housing Options. This bill expands housing options through easing barriers to the construction and use of accessory dwelling units, and was partially vetoed by the Governor. However, the primary components of the bill would remain, thus, affecting the number of new housing units that may be needed to accommodate new employment in any given city within Washington State. Thus, the number of new housing units for the City of

Bellevue would need to be determined. An example of how this bill could affect housing would be in the State of California whereby the bill was passed and fewer new homes were needed as a result. Thus, HB 1337 has a strong potential of affecting the no-action alternative, along with Alternatives 1 to 3.

House Bill 1181. Climate change and Resiliency. This bill includes a climate change and resiliency component that is required to be included in city comprehensive plans. The bill is intended for cities to mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental economic, and human health and safety; and advance environmental justice. Much of this is already included in the DEIS in Appendix G (Relationship of Climate Change Vulnerability to the Alternatives) but specific compliance with the bill is not included because Governor Inslee only signed the bill on May 3. Thus, the alternatives were not analyzed to determine which alternative better meets sustainability, climate change, and resiliency. There are no recommended mitigation measures to also address components of this bill.

**Covid:** The Covid-19 pandemic sparked a new working-from-home economy where many workers have the flexibility to work remotely from home. This unprecedented shift to remote work will be occurring in some form over the next 20 years. Now, roughly six-in-ten U.S. workers who say their jobs can mainly be done from home (59%) are working from home all or most of the time. Working from home results in changes in office use and transportation resulting in a declining need to live in Bellevue when working in Bellevue. This is a fundamental flaw where the DEIS is not addressing employment and residency adequately based on recent changes to office use. Many employees are now moving outside of the city and then commuting to their workplace only once or twice a week. The DEIS should be revised to reflect this change in how employees will work and live in Bellevue in the housing, office, and transportation components of the DEIS.

Updated Tree Code, Parks, and Green Space, Parks and Recreation: The City of Bellevue plans to update its tree code in 2023, which will have significant effects to new construction. Bridle Trails R-1 tree code may be updated. The updated tree code may, hopefully, provide better protection for significant and landmark trees and require contractors and builders to redesign multi-family and single-family homes to protect these trees. The Tree Code may also deter contractors from building on sites with significant trees. Thus, BTCC is requesting that the DEIS Comprehensive Plan inform and recommend ways that the new tree code should affect planned protection of significant trees. The City of Bellevue Urban Tree Assessment (July 2022) stated that land use changes are important factors of the urban environment and can contribute to changes in citywide canopy numbers. As described in the Urban Tree Assessment, it is important for the City to use this assessment to inform future investments in the urban forest so that all those who live, work, and play in Bellevue can benefit from the urban forest. The City must proactively work to protect the existing urban forest and replenish the canopy with additional native trees. Nowhere in the DEIS do the alternatives address how the existing urban forest will be protected. Thus, the alternatives

should describe how the tree canopy and parks would be affected. Would these additional residents and office workers have additional parks and recreation opportunities, or will there be less opportunity for green space and parks? Will there be set asides in developments for green space? Will street trees be required? The DEIS should be informative about this issue and recommendations should be provided in the DEIS.

Note that in the DEIS PowerPoint provided in the DEIS public meetings, Slide #4 states the following: *"The comprehensive plan ensures that people can: ..... Enjoy Parks, Recreation, and Green Space.* However, there is no DEIS analysis that shows differences in how alternatives will affect parks, recreation, and green space. We are hoping that the DEIS will address replacing lost trees with native trees, and that the Comprehensive Plan will show synchrony with its Urban Tree Assessment, as well with the planned updated tree code. Which alternatives may be best for protecting our urban trees?

Note that the comprehensive plan should give direction for future policies and codes, but it is silent on how each alternative will impact parks, recreation, and green space. Although Appendix E was prepared to address plants and animals, this appendix was merely a whitewash stating that (with no analysis) there will be no impact on plants and animals that existing laws and regulations cannot accommodate. **But it does not show how the comprehensive plan will meet the requirements of existing regulations nor does it provide any mitigation options that may be necessary to meet existing regulations.**

The City must address the impact to large wild animals. Bridle Trails and South Bellevue have had bears on a semi-permanent basis in the last year. Bobcats regularly live in the Bridle Trails area. Coyotes live and deer are a mainstay. Why are large, wild animals not addressed in Appendix E Plant and Animal Memorandum and in chapter 3 Land Use? How will growth throughout the county impact Bellevue? How the comprehensive plan will meet the requirements of existing regulations? What are mitigation options that may be necessary to meet existing regulations? Which areas are affected by each alternative?

The City must include domestic animals in its planning. Chapter 11 Transportation needs to discuss provisions for equestrian use and trails. Parks and streets need to consider pets, especially dog parks (SECTION 3.2. Affected Environment, Draft Environmental Community Amenities: Recreation and Services, p 3-11/123). Licensing should be addressed. Animals raised for food, e.g. chickens, will be affected by smaller lot sizes. With growth, the capacity of the City to meet the needs of animals. Why was this not discussed in the DEIS?

In particular, the comprehensive plan should inform and provide direction to the planned Tree Canopy Code Amendments such that native trees and shorelines are protected during development. For example, native trees removed should be replaced by native trees of the same stature and growth, native shrubs should be placed on a recommended plant list for developers, all weed species should be removed on sites slated for development, riparian areas should be protected at least 200 feet from a stream, parks for families of all ages should be part of the plan such that parks should not only be planned for children. The Potential Impacts of

the Comprehensive Plan Periodic Update page 995 . Why were these issues not addressed? The comprehensive plan can do so much for the betterment of Bellevue residents.

Most people in the Wilburton area are concerned about how their green space will be protected from the increased development, but there is no discussion of their loss of green space. Why is this omitted in the DEIS?

Bellevue's tree canopy assessment states that there is an opportunity to implement regulations to require clustered development and preservation of large trees and that there is an opportunity to require developers to add trees through development regulations, but the DEIS and comprehensive plan is silent on this. However, the comprehensive plan is to inform and recommend future development and that includes how development will protect our trees and either increase or maintain the tree canopy at 39 percent. How does each alternative address this? TABLE G-4 would lead us to believe each alternative has the same impact.

The comprehensive plan should also include protection of our lakes from potential future development, particularly toxic chemicals emitted through increased road use and construction. It is unfortunate that Bellevue's stream corridors have only 65 percent tree canopy coverage. How will the comprehensive plan inform, recommend, and direct protection of the tree canopy?

BTCC suggests that the comprehensive plan has a 200-foot protection zone and that native trees are planted by the developer to provide shade to streams. This is very important due to climate change and warming waters. A 200-ft stream buffer with trees and shrubs will provide shade and food for salmon. The insects that are on the trees and shrubs hanging near the water provide prey for the juvenile salmon out-migrating from the streams. If Bellevue wants to keep salmon within their streams, this needs to be discussed in the DEIS since development is a significant impact to plants and animals. How much green space will be lost under each of the alternatives? Why was this topic eliminated from the review? Mitigation should include protecting green space in areas slated for development.

"TABLE G-4 Climate Vulnerabilities and Comparison of Alternatives" has the same conclusion for Alternatives 1,2,and 3.

Action Alternatives include new policies and code and opportunities to build more resilience in buildings (e.g., building location and landscaping, passive cooling, clean air filters) and to increase human service/emergency services and information to vulnerable populations (e.g., seniors, people living alone,

Homelessness. **The City must address how homelessness will be avoided or minimized under each alternative.** Although the City is investing in facilities such as shelters, transitional housing and affordable housing units for those living in vehicles or unsheltered in the community, how will these additional housing units affect homelessness and will some units be available to homeless people? If the City of

Bellevue's notes that affordable housing, especially in the lowest income brackets, is critical to help individuals transition out of homelessness and maintain housing, then why is this not discussed on the DEIS? Please directly point out effects to the no-income residents and how this will be mitigated.

Historic Resources: The City must address historic and cultural resources beyond residences. Bridle Trails equestrian area, with its private and public trail system, equestrian nature, and connection to the State park is one such resource. In response to a request from local horseback riders who used the area, the Washington Commissioner of Public Lands set aside the area of the current park for park use in the early 1930s. Bridle Trails contains the only properties in the city that have agriculture current use, numerous out buildings such as barns and stables, pastures, an equestrian overlay, and an equestrian-based small-business sector. Most of Bridle Trails was annexed between 1955-1967, more than 50 years ago. The GMA as cited in 4.2.1 #13 and the county wants to encourage historic planning. The multicounty planning policy (MPP) DP-6: "preserve significant regional historic, visual, and cultural resources, including public views, landmarks, archaeological sites, historic and cultural landscapes, and areas of special character", cited on SECTION 5.3. Historic Preservation Program, p 5-5. In 5.4, Neighborhood Subarea Plans are addressed.

**Environmentally Sensitive areas:** The City must address how environmentally will be avoided or mitigated under each alternative. Current land use in Bellevue includes environmental factors in the land use pattern. Erosion hazard (1990 SAO) such as along the Mercer Slough to I-405 do not use maximum capacity. In Bridle Trails, Erosion hazard areas and streams are R-1. Throughout the city, many streams were made into parks and green spaces. Eastgate Park accounts for a large erosion hazard area. How much space will be unbuildable due to environmentally sensitive area under each of the alternatives? What is the decline in housing units for each alternative?

Finally, the DEIS needs to be revised to remove or explain buzz words, industry jargon., and technical terms that are essential to understanding the DEIS. This DEIS should strive for transparency and accuracy in presenting information, impacts, and mitigation measures. "Gentle Density" does not mean kind, mild, moderate, slow, easy, nor slight density. It is professional jargon. Using these kind of terms creates a lack of trust. "Gentle density" is an crucial term to understand this DEIS. It use has limited our ability to make comment. While the use of certain buzz words or industry jargon is not explicitly prohibited in an Environmental Impact Statement (EIS), the use of clear, concise, and accessible language makes the meaning easily understandable to a wide range of readers. This use of "gentle density" is especially jarring knowing that access is a fundamental value this City is underscoring. It has led to the perception that the document is dismissive of public input.

BTCC recognizes that it would be impossible to keep up with every possible land use bill and regulation but these existing and signed bills are important for any city comprehensive plan and if not covered under the this DEIS then an amendment would be needed that would take more time to cover the requirements above. Furthermore,



this amendment effort would be more costly to the City of Bellevue. BTCC recognizes the significant effort already undertaken for this DEIS but we also desire to review a complete DEIS that includes passage of bills and regulations that have occurred in 2023. Too much has changed for the City to move directly into a Final EIS. That document would include new information not shown in the DEIS and may not meet requirements for informative decision making and communications to the public. Thank you for the opportunity to comment and we look forward to working with you and your staff in creating a City of Bellevue comprehensive plan that is complete, meaningful, and applicable for immediate use.

Sincerely,

The Bridle Trails Community Board

--

Jim Bowles Cell: 206-947-7103

Jane G. Blair  
Lindsey Properties LLC

June 9, 2023

Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Re: Bellevue 2044 Comprehensive Plan DEIS

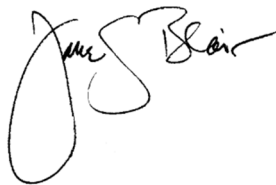
Dear Mr. Pittman:

Lindsey Properties LLC is the owner of the property located at 120 -116<sup>th</sup> Avenue NE in Wilburton and we are writing to provide comments on the Draft Environmental Impact Statement ("DEIS") prepared by the City of Bellevue ("City") for the Bellevue 2044 Comprehensive Plan Update. We have owned the property for over 100 years and are deeply committed to the future of the Wilburton neighborhood.

**We support Alternative 3 to be adopted as the Preferred Alternative in the Final EIS. Alternative 3 provides the most flexibility in future uses in the Wilburton subarea and is consistent with the direction provided by the City Council for future development in Wilburton. It creates the greatest opportunities for jobs and housing in the neighborhood.**

We also want to endorse and support the DEIS comment letter from the Wilburton Property Owners Group. Please consider those comments incorporated here. We appreciate the opportunity to provide these comments and look forward to working with the City as the plan moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Jane G. Blair". The signature is stylized with a large, looping initial "J" and a cursive "Blair".

Jane G. Blair  
206-595-1999

Cc:  
Becky Gordon  
Joseph Golberg



Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Ave NE  
Bellevue, WA 98004

American Capital Group  
15 Lake Bellevue Dr. Suite 200  
Bellevue, WA 98005

June 12, 2023

**RE: Bellevue Comprehensive Plan DEIS**

Dear Reilly,

American Capital Group (ACG) is a Bellevue native, a leading West Coast Real Estate Developer, and a local small business that has called the City of Bellevue our corporate home for nearly 4 decades. Our personal home for even longer. Despite our longstanding presence in the City, our attempts to develop nearly 1,000 apartment homes in Wilburton and Bel-Red over the past 3 years have been unsuccessful. We attribute this to factors such as the City's focus on the Comprehensive Plan Update and the lack of staff resources to review our proposals.

Our corporate office is on Lake Bellevue, and our parking lot is the largest developable site around the lake, directly adjacent to the Wilburton light rail station. It is an underutilized property, just one of many lots around the City, near a major transit station with immense untapped potential. As owners of multiple businesses and property in Wilburton, we have a vested interest in its health, success, and the impacts of the City's decisions during these updates.

We believe it is important to plan Wilburton with flexibility in mind. The City, region, and economy is changing at a pace we haven't seen in generations and our ability to meet the needs of the City for the next 20 years relies on our decisions throughout this process embracing that fact.

We appreciate the City's thoughtful and patient consideration of the future of Wilburton and Bellevue's many great neighborhoods. We look forward to working with the City on comprehensive solutions to serve the people of this great community for years to come.

**ACG supports Alternative 3 as the preferred alternative in the Final EIS.**

Alternative 3 supports the greatest opportunity for growth in an area well served by transit. While the City has benefitted from the infrastructure investment in the region's major transit stops and light rail, we have fallen short of zoning these areas to allow the density that will most benefit the majority of the Wilburton and Bellevue population, especially in regard to affordable housing. Without a healthy supply

of housing, preferably within walking distance to major transit stops and light rail, the City will have a great challenge finding feasible, impactful, solutions to contribute to our affordable housing needs.

**All alternatives should include high density flexible zoning around Lake Bellevue**

In the original EIS Lake Bellevue was left out of all proposed alternatives. In the DEIS this year, Lake Bellevue was included in Alternative 3 but not to the height and density required for most development achieve feasibility. The Wilburton light rail station and the Grand Connection pedestrian bridge are located right next to the lake with no existing housing nearby to use them. The existing zoning allowed for any use in this area is the below bare minimum, unsupportive of any development that would serve the community and a great example of a massive opportunity missed for the City of Bellevue.

Concerns were raised by the City throughout multiple meetings regarding the potential environmental impacts of developing the surrounding Lake Bellevue area, yet the EIS required for the light rail proved those impacts are minimal. We hired an independent environmental consultant prior to our Comprehensive Plan Amendment application that was not supported by the City to ensure our vision for this area would not negatively impact the environment or the lake. It was determined by our consultant that our proposed development (and any proposed development in this area) would be an improvement over the existing condition and to the environment of Lake Bellevue. They stated “Based on the conceptual project design that results in no net increase of impervious surfaces and the modernization of the existing stormwater system meet current standards, it is expected that there will be a modest improvement in water quality, a leveling of peak flows, and maintenance of hydrology to Sturtevant Creek. For heavily urbanized areas such as the subject property, improvements in these functions are crucial for downstream fisheries including federally listed species such as Winter Steelhead and Fall Chinook, which are both identified as present in the downstream portions of Sturtevant Creek. In addition, Sturtevant Creek directly contributes to Kelsey Creek which is listed as a 303d water for temperature, bacteria, and dissolved oxygen. Improvements to water quality with the Kelsey Creek Basin has a clear benefit for the downstream systems.” As part of this consideration, any burdensome Critical Areas Ordinance or unreasonable penalties such as the proposed “density penalty” will deter development in Wilburton and all areas of the City where this could be imposed. Since no critical area ordinance or buffers are applied downtown, other growth areas, and mixed use centers should receive similar treatment. In fact, all other proposed developments should have an alternative to a development focused penalty when considering development in these areas.

**All Alternatives and the Comprehensive Plan update should encourage the highest density within walking distance of major transit stops and light rail, with flexible, market driven zoning.**

The existing Comprehensive Plan was to drive housing and development near transit. Due to the lack of, or complexity of the current zoning we fell well short of meeting this goal. The updated plan must allow for flexibility in the base zoning, or at the very least a PUD (Planned Unit Development) process for variations in site design and density. This could be in return for a public comment period and design review to ensure compatibility with the setting. Currently there is no pathway to work together with the City towards smart development solutions if the zoning and development are not perfectly aligned. Objective HO-18 in the existing Comprehensive Plan calls for the City to “Promote working partnerships with housing developers to help create a variety of housing types in the community” Our experience through multiple proposals for new developments in many different sub areas of Bellevue is that we are far from achieving this goal. Three unsuccessful attempts can be attributed to not following through on this commitment. The next comprehensive plan can provide an opportunity to create the flexibility required to achieve this goal, saving the City and the public significant time and resources.

**All Alternatives should not include implementing a road grid.**

Figure 11-28 of the DEIS appears to propose a road grid. ACG disagrees with the notion that a City-imposed road grid, disregarding property boundaries, topography, and the City's ability to deliver the road grid an efficient manner with regard to the development goals of Wilburton, would align with the vision of either proposed Alternative. The City should conduct a thorough examination to determine whether the access/road grid should be obligated to accommodate cars or if it should prioritize connections for pedestrians and bicycles, aligning with the transportation mitigation policies outlined in M-TR-1 through M-TR-4.

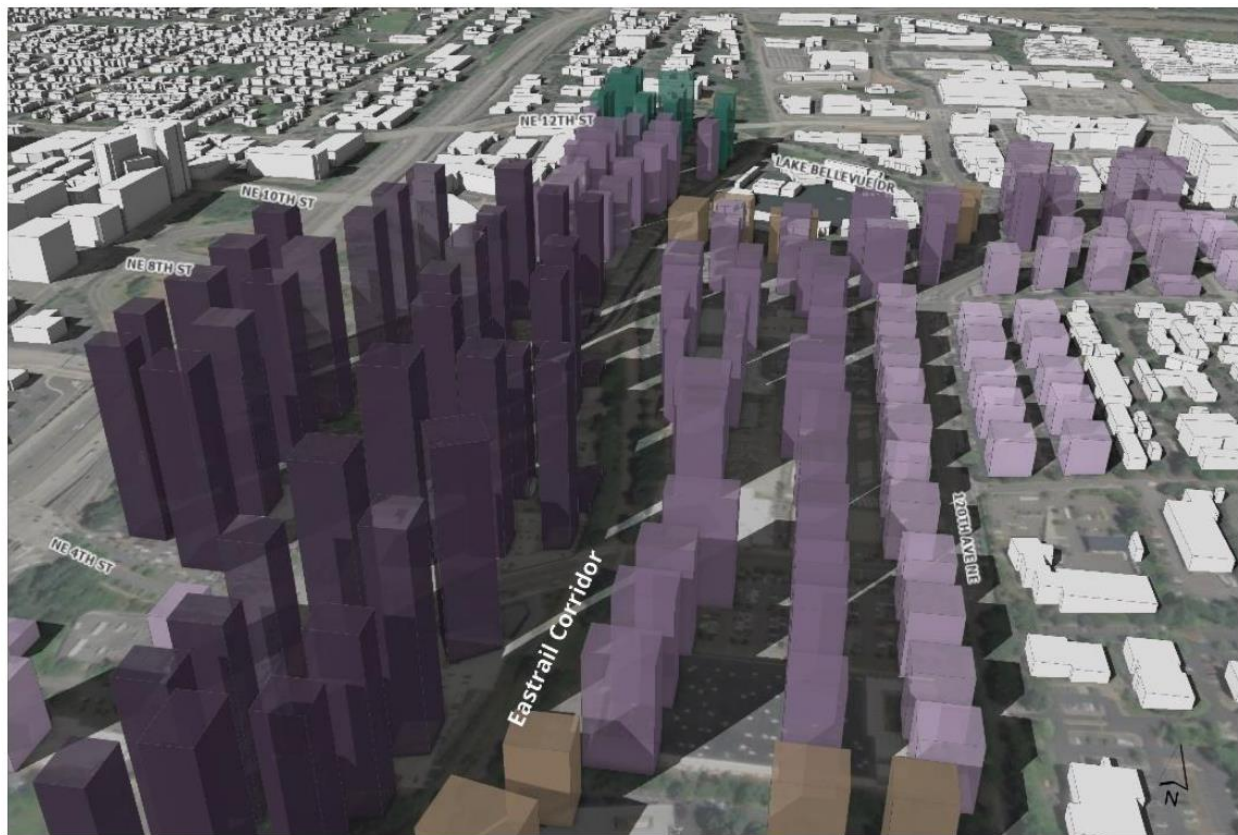
ACG commends the City's transportation mitigation measures outlined in M-TR-1 through M-TR-4, acknowledging the strong link between land use and transportation in mitigating transportation impacts. The City correctly identifies Alternative 3 as having inherent transportation benefits compared to the No Action Alternative. ACG shares this view, in a dense urban setting, promoting transit usage, and expanding pedestrian and bicycle networks are the most effective means of enhancing transportation efficiency and accommodating a larger number of people. Additionally, prioritizing walkability and bike-friendliness, rather than car-centricity, brings vitality to neighborhoods and supports local businesses and activities at the street level.

These pedestrian connections should be adaptable and consider property boundaries, ensuring these connections do not inadvertently hinder the vision for new development and the urban environment. An example of unnecessary proposed connections can be found on DEIS page 11-56. Specifically the area around Lake Bellevue. This figure proposes pedestrian paths and vehicular access lanes cutting through private property, not working with it. There is no existing or ability for future public access to or around Lake Bellevue, in fact, all Lake Bellevue development is located on the Lake itself and acts as a barrier to the Lake. Therefore, vehicular and pedestrian pathways around the lake as depicted in the following image are unnecessary and will negatively impact/deter development around Wilburton Station.



Density should be market/needs driven, especially around major transit stops and light rail stations. We encourage the City to allow greater height and density around Transit. Page 6-47 provides an example of how Alternative 3 reduces density near Wilburton Station and around Lake Bellevue. This area should mimic the heights along NE 8<sup>th</sup> or be taller. There is naturally occurring high groundwater in this area that will be a deterrent for subgrade parking, requiring future development to provide all above grade parking due to cost. In an area directly adjacent to Transit, we implore the City to consider allowing taller heights and greater density in these areas to foster future development and aim to achieve the most meaningful results near transit. The greater the density, the more achievable it will be for most developments to include affordable housing at the existing MFTE levels.

Figure 6-60 below provides a visual example of the City proposed reductions around Lake Bellevue.



**Proposed mitigation measures could stifle development goals.**

Requiring a "right to return" or Community Benefit Agreements for displaced businesses raises legal and procedural concerns. Instead, if the City decides to assist displaced small businesses, it should provide incentives in the Land Use Code, such as bonuses for small business spaces. Additionally, the City should facilitate ease of movement for small businesses by eliminating parking minimums for relocated businesses, streamlining tenant improvement and sign permits, waiving traffic impact fees, and considering higher SEPA thresholds for relocated businesses to avoid burdensome SEPA review. The City's proposal of an "MFTE" program for small business locations is a creative idea that could effectively retain small businesses. Before limiting redevelopment opportunities, the City should assess existing



policies and procedures in Bellevue that hinder businesses from operating in the city. The potential impact of these mitigation measures should be thoroughly studied and disclosed in the FEIS. Requiring interior noise levels of 45 dBA or lower along noisy arterials will impose significant cost burdens on new projects, which will ultimately be passed on to tenants. Bellevue's noise requirements are more stringent than those of any other city. It is crucial to study the potential impact of implementing noise buffer areas or expensive windows that could hinder density in Wilburton or increase housing costs. ACG has developed in other jurisdictions directly on I-5 with far more friendly acoustic requirements and have been able to achieve a quiet, audibly safe living environment. The effects of these mitigation measures should be thoroughly studied and disclosed in the EIS. Including acoustic studies and comparisons to other jurisdictions with similar conditions.

**The Preferred Alternative should not include affordable housing mandates.**

We acknowledge the significant challenge of creating affordable housing for all income levels in our City and the region. Private development can contribute to addressing this issue by increasing the overall housing supply and incorporating affordable housing through well-designed height and density bonuses, as well as tax programs like MFTE. However, we believe that imposing strict affordable housing mandates on private development, which would raise the cost of housing and likely hinder further development, is not the appropriate solution for Bellevue. The mandatory inclusionary affordable housing program proposed in Alternative 3 should not be pursued in the FEIS Preferred Alternative.

Instead, in the Preferred Alternative, the City should explore the expansion of a carefully calibrated height or density-based affordable housing incentive program in Wilburton. Additionally, the City should explore alternative tools and funding sources that do not rely solely on private development to create affordable housing. When designing an incentive-based program, it should take into account the comprehensive cost of development, including infrastructure, building codes, development standards, and current market conditions. Lastly, the City should offer an in-lieu fee option within the incentive program, which can serve as a valuable funding tool for the City to directly support city-driven housing projects or partner with local nonprofits that develop and build affordable housing. The pricing of the in-lieu fee should be based on the value of the incentivized square footage to the development. Other incentives could include partial exemptions from City permit fees and finding thoughtful ways to assist developers in contributing to the City's affordable housing needs. HO-29 in the existing Comprehensive Plan encouraged the City to do just that. We should continue that line of thinking while taking a step back to consider the significant developer costs associated with these programs.

**The Comprehensive Plan update should consider reviewing areas left behind during other Sub Area updates, like East Main.**

Last year the City achieved a great milestone with the completion of the East Main Subarea plan. We applaud the efforts and time it took accomplish this task. The EM-TOD Districts aim was to provide mixed-use, transit-oriented Development within one-half mile of the East Main Light Rail Station. However, an example of an area that could have easily been a part of this reprogramming is the Northeastern corner of the Richards Valley Sub Area, a small unnecessarily isolated group of approximately 3 parcels that are suitable for higher-density residential development. This area is conveniently located just .7 miles from the East Main Light Rail Station and directly across from the Wilburton Park and Ride. By integrating daily commuters who can easily access transit on foot, the City can more efficiently revitalize underutilized properties in transit-served areas, fostering opportunities for future businesses, developments, and residents to flourish. The city should prioritize areas primed for development today while focusing on the needs of tomorrow.

Doing so would allow for multiple new developments, including a residential development with approximately 264 market rate and 52 affordable units today. The City has an opportunity to expand the zoning in order to see an existing proposed development move forward. These considerations will also help the City come closer to meeting a number of housing goals, such as HO-11, HO-12, HO 14, HO-16, HO-18, HO-23, HO-26, and TR-7 from the current Comprehensive Plan.

**In conclusion**, as a long-standing local business and developer in Bellevue, ACG emphasizes the importance of flexible planning for Wilburton and the need for the City to embrace the changing landscape of the region. ACG acknowledges the City's thoughtful consideration and thanks the City's hard work thus far, as we look forward to collaborating on comprehensive solutions for the benefit of the community throughout this process.

ACG supports Alternative 3 in the Final EIS, emphasizing its potential to best address the City's housing needs and promote growth, especially near transit hubs. We encourage the City to permit higher density in all alternatives, to allow future developments to have the flexibility necessary to meet the needs of the community, especially in the East Main Corridor, the Wilburton Sub Area, and around Lake Bellevue. We recommend high-density zoning around Lake Bellevue and acknowledge the potential for high-density development to have a net positive impact on the Lake and the environment. The Comprehensive Plan should encourage market-driven density near transit, fostering partnerships with developers like ACG, who remain committed to the success of this City. The proposed road grid should be assessed for its impact on development and congestion with consideration given to property boundaries and pedestrian/bicycle connections. Mitigation measures like affordable housing and interior noise levels should be evaluated for their effect on development goals. ACG suggests exploring incentive-based programs and alternative funding sources for affordable housing. A flexible and adaptive approach to planning is crucial for smart and sustainable development in Bellevue.

Thank you for your outreach and commitment to our City. We welcome the opportunity to answer questions or provide additional comments should the opportunity arise and look forward to the positive impact these changes are sure to create.

Sincerely,

**BJ Kuula:** Chief Executive Officer  
American Capital Group

**Levi Singleton:** Chief Operating Officer  
American Capital Group

**David Sinnett:** Vice President of Development  
American Capital Group

**Sean Thorson:** Director of Acquisitions  
American Capital Group



June 12, 2023

City of Bellevue Development Services Department  
Attn: Liz Stead, Director and SEPA Responsible Official  
Reilly Pittman, Environmental Planning Manager  
450 110th Avenue NE  
Bellevue, WA 98004

*Via email to [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)*

Re: Bellevue 2044 Comprehensive Plan DEIS Comments

Dear Director Stead and Mr. Pittman,

As written in our scoping comments of October 27, 2022 (a copy of which is attached for your reference), we again share our thanks for your vital work to shape our City's future through the 2024 Comprehensive Plan process and its recently completed Draft Environmental Impact Statement ("DEIS"). We also appreciate the opportunity to provide comments on the DEIS.

Careage Health Care of Washington, Inc. ("Careage") and our senior living communities provide a complete spectrum of quality care for older adults of all ages and abilities. We have been a part of the Bellevue community since 1996, providing services such as rehabilitation and occupational therapy and degenerative chronic condition care to Bellevue's older citizens and others at our 60,000 square foot Mission Healthcare facility located at 2424 156th Avenue NE ("Mission Healthcare Site" or "Site"). The facility has operated for the past 25 years under a conditional use permit, and it does not currently provide residential services.

As Careage and the City look toward the future, we hope the Mission Healthcare Site will be able to provide additional residential density and services for active adults, senior citizens, and others with new facilities that replace the current outdated infrastructure. A redevelopment of the of the Site would better embrace its immediate proximity to the Bel-Red subarea, frequent transit (including frequent bus service and light rail), and Redmond's rapidly densifying Overlake mixed-use neighborhood.



As previously written, mixed-use development and densification on the Mission Healthcare Site could provide notable support for the City's housing and employment density goals, but this will not be possible unless the City makes comprehensive planning and zoning changes that support such redevelopment. The current DEIS Action Alternatives do not contemplate such changes, which is a critical misstep for the City that must be rectified in the FEIS. The Preferred Alternative should designate the MU-M designation for the Site to meet these goals.

**I. The Preferred Alternative should designate future land use at the Mission Healthcare Site to at least "MU-M," rather than discouraging new housing with "MU-L."**

In our scoping comments, we requested that the City study extension of denser subarea and zoning designations to edge properties poised for redevelopment like ours. We were dismayed to see that the DEIS' action alternatives at most suggest a MU-L designation for the Site (Alternatives 2 and 3), which would only allow 2-4 stories of height. Such a designation is a major missed opportunity to support the City's housing and employment density goals.

As we have written during scoping and commented before the Planning Commission, the location of and uses surrounding the Mission Healthcare Site make it an excellent candidate for greater density of transit-oriented housing supply, including housing that could serve Bellevue seniors. The Mission Healthcare Site is situated at the corner of two major arterials (156th Avenue NE and Bel-Red Road), and based on the DEIS maps, is in both a frequent transit area and a Neighborhood Center. This provides an excellent opportunity for the Future Land Use Map in the Preferred Alternative to set the City's housing goals in motion by allowing senior housing or traditional housing to be developed on this site in its most cost-efficient typology, which is 6-8 story wood frame construction.

Further, the Mission Healthcare Site is directly across the street from portions of Redmond's rapidly densifying Overlake neighborhood where minimum structure height is proposed to be 6 stories, and maximum height is proposed to be between 14 and 30 stories for residential uses. Although that neighborhood is outside of the City's jurisdiction, immediately adjacent density is absolutely relevant in the land use context, and the Mission Healthcare Site provides the City with an opportunity to provide a gentle transition between Redmond's greater heights and lower-density areas of Bellevue further east. Likewise, immediately surrounding uses in the Overlake neighborhood and Bellevue's other adjoining properties are not occupied with sensitive users, so the Mission Healthcare Site is an opportunity to provide transit-oriented density with less risk of land use conflicts. Enclosed as an attachment is a study showing the immediately surrounding



uses, which include a gas station, shopping center, midrise multifamily buildings and an office park. The transit-oriented development that is possible on our Site would integrate seamlessly with these uses and be well buffered.

Finally, it should be noted that Alternative 3's proposed MU-L zoning is more or less equivalent in development potential to the Mission Healthcare Site's zoning at present, which is not consistent with the City's growing aspirations and goals for denser housing proximate to transit and sustainability. A reasoned increase to MU-M in the Preferred Alternative would better align with the City's stated policies and goals.

**II. Future land use designations within Neighborhood Centers should account for proximity to transit or other features that could influence a more complex future land use designation within each Center.**

Generally, the DEIS is an impressive demonstration of how front-end environmental analyses can inform a preferred alternative that minimizes and mitigates negative environmental impacts to the greatest possible extent. To ensure consistency and thoroughness in this approach, however, the FEIS must account for transit proximity in future land use designations within Neighborhood Centers.

We understand that Alternatives 2 and 3 suggested the undesirable MU-L designation for the Site in part because the future land use designations proposed within Neighborhood Centers did not account for the nuances of proximity to transit or other local features that could influence a more complex future land use designation within each center. The FEIS should reconsider this approach because the environmental and public policy impacts within Neighborhood Centers will be directly changed – for better or worse – by the proximity of zoned housing density to transit. Whether in Neighborhood Centers or elsewhere, mapping future land uses without consideration of transit proximity is a recipe for inefficient housing growth and will burden the City's ability to meet its goals for traffic, greenhouse gases, other roadway pollution, and efficient growth of new housing stock.

The FEIS must map future land uses in the Preferred Alternative based on proximity to transit in Neighborhood Centers in order to inform both a complete disclosure of environmental impacts and the best possible alternative for our community and our goals.

**III. In addition to modest increased height, the Preferred Alternative should eliminate FAR restrictions and other development standards that reduce housing potential.**



As written in our scoping comments, the Preferred Alternative should remove residential FAR limits because they artificially constrain development potential. As an alternative, form-based standards as contemplated in the City's "Next Right Work" will better facilitate the aesthetically integrated growth that the City hopes to see.

Similarly, other development standards that stifle housing growth should be reexamined and reimagined, and we appreciate the work that the City is already doing and will continue to do to this end. Because "[t]he Action Alternatives would require the development of new or revised zoning and development regulations," DEIS at 4-18, the Preferred Alternative is the right place to specify that development standards should be updated or eliminated where they are unnecessarily constraining housing. This is consistent with King County Countywide Planning Policy H-13, DEIS at 7-6, and in myriad scoping comments already received, DEIS at Scoping Comment Summary at 8.

For midrise housing in particular, the FEIS Preferred Alternative should study the following development standards to be implemented in MU-M areas, in addition to unlimited residential FAR:

- Eliminate floorplate limits for midrise wood frame construction types up to 85 feet in height;
- Eliminate prescribed upper-level step-backs and setbacks for midrise wood frame construction types up to 85 feet in height;
- Codify green roof and other functional alternatives available to meet impervious surface limits;
- Eliminate the multi-family play area requirements for residential development and replace them with reasonable market-informed residential amenity standards;
- Provide incentives for family sized units;
- Provide incentives for ground-floor active uses, not mandates, within Neighborhood Centers; and
- Eliminate residential parking minimums in frequent transit areas.

**IV. Affordable housing programs are important but should remain incentive-based and provide offramps for senior housing.**

As the City identifies options to do its part to address the region's housing affordability crisis and meet its housing supply goals, we must restate our final comment provided during the scoping process. The suggestions above will help provide additional housing supply on sites like ours and should go hand-in-hand with policies that support affordable housing units. Addressing the housing needs of our community is important work, and we





are pleased to be able to contribute to this as a housing provider in other markets, and hopefully, a future housing provider in Bellevue.

We are deeply concerned with the mandatory inclusionary affordable housing program identified in DEIS Alternative 3. While market-based affordable housing programs are undoubtedly an important tool to create affordable housing, we do not support mandatory programs that carry the risk of stifling development. Instead, in the FEIS Preferred Alternative, the City should continue its focus on incentive-based programs that can meet the same goals without the high risk of shutting down the development pipeline. For housing projects, an incentive program should focus on additional height, not FAR as the City should move to an unlimited FAR model as noted above. Other key elements of any such incentive program that should be included in the FEIS study are: reasonable "base" heights; true incentives to construct bonus heights calibrated to incentivize development generally in addition to affordable housing production; and in-lieu fee alternatives based on the value of the bonus height achieved.

Any such program should also be calibrated to account for the different cost and rent price points of different construction types, and a detailed economic analysis with clear methodology should be included in the FEIS to support the code development. Finally, the incentive program should recognize the challenges of providing typical affordable housing in senior housing projects because of various rent and ownership models, so it should also provide a variety of alternative means of compliance for senior housing.

We appreciate the City's hard work on this critical project and look forward to continued collaboration with you in planning and building an equitable, affordable, and clean City of Bellevue. Again, the Preferred Alternative's Future Land Use Map should identify at least MU-M density on our Site in order to avail the City of an important and ideally placed opportunity for density.

Please do not hesitate to contact me if you have any questions about these comments.

John Hogan  
President  
Careage Inc.  
(253) 377-3160



Image A: Looking North on 156th Ave NE towards seven story multifamily construction within Redmond city limits.



Image B: Chevron service station directly across 156th Ave NE



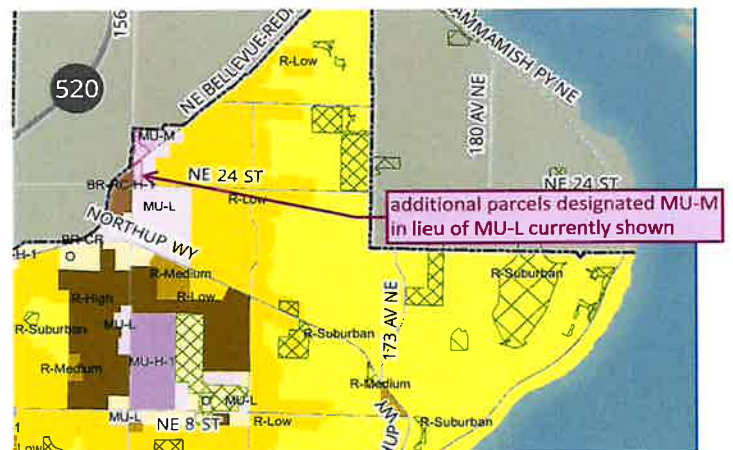
Image C: Shopping center on the southwest corner of NE 24th St & 156th Ave NE



Image D: Bellevue Technology Center (SE corner of NE 24th St & 156th Ave NE)



Vicinity Map & View Key



Suggested revision to Bellevue Comp Plan DEIS Alternative 3

# THE SPRING DISTRICT

June 12, 2023

Draft Environmental Impact Statement Comments  
City of Bellevue Development Services Department  
Attn: Liz Stead, Director and SEPA Responsible Official  
Reilly Pittman, Environmental Planning Manager  
450 110th Avenue NE  
Bellevue, WA 98004

Via email to [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

**Re: SEPA Comments on the 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement for The Spring District**

Dear Director Stead and Mr. Pittman:

This SEPA comment letter is submitted on behalf of WR-SRI 120th LLC on the City of Bellevue's 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement ("DEIS"). WR-SRI is the principal owner and developer of The Spring District that is in the heart of the 120th "Node" in Bel-Red and encompasses the 120th / Spring District light rail station. The District is a catalyst development decades in the making and represents true transit-oriented development with opportunities to live, work, and play. Although the District has been substantially built out under current Bel-Red zoning and our Development Agreement, eight parcels remain as future development sites. In order to ensure the greatest potential for those sites to be developed in the coming years, we support zoning changes to add additional height and density to the District.

We have reviewed the DEIS and provide the following comments that should be incorporated into the Final EIS ("FEIS") analysis:

1. The Preferred Alternative should promote the highest density and height in mixed use centers within a quarter mile of Sound Transit light rail stations, and increased height and density must be added adjacent to the 120th Station.

We are encouraged by the analysis in the DEIS, which reflects a bold vision for the future of Bellevue that recognizes the densifying nature of the city in its mixed-use centers. While we commend the City's effort to update the Comprehensive Plan so that it "looks ahead to the challenges Bellevue needs to address[.]" we feel that Action Alternative 3, which includes "the highest combined amount of future capacity among the three Action Alternatives" does not go far enough to meet this goal with appropriate density in the area surrounding the 120th Station and The Spring District. DEIS at 1-2, 2-27. Alternative 3 identifies The Spring District for a BR-OR-H-2 designation that would allow 25 stories, but this height is insufficient compared to density surrounding other stations. Light rail is a multi-billion dollar taxpayer investment that deserves supportive density that can realize its powerful potential to get people out of their cars and reap the benefits of less congestion and greenhouse gas emissions.



Comparing the density proposed for The Spring District and 120th Station (25 stories) to the density that will be allowed at the other Eastlink stops, it is clear that more density should be granted to achieve parity and support the taxpayer investment. Development surrounding the East Main station is allowed up to 300 feet, development surrounding the Downtown station is allowed up to 600 feet, and development surrounding the Wilburton station is proposed up to 450 feet. In Redmond, the City is similarly discussing height near its Overlake station of 30 stories. Based on these comparisons, it makes sense for The Spring District, already on its way to significant transit-oriented development, to receive additional height and density. Therefore, we request the City modify the BR-OR-H-2 zoning in the Preferred Alternative to allow up to 35 stories (350 feet) of height and supporting density and apply this designation to The Spring District. Allowing this expanded density and height within a quarter mile of Sound Transit light rail at The Spring District will continue to carry out the vision for the 120th Station node set out in the last Comprehensive Plan update to “provide for a mix of office, housing and retail uses, with office as the predominant use.” Policy S-BR-87.

2. The City should recalibrate Bel-Red’s incentive zoning system instead of adopting affordable housing mandates.

We appreciate the City’s head-on approach to addressing affordable housing, beginning with an acknowledgment (and corresponding analysis) that the No Action Alternative will result in significant adverse impacts on affordability. DEIS at 7-44. Affordable housing is one of the critical problems facing Bellevue and our region. However, we are deeply concerned that Alternative 3 identifies a mandatory inclusionary affordable housing program that risks stifling development. We do not support this approach. If not calibrated correctly, such mandatory programs result in no development occurring. That is a much riskier proposition compared to an incentive-based program that would only result in developer choice to build larger or smaller if calibrated incorrectly.

Based on the level of growth Bellevue needs and is planning for in the next two decades, it does not have the luxury of taking a high risk on a mandatory program. Instead, in order to ensure development continues and keeps pace with our needs for growth, the City should study in the Preferred Alternative continuing the current incentive-based system in Bel-Red, but recalibrating it to align with current City priorities - including a significant focus on affordable housing. The current incentive system reflects the City’s priorities in 2007 when the zoning code was adopted and not current issues. Through recalibration to focus its tiers first on affordable housing for both residential and office development, along with appropriate in-lieu fee compliance methods, the City can increase the amount of affordable housing provided as a public benefit with development.

Such recalibration combined with other incentives like the Multifamily Housing Tax Exemption will provide powerful tools to create more workforce affordable housing in Bel-Red. This combined potential of incentive system recalibration and MFTE should be studied in the FEIS.

3. The DEIS fails to adequately study the impact of lowering or eliminating minimum parking requirements as mitigation for transportation impacts.

We applaud the DEIS's exploration of "lowering or eliminating minimum parking requirements and reducing the maximum parking requirements" as potential mitigation of transportation system impacts. DEIS at 11-127. We similarly commend the City for striving to "[e]nsure that supply of private parking does not incentivize driving to the point that it degrades the performance of the overall multimodal system." DEIS at 11-125.

The City further acknowledges that "[t]he degree to which these strategies can mitigate traffic congestion impacts depends on the types of strategies and how aggressively they are implemented as well as the context of the impacted area, for example, location, other available mobility options, and magnitude of the impact." DEIS at 11-127. Yet, no specifics are provided on what the City is envisioning for parking changes. For the City to take an affirmative step towards achieving these goals, the contemplated mitigation of lowered or eliminated parking minimums must be further explained in the FEIS, and it should be ultimately adopted in the Preferred Alternative. As a forward-looking document, it is important the Comprehensive Plan reflect and acknowledge multimodal transportation that is central to our region's future.

### Conclusion

For more than 15 years WR-SRI has partnered with the City to envision and execute a catalyst transit-oriented neighborhood in The Spring District. We remain committed to the development and believe that future changes aligned with the Comprehensive Plan can only result in a better development if they represent appropriate levels of density. We therefore ask the City to modify the BR-OR-H-2 zoning in the Preferred Alternative and allow 350' of height and supportive density on The Spring District.

We appreciate your hard work and commitment to creating a bold vision for the future of Bellevue, and we look forward to continued engagement in this process.

Sincerely,



Gregory K. Johnson  
Authorized Signatory  
WR-SRI 120th LLC

**From:** karrin dobbe <karrin@msn.com>  
**Sent on:** Saturday, June 10, 2023 8:02:10 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** EIS Comment

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello, thank you for the opportunity to comment. My only comment is to stop cutting down so many trees down in Bellevue. I don't see any new trees being planted for the losses.

The area by the High School on Coal Creek makes me sick. So many old beautiful trees are now gone.  
What about the climate change? We're headed to be a very limited tree canopy city. It is so unhealthy.  
How about the acreage across from Red Town Trailhead. Save Trees!!!  
I've lived in this area all of my life. Now I'm just horrified for the future of a very hot climate Bellevue.

Karrin Dobbe



Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004  
Via Email: [compplan2044eis@bellevuewa.gov](mailto:compplan2044eis@bellevuewa.gov)

Dear Reilly:

Thank you for the opportunity to comment on the Draft EIS for the Bellevue 2044 Comprehensive Plan Update. The 116<sup>th</sup> Avenue Coalition is submitting comments on behalf of property owners representing the privately owned land adjacent to the north side of NE 12<sup>th</sup> Street between I-405 and Spring Boulevard, located at the addresses in the table below, and outlined in red in the map (collectively, the **“Property”**). On October 31, 2022 we provided a letter explaining that the existing zoning for the Property precludes any viable redevelopment, requesting an extension of the future BR-MO-1 zoning north to include the Property and the other parcels outlined in black in the drawing, and explaining that enabling this increase in allowed development density is justified given the proximity of the Property to the soon-to-be-opened light rail stations at Spring District and Wilburton (*see current zoning map above*).

<b>Address</b>	<b>Parcel</b>	<b>Owner</b>
1407 116 <sup>th</sup> Ave. NE	292505-9023	Wallace Properties – Washington Park LLC
1414 116 <sup>th</sup> Ave. NE	282505-9105	Wig Properties LLC – Bell3
1417 116 <sup>th</sup> Ave. NE	292505-9307	Wallace Properties – Washington Park LLC
1427 116 <sup>th</sup> Ave. NE	292505-9329	Blu Compass LLC

- Continue to request that the Property receive the same future Comprehensive Plan designation and zoning as our neighbors to the south.
- Support the City’s designation of the Property as BR-MO-H-2 (which is the same designation as our neighbors to the south) in all three Alternatives in the Citywide study.
- Request that the FEIS include the Property in the Wilburton Study Area as well.
- Provide the results of our studies as to the suitability of the heights called for in Alternatives 2 & 3 to development of the Property and cohesiveness with the surrounding area. The studies are provided for reference in ***Attachment A***.
- Provide additional comments to the DEIS and recommendations for improvements to the land use code to support of viable redevelopment of the Property and a competitive medical and life sciences district.

<sup>2</sup>The current BR-MO zone has a maximum FAR of 1.0, which effectively precludes development of all but raw land. The City should consider updating the zoning at the north end of the corridor to something that is viable for redevelopment, and entirely eliminating BR-MO from the code, or attributing much more significant FAR to BR-MO.

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transition point to the north where the scale of building heights, and presumably density, reduces for the land outside of the light rail stations' 15-minute walkshed.

We appreciate the City's continued support for medical and new focus on life sciences, which is appropriate for the area given the presence of Overlake Hospital, Childrens Hospital and Kaiser Permanente, and the proposed life sciences project at the intersection of Spring Boulevard and 120<sup>th</sup> Ave. NE. Extension of the Hospital District in this manner, and proposing zones that facilitate efficient medical office and hospital development (discussed below), will support the existing hospitals and enable growth of medical and life sciences jobs on the Eastside. Doing so supports the City's economic development goals and diversifies its jobs base, all consistent with the City Council's Economic Development Vision, and consistent with other planning goals.

In the FEIS, we ask that the City amend the Wilburton Study Area to include the Expansion Area. From a planning standpoint, the 116<sup>th</sup> corridor has a stronger relationship with the properties included in the Wilburton subarea to the south of NE 12<sup>th</sup> Street than the Bel-Red Area to the east. The BR-MO-1 properties to the south of NE 12<sup>th</sup> Street are included in the Bel-Red Study Area, but they have also been added to the Wilburton Study Area. The Expansion Area should be included as well. As we indicated in our previous letter, treating the Property the same as the currently-zoned BR-MO-1 properties to the south is appropriate because the siting and completion of the light rail stations and Spring Boulevard brings the Property within the walkshed of the stations. This is true of the Expansion Area parcels if the 15-minute walkshed is used. The current 1.0 maximum density for the Property precludes redevelopment of the land. We would like to have the ability to start planning for development under zoning that matches the property to the south as soon as possible, and would prefer not to have to wait for the Bel-Red update to be completed.



Last year we asked the City if we should submit for a site-specific rezone or participate in the current Comp Plan Update, and were asked to do the latter. If the Property is not going to be included in the Wilburton Study Area we would like to see provisions that make it easier for us to complete a site-specific rezone to the same land use designation as the property to the south; as such, we ask that the FEIS study the Property as the same land use designation as the property to the south.

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**Please consider the following code provisions for the Property zone (BR-MO-H-2 or otherwise):**

- Allow multifamily residential as a permitted use (not currently allowed in BR-MO-1). Vertically integrated mixed use buildings with medical services on the ground floor and residential above are viable. Wallace Properties is currently building an apartment project in Green Lake with a Swedish Medical Clinic on the ground floor. Horizontally integrated projects, such as the Alexandria/Burnstead project on Spring Boulevard, with life sciences and apartment buildings on the same site, are also viable. Permitting this flexibility can help realize both the job and housing goals stated in the Comp Plan Update. Residential or hospitality in close proximity to hospital uses serves patients and hospital workers alike.
- Allow restaurants, retail, professional services, R&D, and computer programming as permitted uses. Current BR-MO-1 zoning does not permit restaurants, many types of retail or professional services, other, computer programming or R&D services. The increased density in the new zone creates the opportunity for integration of retail uses with medical. Projects should not be prohibited from leasing space to non-medical professional services tenants. The new focus on life sciences means that computer programming and R&D should be permitted. Hospitals and life science uses thrive in areas where supportive services to hospital patients and workers are permitted outright; doctors, patients, lab workers and nurses need places to eat and drink, and places to buy things.
- Dimensional requirements. The zone should include the following:
  - For non-residential buildings, allow 30,000 GSF/F Floor Plates to 150' and 24,000 GSF/F above, with floorplate averaging. BR-MO-1 currently allows 28,000 GSF/F up to its height limit of 150'. The 30,000 GSF/F floorplates will improve the viability and competitiveness of life sciences buildings. 24,000 GSF/F is consistent with the floorplate limits for highrise buildings in Downtown zones, such as O-1 and OLB, and is important for highrise office viability.
  - For residential buildings, a 9,000 GSF/F limit is too small. Consider the 13,500 limit in downtown, and a 20,000 GSF/F limit for buildings 150' and below.
  - The impervious surface limits for the Washington Park and Blu Compass parcels are problematic because the grade of the existing street is so much higher than the existing land. Ideally we would build a level parking structure across the site and provide outdoor plaza at the street level. Impervious surface and lot coverage should be increased to 100% in all urban areas; stormwater codes and landscaping requirements can account for stormwater and aesthetic mitigation.
  - Please measure height in feet, not stories (we understand this is how the zoning will be drafted). The height of this zone should be at least 250' to allow for a 17-story R&D or hospital building.
  - Our studies show the maximum FAR will need to be approximately 8.0 to support buildings of this scale on the Property.
  - The existing parking minimums in 20.25D.120 are too high to be viable for highrise, high density development. Please analyze the required parking needs and set the minimums appropriately. Within these light rail walksheds, consider reducing parking minimums to zero and allowing the market to dictate parking supply.

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**Section Comments.**

<b>Section</b>	<b>Comment</b>
1.3	Include the Expansion Area in the Wilburton Study Area.
1.7	The analysis of the elements listed in this summary for Wilburton would not change if the Expansion Area were included. Since the Expansion Area is already being analyzed as BR-MO-H-2, the Land Use Patterns and Urban Form, Aesthetics, Housing, Air Quality, Noise, Public Services and Utilities and Transportation all have the same outcomes whether the Expansion Area remains only in the Citywide analysis or is included in the Wilburton Study Area.
2.1	<i>As it pertains to the Mixed-Use Centers</i> , we support Alternative 2 or 3 to be adopted as the Preferred Alternative in the FEIS. Either of these alternatives produce an aggressive amount of new growth by historical standards. Whether to pursue an outcome close to 2 or 3 depends on the ability to mitigate recognized impacts, particularly transportation impacts.
2.2	Include the Expansion Area in the Wilburton Study Area.
2.3	Modifying the Expansion Area to BR-MO-H-2, or a zone consistent with the property to the south, is consistent with the Bellevue City Council Principles for the Wilburton Study Area – particularly the goal of integrated station area planning, since the Expansion Area is within the station area/walkshed of the Wilburton and Spring District light rail stations, and economic vitality, given the opportunity to create jobs. The location of the Expansion Area does not pose adverse impacts on any nearby residential neighborhoods.
2.3.3	The Changes to Alternatives as a Result of Scoping Comments provides, “Expansion of the [BR-MO-1] node in all three alternatives reflecting similar changes to the BelRed Medical Office (BR-MO-1) density south of NE 12 <sup>th</sup> Street.” This expansion of the node has led to the Expansion Area being designated BR-MO-H-2, which is appreciated. This decision also justifies inclusion of the Expansion Area in the Wilburton Study Area.
2.3.4-2.3.7	We support the proposal in Alternatives 1, 2 and 3 to zone the Property as BR-MO-H-2, or a matching zone to the south, provided that residential, retail, R&D, and restaurants are permitted uses. Either of Alternatives 2 or 3 are acceptable for the Expansion Area. Alternative 0 does not meet the goals stated in the DEIS and Alternative 1 is not favored because it would produce an odd reduction in height (15 stories) for the properties south of NE 12 <sup>th</sup> , while leaving the Expansion Area height limit at 24 stories.
3.2	Placing the Expansion Area within the Wilburton Study Area may result in some need to revise the statistics in this section, but the overall impact to Wilburton would be nominal.
3.2.2	As shown in the map below, the Expansion Area is subject to a number of critical areas, particularly steep slope critical areas, that may hinder redevelopment if current City code requirements continue to apply. The City must study the Plan’s impacts to steep slope areas, and the Critical Areas Ordinance’s impact on the delivery of density, or risk an inadequate EIS. The DEIS does not include adequate analysis of the Plan’s potential impacts to critical areas, including streams and steep slopes. The lack of analysis renders the EIS potentially inadequate. As part of this analysis, the City should analyze the impacts of the Critical Areas Ordinance on the deliverance of density such that decisionmakers can understand the impacts the steep slope



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	regulations and stream buffers may have on density. The DEIS portrays areas as “developable” when the opposite is true due to the application of the steep slopes portion of the Critical Areas Ordinance. Manmade steep slopes currently impact our properties; these manmade steep slopes are currently regulated just as a true steep slope hazard area on a natural cliff would be. The City must study the impact of the ordinance on density and disclose impacts such that decisionmakers are aware of the potential that proposed density may not be feasible under current regulations. Please incorporate such analysis into the Preferred Alternative in the FEIS.
3.3	Including the Expansion Area in the Wilburton Study Area and rezoning to BR-MO-H-2, or the same zone to the south would further the ability to meet the growth targets. The large land areas in the Expansion Area would enable appropriate transitions between zones, and this issue could be further ameliorated by including the entire 116 <sup>th</sup> corridor in the Wilburton Study Area. Displacement and access to community assets is not affected by including the Expansion Area in the Wilburton Study area.
Ch. 4	Including the Expansion Area in the Wilburton Study Area has no impact on this Chapter.
Ch. 5	Including the Expansion Area in the Wilburton Study Area has no impact on this Chapter.
5.4.3	Mitigation measures related to business displacement should be carefully studied in the FEIS and such impacts disclosed to decisionmakers. Requiring displaced businesses be given a “right to return” or requiring Community Benefit Agreements in a development raises troubling legal and procedural questions. If the City determines it should act to assist displaced businesses, it should incentivize small businesses with bonuses in the Land Use Code, and it should do other things to encourage ease of movement for small businesses like no parking minimum for a relocated business, streamlined tenant improvement permits for small businesses, and consider an increase in SEPA thresholds for relocated businesses so that relocation does not require onerous SEPA review. The City’s idea of an “MFTE” program for small business location is a creative idea that could actually result in small business retention. The City should first review policies and procedures that currently exist in Bellevue that reduce the ability of a business to locate and operate in the City of Bellevue before reducing redevelopment opportunity. The impact of such mitigation measures should be studied and disclosed in the FEIS.
Ch. 6	The Expansion Area is surrounded by commercial properties north and south, I-405 to the west and the rail corridor and PSE substation to the east. This means there would few, if any, aesthetic impacts to the surrounding area from its redevelopment in a manner consistent with the proposed BR-MO-H-2 zoning, from making the modifications to the BR-MO-1 code that we request on pages 3-4 above, nor from inclusion of the Expansion Area within the Wilburton Study Area. Redevelopment of these sites would not interfere with any viewsheds, cast undue shadows on homes, and the buildings would be designed to reduce/eliminate light and glare impacts. Including the Expansion Area within the Wilburton Study Area would enable the City to impose the same standards on the Expansion Area as the remainder of the BR-MO-H-2 zoned land.
Ch. 6	The DEIS states that additional transition measures or other measures to reduce Aesthetic Impacts could be considered as mitigation. We strongly suggest that such mitigation measures be limited for the BR-MO-H-2 zone. As stated above, the property that the DEIS proposes to receive this zoning designation is surrounded by I-405, the rail corridor and other commercial



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	<p>properties. Accordingly, the transition measures should not be applied. Allowing flexibility in design is important such that buildings are constructed per market needs—i.e., medical office buildings and technology buildings should be allowed larger floor plates. Street or upper level setbacks should not be required in a dense urban environment surrounded by two freeways. Shadows on private property should not be regulated. Views from freeways, and private views, should not be regulated. Any protected public views should be very clearly and narrowly defined. Please include this analysis in the FEIS.</p>
Ch. 7	<p>Alternatives 2 and 3 both contain concerning language about the need for “deeper affordability” to receive a majority of new units that are affordable to &lt;80% AMI. We request that the City closely study the economic and legal issues surrounding housing affordability requirements. Any proposed affordable housing program must be legal, meaning it cannot require a disproportionate share of affordable housing/payment for affordable housing beyond a project’s impacts to affordable housing. Any program must be consistent with HB 1220, which requires “honest planning” to achieve required housing targets. Assuming it is structured reasonably, we support the notion of a “voluntary inclusionary affordability program” in Mixed Use Centers and Neighborhood Centers as stated in Alternative 2 and oppose a “mandatory inclusionary affordability program” in Mixed Use Centers as stated in Alternative 3. Bellevue’s current program for incentivizing 80% AMI affordable housing production, and creating more units through the use of MFTE, should continue. Achieving affordable housing targets below that level, particularly in the 0-30% and 30-50% AMI ranges is not viable through an inclusionary housing program aimed solely at developers. Instead, the City must study and consider the full range of the tools currently available to the City to provide housing at these AMI levels, and ensure that any program does not negatively impact the production of jobs or housing in Bellevue. Such tools to produce a large number of 0-50% AMI units could include a housing levy, a fee-in-lieu program, and housing vouchers. Please disclose these tools to decisionmakers and include this analysis in the FEIS.</p>
Ch. 8	<p>The long-term benefits of redeveloping existing buildings with new projects that are mandated by State code to provide high quality HVAC systems should be considered. In other words, enabling new development is a long-term benefit to air quality. Including the Expansion Area within the Wilburton Study Area has no impact on air quality.</p> <p>“Air quality buffers” from pollution-generating streets impact density production and their impacts must be properly analyzed and disclosed to decisionmakers. The mitigation measure is not well-defined; based on Wilburton’s location, most of Wilburton could qualify for being located in a high air pollution area given its location proximate to I-405 and other major arterials. The City also suggests requiring very expensive air handlers for residential projects near freeways that would significantly increase the cost of housing in Bellevue. The City should carefully study what would happen to its density projections if such a mitigation measure is adopted, and instead the City should consider recommending less severe mitigating measures such as some of those stated in the DEIS: constructing air pollution buffers along freeways and arterials, and reducing Vehicles Miles Traveled (“VMT”) through transportation mitigation measures. Reducing the source of pollution as much as possible should be the first mitigation measure. Please study the impact of inclusion of this mitigation measure in the FEIS.</p>
Ch. 9	<p>The Property, and much of the Wilburton Study Area, lies in proximity to I-405. Bellevue’s current standards for noise control in BCC 9.18.045B.A requires incorporation of sound</p>

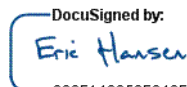
June 11, 2023

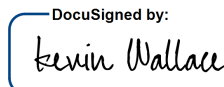
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	<p>attenuation measures intended to reduce interior noise levels to 40 dba in sleeping areas near areas with 65 decibel exterior ambient noise levels, as opposed to the 45 dba stated in the DEIS. The 40 dba level is out of step with similar cities, has resulted in excessively expensive housing costs and will lead developers to seek nonresidential development options for sites near the freeway. We encourage the City to research and implement a more appropriate decibel level.</p> <p>Including the Expansion Area within the Wilburton Study Area has no impact on noise issues.</p> <p>Noise mitigation from existing sources of noise such as roads should not be considered in a dense urban City. Requiring interior noise requirements along noisy arterials of 45 dBA or lower will place a significant cost burden on new projects that will be passed along to tenants. These onerous requirements could impact the ability of a Hospital District to form. Please study the impact a potential noise buffer area and other excessive noise mitigation requirements would have on the ability for transit-oriented density to be achieved in the Hospital District. The impact of such mitigation measures should be disclosed in the EIS.</p>
Ch. 10	Including the Expansion Area within the Wilburton Study Area has no impact on public services and utilities.
Ch. 11	The Property is located adjacent to two primary arterials, within the walkshed of two light rail stations, and is well served by bus transit, bicycle and pedestrian facilities. Changing the zoning to BR-MO-H-2, or zoning to match the properties to the south, will not result in undue transportation impacts. Including the Expansion Area within the Wilburton Study Area has no impact on transportation.

In summary, we appreciate your work in the DEIS, would appreciate the property being considered for inclusion in the Wilburton Study Area, and if inclusion is not possible we would appreciate studying a zone that allows a site-specific rezone to a similarly dense zone to occur more quickly than the Bel-Red look forward. Thank you for the opportunity to comment. We look forward to working with you in the future.

Sincerely,

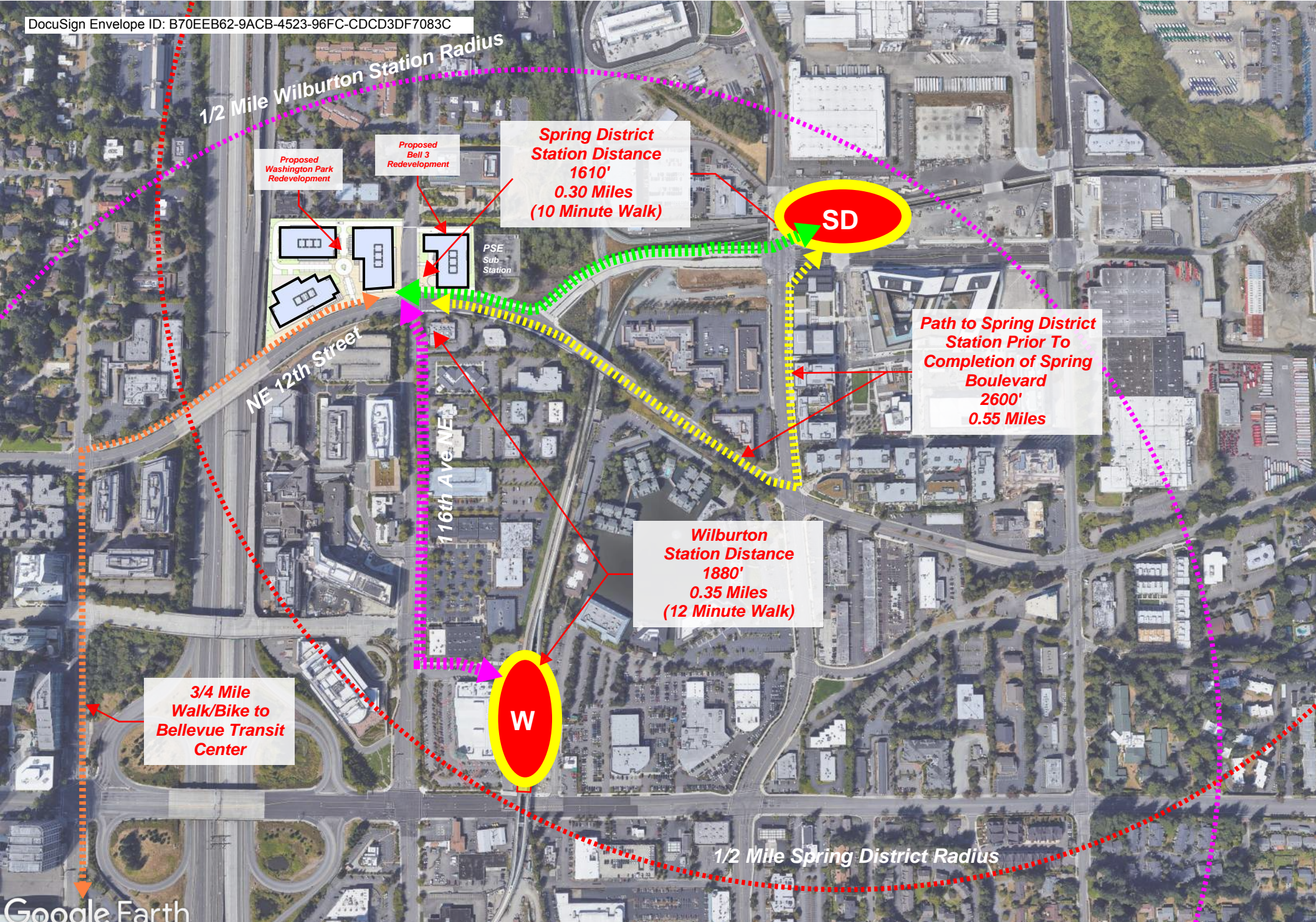
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 Partner/Managing Director,  
 Wig Properties LLC

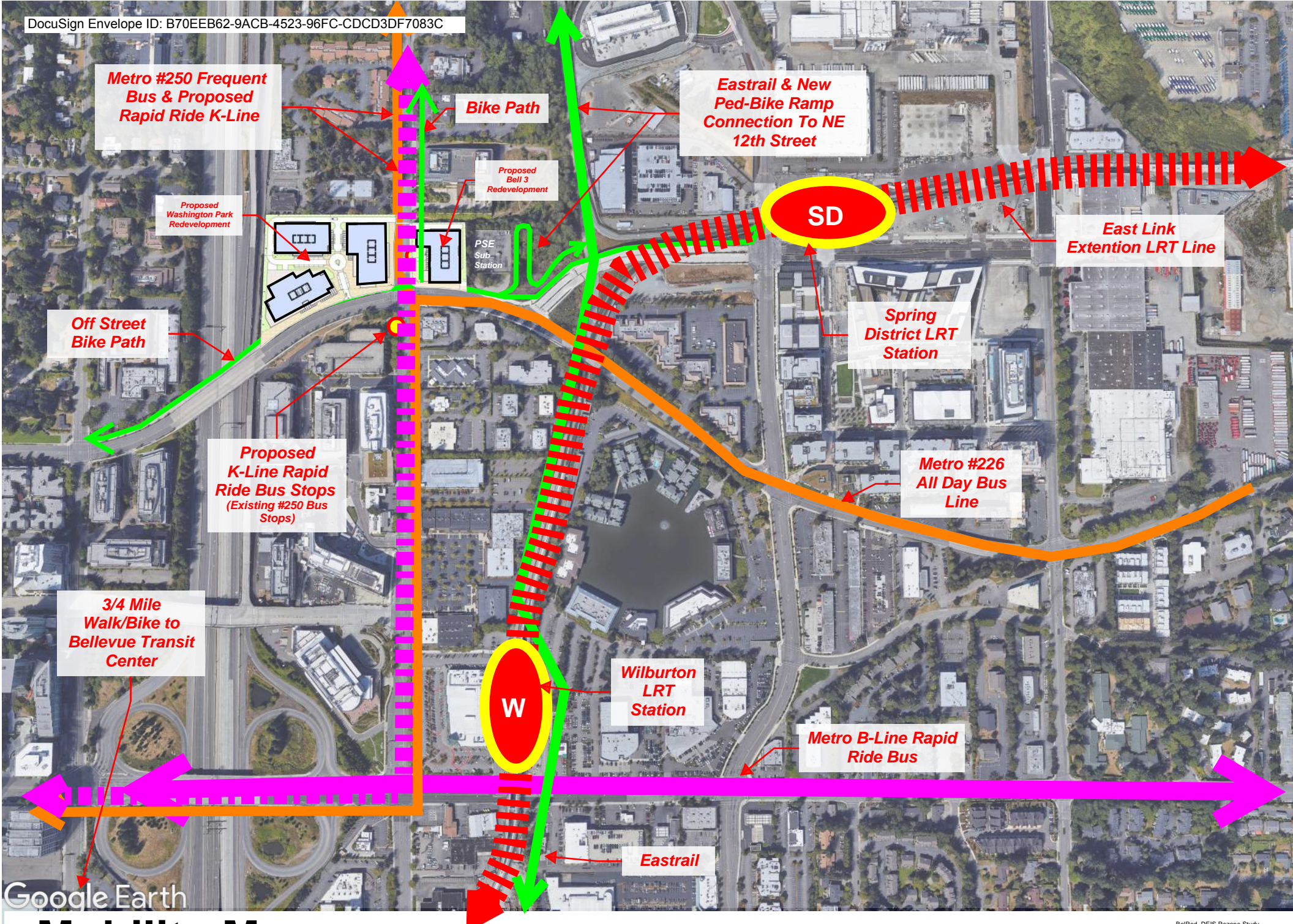
Attachment A: Light Rail Station Proximity; Mobility Map; Light Rail Station Walkshed Maps;  
 Development Propensity Map and Views.





Light Rail Station Proximity



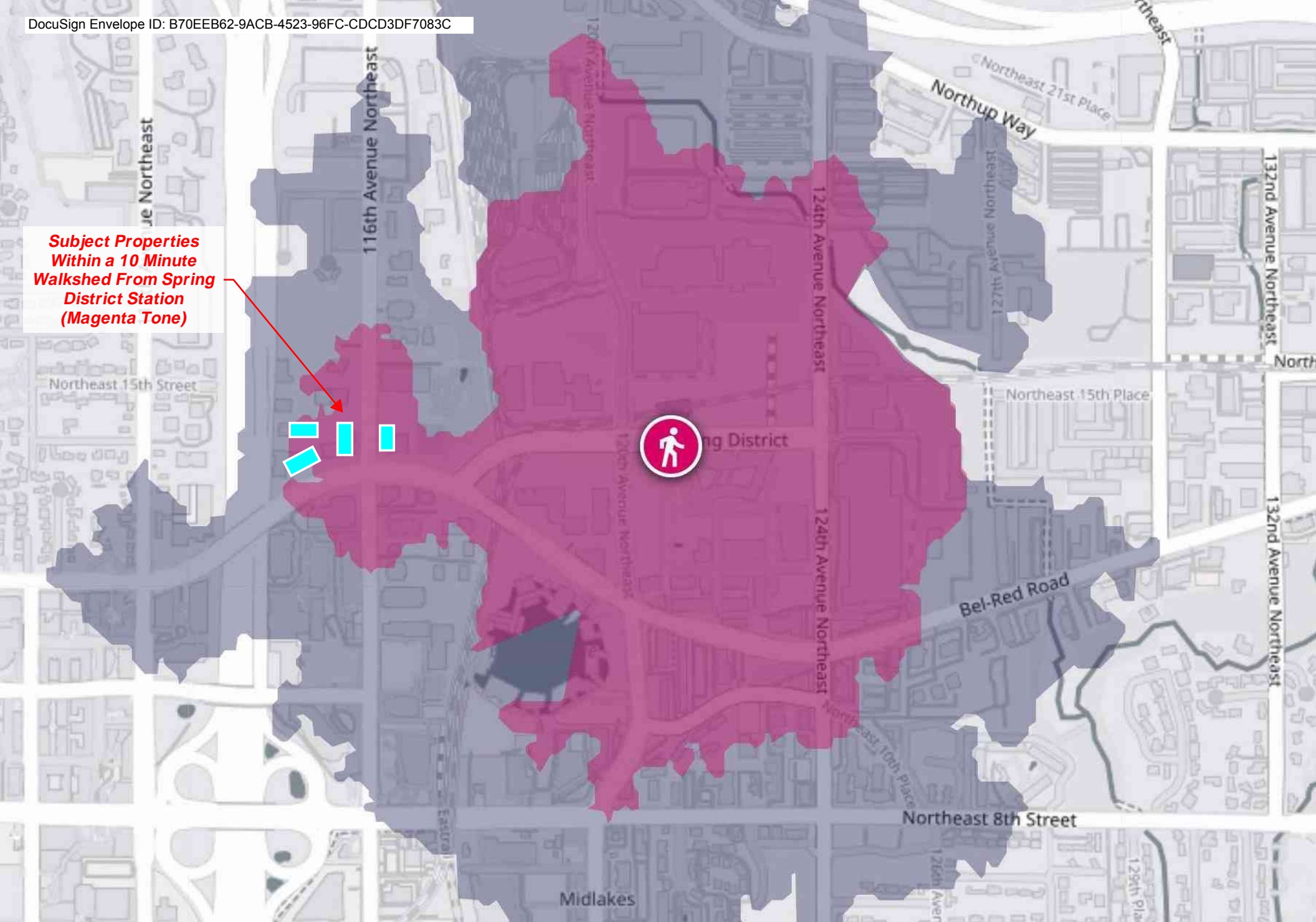








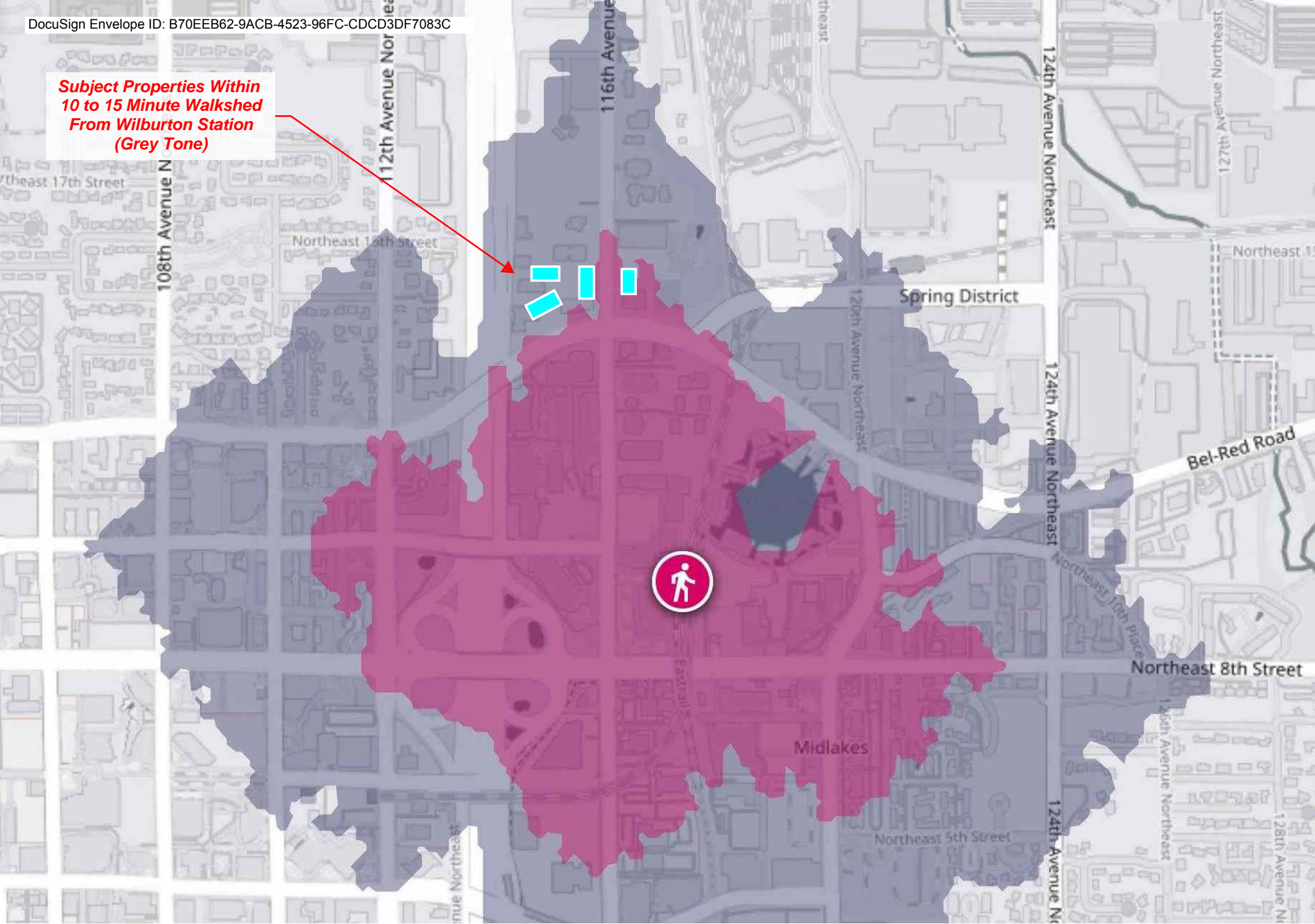
**Subject Properties  
Within a 10 Minute  
Walkshed From Spring  
District Station  
(Magenta Tone)**



Walkshed 10 Minutes From Spring District Station



**Subject Properties Within  
10 to 15 Minute Walkshed  
From Wilburton Station  
(Grey Tone)**



Walkshed 15 Minutes From Wilburton Station









# Future Development Propensity Views

Note: This development propensity massing model represents potential urban form (height & building footprint) per Alternative 3 in the 2024-44 Bellevue Comp Plan Update/Wilburton Vision DEIS. Floor Area Ratio's and specific development standards were not assigned in the DEIS. For this study, FARs range from approximately 4.0 to 9.0 depending on height limits and parcel size. A minimum tower spacing of 60' was maintained and new development is generally placed on underutilized sites (low scale development without recent major improvements). This is a generalized visual representation of one potential outcome of urban form as it relates to the properties at 116th Ave NE & NE 12th street. This does not represent a detailed, property by property, feasibility study.

BelRed DEIS Rezone Study  
116th Ave NE & NE 12th ST

**M** RÖWE  
ARCHITECTURE  
& PLANNING LLC

June 12, 2023



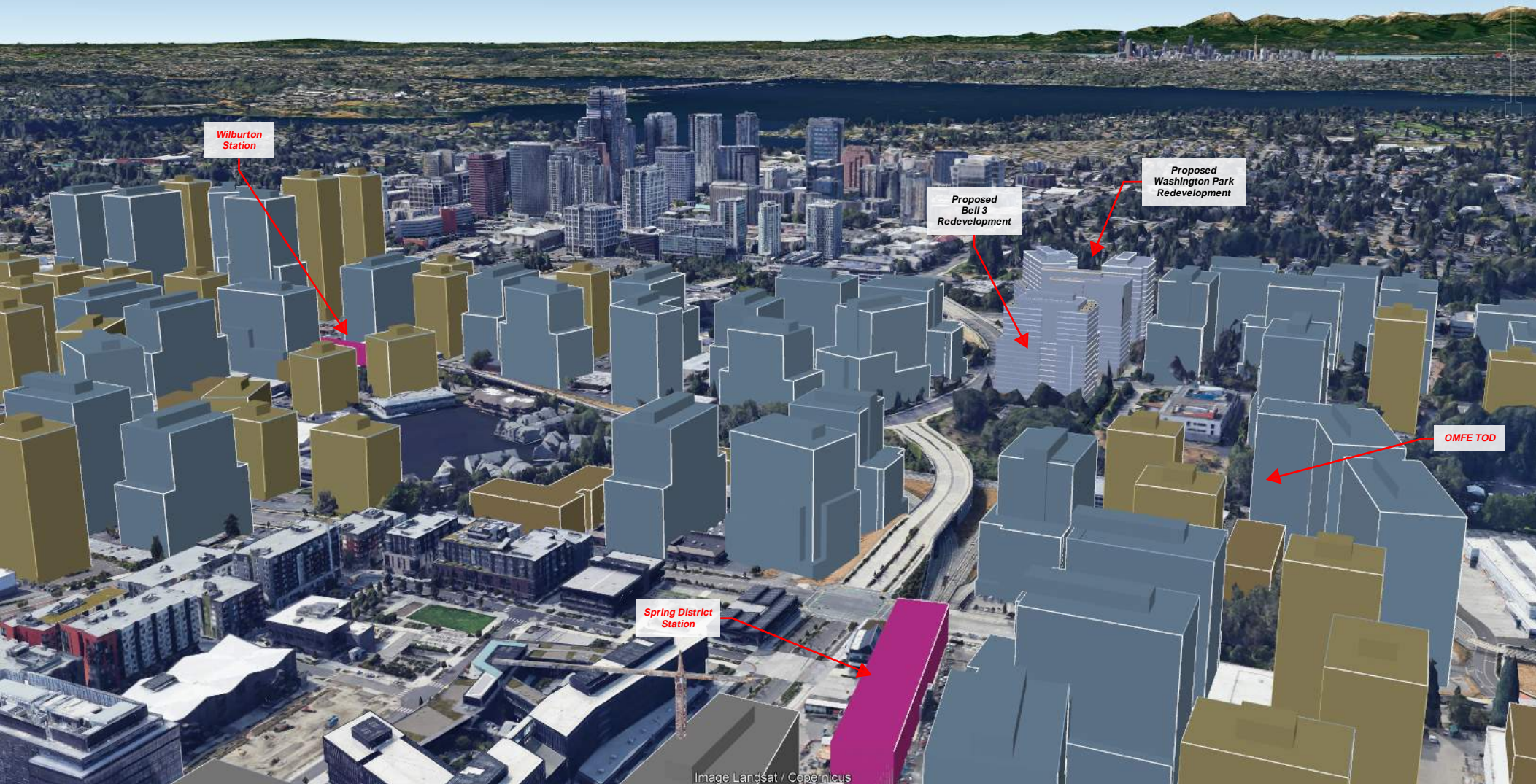


# Future Development Propensity Views

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BelRed DEIS Rezone Study  
116th Ave NE & NE 12th ST





# Future Development Propensity Views





# Future Development Propensity Views

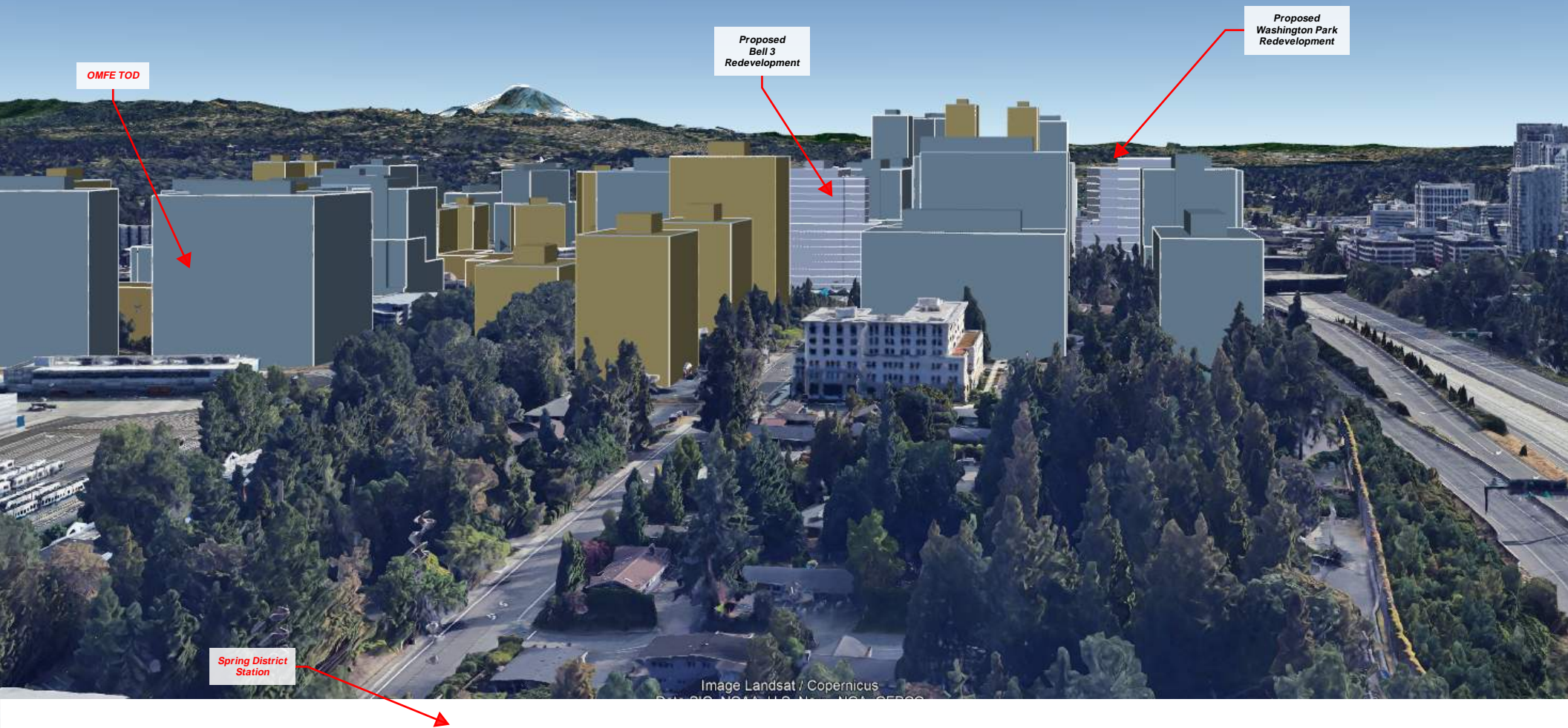
Note: This development propensity massing model represents potential urban form (height & building footprint) per Alternative 3 in the 2024-44 Bellevue Comp Plan Update/Wilburton Vision DEIS. Floor Area Ratio's and specific development standards were not assigned in the DEIS. For this study, FARs range from approximately 4.0 to 9.0 depending on height limits and parcel size. A minimum tower spacing of 60' was maintained and new development is generally placed on underutilized sites (low scale development without recent major improvements). This is a generalized visual representation of one potential outcome of urban form as it relates to the properties at 116th Ave NE & NE 12th street. This does not represent a detailed, property by property, feasibility study.

BelRed DEIS Rezone Study  
116th Ave NE & NE 12th ST

**M RÖWE**  
ARCHITECTS  
& PLANNING LLC

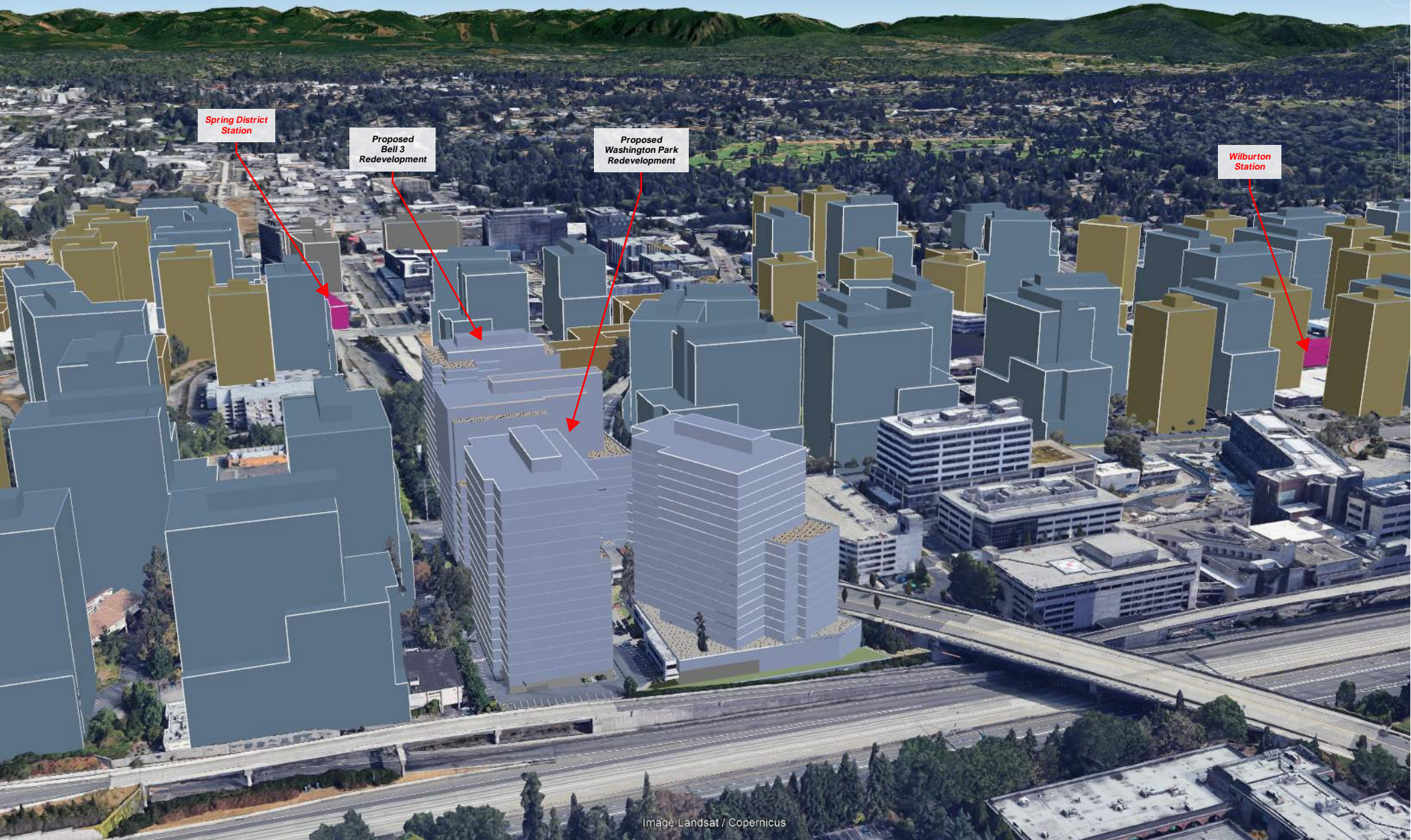
June 12, 2023





# Future Development Propensity Views





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Note: This development propensity massing model represents potential urban form (height & building footprint) per Alternative 3 in the 2024-44 Bellevue Comp Plan Update/Wilburton Vision DEIS. Floor Area Ratio's and specific development standards were not assigned in the DEIS. For this study, FARs range from approximately 4.0 to 9.0 depending on height limits and parcel size. A minimum tower spacing of 60' was maintained and new development is generally placed on underutilized sites (low scale development without recent major improvements). This is a generalized visual representation of one potential outcome of urban form as it relates to the properties at 116th Ave NE & NE 12th street. This does not represent a detailed, property by property, feasibility study.





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BelRed DEIS Rezone Study  
116th Ave NE & NE 12th ST

**M RÖWE**  
ARCHITECTURE  
& PLANNING LLC  
June 12, 2023



**I endorse the comments below by Barbara Braun.**

**Kristi Weir**

4639 133<sup>rd</sup> Ave SE

Bellevue WA

**This is a second and separate submission from me.**

Barbara Braun - 13609 SE 43<sup>rd</sup> Place

The City's commitment to reducing greenhouse gas emissions by 50% by 2030 is not sufficiently analyzed or addressed in the Comprehensive Plan.

The Washington Department of Commerce's Climate Element Review Group has been working on an optional Climate Element section guideline for Comprehensive Plans that should be included in the final EIS for Bellevue. [Link](#)

From the Department of Commerce's website:

"The Washington Department of Commerce is developing a model element to help cities and counties address climate change in their comprehensive plans. The model element will include mitigation (greenhouse gas reduction) and resilience (climate impacts preparedness, response, and recovery) planning guidance, as well as a model chapter with goals and policies (Menu of Measures) that communities may voluntarily adapt or adopt into their comprehensive plans as part of their periodic update. The model element — described in the [2021 budget \[Section 129 \(126\)\]](#) — must be completed by **June 2023** and must integrate input from fellow state agencies and other partners."

The draft Guideline and development timeline can be found here:

1. [Draft Guideline](#) – post as of May, 2023
2. [Development Timeline](#) - The initial products – the model elements – are due by June 30, 2023.

Bellevue should adopt this guideline into our Comprehensive Plan even if this requires us to be a pilot city. The preferred Alternative should be analyzed on its ability to meet our climate goals using this Guideline and appropriate mitigations should be outlined in the Final EIS.

Included in the Final EIS should be numerical estimates of future GHG emission metrics along with the key actions and mitigations that will enable us to achieve those measurable targets.

The final Comprehensive Plan should not be adopted without full confidence that our climate goals will be met. The timing of the final EIS should be modified to allow time for the inclusion of this planning element, and the schedule for completing and adopting the Comprehensive Plan should be modified accordingly.

Bellevue should stand out as a large municipality who is taking climate action seriously.

Thank you!

**From:** <lesliegeller@gmail.com>  
**Sent on:** Monday, June 12, 2023 8:50:11 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Request to be party of record for Comp Plan 2044 and EIS

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello,

I would like to be a party of record for the Comp Plan 2044 and/or the DEIS and EIS.

Thank you,

Leslie Geller  
15102 SE 43<sup>rd</sup> St.  
Bellevue 98006



**From:** L Y <lyin71@hotmail.com>  
**Sent on:** Monday, June 12, 2023 6:17:35 AM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Please add me as a “party of record”

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Thank you!

Lily Yin  
发自我的 iPhone



June 11, 2023

City of Bellevue Development Services Department  
Attn: Elizabeth Stead  
450 110<sup>th</sup> Ave. NE  
Bellevue, WA 98004

RE: 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement

Dear Ms. Stead,

Thank you for the opportunity to comment on the City of Bellevue's Comprehensive Plan Periodic Update and Wilburton DEIS. We believe it is appropriate for the City to consider long-term development alternatives for the Wilburton area and support mobility and access across all modes in proportion to travel demand. Our comments and questions, as in the past, focus on transportation. In reviewing the transportation chapter in the DEIS, we have several questions and concerns about the plan's mitigation measures and lack of analysis and evidence to support its findings and conclusions.

Our primary concern is that the DEIS does not provide adequate or appropriate mitigation for traffic impacts in any of the proposed alternatives, resulting in a stated plan for intersection failure and gridlock. This is not acceptable.

Section 11.6 of the Comprehensive Plan DEIS focuses on Avoidance, Minimization and Mitigation Measures for the impacts of proposed alternatives. The impacts are entirely on system intersection V/C ratio, primary corridor speed, and state facilities (Table 11-40). Mitigation strategies listed do not include a discussion of capacity improvements that are needed to accommodate the City's projected increases in vehicle miles traveled (VMT), or address these significant performance target gaps. The previous Wilburton DEIS, released in 2018, pointed to several capacity improvements that would reduce the V/C ratio at intersections. Capacity solutions to decrease delay at intersections caused by upzoning should be explored in a similar fashion as in 2018.

The Mobility Implementation Plan (MIP) prioritization framework guides Bellevue's mitigation strategy. The DEIS states that, per the MIP, "some gaps (particularly related to System Intersections and Primary Vehicle Corridors) will remain because reducing intersection congestion and increasing vehicle speeds must be balanced against priorities including safety, environmental stewardship, land use impacts, etc." Reducing traffic congestion should not be seen as a separate or competing priority among others listed, but one that is directly related to public safety, environmental stewardship, and land use impacts.

For example, policy decisions that do not prioritize traffic congestion relief and allow vehicular delays to worsen may impact emergency response times and health outcomes for the public. In 2017, Harvard researchers examined 10 years' worth of patient records and analyzed death rates among Americans who had a heart attack or cardiac arrest near a major marathon where there were multiple street closures. They found that ambulance vehicles were delayed by an average 4.4 minutes on marathon days (32% longer than on days not delayed by marathons), which resulted in a spike of 15% higher likelihood of death among non-marathon patients admitted on race day. The researchers noted that every minute counts and while "the study findings do not establish cause and effect between street closures and greater mortality...many studies have shown that even very small delays in

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getting care could make the difference between life and death.”<sup>1</sup> This is an element of safety that is not at odds with reducing traffic congestion. How will DEIS policy choices that allow failed intersection and corridor speed performance targets to “remain,” considered alongside the City’s other transportation planning documents that guide future projects, cumulatively impact emergency response times in Bellevue?

The DEIS must include an honest and robust discussion of strategies that will measurably reduce traffic congestion, including existing City-supported transportation projects. This would align with 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”). TR-2 does not state that the City ought to merely look at or consider congestion impacts to all users, but aim to “reduce” congestion. WAC 197-11-060(1) requires the City to consider the “range of proposed activities, alternatives, and impacts” – this should include an analysis of mitigation strategies, like capacity improvements, that would result in reduced traffic congestion, and can be added to Section 11.6.

Rather than providing a complete list of mitigation strategies and evidence that they will produce meaningful results, the DEIS provides a partial list of mitigation measures that will be informed by Transportation Demand Management (TDM) strategies, transportation systems operation and management, agency partnerships, parking strategies, and safety strategies. What will each of these measures accomplish in accommodating or even shifting demand?

Specific to TDM, the DEIS references California Air Pollution Control Officers Association (CAPCOA) research, which suggests TDM programs will produce a 5-10 percent vehicle trip reduction, but the findings in that document are not context-sensitive to Bellevue, do not consider available US Census travel data specific to Bellevue, and are not explained in the DEIS.

For PMA 1, the DEIS recommends addressing intersection V/C ratios and primary corridor vehicle speeds that don’t meet performance targets by focusing “primarily on building out the pedestrian and bicycle network,” “exceptional TDM” requirements, Smart Mobility solutions, and parking code reforms. The notion that “primarily building out the pedestrian and bicycle network” will improve intersection V/C ratios and primary corridor vehicle speeds is not supported by any data or analysis in the DEIS. Bellevue’s own modal projections show minimal increases in walking, no increases in biking, and increases in SOV driving among both Bellevue workers and Bellevue residents when comparing the No Action Alternative to Alternative 3 (Table 11-33). It is not appropriate or reasonable to expect bike and pedestrian infrastructure to mitigate expected increases in VMT. The City needs to provide evidence that building out the pedestrian and bike network is an adequate mitigation strategy for higher levels of traffic congestion, or remove this from the mitigation strategies list. Evidence can be provided by showing whether targeted spending on bike and pedestrian infrastructure in Bellevue has, historically, produced intersection and corridor speed improvements in the area where the infrastructure was provided.

Those who commute to work in Bellevue by car (including workers in poverty, 60% of whom drive alone or carpool to work), as well as emergency responders and freight, will not benefit from bike and pedestrian infrastructure (which they do not use and which could increase traffic congestion in areas where the City plans to convert travel lanes to bike lanes).

Further straining the analysis contained in the DEIS is the assumption that proposed high-rise buildings densely placed between NE 4<sup>th</sup> and NE 8<sup>th</sup> (critical service corridors for emergency responders, freight and commuters) without planned capacity improvements will not have detrimental impacts on transportation in Bellevue.

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<sup>1</sup> “Delays in Emergency Care and Mortality during Major U.S. Marathons,” by Anupam B. Jena, M.D., Ph.D., N. Clay Mann, Ph.D., et al., The New England Journal of Medicine, April 13, 2017, at <https://www.nejm.org/doi/full/10.1056/NEJMs1614073>.



Given the lack of information in the DEIS on capacity improvements that would help mitigate some of the expected pressure on Bellevue's transportation network, it is not surprising to see Table 11-40 showing multiple intersections, primary vehicle corridor speeds, and state facilities that will be significantly impacted from all action alternatives and which will therefore not meet respective performance targets. It is, however, surprising that the DEIS simply dismisses this reality, stating that, "While incremental improvements in performance to some impacted facilities could be achieved, it is expected that some of the significant impacts on System Intersection V/C, Primary Vehicle Corridor travel speed, and state facilities would remain."

This is a plan for transportation failure, with proposed mitigation measures that are unlikely to mitigate the more significant traffic problems the DEIS projects will occur.

The City must propose adequate mitigation to reduce traffic congestion, comply with TR-2, and prevent intersection and corridor failure. We do not agree that it is acceptable for these significant adverse impacts to "remain" or to become exacerbated by the cumulative impacts of proposed changes in the comprehensive plan and other City planning documents.

Bellevue is a beautiful, growing city. The policy decisions made today can either improve or deteriorate future mobility and access, which is central to Bellevue's economic growth and success. For any growth alternative that is selected, please consider providing adequate transportation mitigation that expands arterials and strategically adds capacity to areas that are already gridlocked during peak hours of the day in order to accommodate the vehicular demand the City anticipates over the next two decades.

Sincerely,

Mariya Frost  
Director of Transportation  
Kemper Development Company

**From:** Mel Levine <gorgesailor@gmail.com>  
**Sent on:** Saturday, June 10, 2023 8:45:44 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** Board@bridletrailscommunity.org  
**Subject:** Bridle trails up zone

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

I am in agreement with draft sent to you by Board@bridletrailscommunity.org re up zones.

Mel Levine

Sent from my iPhone

**From:** melinda hirsch <melindash@hotmail.com>  
**Sent on:** Saturday, June 10, 2023 6:04:57 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** BTCC <Board@bridletrailscommunity.org>  
**Subject:** Bridle Trails/Comp plan

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

I am writing as a 34 year resident of Bridle trails. The comp plan fails to recognize the special uniqueness of the neighborhood, its Park, and the equestrian overlay of the neighborhood. BT may be the only neighborhood of its type in the country.

We have a State Park, partially paid for with resident funds and established first and foremost for horses and riders, dogs must be on leashes and no bicycles. We have the only Park west of Chicago that has these requirements.

The comp plan fails to talk about the tree canopy and how it will be maintained. We have a host of wildlife including deer, coyotes, bobcats, a partial resident bear or two, an occasional cougar, and numerous birds including owls and hawks. Our streams and canopy need to be protected to ensure the essential nature of the area.

None of this is addressed in the comp plan. We have worked long and hard to protect these elements. The equestrian overlay with its stables, barns, and domestic animals can't just be shoved under the rug. People from other neighborhoods come to use these horse-y benefits. The neighborhood makes steady use of them. Streams, wildlife, forests, and the tree canopy with its many large, old, trees need to be addressed and protected by the new plan. Thank you for accepting comments.

Melinda S. Hirsch, M.D.  
3836 134th Ave NE  
Bellevue, WA 98005





## PLUSH COMMITTEE

Planning, Land Use, Sustainability, & Housing

bellevuechamber.org

425-454-2464

staff@bellevuechamber.org



Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004  
Via Email: [compplan2044eis@bellevuewa.gov](mailto:compplan2044eis@bellevuewa.gov)

Re: Bellevue 2024-2044 Comprehensive Plan Periodic Update DEIS  
Bellevue Chamber PLUSH Committee Comments

Dear Reilly:

The Bellevue Chamber and PLUSH Committee applaud the City of Bellevue for the projected capacity, building heights, and thoughtful analysis proposed in the DEIS. The alternatives proposed target significant amounts of employment and housing in close proximity to transit, which will serve Bellevue's growth well in the next twenty years. The length of this comment letter should not indicate a poor opinion of the City's work—to the contrary, PLUSH considers this to be a strong document—but as a reflection of the wide range of topics the City is pursuing to improve its ability to handle growth in Bellevue.

PLUSH would like to submit the following comments to the DEIS:

- **We strongly endorse Alternative 3. Alternative 3 best accommodates housing that must be built in Mixed-Use Centers.**
  - Bel-Red, Wilburton, and Downtown accommodate most of Alternative 3's growth. This is true "smart growth" as placing most of Bellevue's growth in Mixed-Use Centers and surrounding transit will minimize traffic impacts by leveraging transit investment in these TOD areas.
  - Taller heights incorporated in Alternative 3 (above 16 floors) allow density to spread out vertically, rather than sprawl horizontally. Higher building heights can translate into more open space and human-scaled ground planes. Taller heights also enable high-rise building typologies to be more feasible economically than height limits between 8-16 stories.
- **General Questions and Comments:**
  - What are the DEIS's "informed build-out" assumptions? How is developable and re-developable land defined? Please provide this in the FEIS to determine that impacts were studied adequately.
  - What are the DEIS's FAR or density assumptions for the alternatives? Please provide these details in the FEIS to help inform our analysis of the impacts that were studied.

- We understand that an economic analysis was included in the study of the affordable housing options, and possibly in the study of the informed build-out assumptions. This economic analysis should be attached as an appendix in the FEIS so that economic assumptions can be publicly reviewed.
  - What was the City's methodology/criteria used to designate new land use designations? Particularly with respect to the MU-L and MU-M designations in Neighborhood Centers? We understand the City may not have accounted for frequent transit proximity in identifying these designations. If that is the case, the Preferred Alternative should revisit these designations and identify sites for MU-M if they are within transit proximate areas.
  - The property at 12<sup>th</sup> and 8<sup>th</sup>, known as Evergreen Court and Glendale is listed at 16 floors in Alternative 2 but only 7-10 floors in Alternative 3. Please state the difference in assumptions and the outcome; is this reduction of height related to affordable housing assumptions? We prefer the higher density on this property in Alternative 2.
- **Uses / Mapped Land Use Designations:**
    - We recommend studying a more agnostic mix of uses between residential and commercial uses in Mixed-Use Centers in the FEIS. In Mixed-Use Centers, consider allowing residential and commercial generally interchangeably, rather than tightly controlling uses. This will greatly simplify the Land Use Code and drafting of future regulations, and result in a code that is more responsive to market conditions. While we recognize and strongly support housing as a priority, the overall velocity of both commercial and residential projects will increase as flexibility increases.
    - Consider the wide application of a "Mixed-Use" zone in the Mixed-Use Centers. For example, is there a reason to have East Main-focused, Wilburton-focused, Bel-Red-focused, and Eastgate-focused separate land use codes? Utilizing one "Mixed-Use" zone in each of these centers will give the City the ability to more easily and quickly rezone centers. It would also result in permitting efficiency as staff would have fewer zoning designations to apply.
    - Study a less prescriptive approach with Comprehensive Plan map designations. Currently there are 53 different land use designations listed in the Comp Plan cityside (page 653). For example, in Wilburton, rather than including individual designations on each parcel, consider determining the whole area as "Wilburton Mixed Use Center" in the Comp Plan. Consider including a range of implementing zones that can be utilized to implement the Comp Plan map. Similar approaches could be used in Downtown and Bel-Red. Decoupling the Comp Plan/FLUM from the zoning map is allowed by the Growth Management Act and allows flexibility in zoning in the future.
    - Office ("O") zones are not designated for any growth, nor for any ability to have more flexible uses or additional FAR in Alternative 3. We consider this to be a lost opportunity in the 20-year horizon; these 1-2 story office buildings are the buildings that are being hit the hardest by the current office leasing crisis (these buildings are most often older Class B office). This is an opportunity to incentivize development or reuse of underutilized buildings/properties in areas typically close to transit or major arterials. Please study the ability to do all residential / mixed use buildings in the O zones, with heights up to 6 stories, and up to 4 FAR.
    - Plan for future density along corridors that will likely have transit in the 20-year horizon. For example, the Bellevue Way corridor may have more transit in the future running locally between Bellevue and Kirkland. As a major arterial, particularly north of Bellevue, there

should be additional density considered in this corridor in the 20-year horizon. Consider the R-High designation or an MU designation along this and other similar corridors.

- We support the creation of a medical / hospital district surrounding Overlake and to the north—consider sufficient densities and heights that will allow MOB and life sciences to develop. Consider allowing some residential, retail, R&D and other supportive uses in this subarea to support hospital workers and those needing to stay longer term for medical treatment; Bellevue currently lacks these housing options near the hospital. Given the current lack of traditional office market, medical office/lab space is more likely to develop in the short term. Consider adding more space to the Wilburton Study Area (north of 12<sup>th</sup>) that is designated for medical use to allow for these properties to develop in the shorter term.
- Please study higher densities than currently shown in Alternative 3 in the areas along 520, south of NE 24<sup>th</sup>, along Northup Way, and near the border of Redmond’s Overlake Urban Center (especially at the intersection of 156<sup>th</sup> and Bel-Red Road). These areas are currently designated generally MU-L, which would only allow low-rise buildings in a mix of 2-4 stories. BR-GC is also only 1-2 stories. Extend Bel-Red zoning to these areas with the BR-MU-M designation or a similar zone. Again, in the next 20 years it is very likely that the buildings along 520 will need to be redeveloped. More density will also fit better with the future context. For example, on the Redmond side of the of NE 20<sup>th</sup> and 148<sup>th</sup> intersection, Redmond is planning for high density/25-story towers. Bellevue should match the height and density that Redmond is planning in Overlake in border areas. These are areas of potential growth that do not impact single-family neighborhoods or lower density zones, and placing growth in these areas could be traded for growth currently designated in neighborhood centers that may also be not well served by transit or create problematic transitions to single family zones.
- Please study a higher density for OLB zones (OLB and OLB2). It is our understanding that OLB zones will be a part of the Phase 2 code amendments. In Eastgate, a large area of OLB exists along the freeway, up 139<sup>th</sup> and in the vicinity of 161<sup>st</sup>. Is there a better designation for this area given its proximity to Bellevue College and its need for housing? Or is it more appropriate to add density to OLB zones and keep this area OLB? Consider a more flexible zone like an MU zone in the Eastgate area.
- Along 116<sup>th</sup> south of Downtown, please study a “future vision” for this area rather than designating generally what exists today. This area is close to downtown and is served well by transit near SE 8<sup>th</sup>. For example, consider whether an LI zone should remain in this area for the next 20 years?
  - Study all center boundaries and ensure parcels are not split zoned (half in centers, half out). For example, on the southwest corner of the downtown boundary, parcels are split zoned downtown and R. This inhibits development in a key corner of downtown along Old Main. Similar conditions may exist in the other centers, particularly in Eastgate. Please review these edge conditions in all Centers and ensure parcels are adjusted to be fully in or out of Centers. Review Centers and determine whether they should be expanded slightly given context.
- The Preferred Alternative must repeal any existing subarea plan policies that restrict multifamily housing choice. As noted in Section 4.2.4, the City has 14 neighborhood subarea plans. Some of the existing subarea plans include policies that specify areas where certain uses are prohibited, such as Northeast Bellevue Subarea Plan Policy S-NE-7 and Crossroads Policies S-CR-63 and S-CR-80. These policies are inconsistent with the Growth Management

Act regulations that encourage vibrant housing options in zones that allow for residential uses. The DEIS should evaluate the impacts of these Subarea Plan policies that restrict housing choices and frustrate the implementation of the 2044 Plan's vision and applicable housing laws, including HB 1220 and HB 1110. The Final EIS should evaluate the Subarea Plans for such inconsistencies, and where identified, repeal them with the 2044 Plan.

- **Aesthetic Visual Analysis – Wilburton.** (pages 6-19 through 6- 50): We have concerns that the massing model may appear to overstate the density possible in Wilburton. The public could misunderstand what these models represent failing to understand that the EIS needs to show 100% re-developable build out to show a “highest-growth case scenario.” Understandably, the massing doesn't reflect existing property configurations and shows built form on unbuildable wetlands, the existing substation, and does not leave space for planned city parks and the planned bridge for the Grand Connection, all of which would reduce the extent of built form. The City should also develop more realistic propensity diagrams that take into consideration these real-world conditions so that the public has more accurate information to gauge impacts. We feel the EIS should also include additional written explanation to accompany the current diagrams. We suggest inserting the following:

*Please note these massing diagrams represent 100% development capacity expressed as built form for each alternative. Many property and land-use determinants that would reduce buildable areas were not considered when creating these diagrams. There is no real estate development precedent to support 100% build out as shown in the next 25 years.*

- We also caution the City against increasing transition zones in the Mixed-Use Centers. In a City, fewer step-down transitions are expected. Transition zones are better suited adjacent to single-family zones, and the City should consider whether the reduction in density currently deployed by transition zones is an effective approach to “mitigate aesthetics” or whether it simply stops redevelopment from occurring.
  - The mitigation related to viewsheds should be tightly defined and controlled. Private views are not protected by SEPA, and any public views to be protected should be very specifically defined.
  - We are concerned about mitigation related to “Aesthetic Impacts” that will further reduce the efficient creation of density. We strongly suggest that such mitigation measures be limited, particularly given increases in density that will be required per new state laws throughout Bellevue. In addition, we believe that allowing flexibility in design is important such that buildings are constructed per market needs—i.e., medical office buildings, technology buildings, and residential buildings below 85' should be allowed larger floor plates, and residential towers above 85' should be sized such that residential units can be delivered more efficiently (upper-level setbacks add cost to structures). The City should not look to current upper-level tower limits, but instead, look to the market to inform the most efficient forms to avoid adding unnecessary cost to projects. Inserting a cost/benefit analysis of potential mitigation measures may assist decision-makers. In addition, shadows on private property should not be regulated, and if the City seriously considers this mitigation, adequate analysis should be completed to determine impacts to density related to such a regulation.
- **Critical Areas/Stormwater/Trees.** The City should analyze impacts to critical areas; the current 4-page memorandum in the Appendix is insufficient. The City should study implementation of the following:
    - Exempting man-made steep slopes from critical areas requirements. The proposed alternatives show much growth in areas where it is currently impossible given man-made

steep slopes such as rockeries. The City should study this so the code can be changed, this is a major impediment to urban development in Bellevue and does not reflect best available science.

- The “critical areas penalty” should not apply in any Mixed-Use Center. Currently the penalty does not apply in downtown. If it applies in the City at all, the penalty should only apply in low density zones; it is inappropriate given the stringent stormwater codes and other regulations that we now have in Bellevue that protect critical areas, and a reduction of density on top of critical areas regulations and buffers is not necessary. Please include this analysis in the study such that future rezones can utilize the environmental review.
- The current Bel-Red neighborhood plan includes a policy that seeks to incentivize daylighting of creeks. However, the incentives within the land use code do not properly incentivize developers to daylight and improve creeks. Please study an incentive in which a 20-or 30-foot buffer and building setback could occur with daylighting of currently piped creeks, with restoration of ecological function. Impacts/outcomes of such an approach should be disclosed to decision makers. There is no possible way the City can afford the massive daylighting undertaking that should occur, and developers will not be able to accomplish this unless buffers are appropriately set and do not prevent redevelopment. If daylighting is properly incentivized, developers will build creek daylighting into their projects, and the City’s current comp plan goal can be achieved. A similar study should be undertaken for Sturtevant Creek in Wilburton, and other streams that run underneath urbanized areas in Bellevue. The City must also recognize that areas of Sturtevant Creek in Wilburton are on WSDOT property within the “limited access area” that is highly regulated by FHWA and no daylighting or additional mitigation may be possible in these areas. The City should account for this in the regulatory context section of the FEIS.
- The FEIS should study the loss of housing units and consequently affordable housing if the current critical areas requirements remain; these impacts should be disclosed to decision-makers.
- The FEIS should study the use of Mitigation Banking.
- The FEIS should study alternate stream designations such as the “Urban Stream” designation used by the City of Woodinville, these designations recognize that even a salmon-bearing stream can be properly protected in an urban area without large 100-foot buffers, and that it may actually be positive for stream function to incentivize improvement of current stream function.
- The FEIS should study properties in Bel-Red and Wilburton that are most impacted by critical areas and determine whether redevelopment will be possible given current critical area requirements.
- The FEIS should study alternate forms of mitigation and ways in which the sites most impacted could still re-develop. If the critical area requirements are so onerous so as to prevent any re-development from occurring, then the critical area will never realize any improvement, which is exactly the opposite of the intent of the critical area requirements.
- Tree Ordinance: Since the DEIS does not assume or address any new tree standards or regulations, we recommend not implementing any revised tree regulations until the Comprehensive Plan and subsequent LUCA amendments are in place. The City should complete a supplemental FEIS analysis on tree impacts following Comprehensive Plan implementation and disclose how any tree ordinance could impact the density assumed in the FEIS. All Mixed-Use Centers should be exempt like downtown is exempt.



- Impervious Surfaces. The City's requirements of substantial pervious surfaces in dense urban environments runs contrary to the infill goals of Alternative 3 of the DEIS. The requirement of significant pervious areas on dense urban sites should not be a part of future Wilburton or Mixed-Use Center regulations. Most other urban jurisdictions have identified ways to address storm water quality without the need to impose major penalties on site usability. Bellevue should update its regulations accordingly.

- **Housing Affordability**

- Any approach to affordable housing must be legal. Affordable housing requirements cannot exceed the impacts created by new development, and must meet the requirement of WAC 365-196-870, that increased density can be achieved given the affordable housing requirements and other development regulation constraints.
- The City should also consider itself as an essential partner in the housing affordability issue. Rather than focusing solely on market-rate developer-created funding or housing, which is generally limited to 80% AMI and above, the City should explore and disclose in the FEIS the many tools it may deploy to address housing affordability, such as a housing levy, housing vouchers, impact fee waivers for market-rate units that have performed inclusionary housing at a lower AMI, parking reductions, expanded MFTE, expedited land-use and building permits, financing programs and resources, making underutilized or surplus public properties available, raising SEPA thresholds, etc. and other ideas. WAC 365-196-870 requires the City to review and apply these incentives.
- The FEIS should include each affordability program applied to each alternative to show decision makers the relative efficiency of each program. There is no housing production data associated with the different programs or alternatives, please provide this data in the FEIS.
- The FEIS should recognize that inclusionary zoning housing policies need a sustained level of market-rate development in the local market or IZ policies will not generate a meaningful number of new affordable housing units. In most cases, jurisdictions provide development incentives to ensure the feasibility of development projects affected by an IZ policy. The principal incentives are direct subsidies, density bonuses, tax abatements (MFTE), and reduced parking requirements. Individually, and especially in combination, these incentives can substantially enhance the feasibility of development projects affected by an IZ policy.
- The FEIS should disclose the option of a fee in lieu of developing IZ units, and the city can use those collected fees to support construction for lower-income households directly. Setting the in-lieu payment amount affects IZ outcomes. If the payment amount is set high, developers may not be able to feasibly support the in-lieu payments and will either be able to deliver the below-market units within a project or not build at all. Further, the fee needs to be context-oriented and calibrated with the bonus received to yield better results for both developers and policymakers such as considering market prices, development types, and macroeconomic conditions.
- To the extent that land use requirements and/or fee arrangements impact the building envelope or constructability of buildings, the city should conduct a more cumulative analysis of the effects. For example, land use incentives for affordable housing and childcare facilities must be considered concurrently to ensure they can complement each other.
- Affordable housing is just one "spoke" of the livable City wheel. Other needs that are often obtained via development projects include park dedications/fees, deep green development, trails, sidewalks and street furnishings, roads/road dedications, daycare, community facilities, and stream restoration. Depending on the extent of the affordability program, disclose in the

FEIS via an economic analysis the ability of a project to “do it all” — most projects cannot do it all, and will not develop if regulations are collectively too onerous.

- **State Legislation Analysis / General SEPA**

- SB 5412. This state law requires jurisdictions to exempt from SEPA review all projects that include one or more housing unit. Please include the required analysis according to the new RCW 43.21C.229(2)(d) such that Bellevue can comply with the state law and allow for streamlined permitting of residential units following adoption of development standards.
- HB 1293. This state law requires jurisdictions to apply only “clear and objective development regulations governing the exterior design of new development” and limits design review application to only the exterior of buildings, not interior uses. Design regulations also may not result in a reduction in density, height, bulk, or scale below the applicable development regulations for the zone. Compliance with this state law is required within 6 months of the adoption of the Bellevue 2044 Comprehensive Plan. Please incorporate analysis of this state law within the Preferred Alternative as it relates to the adoption of Wilburton Design Guidelines (p. 6-63), as well as mention of the new state law regarding all other applicable design guidelines and how these must be augmented to meet the requirements.
- SB 5290. This state law requires consolidated permit timelines. The City should include study of the following items that would significantly streamline permit timelines:
  - Define SEPA thresholds for changes of use / procedures for change of use more clearly and increase SEPA thresholds generally for commercial uses.
  - Eliminate parking requirements for changes of use; allow existing nonconformities to continue; this will allow for the more flexible use of existing spaces.
  - Allow an administrative land use exemption process to modify issued MDPs between uses; this will allow for a better reuse/adoption of existing MDPs in an era when permitted office spaces may not be built.
  - Standardize the permit review process for both land use and technical (building, utility, shoring) permits; currently many different permits are reviewed in different ways with corrections being emailed rather than stored on the permit system. Study ways to make the clear and grade permit process happen more smoothly and more predictably.
- In general, the FEIS should include a basic statement about what the FEIS mitigation suggestions are, and what they are not. Under SEPA, impacts of the proposed action have already been determined to be significant. SEPA does not require impacts to be mitigated to a level of non-significance as part of the FEIS process. As such, mitigating measures are suggestions only, and are not required by SEPA. Decision-makers and the public should be made aware of this distinction.
- As of January 2023, parking is no longer an element of the environment required to be reviewed by SEPA. The FEIS should recognize the connection between car usage and free ample parking (free parking promotes car usage) and should continue to discuss parking policy in the context of transportation mitigation.

- **Transportation**

- For Wilburton, we believe SE 6<sup>th</sup> should be extended only to 116<sup>th</sup>, not to 120<sup>th</sup>. The DEIS shows that there is almost no difference between the traffic impacts of Alternative 3 and 3A, and that traffic may be a bit worse for the extension option. In addition, the impacts to Eastrail of another crossing are not acceptable.

- Prioritize the Grand Connection’s connector bridge as an essential public investment in a broader range of mobility choices. The usefulness of the Eastrail system is contingent on this link to downtown. This connection should be a top priority in city funding; SB 5452 has been passed allowing pedestrian and bicycle improvements to be paid for by transportation impact fees. Further, consider the use of zoning incentives in the bonus amenity program for adjacent sites to respond.
- Figure 11-28 shows a street grid in Wilburton. Just as in Bel-Red, we have significant concerns about a road grid that does not reflect property boundaries or the City’s ability to effectively deliver the road grid in an efficient manner. The City should study whether a built out road grid in Wilburton would have an impact on the various transportation significance thresholds, and if not, the City should reconsider whether a road grid that would add cars and congestion to the network is actually necessary from a transportation standpoint. Moreover, the City should study whether the access/road grid should be required to include cars, or should the grid instead be required to connect with pedestrians and bicycles, in keeping with the transportation mitigation policies stated in M-TR-1 through M-TR-4.
  - It is significant that completion of the road grid is not identified as a required measure to mitigate either aesthetic or transportation impacts. The Chamber supports this finding of the DEIS, we do not believe that a road grid is necessary to mitigate either aesthetic or transportation impacts.
  - We also note that the massing diagrams shown in the Aesthetics section (pp. 6-38 through 6-50) do not appear to show the road grid and the impacts to achievable density. Please include an analysis of the road grid on potential for achieved density.
  - Similarly, in Bel-Red, we believe that the existing “required” road grid should be studied and reconsidered. It does not appear that completion of the road grid is a component of the transportation analysis. In general, it has been exceedingly difficult to obtain a road grid in Bel-Red, again due to the fact that the proposed road grid had no regard for property boundaries or cost or ability to build-out. Please study whether the road grid is necessary from a transportation standpoint, and if not, reconsider whether adding additional cars and congestion is necessary. Much has changed in Bellevue (including the building of light rail) since the Bel-Red code was adopted, and we would like to see a study of the Bel-Red grid system with the transportation policies stated in M-TR-1 through M-TR-4 in mind.

- **Mitigation**

- **Commercial displacement.** Requiring displaced businesses be given a “right to return” or Community Benefit Agreements in a development raises troubling legal and procedural questions. If the City determines it should act to assist displaced small businesses, it should incentivize small businesses with bonuses in the Land Use Code, and it should do other things to encourage ease of movement for small businesses like no parking minimum for a relocated business, streamlined tenant improvement and sign permits for small businesses, and consider an increase in SEPA thresholds for relocated businesses so that relocation does not require onerous SEPA review. The City’s idea of an “MFTE” program for small business locations is a creative idea that could result in small business retention. The City should first review policies and procedures that currently exist in Bellevue that reduce the ability of a business to locate and operate in the City of Bellevue before reducing redevelopment opportunity. The impact of such mitigation measures should be studied and disclosed in the FEIS such that decision-makers can truly weigh and balance the relative benefits of such mitigation measures.

- **Noise.** Requiring interior noise requirements along noisy arterials of 45 dBA or lower will place a significant cost burden on new projects that will be passed along to tenants. No other City has as onerous noise requirements as Bellevue. Please study the impact of a potential noise buffer area or expensive windows that would reduce the ability for density to locate in large swaths of the City. The impact of such mitigation measures should be studied and disclosed in the EIS. As an alternative, we suggest raising the dBA to make Bellevue consistent with other cities that have high-rise buildings near these arterials. Seattle is one example of this.
- **“Air quality buffers”.** The DEIS suggests air quality “buffers” for development along arterials and requiring very expensive air handlers for residential projects near freeways, all of which would significantly increase the cost of housing in Bellevue. It would seem that this mitigation is better placed in the “environmental health” section, as the DEIS identifies freeways as an environmental health hazard. Based on Wilburton’s location, most of Wilburton could qualify as for such a buffer. Worse, these targeted arterials are also the City’s key transit corridors, so the implementation of such buffers would completely undermine the City’s urban density and mobility strategy for the Plan. More important, the DEIS does not demonstrate that actual air quality impacts would occur to nearby residents or employees; demonstrating such significant adverse impacts is a precondition to any discussion of mitigation. The City has identified a significant impact without an applicable threshold and without taking into consideration the impact of transportation mitigation measures on GHG emissions. This analysis is flawed and must be updated in the FEIS. Further, the City’s 2017 rezone of Downtown and recent rezone of East Main – both located along I-405 – included no such mitigation requirements. Selective application of such unwarranted restrictions in Wilburton, Bel-Red, Factoria, and Eastgate would only impair urban development in the area, without justification and in a manner inconsistent with regulation in similar areas. The FEIS should eliminate this recommendation.
- **Greenhouse Gas Emissions.** The DEIS relies upon existing and future building and energy codes to reduce the impact of the listed future development alternatives. In addition, the DEIS relies upon the Eastside Electrification Project and Puget Sound Energy to provide the increased electrical capacity necessary for future development. But upcoming building and energy codes will soon shift to full electrification for building heating and increasing cooling loads as temperatures increase. Consistent with the City’s published Environmental Stewardship Plan, the FEIS should encourage and incentivize new developments to adopt strategies to reduce their greenhouse gas emissions and reliance upon electrification that goes beyond code. This should be done while decreasing demand on the electrical grid through renewable energy alternatives and encouraging local development of district energy systems and infrastructure. Incentives to incorporating district energy systems should be explored in zoning codes and in the FEIS.

Since building form and bulk controls influence multiple chapters in the DEIS, the Chamber recommends the following adjustments to LUCA development standards be considered in parallel with the Comp Plan Update and studied in the FEIS as much as possible. Many of the standards addressed below are currently barriers to housing production and positive economic development.

1. **Plan BelRed and Wilburton Concurrently.** Continue to simultaneously plan for Wilburton and BelRed as both areas are concurrently responding to the light rail investment and both areas have tremendous redevelopment propensity. As you shape the LUCA amendments, we urge you to update these areas with common development standards and incentive programs. These neighborhoods can and will evolve as distinct districts and subdistricts, but the approach to land-use and zoning controls should have the same underpinnings. This amendment process is a great opportunity to make the

code more consistent, concise, approachable for the public and more workable for the city staff and the real estate development community.

2. **Revisit the 53 land use designations in the DEIS.** We suggest reducing these in number and making them more “use-agnostic” as mixed-use zones. Redmond is currently doing this in Overlake.
3. **Industrial Uses.** Consider eliminating future Industrial/Manufacturing uses in Bel-Red and Wilburton that create pollution, noise, or dust. These uses are incompatible with livable TOD neighborhoods at high-capacity light rail stations. Compatible light industrial uses could be a conditional use in certain perimeter locations while current industrial/manufacturing uses would remain until those properties redevelop. The existing use framework in Bel-Red has proven fair, and it should be retained and could be expanded to Wilburton.
4. **Floor Area Ratio.** Traditional floor area ratios do not translate well in Bel-Red/Wilburton due to a concentration of both extremely large and small parcels, critical areas, and lack of a street grid.
  - a. Eliminate Residential FAR. We believe residential development is better managed and ultimately encouraged by just using bulk controls (height, floor plate, setbacks, tower separation, etc.) and administrative design review rather than setting FAR limits. Some of Seattle’s SM-SLU and downtown codes use this methodology. Base/minimum FAR can still be used for calculating incentive programs, or the City could use a height model for incentives, like Downtown.
  - b. Commercial FARs should remain but be increased from current limits to utilize increased heights and floor plate limits. Specifically, commercial FARs should be increased within a quarter mile around all light rail stations. A balance of jobs and housing around all stations is key to create a vibrant station area, provide both daytime (office worker) and evening (residents) to support local retail, and to maximize the transit benefits and reduce vehicular traffic.
5. **Height Limits.** We applaud the bold heights proposed in the DEIS alternatives.
  - a. Exclude elevator/mechanical screens/stair overruns/solar panels/railings/parapets from floor/height limits and provide adequate additional heights or provisions for these important features. As energy codes evolve, even more height is needed to accommodate rooftop mechanical equipment and we encourage the City to be flexible rather than prescriptive with these standards.
  - b. Work with the building official and fire department to consider allowing “6 over 2” construction (6 levels of Type III-A wood frame over 2 levels of Type I-A concrete). This is allowed in Seattle and is a very popular and more feasible way of building rather than 5 over 3 construction.
6. **Floor Plate Limits:**
  - a. Commercial
    - i. No floor plate limit under 85’ tall
    - ii. Increase maximum floor plates on buildings between 85’ and 180’ tall to 50,000 SF to attract more national/international tech, medical and life science users.
    - iii. Heights over 180’ – 24,000 SF Floor plate.
  - b. Residential - Size by typology to allow efficiency and better feasibility as follows:
    - i. Midrise to 85’ Unlimited



- ii. Highrise 85' to 180': 20,000 SF
    - iii. Highrise above 180': 12,000 SF
  - c. Allow averaging of floorplates above and below the sizes listed above.
  - d. Create new design guidelines and administrative design review for modulation, articulation, top expression, etc.
7. **Upper-Level Setbacks and Step Backs.** Eliminate this standard for midrise and make it only a design guideline for tower buildings over 85' tall. This would enable better feasibility and more housing production. Step backs force large, inefficient units that do not stack, which can prevent projects from pursuing MFTE. Using design guidelines to allow flexibility and case by case/ site specific/ context/ affordability/ materials/ modulation issues can be considered. Also, when the setback is required for towers, raise the podium transition height from 40' to 48' so taller floor heights can be achieved in a 3-story commercial or 4 story residential podium with higher retail ceilings at the ground level.
8. **Parking:**
- a. Ratios: Reduce or eliminate minimums. The market will provide parking as necessary and affordable housing projects near high-capacity transit and unusual shaped properties can respond appropriately. We support the DEIS's page 74 statement on parking that *"...Bellevue should focus on...parking code reforms to eliminate parking minimums near Link light rail stations, and potentially add further maximum parking limits..."*
  - b. Compact parking: Allow at least 50% of stalls to be compact, and up to 65% in Mixed Use Centers.
  - c. Allow additional flexibility (height, locations, exemption from FAR, exposure to public ROW) for above-grade parking where critical areas and high-water table are key development determinants.
  - d. Do not require additional parking requirements for changes of use; this will allow existing spaces to be re-tenanted more easily.
9. **Build to Lines.** Eliminate this requirement. We feel this is an outdated suburban planning tool that has historically been used to keep surface parking out of streetscapes. This is no longer necessary as new projects consistently create urban street wall conditions as they generally need every square foot of land to make projects feasible. Also, plazas and public open spaces are incentivized and encouraged, but the built to line standard requires granting a departure.
10. **Critical Areas, Manmade Slopes, Grading and Streams:**
- a. Exempt all man-made slopes/grading from critical area setbacks. Allow for historic/natural grades to set criteria for critical area mapping and steep slope setbacks.
  - b. Reduce setbacks from manmade stream channelization or consider flexibility where streams have been altered.
  - c. Allow creative habitat and ecological solutions to be explored as an alternative to a linear setback.
  - d. Measure stream buffers from ordinary high-water mark rather than "top of bank". Consider exemptions like Seattle.
  - e. Alternate stream designations, such as the "Urban Stream" designation used by Woodinville should be adopted.

- f. Approve the use of mitigation banks in lieu of critical area setbacks. For example, The Keller Farm mitigation bank is already approved for the Lake Washington watershed (approved by Corps, Ecology, WDFW, EPA and Muckleshoot Tribe).
- 11. **Noise Ordinance.** Revisit the thresholds in the noise ordinance to better accommodate urban conditions.
- 12. **Lot Coverage & Impervious Surface Limits.** Allow 100% coverage in all Mixed-Use Centers and areas considered to be more urban zones, which is typical in dense, urban, and transit-rich areas. Focus more on encouraging bigger consolidated open spaces, green belts, green roofs, habitat improvements at streams and creative storm water and landscaping solutions.
- 13. **Landscape Buffers.** Elimination of the 10' landscape buffer on interior lot lines. Building codes and fire separation will determine setbacks from lot lines and in most cases, assure setbacks if window openings are provided. Focus more on encouraging bigger consolidated open spaces, green belts, green roofs, habitat improvements at streams and creative storm water and landscaping solutions.
- 14. **Multifamily Play Areas.** Current standards are too onerous. The market already demands/provides amenity space. Also, public investment in our parks system (including park impact fees) should be taking care of play equipment. We feel the public would rather have larger, high-quality playgrounds shared by all versus dozens of segregated, privatized ones that are mediocre.
- 15. **Bonus Amenity Incentives.** Beyond the current lists, consider including the following as Tier 1 Priorities:
  - a. Larger, family-sized units (2 & 3 bedroom)
  - b. Affordable and mid-market housing at 80-120%
  - c. Daycare/early learning centers
  - d. Green building/LEED/Passive House/Living Building Challenge / Salmon Safe
  - e. Enhancement, construction, public amenities, and active retail adjacent to the Grand Connection Bridge and Eastrail bike/ped network.
  - f. Construction of missing street grid (see below)
  - g. Allowing large properties to allocate a portion of the site to a non-profit development partner for a standalone affordable building and to receive credit for the affordable housing bonus as "on site" or "inclusionary" for the whole property.
- 16. **Street Grid Challenges.** Revisit the aspirational 660' square street grid in Bel-Red, which is based on the historic 1785 BLM Township and Range land divisions.
  - a. Consider the realities of topography (e.g., streets can follow contour lines rather than go off a cliff).
  - b. Look for ways the city can fund construction, better incentivize, or facilitate achieving this with multiple landowners to complete street segments already started.
  - c. Continue to include these easement areas as the FAR property basis. Flexibility and public funding may be needed to create useful and complete rights-of-way.
  - d. For unconnected spur streets - focus on creating interim uses rather than requiring full build out until adjacent properties can also respond. These include pedestrian connections, bike paths, shared or private fire access lanes on permeable paving and community uses such as playgrounds or pea patches.

- e. Ensure that these challenges are also addressed in the Wilburton “street grid.”

**17. Administrative Flexibility.** In Mixed Use Center and Neighborhood Center zones, **allow** administrative design review departures from all standards aside from height and commercial FAR to ensure projects can best respond to their unique site conditions.

**18. Large Property Flexibility & Discretion:**

- a. Study and identify sites, such as those larger than 5-acres and within walking distance of light rail, that have potential to be Catalyst Projects and/or anchor sites. These larger sites offer the opportunity to have a wider range of allowed uses for commercial, residential, retail, R&D, healthcare, etc. which will work to anchor the station area. This will then drive housing, create retail opportunities, and support an 18-hour neighborhood.
- b. Study allowing more flexibility and discretion in the application of key development standards for large properties with multi-building/multi-phase development with development agreements. These include:
  - i. Height averaging for towers to allow for a sense of building hierarchy, to better manage shadowing/neighbor impacts and to create an interesting skyline profile.
  - ii. Dedication of a portion of the site to a dedicated affordable building that would meet the entire properties requirement for onsite inclusionary housing.
  - iii. Open space consolidation with partial completion by phase.
  - iv. Allowance of “alleys with addresses” in areas of the City other than downtown that allow private roads to function as alleys that still access public roads. Introduce the new concept of a service alley that can consolidate back of house activities away from public and private streets and pedestrian activities, which will benefit the public realm and transportation system. Such service alleys would not have pedestrian facilities.

Thank you for the opportunity to comment on the City of Bellevue’s DEIS. The Chamber and PLUSH look forward to continuing this important work alongside City staff, the Planning Commission, and City Council.

Sincerely,



Jodie Alberts  
Vice President, Government Affairs



Jessica Clawson  
PLUSH Committee Chair

**From:** Mike Bogin <mikebogin@gmail.com>  
**Sent on:** Monday, June 12, 2023 8:07:22 AM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Bridle Trails Zoning

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

My family has cherished more than thirty years living on Pikes Peak. We have never been wealthy, nor have half our neighbors, yet the experience of living with elbow room and tall trees and now even deer just minutes from the burgeoning city has brought a richness that cannot be measured in money. Meanwhile, just our property taxes now well exceed the expense for the mortgage and insurance and taxes when we bought the house.

Green space is special, not only for us but for everyone. People walk and bike here all the time. We breathe cleaner air thanks to our trees. Once we get higher density we will be displaced by greed. Some may say we have it too good. We say, come out and participate in this wonderful environment rather than destroying it!

Mike and Sue Bogin

Sent from my iPhone



June 12, 2023

City of Bellevue Comprehensive Plan Periodic Update DEIS Comments  
c/o Thara Johnson, Comprehensive Planning Manager  
City of Bellevue  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Via electronic mail: [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Re: Amazon comments on the City of Bellevue's 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement

Dear Ms. Johnson,

On behalf of Amazon, thank you for the opportunity to comment on the City of Bellevue's 2023 Draft Environmental Impact Statement for the 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation. We applaud city staff on their work to deliver a thorough draft analysis. We also appreciate the City of Bellevue's public engagement, including direct engagement with the business community as stakeholders.

As a major employer that is growing in Bellevue, we support the city's effort to chart a bold vision for how Bellevue should grow, locate housing and jobs, and make investments in transportation, utilities, and parks in the next twenty years. Amazon is committed to partnering with the City of Bellevue and the community on this important planning effort.

Amazon first opened an office in Bellevue in 2017 and we had about 450 employees in the city at the time. As customer demand increased through the years, we continued to hire and grow in the Puget Sound region. In 2019, we announced plans to invest much more on the Eastside—bringing 25,000 jobs, and making Bellevue and the Eastside the location of our future growth in the Puget Sound region.

Building off of our EIS Scoping letter submitted on October 31, 2022 where we emphasized the importance of striking balance between job growth and housing stock, we highlighted three areas for consideration:

- Study 80,000 housing units and 30,000 job capacity above the No Action Alternative
- Prioritize density around frequent and reliable transit
- Study multimodal solutions as mitigation of growth and dense, mixed-use development

We thank the Bellevue 2044 team for taking our comments into consideration in the draft analysis. Specifically, we see our inputs reflected in Alternative 3 where housing capacity increased from initially 65,000-70,000 housing units to 95,000 housing units and jobs capacity increase from 145,000 jobs to

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Seattle, WA 98121



200,000 jobs. Additionally, we see our comment to prioritize density around frequent and reliable transit and increase height and density in BelRed and Wilburton reflected in Alternative 3 where additional height and density was studied. Last, we support the city's use of a multimodal transportation analysis, based on the Mobility Implementation Plan (MIP) adopted by City Council in 2022, to evaluate various growth alternatives within the DEIS.

Consistent with those priority themes shared in our initial comment letter, Amazon offers the following comments for consideration for the final Environment Impact Statement (FEIS) and selection of the preferred alternative:

- **Alternative 3 Best Reflects Bellevue's Needs:** Upon review of the three Action Alternatives, we believe Alternative 3 allows for the diversity and density of housing and job growth that best reflect Bellevue's needs. Alternative 3 also focuses growth in BelRed, Wilburton, and Downtown, where there are existing and planned transit investments to encourage transit-oriented development. We also support the taller heights in Alternative 3 to allow for more flexibility for housing and better feasibility for high-rise building typologies.
- **Connection between Alternatives and Affordable Housing Programs:** We suggest the city clarify in the FEIS why each Action Alternative is paired with different affordable housing programs such as incentive zoning versus mandatory inclusionary affordable housing and whether they can be decoupled. Additionally, it would be instructive to study how various affordable housing programs and calibrations of those programs might yield different outputs in each of the Action Alternatives. We suggest the city show, in the FEIS, analysis that compares estimated market-rate and affordable housing unit output, broken down by area median income (AMI) affordability levels, for each of the Action Alternatives. The analysis should compare the different affordable housing policy tools that are being considered, including but not limited to incentive zoning, mandatory inclusionary (with and without fee-in-lieu and deed-in-lieu options), and MFTE. The analysis should account for how these different policy tools, such as incentive and mandatory inclusionary zoning, affects overall residential development decisions. The analysis should also take into consideration the role of other non-land use related affordable housing funding and financing tools such as the Washington State Housing Trust Fund and the federal Low Income Housing Tax Credit. This level of analysis would help the city select affordable housing policy approaches informed by data and modeling.
- **Simplify Land Use Designations:** The current maps show 53 land-use designations which is quite complicated. We suggest finding ways to consolidate them into more flexible 'mixed use' zones.
- **Reflect Phased Buildout Over 25 Years:** For baseline comparison, it would be informative to show in the FEIS previous pace of growth in Bellevue. For example, show the percentage of developable land that was redeveloped within the last 25 years. The city can apply that baseline to the alternatives to provide a data-informed, more realistic view on how each of the alternatives could potentially meet, not meet, or exceed the King County Growth Targets of 35,000 housing and 70,000 jobs over a 25-year span in Bellevue. In part, Amazon supports Alternative 3 because we understand that capacity does not necessarily result in development. Alternative 3 provides ample capacity, and therefore flexibility, to help the city accommodate the expected growth and achieve a more favorable housing to jobs ratio. Based on Figure 2-10 on page 2-32, in order to meet or exceed the 35,000-housing target, 59% of all developable residential capacity would need to be built in Alternative 1, 45% in Alternative 2, and most realistically, 37% in Alternative 3. The FEIS should reflect phased build out based on historic development data so that decision-makers and the public can use that information

to select a Preferred Alternative. On the contrary, the aesthetic visual analysis for Wilburton (pages 6-19 to 6-50) show a 100% buildout without distinction from undevelopable sites such as parks or wetlands. Without a disclaimer or clarification, we are concerned that the massing images shown will cause confusion and alarm.

- **Study Barriers to Fully Achieve Housing Capacity:** While we understand the primary requirements of an EIS is to identify growth target distribution approaches and evaluate the impacts of growth distribution, we believe there are gaps between zoning capacity studied in the EIS and what might actually get built after factoring in floor-to-area (FAR) ratios and development standards. Alternative 3 allows for 95,000 housing units but the DEIS does not specify FAR assumptions for any alternative which could dramatically alter actual unit output and development feasibility. It would be helpful for the city to clarify FAR assumptions used for modeling. The city should also analyze other potential barriers to fully achieving the housing capacity numbers, including development standards and parking requirements. For example, if zoning allows for residential development to achieve a certain height, other factors such as landscape buffers or setbacks may render it less feasible to fully achieve or max out on the development capacity. It would be helpful to understand how those factors might impact the city's ability to realistically meet housing targets.
- **Catalog Publicly-Owned Surplus Land Suitable for Affordable Housing Near Transit:** Through Amazon's Housing Equity Fund, we have invested \$514 million in loans and grants in the Puget Sound region to create and preserve 5,200 affordable homes for families making between 30% and 80% of Area Median Income (AMI). In Bellevue, we have increased the restricted affordable housing stock by approximately 20% as of August 2022 and continue to increase that number by supporting 233 new affordable housing units near Bellevue's 120<sup>th</sup> Street light rail station. Through our experience over the past few years, we have noted that increasing land costs presents further challenges to bringing more affordable housing online. It would be prudent for the city to identify publicly-owned land that is underutilized or surplus, particularly in Mixed-Use or Neighborhood Centers, and designate them as potential sites for affordable housing.
- **Bolster Mitigation Measures under Transportation:** We believe the stated Avoidance, Minimization, and Mitigation Measures in Section 11.6 is a good starting place to reduce the significance of the adverse impacts identified in the Action Alternatives. However, while we support building out pedestrian and bicycle network per the city's Mobility Implementation Plan, we encourage the city to consider additional vehicle and road-focused solutions to mitigate impacts on System Intersection V/C ratios, Primary Vehicle Corridor speed, and state facility LOS. For example, page 11-132 states, "vehicle capacity expansions may be warranted in strategic areas if the other project concepts and strategies do not adequately address vehicle performance target gaps." It would be helpful to clarify what those potential vehicle capacity expansions could be and how it might mitigate the adverse impacts.
- **Add Mention of the Grand Connection I-405 Non-Motorized Crossing Throughout the Transportation Chapter:** Given the City of Bellevue issued a Request for Qualifications for consulting firms to conduct preliminary engineering design for the Grand Connection I-405 Non-Motorized Crossing in April this year, the DEIS should include mention of the project in the Transportation section. This includes, but is not limited to, the following references:
  - In section 11.4. Regulatory Context, add mention of the I-405 non-motorized crossing within the list of 'Relevant Plans and Policies'.

- Clarify on page 11-43, under I-405 Corridor Program, whether the I-405 non-motorized crossing is counted as one of eight new pedestrian and bicycle crossings over I-405 referenced in that section.
- In Mitigation Measures M-TR-1, 2, and 3, reference Eastrail and I-405 non-motorized crossing as key strategies to expand pedestrian and bicycle network.
- Under Section 11.5.1, clarify if the Grand Connection I-405 non-motorized crossing between City Hall and Eastrail is assumed to be to be in place in at least one of the Action Alternatives. Also clarify whether in Alternatives 1-3 in the same section, which specific new multimodal connections in the Wilburton study area were included in the system performance modeling.
- **NE 6<sup>th</sup> Street Extension in the Wilburton Study Area:** Under Alternative 3A in the Wilburton Study Area (page 11-110), we agree with the city's analysis that a NE 6<sup>th</sup> Street extension to 120<sup>th</sup> Ave NE with an at-grade intersection at 116<sup>th</sup> Ave NE and Eastrail would greatly impact the experience for Eastrail users by adding another trail crossing and new modal conflict. We support a NE 6<sup>th</sup> Street extension to 116<sup>th</sup> Ave NE for local East-West access, not limited to HOV access to I-405.
- **Incentivize Trail-Oriented Development along Eastrail and Grand Connection I-405 Crossing:** As mitigation to aesthetic impacts in the Wilburton Study Area outlined in Chapter 6, we suggest the city consider incentivizing trail-oriented development along Eastrail and the Grand Connection I-405 non-motorized crossing. For example, Section 6.5.3 "Other Proposed Mitigation Measures", only references adding more regulations and requirements that could limit a project's flexibility to best deliver trail-oriented design on the ground-level. Adding incentives to the toolbox of mitigation measures could ultimately help realize the Wilburton vision.

Once again, we want to thank the City of Bellevue for your consideration of these comments. We appreciate Bellevue leadership and staff's work on this periodic update. We look forward to working together to ensure Bellevue is not only prepared for future growth, but is well positioned to continue to thrive and be a fantastic place to live, work, and play for all. Should staff have any questions or would like to discuss these comments further, please contact me at [phleung@amazon.com](mailto:phleung@amazon.com).

Sincerely,



Pearl Leung  
Senior Manager, Public Policy  
Amazon

CC:  
Bellevue City Council  
Brad Miyake, City Manager, City of Bellevue  
Diane Carlson, Deputy City Manager, City of Bellevue  
Michael Kattermann, Director of Community Development, City of Bellevue  
Emil King, Planning Director, Community Development Department, City of Bellevue  
Liz Stead, Interim Development Services Director and Land Use Director, City of Bellevue

**From:** Natalie Duryea <n\_duryea@hotmail.com>  
**Sent on:** Monday, June 12, 2023 2:14:41 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Comment on DEIS

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hello-

Thank you for the opportunity to comment on the enviornmental impact statement.

I agree with the findings on the Bridle Trails Community club response. Specifically around clarifying goals for the tree canopy, making amendments for improving conditions for large wildlife and protecting water systems.

Thank you!  
Natalie Duryea

**From:** Norman Baullinger <climber729@aol.com>  
**Sent on:** Sunday, June 11, 2023 10:37:28 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Comprehensive Plan Comments

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Regarding the 2044 City Comp plan, my concern is that Phantom Lake is being classified as a wetland.....It's a lake and if you don't believe that, come and see it for yourself. Also, per earlier KCM reports, the lake is 54 feet deep, not 45 feet.

As these may impact how the lake is viewed/classified, in the future, please correct these items in your plan, especially the fact that it is not a wet land..

Norman Baullinger  
16226 E 24th St  
Bellevue, WA 98008



**From:** p johnston <pamjjo@msn.com>  
**Sent on:** Monday, June 12, 2023 6:07:36 AM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** BTCC Board <board@bridletrailscommunity.org>  
**Subject:** BTCC: Attached letter for DEIS Comments  
**Attachments:** Letter on DEIS Comprehensive Plan June112023BridleTrailsCommunityClub.pdf (843.29 KB)

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Bridle Trails Community Club  
6619 132nd Avenue NE. #133  
Kirkland, WA 98033  
[bridletrailscommunity.org](http://bridletrailscommunity.org)

June 11, 2023

Subject: Comments on the Draft Environmental Impact Statement (DEIS) City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation

To: Elizabeth Stead  
City of Bellevue Community Development Department  
450 110th Avenue NE  
Bellevue, WA 98004

Dear Ms. Stead:

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. TCC has concerns regarding the adequacy of the DEIS because substantial City of Bellevue issues have not been addressed in the document. We are requesting that the DEIS is revised to address this missing information and then re-sent as a revised draft. Only in this way can our Bellevue residents understand how the comprehensive plan addresses the most significant issues of our City. We find that the DEIS does not have a reasonable thorough discussion of the significant aspects of the following and described in the attached letter.:

Cordially,

*-pamela Johnston*

BTCC Co-president

Phone number on file

**From:** p johnston <pamjjo@msn.com>  
**Sent on:** Monday, June 12, 2023 6:43:20 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** BTCC Board <board@bridletrailscommunity.org>  
**Subject:** 520 and the NE24th exit/entrance  
**Attachments:** OFMTranspoDoc2023-1ProposedTransProjectList.pdf (278.65 KB)

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The State Transportation budget has moved out the 124<sup>th</sup>/520 intersection expansion to be completed by 2039. The DEIS should be revised to reflect this change.

Cordially,

*-pamela johnston*

Bridle Trails Community Club Co-president on behalf of the board and myself.

425-881-3301

3741 122<sup>nd</sup> Ave NE

**From:** p johnston <pamjjo@msn.com>  
**Sent on:** Sunday, June 11, 2023 6:40:51 AM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>; Comp Plan 2044 <CompPlan2044@bellevuewa.gov>  
**CC:** Council <Council@bellevuewa.gov>; City Manager <CityManager@bellevuewa.gov>; Heilman, Mark <MHeilman@bellevuewa.gov>; McCormick-Huentelman, Mike <MMHuent@bellevuewa.gov>; Cuthill, Theresa <TCuthill@bellevuewa.gov>; dm ficken@gmail.com; kfried305@yahoo.com; smenaker@gmail.com; renaybenett@msn.com; vipul.patel@hotmail.com; dgatien1@gmail.com; bridletails@gmail.com; dan\_sabina@yahoo.com; cloucnr@comcast.net; cheryl.kuhn@comcast.net; pactide@msn.com; wendyrjones@hotmail.com; eastgatecommunitywa@gmail.com; PaulThomsen@hotmail.com; president@horizoncrest.org; philipm563@aol.com; pweertman@comcast.net;mlink@windermere.com; norwegian\_gal@mac.com.; mindy@garner.net; lhd2hoaboard@gmail.com; craigspi@agelight.com; mockingbirdhill.news@gmail.com; joephram@hotmail.com; info@newporthillscommunityclub.org; northtownecommunityclub@outlook.com; norwoodvillage@gmail.com; president@pembrookmeadow.com; digital.mailbox123@yahoo.com; pdf3@comcast.net; shcahl@gmail.com; sfccbellevue@hotmail.com; somerset98006@gmail.com; jeffreypbyers.swca@gmail.com; sonarahoaoffice@gmail.; comkline.g@comcast.net; betsihammer@yahoo.com; surreydownsscc@gmail.com; chrisbodiford@msn.com; vuemontmeadows@comcast.net; Vic Bishop (Vicbishop@earthlink.net) <Vic Bishop (Vicbishop@earthlink.net)>; steve\_guest@comcast.net; wilburtonpresident@gmail.com; erin.kenway@icloud.com; Karen Smith <ksmith233@hotmail.com>  
**Subject:** DEIS and Registered Neighborhood Associations

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

The City has solicited neighborhood associations to be added to the Registered Neighborhood Associations. Yet, this is not used for the DEIS. How was the distribution list of organizations defined? Why was the Registered Neighborhood Associations list not be part of the distribution list?

Please add

Bridle Trails Community Club  
6619 132nd Avenue NE. #133  
Kirkland, WA 98033  
[board@bridletrailscommunity.org](mailto:board@bridletrailscommunity.org)

Cordially,  
*-pamla johnston*  
425-881-3301

**From:** p johnston <pamjjo@msn.com>  
**Sent on:** Monday, June 12, 2023 5:29:43 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** btccadvisors@googlegroups.com  
**Subject:** FW: BTCC: Attached letter for DEIS Comments  
**Attachments:** Letter on DEIS Comprehensive Plan June112023BridleTrailsCommunityClub.pdf (843.29 KB)

[EXTERNAL EMAIL Notice] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Please add as a party of record:

Loretta Lopez, Co-President  
Pamela Johnston, Co-President  
Margie Ye, Treasurer  
Barbara Hughes, Secretary  
Norm Hansen, Member  
Stuart Heath, Board Member  
Eva Orlowska-Emadi, Board Member  
Mitch Kruse, Co-Chair  
Heidi Benz-Merritt, Past President  
Wayne Bruning, Past Treasurer  
Reiner Decher  
Dana Fick  
Pam Gunther  
Marianne Haywood, The Vine  
Karin Morgan, Past President  
Jim Moore, Past Treasurer  
Cindy Ludwig, Past President  
Laura Polt, Past President  
Don Prince  
Darrell Tanner  
Dennis Tillman  
Zhanbing Wu

advisors@bridletrailscommunity.org

---

**From:** p johnston  
**Sent:** Sunday, June 11, 2023 11:08 PM  
**To:** CompPlan2044EIS@bellevuewa.gov  
**Cc:** BTCC Board <board@bridletrailscommunity.org>  
**Subject:** BTCC: Attached letter for DEIS Comments



Bridle Trails Community Club  
6619 132nd Avenue NE. #133  
Kirkland, WA 98033  
[bridletrailscommunity.org](http://bridletrailscommunity.org)

June 11, 2023

Subject: Comments on the Draft Environmental Impact Statement (DEIS) City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation

To: Elizabeth Stead  
City of Bellevue Community Development Department  
450 110th Avenue NE  
Bellevue, WA 98004

Dear Ms. Stead:

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. TCC has concerns regarding the adequacy of the DEIS because substantial City of Bellevue issues have not been addressed in the document. We are requesting that the DEIS is revised to address this missing information and then re-sent as a revised draft. Only in this way can our Bellevue residents understand how the comprehensive plan addresses the most significant issues of our City. We find that the DEIS does not have a reasonable thorough discussion of the significant aspects of the following and described in the attached letter.:

Cordially,

*-pamela Johnston*

# McCULLOUGH HILL PLLC

---

June 12, 2023

VIA ELECTRONIC SUBMITTAL  
[CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Re: Bellevue 2044 DEIS Comments

Dear Mr. Pittman:

We are writing on behalf of KG Investment Properties and Rockwood Capital to provide comments in response to the Draft Environmental Impact Statement (DEIS) prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, KG Investments and Rockwood Capital own 7 acres on the east side of 116<sup>th</sup> Avenue NE, between NE 4<sup>th</sup> Street and NE 6<sup>th</sup> Street (the “Property”) – the heart of the Wilburton subarea and the point at which the Grand Connection and Eastrail will one day intersect. A map of the Property is attached for your reference. The Comprehensive Plan update will be important to the future use and development of our property and the role it will play in Bellevue’s growth as a regional center.

## General

- We support Alternative 3 as the Preferred Alternative in the FEIS. Alternative 3 achieves the most amount of growth in an area well-served by transit and other strong local and regional means of transportation, including bicycle and pedestrian connections, as well as a host of community-serving uses, such as grocery stores, medical services, restaurants, department stores and entertainment. It also provides the most flexibility in future uses in the Wilburton subarea.



## Land Use

- Uses. Like Downtown, the range of permitted uses in Wilburton zones should be very broad, including all typical urban uses. The Plan should not attempt to micro-manage land uses within the Subarea, but it should instead allow flexibility for future development to follow market demand.
- Urban Form. Bellevue has traditionally used setbacks, building setbacks and floorplate restrictions to achieve an end result in the built environment. These types of prescriptive regulations create their own repetitious buildings as designers substitute these dimensional tables in place of creative and site-specific design solutions. These types of regulations increase the cost of construction, reduce building efficiencies and the financial viability of new development – new development which is critical to realizing the Plan vision. Since the DEIS is an evaluation and disclosure document, it should also explore other options to solve the issues of building massing, human scale proportionality, site permeability and design rather than limiting the analysis to prescriptive and strict dimensional requirements. Developers should be allowed flexibility in how they achieve these urban design goals in lieu of prescriptive numbers.
- Build-out of the Grand Connection and Eastrail. The Grand Connection overlays the existing Pedestrian Corridor downtown and in many ways represents an extension of this Corridor to the west and east. In Wilburton, Eastrail will extend the Grand Connection north and south throughout the region. The City created Code provisions decades ago to promote the dedication and development of the Pedestrian Corridor. These provisions have and continue to be successful in incentivizing the development of the Corridor, and these same approaches should be used for the extended areas of the Grand Connection and Eastrail. Specifically, we suggest that the Final EIS evaluate the use of the “superbonus” provided in the Downtown Code for the future dedication and development of the Grand Connection and Eastrail in Wilburton. As in Downtown, the dedication and development of the Grand Connection and Eastrail could create FAR amenity points at a 16:1 ratio and those bonuses could be used to develop floor area above the height and density limitations otherwise applicable in the Wilburton zone. This has been a successful approach to the build-out of the pedestrian corridor downtown, and its use in Wilburton would promote the implementation of the Grand Connection. [ In addition, we note that the State Legislature adopted SB 5452 in this year’s session, allowing transportation impact fee revenue to be dedicated to the development of bicycle and pedestrian facilities. The Final EIS should discuss the importance of making this new tool available to support the future development of the Grand Connection and Eastrail.
- City Property. The City-owned property on the west side of 116<sup>th</sup> Avenue NE near NE 6<sup>th</sup> Street (as extended) is a key element in formulating future land use patterns in Wilburton. Its location at the eastern end of the future Grand Connection I-405 Non-Motorized Crossing makes it an ideal location for potential public open space and neighborhood facilities. We encourage the City to explore such options in the Final EIS.

- Unit Density. The maps outlining future housing density by alternative (see, for example, Figure 2-2) establish 141 units per acre as a maximum residential density. This figure is quite low for an urban center environment; one would expect actual average densities in core areas to be much higher. The Final EIS should discuss actual projected residential densities in these core areas and determine whether this adjustment requires a refinement to the analysis.
- Future Land Use Map. The DEIS depicts the City's Future Land Use Map (FLUM) in Figure 3-6. However, this depiction does not accurately reflect the City's FLUM. Figure 3-6 is instead a highly generalized version of the FLUM, aggregating dozens of different actual land use categories into more general buckets. This generalization may be helpful for the reader, but it tends to mask a significant shortcoming of the City's Comprehensive Plan which the Final EIS should discuss. Bellevue's Comprehensive Plan in many areas employs FLUM designations that effectively mirror the zoning, so that in many cases there can be only a single implementing zone for a FLUM designation. The result in these cases is to prevent a rezone from being approved with a corresponding and prior amendment to the FLUM. This substantially reduces the ability of the rezone process to be used as a tool for land use evolution in the periods between major Comprehensive Plan updates. The Final EIS should discuss converting the FLUM to a more generalized map, such as shown in Figure 3-6, to allow greater flexibility in zoning decisions going forward.
- Development Agreements. State law broadly authorizes the use of development agreements by cities, but the City of Bellevue has traditionally limited the availability of the entitlement tool. As a result, the City is foregoing opportunities to achieve even higher-quality urban development and public benefits in its growth centers. The Final EIS should discuss making the development agreement process generally available for projects in the City's growth centers like Wilburton.

## Transportation

- The DEIS Transportation Analysis is Excessively Conservative. It is appropriate for the DEIS to adopt a "worst-case" analysis of transportation impacts, but the DEIS far exceeds this standard. For all impact analysis, the DEIS adopts a "market factor" of 100%; that is, the DEIS assumes that the entire new zoned capacity identified in each alternative will be developed and placed in service within the next 20 years. The DEIS properly notes the conservatism of this analytical approach. However helpful this worst-case approach is for SEPA review purposes, it is important that the EIS also characterizes the likelihood of this worst-case scenario. Otherwise, the process of legislative policy review of the Plan will be infected by an unrealistic view of future impacts.

For example, the Downtown Plan adopted by the City in the 1980's never approached anything resembling full build-out over the ensuing 35 years, with probably less than 50% of full build-out. The Bel-Red Plan was adopted in 2010 and actual development over the succeeding 13 years has been only a small fraction of the theoretical full build-out. The Final

EIS should note that the likelihood of such 100% build-out occurring for any alternative within the life of the Plan is essentially zero. To ensure that the legislative policy discussion regarding the Plan is rooted in reality, the Final EIS should also provide comparative impact analysis for lesser build-out scenarios for each of the alternatives.

- NE 6<sup>th</sup> should terminate at 116<sup>th</sup> Avenue NE. Alternative 3A proposes an extension of NE 6<sup>th</sup> Street to 120<sup>th</sup> Avenue NE and the DEIS properly notes the reasons to reject this concept. We suggest that Alternative 3A be eliminated from the Final EIS. The intersection of the Grand Connection with Eastrail is a special opportunity for trail-oriented development that could become the gateway to Bellevue from the regional trail system. The extension of NE 6<sup>th</sup> Street to 120<sup>th</sup> Avenue NE would not only destroy this potential, but it would also require an enormous investment of funding, resources and time. Introduction of yet another Eastrail crossing with thousands of vehicles each day would destroy the unique urban pedestrian junction where the Grand Connection meets Eastrail and dramatically undermine the pedestrian development potential and experience between NE 4<sup>th</sup> and NE 8<sup>th</sup>. We believe extending NE 6<sup>th</sup> Street with a termination at 116<sup>th</sup> Avenue NE is the best option for Wilburton for all of the reasons cited in the DEIS. Introducing another auto crossing of Eastrail does not meet the neighborhood or City vision for Eastrail and introduces significant safety issues to Eastrail (DEIS, p. 11-110). In addition, extension of SE 6<sup>th</sup> to 120<sup>th</sup> achieves nothing material in terms of transportation or circulation benefits (DEIS, p. 11-111).
- Street Grid. Figure 11-28 shows the “Wilburton Study Area Draft Circulation and Permeability” network, which appears to be a proposed road grid. No requirement of a “street grid” should be imposed on Wilburton. Grid streets can work well, as in Bel-Red, when they can be developed on generally flat or gently sloping topography and when they truly provide connections through and across a larger neighborhood to various destinations. Neither is the case here. The significant grades across the Property impair the use and activation of any such grid streets and those streets would not connect to any larger network – they would only dead-end into Eastrail or a retaining structure that supports it. The development of the Property can and should accommodate east-west pedestrian connections between 116<sup>th</sup> Avenue NE and Eastrail, but the introduction of vehicular access through the Property would be a mistake.
- Access from 116<sup>th</sup> Avenue NE. The Plan proposes to redevelop 116<sup>th</sup> Avenue NE into a new boulevard street. We endorse this design concept for 116<sup>th</sup> Avenue NE, but it must also be recognized that 116<sup>th</sup> Avenue NE will provide the only vehicular access for the high-density urban development sites adjoining it. Therefore, 116<sup>th</sup> Avenue NE must be planned and designed to satisfy these fundamental access requirements.
- Parking requirements. Required parking ratios should be flexible, demand-based and consistent with market requirements across other urban centers in Bellevue. Parking ratios that are too high or too low will only impede new urban development in this area. Furthermore, new development in Wilburton may reflect greater parking requirements than

seen in Downton and Bel-Red, based on potential technology tenants. The DEIS should address this reality.

- Grand Connection I-405 Non-Motorized/Bike/Ped Crossing of I-405. In April 2023, the City initiated the process of preliminary engineering design for the Grand Connection I-405 Non-Motorized Crossing (the “Grand Connection Crossing”). As we know, the Wilburton Subarea Plan includes an evaluation of the Grand Connection in general, which includes the Grand Connection Crossing. The vitality and design of future land uses in Wilburton will be significantly improved by the completion of the Grand Connection Crossing. The Final EIS should include a more thorough evaluation of the Grand Connection Crossing within the future transportation network. The Grand Connection Crossing should be identified as a key mobility mitigation measure both for Wilburton and the City as a whole.
- Transit Proximate Areas. The depiction of Transit Proximate Areas in the DEIS is based on current data as of 2023. This fails to account for the likely expansion of transit service throughout the City over the next 20 years. The Final EIS should evaluate the potential for such transit expansion and should recommend possible land use changes to accompany such expansions, if they occur.
- Eastrail Design. The DEIS should address the land use/urban design impacts of a grade-separated Eastrail crossing of NE 4th Street. In particular, the Final EIS should evaluate the potential impacts of a grade-separated alternative, including:
  - Minimum slopes required to allow accessibility and to achieve adequate crossing height over NE 4th Street will require approaches that stretch 500 feet north and south into key redevelopment areas under the Plan. Approximately 80% of the unique pedestrian experience along the Eastrail between 4th and 8th would be substantially degraded if these imposing ramp structures were to be implemented.
  - Such ramp structures will create a wall down the center of the Plan area and will divorce much of the Eastrail from adjoining development in precisely the area in which that connection is critical (i.e., the junction of the Grand Connection and the Eastrail).
  - The substantial cost of a grade-separated crossing will make its implementation unlikely and, in the best case, significantly delayed.

An at-grade crossing option for NE 4th Streets was supported by the Wilburton CAC and has no adverse transportation impacts. It also allows a much-improved relationship between the Eastrail and adjoining land uses and avoids the construction of a wall through the middle of the Plan area. The Final EIS must fully evaluate the at-grade option in all Plan alternatives and undertake a complete assessment of the impacts of the grade-separated alternative as well.

## Other Issues

- “Air quality buffers”. The DEIS suggests air quality “buffers” for development along arterials and requiring very expensive air handlers for residential projects near freeways, all of which would significantly increase the cost of housing in Bellevue. Based on Wilburton’s location, most of Wilburton could qualify as for such a buffer. Worse, these targeted arterials are also the City’s key transit corridors, so the implementation of such buffers would completely undermine the City’s urban density and mobility strategy for the Plan. More important, the DEIS does not demonstrate that actual air quality impacts would occur to nearby residents or employees; demonstrating such significant adverse impacts is a precondition to any discussion of mitigation. Further, the City’s 2017 rezone of Downtown and recent rezone of East Main – both located along I-405 – included no such mitigation requirements. Selective application of such unwarranted restrictions in Wilburton would only impair urban development in the area, without justification and in a manner inconsistent with regulation in similar areas. The Final EIS should eliminate this recommendation.
- Mitigation. The DEIS includes potential mitigation measures for many elements of the environment. It should be noted in the Final EIS that adoption of new comprehensive plan policies and zoning will be a legislative decision of the Bellevue City Council, and that since an environmental impact statement is being prepared, no mitigation is required under SEPA to address any adverse environmental impacts. The listing of potential mitigation measures in the DEIS only provides the City Council with options in the decision-making process. Ultimately, whether to adopt any mitigation measure identified in the DEIS lies in the sole discretion of the City Council.
- Critical Areas. Although the DEIS addresses a full comprehensive Plan update, it fails to address the City’s critical areas regulations. This is a significant omission. Bellevue’s critical areas regulations are outdated and inconsistent with the nature of urban development contemplated by the DEIS. The Final EIS should fully address this issue and identify revisions to the City’s critical areas regulations to promote urban development. These revisions for Wilburton would include:
  - Eliminating the density penalty included in the critical areas ordinance.
  - Rationalizing the ability of urban developments to address steep slope conditions with engineered retaining structures as an exemption to critical area ordinance compliance. This will be particularly important to ensure that development can occur alongside Eastrail and that the Eastrail experience can provide urban activation.
- Impervious Surfaces. The City’s requirements of substantial pervious surfaces in dense urban environments runs contrary to the infill goals of Alternative 3 of the DEIS. The requirement of significant pervious areas on dense urban sites should not be a part of future Wilburton regulations. Most other urban jurisdictions have identified ways to address storm water quality without the need to impose major penalties on site usability. Bellevue should



update its regulations accordingly.

- Views. The DEIS should acknowledge that future development will impact views and solar access. The DEIS evaluates the impacts of future development in Wilburton on views from public places and on shadows on other public places, such as Eastrail. The Final EIS should acknowledge that Wilburton redevelopment will inevitably impact view and shadows in this way. Redevelopment of Wilburton is not possible without creating such impacts; but it is not likely that any of these impacts would be significant. The segment of Eastrail between NE 4th Street and NE 8th Street is a unique opportunity on the entire trail for activation and urban-scale trail-oriented development. While there will be outstanding opportunities for light and view along the full Eastrail system, this is the one location on the entire Eastrail where there is the opportunity for significant trail-oriented urban development. This opportunity should not be limited or lost in an effort to address views and shadows on this limited segment of Eastrail. In addition, shadows on private property should not be regulated, and if the City seriously considers this mitigation, adequate analysis should be completed to determine impacts to density related to such a regulation. Private views should also similarly not be regulated, and impacts to density should be reviewed. If public views are regulated, the City should specifically define a public view (from what viewpoint, views of which features are protected), and the impacts to potential density and the tradeoffs of protecting views and shadows in this manner should be adequately studied

The DEIS should also evaluate the ways in which Plan implementation will create new views and solar access. Implementation of the Plan will create enormous new areas of open space and pedestrian paths and connection, which in turn will offer new viewpoints and opportunities for solar access throughout the Plan area. The Grand Connection by itself will become perhaps the best and most unencumbered viewpoint in the City to take in views of Mt. Rainier, the cityscape and the Cascade Mountains. Further, the Plan will transform the Wilburton area from one that is currently hostile to pedestrians to an urban village with robust new pedestrian activity, meaning that thousands more will be able to enjoy the new views created by the Plan. These comparative impacts should be evaluated in the Final EIS.

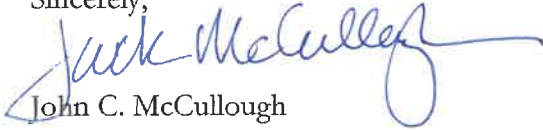
- District Energy Solutions. The DEIS relies upon existing and future building and energy codes to reduce the impact of the listed future development alternatives. In addition, the DEIS relies upon the Eastside Electrification Project and Puget Sound Energy to provide the increased electrical capacity necessary for future development. But upcoming building and energy codes will shift to full electrification for building heating and increasing cooling loads as temperatures increase. Consistent with the City's published Environmental Stewardship Plan, the Final EIS should encourage and incentivize new developments to adopt strategies to reduce their greenhouse gas emissions and reliance upon electrification that goes beyond code while decreasing demand on the electrical grid through renewable energy alternatives and encouraging local development of district energy systems and infrastructure.

June 12, 2023

Page 8 of 8

We appreciate the City's work on Bellevue 2044. Please do not hesitate to contact us if you have questions about our comment. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "John C. McCullough", with a stylized flourish extending from the end.

cc: Rockwood Capital  
KG Investment Properties

**From:** Rebecca K. <rkinnestrand@gmail.com>  
**Sent on:** Monday, June 12, 2023 2:07:12 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** DEIS comment

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello,

I agree with the Bridle Trails Community Club letter commenting on the DEIS for the City of Bellevue.

Rebecca Kinnestrand  
7612 135th PL NE  
Redmond, WA 98052  
206-818-8400

**From:** Reiner Decher <reiner54@gmail.com>  
**Sent on:** Monday, June 12, 2023 3:28:52 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** Board@bridletrailscmmunity.org  
**Subject:** CompPlan BLV

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

A comment on the Bellevue Comprehensive Plan.

My family and I have lived in the Bridle Trails area of Bellevue for 55 years. We moved here because we were able to keep horses and use the nearby park for its then intended purpose. As you might surmise, we are getting old, and our kids have lives of their own in other parts of the world. We will not be a part of this community for all that many more years so that making comments about the future and our interest in it is not personal but may be able to help others to think about the nature of the area and the city.

We recognize the reality of the changing demographics. Specifically, we recognize that keeping animals like horses is not everyone's cup of tea, nor should it be. The proximity of Bridle Trails State Park to Bellevue and to other nearby cities has allowed the lifestyle choice that involves keeping horses to be realized. The change in the kind of businesses and the people who moved here bring their own preferences and they are entitled to live the way they choose.

The zoning for the Bridle Trails subarea has one theme, relatively large lot sizes. The area involved is necessary if animals are going to be kept. The large lot size is also attractive to homeowners who desire large homes that take up a large fraction of the lot. The people who want to keep horses are not necessarily as wealthy as those wishing to live in large homes. This brings out a disparity in the way the properties are taxed with a severe impact on the future of the community.

We have an acre and a half and keep horses. Our tax bill reflects only the size of the lot and assigns a value to our house that is absurdly small. A fairer assessment might be for the assessor to determine if a lot is actually used for keeping animals and assess part of the lot on some agricultural use basis. The additional home assessment should be based on other practical measures. Failing to do that will drive the area to be devoid of animals and change the raison d'être for the Bridle Trails State Park to another purpose. All that may be acceptable, unavoidable and even desirable, but Bellevue Planning should recognize that people may live longer than a planning period and squeezing long term residents out through property taxation is fundamentally cruel and discourages the kind of quasi-rural lifestyle for young families to move to the Bridle Trails area.

This argument on my part is in full recognition of a reality that the population is growing, and space is limited. Further, I recognize that housing is necessary for all members of the community even as economic circumstances become dire for some. Those are more global issues and the City is on the right track to address them. The devil is in the details for this area among the others. As I indicated, we no longer have much of a stake in what happens and it may already be too late to maintain a semi-rural environment for people with an interest in keeping horses. Obscenely large houses are everywhere with privacy and security fences and gates everywhere. Is this trend compounded by increasing numbers of unoccupied houses with weedy surroundings owned by absent foreign entities going to allow the area to remain a unique community?

--

Reiner Decher  
Prof. Emeritus  
U of Washington,  
Seattle WA

Docent, The Museum of Flight

425-885-1305  
(please leave a message for call back,  
we are inundated with robocalls hence won't  
answer numbers we don't recognize)

mail address  
5249-140th Ave NE  
Bellevue WA 98005

June 12, 2023

City of Bellevue  
450 110th Avenue NE  
Bellevue, WA 98004

**Re: BDA Comments on Draft Environmental Impact Statement for the Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation**

To Whom it May Concern:

We are writing on behalf of the Bellevue Downtown Association (BDA) to share comments on the Draft Environment Impact Statement (DEIS) that serves to identify and analyze potential unavoidable or adverse impacts and mitigation measures that could result from the Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation.

The City's has been successful advancing proactive policies and strategic investments in support of a thriving Downtown Bellevue has proven to be a highly successful and effective approach, supporting the long-term economic and cultural wellbeing of the entire city. Our comments reinforce this strategy and incorporate feedback from our BDA-member workgroup focused on the DEIS. Their discussion was framed by a set of principles for desired outcomes generated by the [BDA Board of Directors](#).

1. Balance uses to support sustainable growth and long-term viability.
2. Focus density around light rail and encourage transit-oriented development (TOD).
3. Promote flexibility to ensure plans can adapt to changing conditions.
4. Support maximum density to optimize development potential.

We recommend the City pursue land use Alternative 3 for both the City at-large and Wilburton study area as the preferred alternatives. The primary reason is because both options provide the most opportunities to increase development capacity for housing to match the City's needs and support flexibility for neighborhood development based on changing conditions. In addition, the workgroup identified additions for the Final Environment Impact Statement (FEIS) to ensure a holistic body of information to inform future work on the Comprehensive Plan policies and Wilburton Vision Implementation. If topics outlined in our feedback do not fall within scope of the FEIS, we request the City clarify what future initiatives and/or body of work will cover the desired information so that the BDA and its members can plan appropriately.

Our feedback is outlined under two categories: 1) City at-large, representing the DEIS information about the Comprehensive Plan Update and 2) Wilburton, representing the DEIS information about the Wilburton Vision Implementation.



## CITY AT-LARGE

*Requests for additional information or analysis to be included in the FEIS.*

1. Analyze benefits and tradeoffs of development incentives versus mandates related to housing, particularly on affordable housing. The preferred alternative should not select a specific approach, instead it should recognize that an affordable housing program may be incorporated with the upzone, and it should study the pros and cons of each approach, including legality. The FEIS must also disclose all assumptions, economic study, and assumed number of housing units under the various programs studied.
2. Provide detailed information about how the multimodal transportation network will accommodate increased density, noting benefits and tradeoffs.
3. Clarify how the City plans to mitigate vehicular congestion impacts to meet performance targets and examine whether there are any significant impacts even if the identified mitigation measures are implemented.
4. Last-mile solutions will be critical to supporting the growth proposed in the land use alternatives. Provide more information about how transit and pedestrian pathways will be supported, noting benefits and tradeoffs.

## WILBURTON

*Key points regarding the Wilburton information and requests for include additional information or analysis for the following topics to be included in the FEIS.*

### **Key Points**

1. Add specific information about Grand Connection and Eastrail, including the future I-405 non-motorized crossing that is part of the Grand Connection. These major investments will shape Wilburton's future. The FEIS must reflect these multimodal improvements to support the growth alternatives and the neighborhood's future potential.
2. Recognize Wilburton can be an important complement to Downtown that will develop as its own unique neighborhood over time with distinctive qualities and amenities. Future work to examine the relationship between Downtown and Wilburton's potential is important information to supporting the vision's implementation.
3. Recommend NE 6th Extension project end at 116<sup>th</sup> Ave NE. If built to 120th Ave NE, the project could negatively impact both the Grand Connection and Eastrail, as well as future housing and commercial development. Furthermore, the FEIS should disclose the transportation benefits and tradeoffs of this connection to inform future decision making.

### **Additional Information or Analysis to Include in FEIS**

1. Share more information on how to support housing production, particularly affordable and workforce. Include 1) analysis regarding benefits and tradeoffs of development incentives versus mandates and 2) details regarding which development standards hinder or promote building forms that support multifamily midrise housing.

2. Provide more details on how land use scenarios can leverage East Link, Eastrail, and the Grand Connection. Also, provide insights into development incentive that can leverage these major multimodal projects.
3. Include more information about specific areas of Wilburton to support future consideration of potential subareas.
  - Examine the development viability of the growth areas based on constraints and opportunities associated with topography, existing built environment, mobility connectivity and access.
  - Share how master plan developments of a large parcel or series of parcels can impact the area; note benefits and tradeoffs.
4. Examine conditions that would support dynamic places in Wilburton with vibrant 18-24-hour amenities and attractions.
5. Provide more information about how the proposed street network interacts with existing conditions, such as topography, parcel constraints, properties likely or not likely to redevelop, and tools/methods to advance neighborhood buildout.
  - Examine lessons learned from Bel-Red's rezone and vision implementation.
  - Study whether the proposed street network is necessary or beneficial for neighborhood mobility.
6. Provide more information on the air quality findings and how these findings will impact future development. Examine how potential buffers compare to Downtown and East Main mitigation measures and study how air qualities standards measure up to market-driven solutions.

We appreciate the City's effort to undergo an intensive process to examine existing conditions and collect community input. Thank you for leading the City's growth and continued support of Downtown.

Sincerely,



Patrick Bannon  
BDA President & CEO



Matt Jack  
BDA Director of Public Policy



City of Bellevue Development Services Dept  
Attn: Elizabeth Stead  
450 110th Ave NE,  
Bellevue WA 98004

6/12/2023

To Elizabeth Stead and City of Bellevue Development Services,

Hello, my name is Cliff Cawthon, and I am the Advocacy and Policy Manager for Habitat for Humanity of Seattle-King & Kittitas Counties. We are a permanent affordable housing developer that has built homes in partnership with community members in King County for 37 years. I am writing to provide comments on Bellevue's Draft Environmental Impact Study and to encourage you and the staff to explore the Draft Environmental Impact Study's (DEIS) Third Alternative.

We applaud the work that Bellevue's city staff has already done to create an inclusive conversation around how to tackle the City of Bellevue's housing crisis. The third study alternative in the DEIS is the best positioned to maximize the value of Bellevue's implementation of mandatory inclusionary zoning. The alternative analyzes the potential of adding 90,000 plus additional housing units and the potential for tens of thousands of jobs that will come to Bellevue soon.

According to the County and Bellevue's estimated housing need people making less than 80% of Area Median Income (AMI), particularly below 30% AMI are in desperate need of housing. Habitat homeowners like Lila will be the first in her family to own a new home because of the opportunities we can create through aligning land use codes to make affordable homeownership possible. Congregants of Holy Cross Lutheran Church who are facing displacement are enthusiastically partnering with us to build our new Orchard Gardens community development in response to the lack of housing which drives 89% of Bellevue's labor force to commute into the city every week.

Alternative Three goes the farthest in the areas that are key to building affordable housing: addressing housing needs, permitting more middle housing construction, addressing economic displacement and identifying strategies for acquiring and allocating surplus land for more affordable housing. To comply with HB 1110, the middle housing bill, the preferred Alternative must make modifications to Alternative Three, to increase the range of middle housing options allowed throughout Bellevue to accommodate fourplexes citywide, and sixplexes when two of the homes are affordable or near transit.

Other options, such as the no-change option do not address these areas of concern in a satisfactory way. With the no-change option, without changes to the zoning map to allow for more multifamily housing development and mixed-use centers the City of Bellevue will disincentivize continued growth. Under this status quo, Bellevue will continue to have exclusive neighborhoods that prevent its workforce from living near where they work.

Alternative One, while it begins to allow more density, it is limited to the downtown core, Wilburton, and the Bel-Red Corridor. These limitations would miss the value that could be captured in mixed-use and neighborhood centers throughout the city- including near new and growing transit centers. Alternative Two goes further but it still concentrates on certain growth corridors in the city and does not meet the expectations for middle housing under state law and with best practices. The decrease in office capacity in Alternative Two also may potentially stifle economic growth and the potentiality of leveraging commercial development to increase the capacity for affordable housing.

As the DEIS notes, Alternative 3 has the greatest potential to reduce economic displacement by creating more housing overall and more affordable housing. This effect should be quantitatively estimated and explicitly defined to accurately compare overall residential economic displacement risks between the alternatives. Likewise based on HB 1220, the city must conduct an analysis of inventory and housing needs in alignment with King County's housing allocation targets. This alternative would support developing appropriate anti-displacement strategies and effective tools, such as inclusionary zoning. The Final Environmental Impact Survey (FEIS) should also analyze the impact of midrise low-cost housing typologies; such as, townhomes, duplexes, and housing types all the way to sixplexes.

The city's FEIS should investigate the gap between current funding sources and the projected need for funding for potential affordable housing projects. One example of a funding tool that has resulted in substantial support for affordable housing projects is a fee-in-lieu (FIL) alternative. A FIL structure would allow developers flexibility and the city of Bellevue to invest in affordable housing.

Best Regards,

Cliff Cawthon

Advocacy and Policy Manager  
Habitat for Humanity of Seattle-King & Kittitas Counties  
(206) 747-7694  
[Cliff.cawthon@habitataskc.org](mailto:Cliff.cawthon@habitataskc.org)

**From:** S. Williams <swilliams453@yahoo.com>  
**Sent on:** Monday, June 12, 2023 5:35:26 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Draft EIS comment

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

**Bellevue 2044 Draft EIS – comment / from Steve Williams, 12634 SE 4th Place, 38 year Wilburton resident – 6/11/2023**

It is difficult to evaluate these job and population projections, but one thing is clear, this is a development blueprint, not an Environmental Impact Statement. The environmental consequences are not even looked at, or worse - "no adverse environmental impact" is stated.

The population numbers are astounding. Even at 2 persons per household unit in Wilburton, the result is 33 times the current population of 546 stated in Ch. 5-2. ( Alt.1: 9,200 units x 2 = 18,400 people). ( Alt. 2: is worse, 14,200 units x 2 = 28,400, or 52 times current population).

In other words, Alt.1 gets us over 33 times the current number of people on our streets, in our schools, stores, and parks; all needing water, sewer, garbage and power; putting huge demands on supply stores, roads, transit, police, fire, medical and library services, etc.

Utilizing the US 'urban household average' of 2.6 persons per household, the increase is 23,920 or 43.8 times more people for Alt.1. / If our future has more single employees and retired apartment dwellers, the increase is still over 26 times current population. ( 1.6 x 9,200 = 14,720 ). / In our small, seven house cul-de sac, five houses have new families moved in – with a total now of 7 young children and at least two more expected. With the new law allowing unrelated occupants and 'mega houses' being built, it looks like the Wilburton neighborhood average will be 2.6 or larger....

As a 38 year resident, I still can't envision a life here with 43 to 52 times  
more people than we have now. Quality of life will suffer.

-----

As to environment - the impact will be huge: What is the carbon footprint of 28,000 people?

Where will all the water come from? Where will all the waste water and garbage go?

Where will the needed power and food come from? How many schools will we need?

How can even our sidewalks handle that many people? How can we save park lands?

Our trails and parks will be overwhelmed by new people wanting escape from cubicles & city life.

Will any native creatures remain with all the disruption, noise, heat, polluted air & water?

Where does a person find peace, quiet, solitude, communion with nature?

In addition to all the utility and infra-structure questions, I think we need to address the human and emotional needs for freedom of movement, access to nature, 'elbow room' and 'green space.' If there are high-rise, tiny apartments and work spaces, there will need to be adjacent gymnasiums and gardens, playfields and parks. We may need mid-tower school rooms, open courtyards and inside farms and arboretums. We may need to accept far more mass transit, and cars for rental 'out of town only' use. Dispersal of people to rural areas, regional parks and preserves might be accomplished by train or 'bus to trailhead' service. High-rise outer walls can also be green plant spaces and solar collector walls. Lids over freeways can become open space parks and exercise fields. Rain, whenever it comes, must be saved by every means possible. (Gray water conserved & filtered). Trees and shrubs need to be planted along every sidewalk, and large trees in every parking lot. (compare the Best Buy & Home Depot lots with those in office parks to the east & south).

Like many other Bellevue residents, we moved here because of good schools, parks, trails, open space and nature. Wilburton is a wonderful neighborhood because people have space for yards, gardens and trees that they care for. We would not want to live in tall metal & cement boxes next to a freeway.

Packing the maximum number of people into the city is not a full solution,

- Habitat & Quality of Life must be part of the equation.



**From:** S. Williams <swilliams453@yahoo.com>  
**Sent on:** Monday, June 12, 2023 5:35:26 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Draft EIS comment

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- Habitat & Quality of Life must be part of the equation.

**From:** Elliott Bay <elliottbay@yahoo.com>  
**Sent on:** Monday, June 12, 2023 6:20:50 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>; Adams (PXT), Eric <ecadams@amazon.com>  
**CC:** Board@BridleTrailsCommunity.org; Cathleen Adams <cathleenadams@comcast.net>  
**Subject:** Re: Comments on the Draft Environmental Impact Statement (DEIS) City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation  
**Attachments:** Letter on DEIS Comprehensive Plan June112023BridleTrailsCommunityClub.pdf (843.29 KB)

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Good Morning,

I would also like to be added as a party of record and I also adopt the comments, concerns, and objections articulated by the Bridle Trails Community Club in the above email and as set forth in the attached Bridle Trails Community Club June 11, 2023 letter.

Thank you,  
Stuart Heath  
13252 NE 47th Street  
Bellevue, Washington 98005  
425-881-8808  
ElliottBay@Yahoo.com

On Monday, June 12, 2023 at 07:47:20 AM PDT, Adams (PXT), Eric <ecadams@amazon.com> wrote:

City of Bellevue,

As a resident of Bridle Trails Bellevue, this email serves 1) as a request to become a party of record and 2) to express complete endorsement of the thoughtful and detailed commentary provided by the Bridle Trails Community Board (below).

Thank you,  
Eric and Cathleen Adams and Family  
13813 NE 48<sup>th</sup> Place  
Bellevue, WA 98005  
Cell: 508.440.9048

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June 11, 2023

Subject: Comments on the Draft Environmental Impact Statement (DEIS) City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation  
To: Elizabeth Stead  
City of Bellevue Community Development Department  
450 110th Avenue NE  
Bellevue, WA 98004

Dear Ms. Stead:

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. Bridle Trails Community Club (BTCC) is a 501c(4) nonprofit organization dedicated to protecting and enhancing the character and livability of Bridle Trails area near Washington's Bridle Trails State Park in Bellevue and Kirkland. BTCC has been in operation since 1978.

Bridle Trails has about 3,000 multifamily and about 2,000 single family homes of various densities. Per city records, Bridle Trails is second in affordable housing including low-income senior housing. Some larger lots support the 455-acre State equestrian park. Residents have many choices without having to move outside of Bellevue. Bridle Trails has been a leader in protecting tree canopy. Bridle Trails offers a diverse choice of housing densities. Parks, both public and private trails, and right-of-ways work as a network for people and animals. These are hallmarks of our neighborhood, which have been planned and nurtured over fifty years.

BTCC has concerns regarding the adequacy of the DEIS because substantial City of Bellevue issues have not been addressed in the document. We are requesting that the DEIS is revised to address this missing information and then re-sent as a revised draft. Only in this way can our Bellevue residents understand how the comprehensive plan addresses the most significant issues of our City. We find that the DEIS does not have a reasonable thorough discussion of the significant aspects of the following and described below:

- House Bill 1220, 2022
- Timeline of growth
- Rapid growth
- Management of growth, Dialing Growth in or up
- Neighborhood plans
- House Bills: 1110, 1337, and 1181
- Changes in employment and housing as a result of Covid and remote working
- Resources omitted in the analysis (parks and recreation and plants and animals; large and domestic animals)
- Urban Forest Ecosystem
- Water resources
- Salmon & Green space
- Tree Canopy
- Green Space & Streams
- Siting municipal development:
- Homelessness
- Historic Resources
- Accessible language

**From:** Brod, Brooke <BBrod@bellevuewa.gov>  
**Sent on:** Monday, June 12, 2023 3:36:34 PM  
**To:** Tom Wickerath <tom.wickerath@gmail.com>; CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** Johnson, Thara <TMJohnson@bellevuewa.gov>  
**Subject:** RE: We Need Your Input

Hello Mr. Wickerath,

The email you received was sent from another channel. The Comp Planning team has used a variety of communication methods to let community members know about the Draft EIS including a citywide press release, a physical mailing that went to every household, weekly emails, posts on social media. There were also three public meetings held where community members were able to meet with staff and provide comment.

If you require a particular accommodation in order to participate in the process, please let me know.



**Brooke Brod** (she/her)

[bbrod@bellevuewa.gov](mailto:bbrod@bellevuewa.gov) | (425) 452-6930 | [www.engagingbellevue.com](http://www.engagingbellevue.com)

*"It's better to know some of the questions, than all of the answers"*  
- James Thurber

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**From:** Trees <Trees@bellevuewa.gov>  
**Sent:** Monday, June 12, 2023 8:12 AM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Cc:** Johnson, Thara <TMJohnson@bellevuewa.gov>; Brod, Brooke <BBrod@bellevuewa.gov>  
**Subject:** FW: We Need Your Input

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**From:** Tom Wickerath <[tom.wickerath@gmail.com](mailto:tom.wickerath@gmail.com)>  
**Sent:** Friday, June 9, 2023 12:01 PM  
**To:** Trees <[Trees@bellevuewa.gov](mailto:Trees@bellevuewa.gov)>  
**Subject:** RE: We Need Your Input

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Why did someone wait until Friday, June 9, to send this email when comments close on Monday afternoon???

So, if a person needs help with interpretation, so sorry for them—in essence, you are NOT valuing their input!

## ADA Language



For alternate formats, interpreters, or reasonable accommodation requests please phone at least 48 hours in advance [425-452-6930](tel:425-452-6930) (voice) or email [bbrod@bellevuewa.gov](mailto:bbrod@bellevuewa.gov).

# ETA's East King County I-405 Unfunded Project List

## Bellevue

Description of Capacity Projects, (Updated to Transportation 2050, Appendix D)

I. I-405 Master Plan (S. 43rd St., Renton to 164th St. SW, Lynnwood)	Estimated \$ Million	City	Legislative District(s)	PSRC App. D Project #	App D pg.	Source
Downtown <b>Bellevue</b> Access I-90 to NE 4th St	\$ 486	Bellevue	<b>41, 48</b>	4338	155	1, 2
Downtown <b>Bellevue</b> Access NE 4th to SR 520	\$ 837	Bellevue	<b>41, 48</b>	5618	155	1
SR 520 @ 124th Ave. NE Half Diamond IC, <b>Bellevue</b>	\$ 175	Bellevue	<b>48</b>	4528	196	1, 2
I 405 @ I-90 Interchange: HOV Direct Connector Ramps - Phase 1, <b>Bellevue</b>	\$ 640	Bellevue	<b>41</b>	5441	156	1
I 405 @ I-90 Interchange: HOV Direct Connector Ramps - Phase 2, <b>Bellevue</b>	\$ 349	Bellevue	<b>41</b>	4376	157	1
I-405; NE 8th St. and SR 520 Interchange Improvements, <b>Bellevue</b>	\$ 973	Bellevue	<b>48</b>	4382	159	1
I-405; SR 520 Interchange, Direct Connection, <b>Bellevue</b> to Redmond	\$ 454	Bellevue	<b>48</b>	4383	162	1
I-405; SR 520 to NE 70th Pl. Northbound Auxiliary Lane, <b>Bellevue, Kirkland</b>	\$ 30	Bellevue, Kirkland	<b>48</b>	4346	162	1
I-405; SR 520 to NE 70th Pl. Southbound Auxiliary Lane, <b>Bellevue, Kirkland</b>	\$ 25	Bellevue, Kirkland	<b>48</b>	5653	163	1
I-405; SR 520 to SR 522 (Widening - SR 520 to NE 124th St), <b>Bellevue, Kirkland</b>	\$ 174	Bellevue, Kirkland	<b>45, 48</b>	4387	163	1
I-405; SR 169 to I-90 Widening and Interchange Imp., <b>Renton, Newcastle, Bellevue</b>	\$ 1,072	Bellevue, Renton	<b>11, 41</b>	4315	162	1

**Bellevue Total \$ 5.2 Billion**

### Source of project cost data:

1. PSRC 2050 Regional Transportation Plan - Appendix D:

<https://www.psrc.org/media/5938>

2. City of Bellevue 2022 Legislative Agenda

**Eastside Transportation Association (ETA), Victor H. Bishop, P.E., Chair Emeritus**

Approved by the ETA Board of Directors, Nov 2, 2022

## Urban Eastside Unfunded State Highway Project List

**Description of Capacity Projects, (Updated to Transportation 2050, Appendix D)**

App D pg.	I. I-405 Master Plan (S. 43rd St., Renton to 164th St. SW, Lynnwood)	Estimated \$ Billion	Source	City	Legislative District(s)	PSRC App. G Project #	Status	Completi	PSRC Score
155	Downtown <b>Bellevue</b> Access I-90 to NE 4th St	\$ 0.486	1, 2	Bel	<b>41, 48</b>	4338	Candidate	2030	72
155	Downtown <b>Bellevue</b> Access NE 4th to SR 520	\$ 0.837	1	Bel	<b>41, 48</b>	5618	Candidate	2040	71
196	SR 520 @ 124th Ave. NE Half Diamond IC, <b>Bellevue</b>	\$ 0.175	1, 2	Bel	<b>48</b>	4528	Approved	2026	69
156	I 405 @ I-90 Interchange: HOV Direct Connector Ramps - Phase 1, <b>Bellevue</b>	\$ 0.640	1	Bel	<b>41</b>	5441	Candidate	2030	65
157	I 405 @ I-90 Interchange: HOV Direct Connector Ramps - Phase 2, <b>Bellevue</b>	\$ 0.349	1	Bel	<b>41</b>	4376	Unprogrammed	2040	69
159	I-405; NE 8th St. and SR 520 Interchange Improvements, <b>Bellevue</b>	\$ 0.973	1	Bel	<b>48</b>	4382	Unprogrammed	2040	70
162	I-405; SR 520 Interchange, Direct Connection, <b>Bellevue</b> to Redmond	\$ 0.454	1	Bel	<b>48</b>	4383	Candidate	2030	71
162	I-405; SR 520 to NE 70th Pl. Northbound Auxiliary Lane, <b>Bellevue, Kirkland</b>	\$ 0.030	1	Bel,Kir	<b>48</b>	4346	Unprogrammed	2040	59
163	I-405; SR 520 to NE 70th Pl. Southbound Auxiliary Lane, <b>Bellevue, Kirkland</b>	\$ 0.025	1	Bel,Kir	<b>48</b>	5653	Candidate	2030	59
163	I-405; SR 520 to SR 522 (Widening - SR 520 to NE 124th St), <b>Belleue, Kirkland</b>	\$ 0.174	1	Bel,Kir	<b>45, 48</b>	4387	Unprogrammed	2040	61
162	I-405; SR 169 to I-90 Widening and Interchange Imp., <b>Renton, Newcastle, Bellevue</b>	\$ 1.072	1	Bel,Ren	<b>11, 41</b>	4315	Candidate	2030	70
	<b>Bellevue Total</b>	<b>\$ 5.2 Billion</b>							
<b>Source of project cost data:</b>									
1. PSRC 2050 Regional Transportation Plan <a href="https://www.psrc.org/sites/default/files/appendix_d_regional_capacity_project_list_administrative_procedures_011322.pdf">https://www.psrc.org/sites/default/files/appendix_d_regional_capacity_project_list_administrative_procedures_011322.pdf</a>									
2. Bellevue Chamber of Commerce 2022 Transportation Committee Legislative Agenda									
<b>Eastside Transportation Association (ETA), Victor H. Bishop, P.E., Chair Emeritus</b>									
Approved by the ETA Board of Directors, Nov 2, 2022									



## Summary by Legislative District

PSRC Transportation 2050 unfunded Eastside State Highway Projects included in the PSRC Appendix D Project List <sup>1</sup> by Legislative District (\$ Billion)			
Legislative District	I-405 Master Plan Projects	Non I-405 Eastside Capacity Projects	Total PSRC Appendix D Eastside Capacity Projects on I-405 & State Highways
District 21	\$ 0.04	-	\$ 0.04
District 1	\$ 3.3	\$ 0.25	\$ 3.5
District 45	\$ 1.9	\$ 0.19	\$ 2.1
District 48	\$ 3.9	\$ 0.10	\$ 4.0
District 41	\$ 3.5	\$ 0.09	\$ 3.6
District 5	-	\$ 0.43	\$ 0.4
District 11	\$ 4.5	\$ 0.34	\$ 4.8

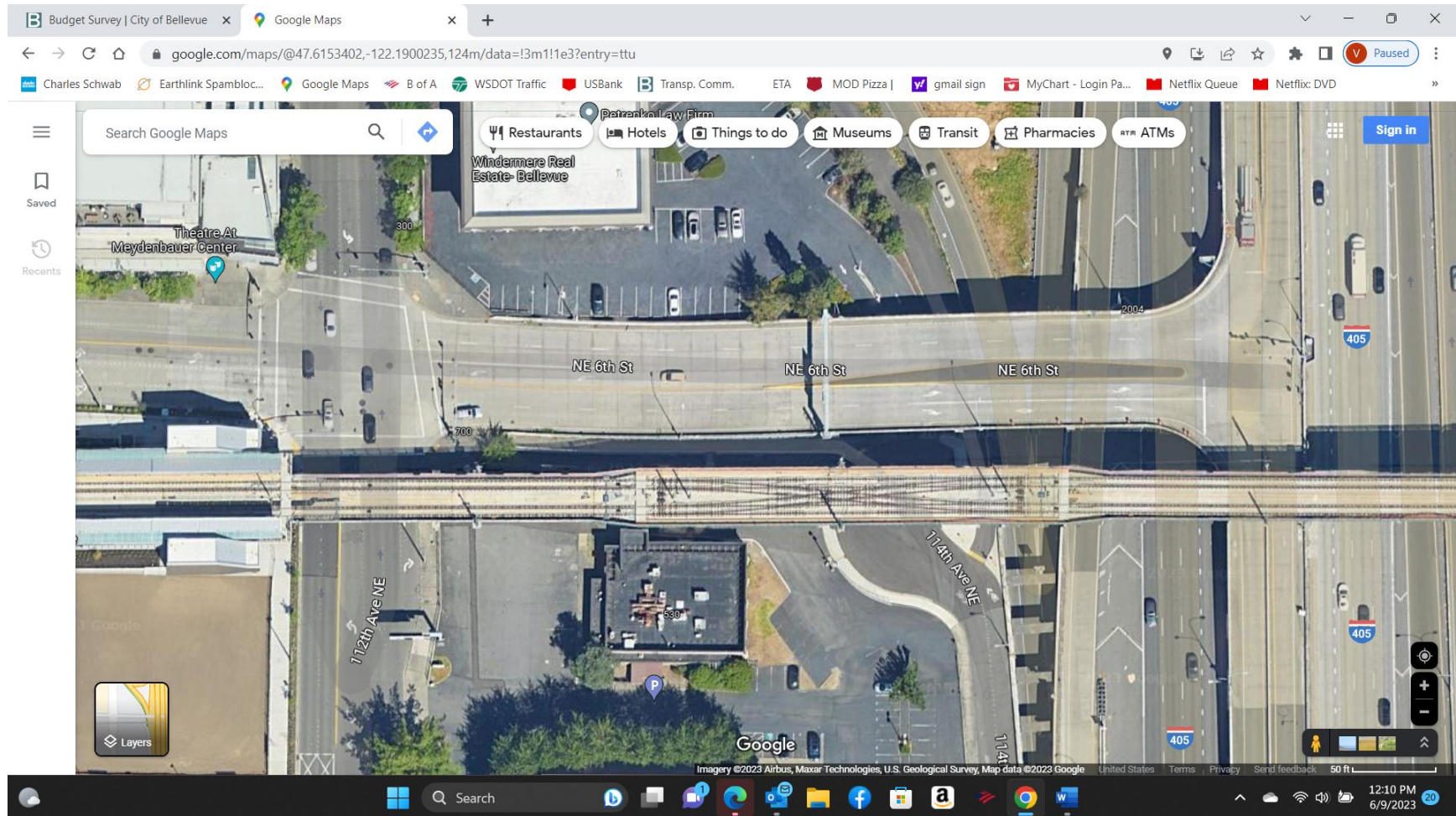
**Source:**  
 1. PSRC 2050 Regional Transportation Plan - Appendix D. Regional Capacity Projects:  
<https://www.psrc.org/media/5938>  
 Note: Multiple projects in multiple Districts - Sum of individual Districts greater than total projects

## Summary by City

PSRC Transportation 2050 unfunded Eastside State Highway Projects included in the PSRC Appendix D Project List <sup>1</sup> by city (\$ Billion)			
City	I-405 Master Plan Projects	Non I-405 Eastside Capacity Projects	Total PSRC Appendix D Eastside Capacity Projects on I-405 & State Highways
Bellevue	\$ 5.2		\$ 5.2
Bothell	\$ 3.2	\$ 0.12	\$ 3.3
Kirkland	\$ 1.9		\$ 1.9
Lynnwood	\$ 1.1		\$ 1.1
Renton	\$ 3.3	\$ 0.34	\$ 3.6
Tukwila	\$ 1.8		\$ 1.8
Redmond		\$ 0.10	\$ 0.1
Woodinville		\$ 0.06	\$ 0.1
Issaquah		\$ 0.09	\$ 0.1
Maltby		\$ 0.11	\$ 0.1
Unincorporated Snohomish Co.		\$ 0.13	\$ 0.1

**Source:**  
 PSRC 2050 Regional Transportation Plan - Appendix D. Regional Capacity Projects:  
<https://www.psrc.org/media/5938>  
 Note: Multiple projects in multiple cities - Sum of individual cities greater than total projects

NE 6th St., 112<sup>th</sup> Ave. NE to center of I-405, Google Maps screenshot, June 9, 2023



## ETA's Urban Eastside Unfunded I-405 Project List

Description of Capacity Projects, (Updated to Transportation 2050, Appendix D)

I. I-405 MASTER PLAN - Renton (SW. 43rd St.) to Lynnwood (164th St. SW)	Estimated \$ Million	City	Legislative District(s)	PSRC App. D Project #	App D pg.	Source
SR 520 @ 124th Ave. NE Half Diamond IC,	\$ 175	Bellevue	48	4528	196	1, 2
Downtown Bellevue Access I-90 to NE 4th St	\$ 486	Bellevue	41	4338	155	1, 2
Downtown Bellevue Access NE 4th to SR 520	\$ 837	Bellevue	41, 48	5618	155	1
I-405; SR 520 Interchange, Direct Connection	\$ 454	Bellevue	48	4383	162	1
I-405; NE 8th St. and SR 520 Interchange Improvements,	\$ 973	Bellevue	48	4382	159	1
I 405 @ I-90 Interchange: HOV Direct Connector Ramps - Phase 1	\$ 640	Bellevue	41	5441	156	1
I 405 @ I-90 Interchange: HOV Direct Connector Ramps - Phase 2	\$ 349	Bellevue	41	4376	157	1
I-405; SR 520 to NE 70th Pl. Northbound Auxiliary Lane	\$ 30	Bellevue, Kirkland	48	4346	162	1
I-405; SR 520 to SR 522 (Widening - SR 520 to NE 124th St)	\$ 174	Bellevue, Kirkland	45, 48	4387	163	1
I-405; SR 520 to NE 70th Pl. Southbound Auxiliary Lane	\$ 25	Bellevue, Kirkland	48	5653	163	1
I-405; SR 169 to I-90 Widening and Interchange Imp.	\$ 1,072	Bellevue, Renton	11, 41	4315	162	1
I-405: North General Purpose Interchanges	\$ 1,107	Kirkland, Bothell	1, 45, 48	4388	159	1
I-405; No. Corridor HOV/ETL Direct Access R., NE 195th St. IC	\$ 429	Bothell	1	4398	159	1
I-405; SR 527 to I-5 ETL Widening and Interchange Improvements	\$ 682	Bothell, Lynnwood	1	4401	164	1
I-405; SR 527 to I-5 ETL	\$ 403	Bothell, Lynnwood	1	4402	165	1
			1, 11, 41, 45,			
I-405 Corridor Park and Ride Expansion, Full Corridor	\$ 90	King County Metro	48	5699	50	1
I-405; NE 85th St. to NE 124th St. Widening, I GP each way	\$ 39	Kirkland, Bothell	45	4351	158	1
I-405; NE 124th St. to SR 527 Widening	\$ 572	Kirkland, Bothell	1, 45	4392	158	1
I-405; I-5/I-405 to 164th St. SW, Auxiliary Lane	\$ 39	Lynnwood, Snoh. Co.	21	5714	158	1
I-405; SR 167 Interchange Area Improvements (Tier I )	\$ 199	Renton	11	4307	160	1
I-405; SR 167: S. 180th St./SW 43rd St. to I-405 Widening	\$ 190	Renton	11	4310	183	1
I-405; SR 167 Interchange Area Improvements (Tier II )	\$ 1,091	Renton	11	4314	161	1
I 405 @ I-5 Tukwila Interchange Improvements	\$ 1,083	Tukwilla	11	4360	156	1
I-405; I 5 to SR 167, ETL 2nd lane, SR 181 IC	\$ 466	Tukwilla, Renton	11	4364	157	1
I-405; SR 167 Interchange SR 181 to SR 167	\$ 291	Tukwilla, Renton	11	5617	161	1

**Subtotal, I-405 Master Plan Completion \$ 11.9 Billion**

### Source of project cost data:

1. PSRC 2050 Regional Transportation Plan - Appendix D:

<https://www.psrc.org/media/5938>

2. City of Bellevue 2022 Legislative Agenda

**Eastside Transportation Association (ETA),  
Victor H. Bishop, P.E., Chair Emeritus**

Approved by the ETA Board of Directors, Nov 2, 2022

# Eastside Transportation Association

*"Dedicated to improving our quality of life and environment by reducing congestion through increased mobility"*

P.O. Box 50621  
Bellevue, WA 98015-0621

June 9, 2023

City of Bellevue  
Development Services Department  
Attn: Elizabeth Stead  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Re: 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation DEIS

Dear Ms. Stead,

The Eastside Transportation Association (ETA) submits this comment letter on the Draft Environmental Impact Statement (DEIS) for the referenced project.

You have before you a very significant transportation policy document for review and comment with recommendations. The Comprehensive Plan amendments and Wilburton Vision Implementation could fundamentally change the policy of the city regarding traffic congestion.

ETA's comments primarily relate to Chapter 11 - Transportation.

In 2021, City Council unanimously adopted Comprehensive Plan policy TR-2, which states the goal:

**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.**

This Comprehensive Plan policy was unanimously adopted by the Council after robust community discussion about revisions to the previous version of this policy which stated: **"Strive to reduce congestion and improve mobility"**.

## **A. ETA's summary of significant DEIS transportation disclosures**

The adoption of TR 2 sent the strong message by the Council to "...aggressively plan, manage, and expand transportation investments to reduce congestion..." Language in the DEIS appears not to align with this stated goal. For example:

1. The first paragraph of Section 11.1, page 11-1 states: "Bellevue's approach to mitigating potentially significant impacts on the transportation system is presented in the Avoidance, Minimization, and Mitigation Measures section..."
2. Table 11-36, pp 11-104-105, lists 33 **System Intersections** that would be 'significantly impacted' by Alternative 3. Twenty-four of these System Intersections would have a volume/capacity (V/C) ratio greater than 1.0. A ratio greater than 1.0 means that more than 100% of the vehicle carrying capacity of an intersection is consumed by the projected vehicle volume. This results in traffic signal operations deteriorating to the point of vehicles waiting multiple red light cycles to get through the intersection, an obvious "significant impact," as identified in the DEIS.

## Eastside Transportation Association

ETA DEIS comment letter, 2024-2044 Comprehensive Plan Update and Wilburton Vision Imp., June 9, 2023

3. Table 11-37, p 11-107, lists 19 **Primary Vehicle Corridors** that would have operation speeds not meeting the Performance Target, seven of which clearly represent a “significant impact” all over the City, some with operating speeds of four to five miles per hour. Operating speeds of four to five miles per hour (pedestrian walking speed) over more than one-half mile reflects the failed System Intersections identified above.
4. Table 11-38, p 11-110, lists 4 **State Facility study locations** that would not meet the Washington State Department of Transportation’s (WSDOT) standard (Volume-to-LOS D Maximum Service Volume Ratio). This means that I-405 and SR 520 East of I-405 would continue to have multiple hours of severe congestion daily.
5. Table 11-40, p 11-115 summarizes Significant Impacts Resulting from Action Alternatives. For Alternatives 1, 2, and 3 **only the Intersection V/C, Primary Vehicle Corridor Travel Speed and State Facilities have Significant Impacts**. There are no significant impacts listed for the Pedestrian Network, Bicycle Network, Transit Network, Safety, Parking, VMT (vehicle miles traveled) Per Capita, nor Transit Travel Time. The only significant impacts identified are automobile related impacts.
6. Section 11.6 Avoidance, Minimization, and Mitigation Measures, pp 11-116 to 11-133, discusses the Mobility Implementation Plan (MIP), Transportation Demand Management Strategies (TDM), Smart Mobility, Agency Partnerships, Parking Strategies, Safety Strategies, and Transportation Mitigation measures. Where is the discussion on traffic congestion relief?
7. There are no recommendations, suggestions, or ideas related to the TR-2 mandate **“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.”** “All users” includes the 64% to 66% of the people in Bellevue that will use cars to get around (Table 11-19, p 11-75; Table 11-26, p 11-88; and Table 11-33, p 11-101) – let’s say two-thirds of all person trips in the city.
8. There are no capacity projects identified. Worse, the proposed policies appear to presume the long-planned N.E 6<sup>th</sup> Street Extension to 120<sup>th</sup> Avenue N.E. will be cancelled at a time when the DEIS clearly identifies the need for more motor vehicle capacity. ETA believes the N.E. 6<sup>th</sup> Street extension is Bellevue’s best opportunity to not only comply with TR-2 but comply with SEPA and mitigate impacts of the alternatives under consideration.
9. Mitigation Measure M-TR-1, p 11-130, suggests that the way to address the performance target gaps for System Intersection V/C ratios and Primary Vehicle Corridor speed in Wilburton is for Bellevue to consider:
  - a. Building out the pedestrian and bicycle network,
  - b. Promoting “Exceptional TDM” requirements to reduce SOV driving demand,
  - c. Incorporating “Smart Mobility” solutions,
  - d. Enacting parking code reforms.
10. ETA agrees that these actions would marginally impact drive-alone trips. However, none of these measures have shown to be *significant* reducers of the public’s preference to travel by car. The “TDM requirements” have a multi-decade history of city focus on the employees of large employers in downtown with marginal success. The other three are more recent ideas with very little data to support the underlying aspirational assumption that the traveling public in Bellevue will change travel modes (except the bicycle usage data, which shows a declining proportional usage from 2019-2021 – see attached data).



## Eastside Transportation Association

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11. In addition, M-TR-1 suggests that “Roadway or intersection capacity expansion should be a mitigation measure of “last resort” in PMA 1” (Wilburton, BelRed, and Downtown).

### B. ETA’s Recommendations

ETA Recommends:

1. The City issue a Supplemental DEIS for each project separately, with its own schedule. The combination of the 2024-2044 Comprehensive Plan Updates and the Wilburton Vision Implementation strategy into a single Draft Environmental Impact Statement has created a very complex and difficult document to effectively comment on and/or communicate about. This is massive and nearly incomprehensible. This process is NOT USER FRIENDLY.
2. Make a new BKRCast Travel Forecast Model run for the separate Wilburton supplemental DEIS which would include:
  - a. Add general purpose traffic as an assumed use to NE 6<sup>th</sup> St. overcrossing of I-405 to effectively use the new crossing.  
The existing portion of NE 6<sup>th</sup> St. from 112<sup>th</sup> Ave NE to the center of I-405 is constructed with a five-lane arterial cross section, obviously designed, and constructed for more than just HOV and Bus traffic. See the attached screenshot of NE 6<sup>th</sup> St. (City staff indicated that WSDOT directed the City to prohibit general purpose traffic from this crossing for the South Downtown Access Study and that position was used here. Why? WSDOT has not put that restriction on the 142<sup>nd</sup> Ave. SE direct access interchange in Eastgate nor the N.E. 128th Ave. direct access interchange in Kirkland.)  
The prohibition of general-purpose vehicles on the NE 6<sup>th</sup> St. crossing of I-405 significantly reduces the assigned traffic volume on the extension of NE 6<sup>th</sup> St. from 116<sup>th</sup> Ave. NE to 120<sup>th</sup> Ave. NE as reflected in the V/C model results of Alternative 3A shown in Table 11-39, p. 11-114.
  - b. Add a new crossing for all traffic including bicycles on NE 2<sup>nd</sup> St. between 112<sup>th</sup> Ave. NE and 116<sup>th</sup> Ave. NE. This is an obvious Downtown grid system missing link that would connect Downtown to Wilburton and needs to be included in the Wilburton buildout scenarios DEIS.
  - c. Include all road capacity projects that are identified in the current Capital Investment Program, the Transportation Facilities Plan, and the Transportation Improvement Program in the future year networks for the new BKRCast model run.
  - d. Use a population and employment estimate for the horizon year of 2044 in the BKRCast travel forecast model as well as the unknown (and unknowable) time frame of the “land use capacity build-out” option used in the DEIS BKRCast model.
  - e. Determine the maximum potential transportation system that could be constructed and determine the population and employment levels that transportation system can handle within the City’s performance targets.
3. Aggressively expand the arterial grid system by, among other arterial gap infills, extending NE 6<sup>th</sup> St. as a general-purpose arterial from 110<sup>th</sup> Ave. NE to 120<sup>th</sup> Ave. NE. See the attached BelRed Transformation map of Capital Improvement Projects dated March 2, 2023, that shows NE 6<sup>th</sup> St. as a planned extension to 120<sup>th</sup> Ave. NE.  
Eliminate the proposed policy to protect Eastrail by prohibiting new general purpose road crossings of the trail – which proposed policy would prohibit the extension of NE 6<sup>th</sup> St. to 120<sup>th</sup>

## Eastside Transportation Association

ETA DEIS comment letter, 2024-2044 Comprehensive Plan Update and Wilburton Vision Imp., June 9, 2023  
Ave. NE. See Planning Commission Study Session Item 399 for the May 24, 2023, Planning Commission Meeting Agenda, Attachment A: Draft Comprehensive Plan Amendments to the Wilburton/N.E. 8th Street Subarea Plan, prepared by city staff. This proposed policy includes: **“Prohibit new general-purpose vehicular crossings across Eastrail”**. This significant Transportation Policy recommendation was buried in the Open Space and Natural Systems section of the planning staff recommendations.).

4. Add turn lanes, signal coordination, additional lanes, etc. to 116<sup>th</sup> Ave. NE within Wilburton and BelRed to alleviate all System Intersection and Primary Arterial Corridor significant impacts.
5. Add a new NE 2<sup>nd</sup> St. crossing of I-405 to 116<sup>th</sup> Ave. NE with bicycle extensions to Eastrail.
6. Complete Phase 4 of the 120<sup>th</sup> Avenue N.E. expansion project.
7. Remove the aggressive editorializing in the DEIS.
8. Identify policies to articulate proportional modal investments in accordance with DEIS mode shares.
9. Model the effects of full build-out of the approved I-405 Master Plan to determine this critical regional highway’s ability to help reduce the overall increase in congestion Bellevue’s continued growth is forecast to cause. Typical networks for future year evaluation only include the funded portions of long-range plans like the I-405 Master Plan.

### C. ETA’s Position

The ETA’s long-standing position has been that traffic congestion is the problem, and we do have the power to reduce it and improve access and mobility for everyone. We recognize several established, well-documented realities:

1. Bellevue residents and employees have chosen the automobile as their preferred choice of mobility as reflected in the mode of travel data in the city’s BKR travel forecast models (see the DEIS tables referenced in item A. 7 above and the attached 2018-2035 citywide mode split charts attached per the South Bellevue Access Study BKR model previously produced by ETA using city data).
2. The 2018 and 2020 bi-annual Bellevue Budget Surveys consistently show that ‘traffic’ and ‘development impacts’ are the top-of-mind issues in Bellevue.
3. Bicycle usage in Bellevue is at an extremely low level of about 0.25% of total trips (one out of more than 400 trips) per the City’s bicycle count data from 2019-2021 and is decreasing as a portion of total trips. (See the attached ETA analysis of City of Bellevue actual ground count bicycle usage data. This DEIS estimates that bike usage will get up to 1% per the mode split tables referenced, an aspirational estimate with no City of Bellevue data basis.)
4. The I-405 Corridor is the transportation lifeline of Bellevue and its economy.
5. The I-405 Master Plan is incomplete. See attached ETA letter to Mayor Robinson, February 17, 2023 with attachments and WSDOT’s program web site at <https://wsdot.wa.gov/construction-planning/major-projects/i-405sr-167-corridor-program>.
6. Significant traffic volume is diverted from I-405 to Bellevue’s arterial streets due to severe congestion on I-405. Bellevue Way, 112<sup>th</sup> Ave. NE and SE, 116<sup>th</sup> Ave. NE and SE, and 148<sup>th</sup> Ave. NE and SE, plus connecting East-West arterials, are obvious recipients of this diverted traffic from the massively congested I-405 Corridor.
7. The state Growth Management Act requires cities to accept growth and provide a transportation system to accommodate that growth through the Concurrency requirement.

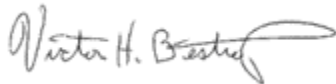
## Eastside Transportation Association

ETA DEIS comment letter, 2024-2044 Comprehensive Plan Update and Wilburton Vision Imp., June 9, 2023

8. The city has decided to denigrate the automotive travel mode by eliminating its Concurrency Standard of V/C ratios through adoption of the Multimodal Level of Service (MMLOS) 'targets' and the Mobility Implementation Plan.
9. The ridership of Sound Transit (ST) light rail (opening in 2025?) and Bus Rapid Transit systems and King County Metro's bus transit system have historically stagnated at about 5-6% of total daily trips and is projected to remain so when Eastrail is mature. (ST projects that about 80% of the projected 45,000 Eastrail daily riders are already taking the bus (e.g., ST's Route 550 between Downtown Bellevue and Downtown Seattle will be eliminated and ST's Route 554 between Issaquah and Downtown Seattle will be truncated at Mercer Island).
10. The way we reduce congestion is to build highway, intersection, and arterial capacity projects at strategic bottleneck locations in coordination with the population and employment growth we are experiencing.
11. The interconnectability of the Arterial grid system is fundamental to an effective street system. We need all the grid system gaps to be constructed.
12. The City Council recognizes the importance of accelerating the reduction of congestion as articulated in the unanimously approved Comprehensive Plan Policy TR 2.

Thank you for the opportunity to comment on this important transportation planning document.

Sincerely,



Victor H. Bishop, P.E.,  
Legislative Chair,  
Eastside Transportation Association  
(425) 518-3343  
[vicbishop@earthlink.net](mailto:vicbishop@earthlink.net)

Attachments (attached separately to the email transmittal of this letter as pdf files):

1. ETA's Bicycle Use Data in Bellevue based on city data
2. ETA's Trends in Bicycle Use in Bellevue
3. NE 6th St., 112th Ave. NE to center of I-405, Google Maps screenshot, June 9, 2023
4. BelRed Transformation map showing NE 6<sup>th</sup> St. assumed to be extended to 120<sup>th</sup> Ave. NE
5. ETA's Citywide Mode split Chart
6. ETA's I-405 Master Plan project lists:
  - a. ETA letter to Mayor Robinson and City Council, Feb. 23, 2023, I-405 unfunded project lists
  - b. Full I-405 Unfunded Project list.
  - c. I-405 Unfunded Project list of projects in Bellevue.
  - d. Summary of Unfunded I-405 projects by Legislative District.

References:

1. Capital Investment Program
2. Transportation Facilities Plan
3. Transportation Improvement Program
4. 2018 Bellevue Budget Survey and 2020 Bellevue Budget Survey



# Eastside Transportation Association

*Dedicated to improving our quality of life and environment by reducing congestion through increased mobility.*  
[www.eastsidetransportation.org](http://www.eastsidetransportation.org)

February 17, 2023

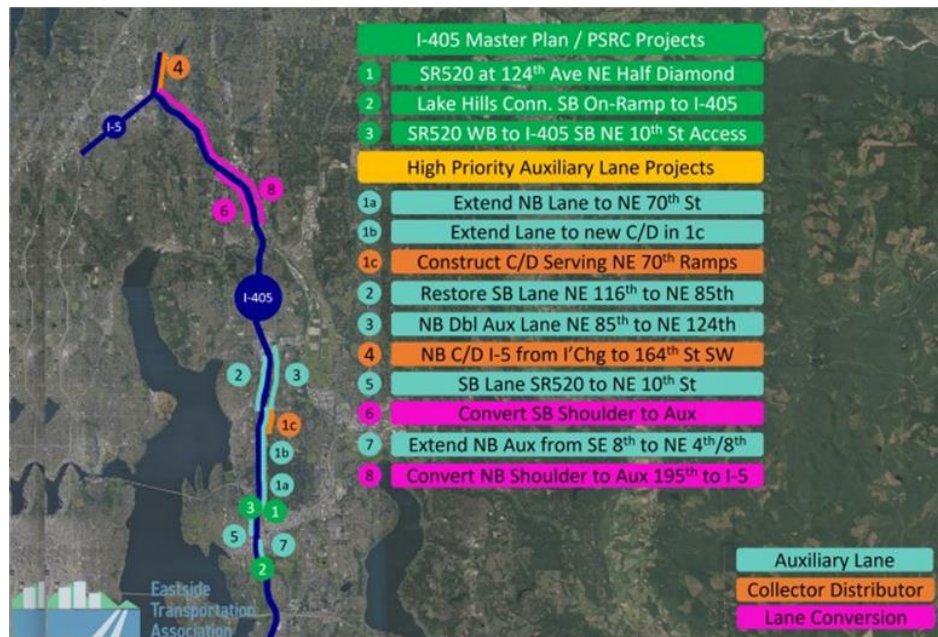
Mayor Lynn Robinson  
Bellevue City Council

Dear Mayor Robinson and Council Members,

The Eastside Transportation Association (ETA) encourages you to request our legislative delegation in the 41<sup>st</sup> and 48<sup>th</sup> Legislative Districts to make a significant investment in the I-405 corridor in the 2023-2025 Washington State Transportation Budget in this legislative session. Given the enormity of the need, ETA recommends you request the Legislature add at least an additional \$800 million for I-405 capacity projects over the next six years. These investments should help restore the economic vitality of King County's Eastside cities, which have been significantly impacted by workers not returning to urban centers.

**The ETA recommends these high priority projects for inclusion in any 2023 Transportation Funding package adopted by the 2023 Legislature. We have identified four (4) projects (See adjacent map) as the immediate next increment to finish the I-405 Master Plan. The first three of these projects are fully within the City of Bellevue and the 41<sup>st</sup> and 48<sup>th</sup> Legislative Districts. The 4<sup>th</sup> project on the adjacent map is an accumulation of ten (10) High Priority Auxiliary Lane Projects. Two of these projects are within the City of Bellevue and the 41<sup>st</sup> and 48<sup>th</sup> Legislative Districts.**

## ETA 2023 Priority Projects



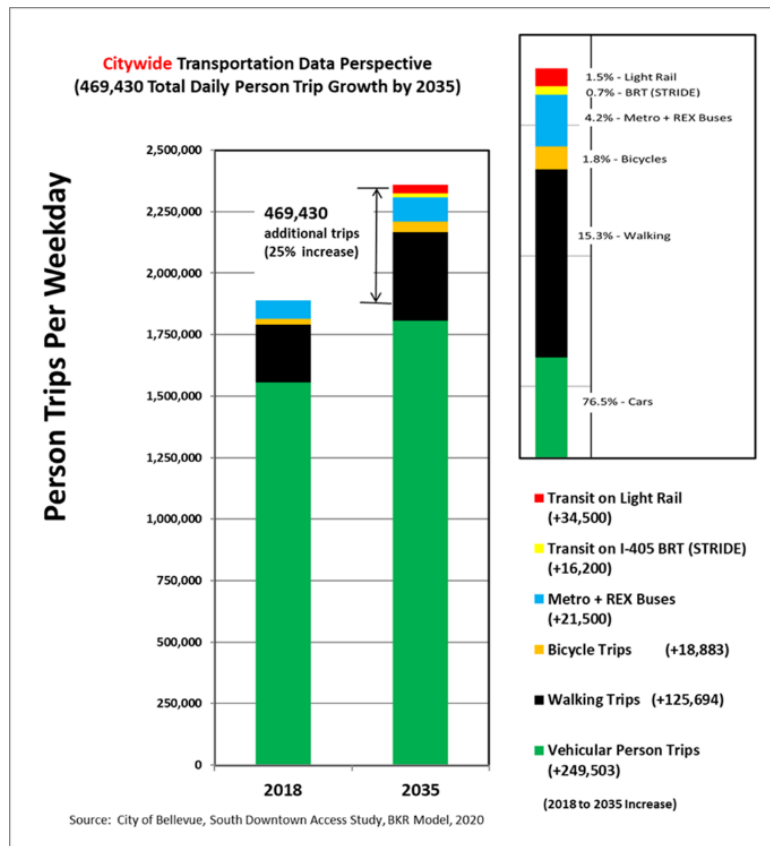
Overall, there are 25 unfunded projects worth \$11.9 Billion in the I-405 Corridor (see attached Full I-405 Project List) included in PSRC's Regional 2050 Transportation Plan that are scheduled for construction in the next decades. **Eleven (11) of these projects worth \$5.2 Billion are wholly or partially within Bellevue and the 41<sup>st</sup>/48<sup>th</sup> Legislative Districts.** ETA

# Eastside Transportation Association

has compiled similar project lists for all seven legislative districts and six cities that have portions of the I-405 Corridor within them (see attached Summary by Legislative District and City).

For your information, existing and travel forecast projections predict over 76% of all daily person trips in East King County are and will be by automobile. The next largest group (mode) are pedestrians at 12-15%; then transit at 6-8% and finally bicycles at under 2%. Both the Puget Sound Regional Council (PSRC) and the City of Bellevue (source of adjacent graph) travel forecasts support this data.

The PSRC recently adopted a new Regional 2050 Transportation Plan (May 28, 2022) which relies heavily on the Approved I-405 Master Plan (2002), endorsed by 31 jurisdictions including all cities in the corridor. Every city, chamber of commerce, and several state, county, port, and transit agencies in the corridor endorse the completion of the I-405 Master Plan.



The ETA is a private sector non-profit organization dedicated to an improved highway system as an integral part of the multimodal transportation system that safely and efficiently moves people, goods, and services. We understand that the I-405 corridor is the backbone of the entire transportation system in East King County. About one million people travel on I-405 every weekday. The announced and projected explosive growth of jobs demands a clear understanding of how people travel.

I stand ready to discuss this data at your convenience. I encourage you to think about the 1 million people who daily use the I-405 corridor, many of whom are frustrated by the daily 4-6 hours of I-405 congestion.

Thank you for your consideration.

Victor H. Bishop, P.E.  
Chair, ETA Legislative Committee  
Eastside Transportation Association  
[vicbishop@earthlink.net](mailto:vicbishop@earthlink.net)  
(425) 518-3343

Eastside Transportation Association, PO Box 50621, Bellevue, Washington 98015



## Bicycling in Bellevue- What the Data Shows

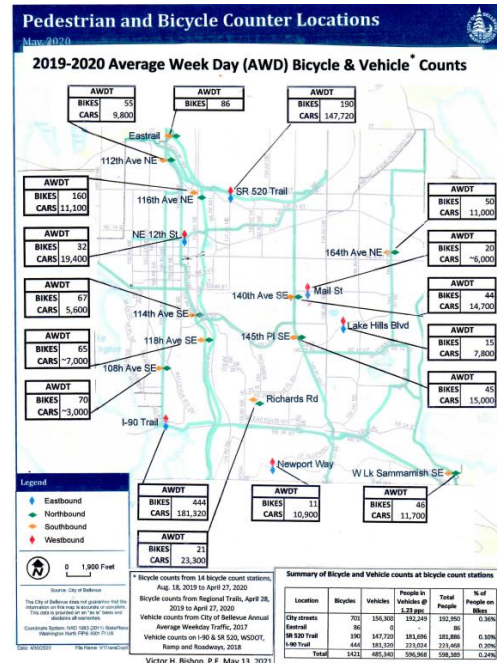
**Oct. 18, 2022, Victor H. Bishop, P,E,**

**Bicycling in Bellevue represented about one quarter of one percent (0.25%) of the daily trips in Bellevue in 2019-2020 (4,500/day) and has been reduced by about 26% by the pandemic.**

The City of Bellevue has a robust bicycle counting program developed by the Transportation Department in 2018-19. The city has 14 locations on city streets and collects or collaborates with WSDOT to collect bike data on the three regional trails in Bellevue on I-90, SR-520 and the EasTrail. The city locations were implemented in August 2019 while the regional trail count locations have been collecting data for decades.

Data is collected at each location using an Eco-Counter system that provides electronic bike data by direction accumulated every 15 minutes 24 hours a day, every day of the year. The city now has about 3 years of detailed bicycle use data at 14 reasonably representative locations around the city on multiple types of city streets plus the three regional trails.

The city also maintains a vehicle count program that provides data for traffic volumes on the 14 street locations where the bicycle data is collected. The adjacent map shows the 17 locations with the 2019-2020 average weekday bicycle data and the comparable annual average weekday vehicle data at each location.



## Summary of Bicycle and Vehicle counts at bicycle count stations

Location	Bicycles	Vehicles	People in Vehicles @ 1.23 ppc	Total People	% of People on Bikes
City Streets	701	156,300	192,249	192,950	0.36%
Eastrail	86	0	-	86	
SR 520 Trail	190	147,720	181,696	181,886	0.10%
I-90 Trail	444	181,920	223,762	224,206	0.20%
<b>Total</b>	1,421	485,940	597,706	599,127	0.24%

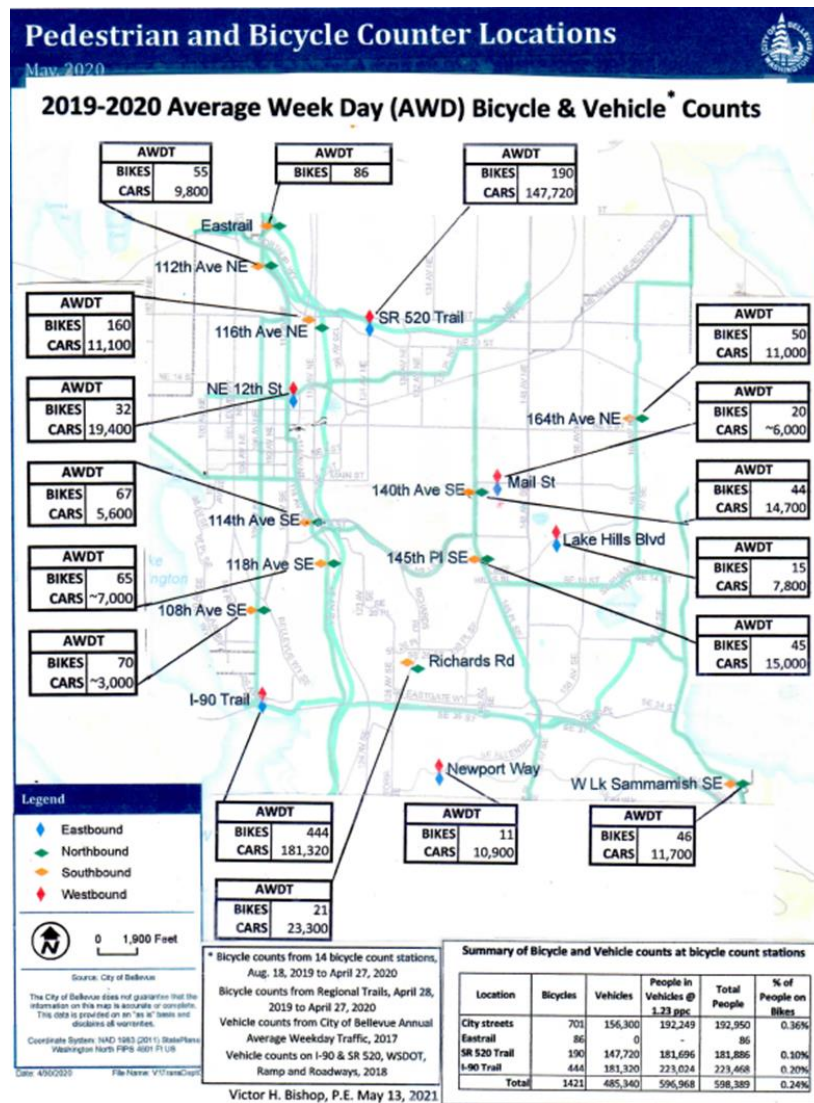
The August 2019-April 2020 data is summarized for these locations in the Table. There was an average of 701 bicycles per day counted at the 14 city street locations and 720 bicycles per day

at the three regional trails. At the same time there were 156,249 vehicles counted on the city streets, but significantly more on I-90 and SR 520. The vehicles counted were converted to people using a factor of 1.23 people per car.

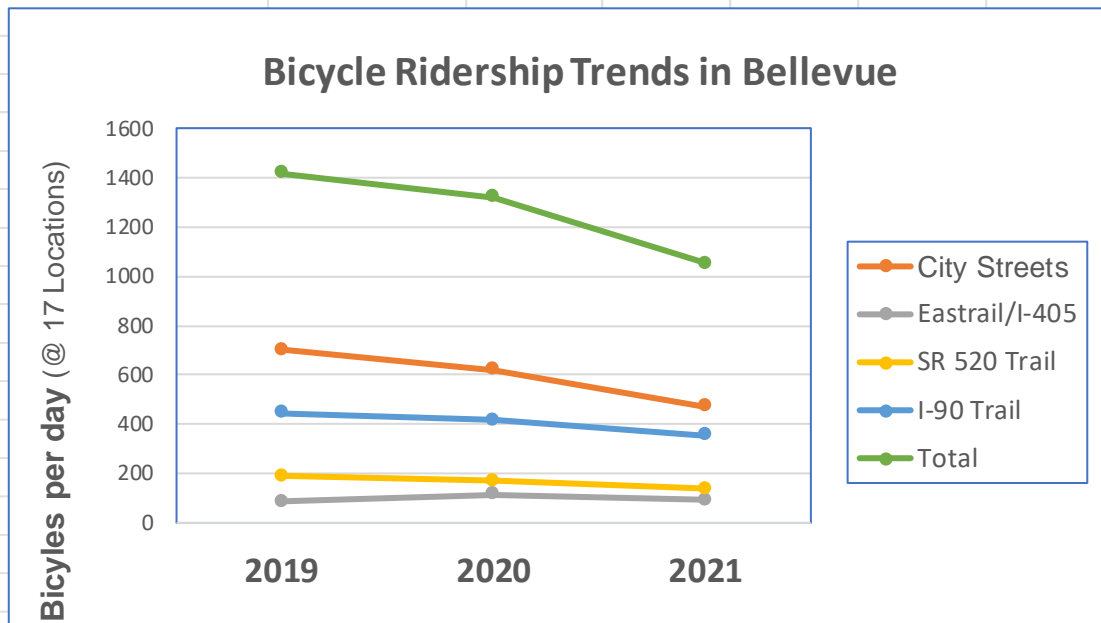
Stated as a portion of the person trips at these 17 locations, **bicycle trips represented 0.24%** of the bicycle plus vehicle person trips (excluding pedestrians and transit riders) in 2019-2020 (pre-pandemic).

When applied to citywide travel, the bicycle portion translates to about **4,500 daily bike trips on an average weekday**<sup>1</sup>

The calendar year 2021 bicycle data totaled 1052 bicycles at the 17 locations on an average weekday, **a reduction of 26% from the pre-pandemic data.**



<sup>1</sup> The city uses it's Bellevue Kirkland Redmond (BKR) Travel Forecast Model to evaluate alternative build scenarios of development growth and infrastructure investments. In 2020 the city used the BKR model to evaluate alternatives for the South Downtown Access Study. Bellevue city staff used 2018 data as the base year for the analysis. In 2018 there were an estimated 1,889,824 daily person trips on an average weekday. Using the 0.24% factor from the bicycle data results in about 4,500 bicycle trips daily on the streets and trails on an average weekday pre-pandemic.



#### Bicycle ridership trends in Bellevue

Location	2019 <sup>5</sup>	2020	2021
City Streets <sup>1</sup>	701	622	471
Eastrail/I-405 <sup>2</sup>	86	115	91
SR 520 Trail <sup>3</sup>	190	170	137
I-90 Trail <sup>4</sup>	444	415	353
<b>Total</b>	<b>1421</b>	<b>1322</b>	<b>1052</b>

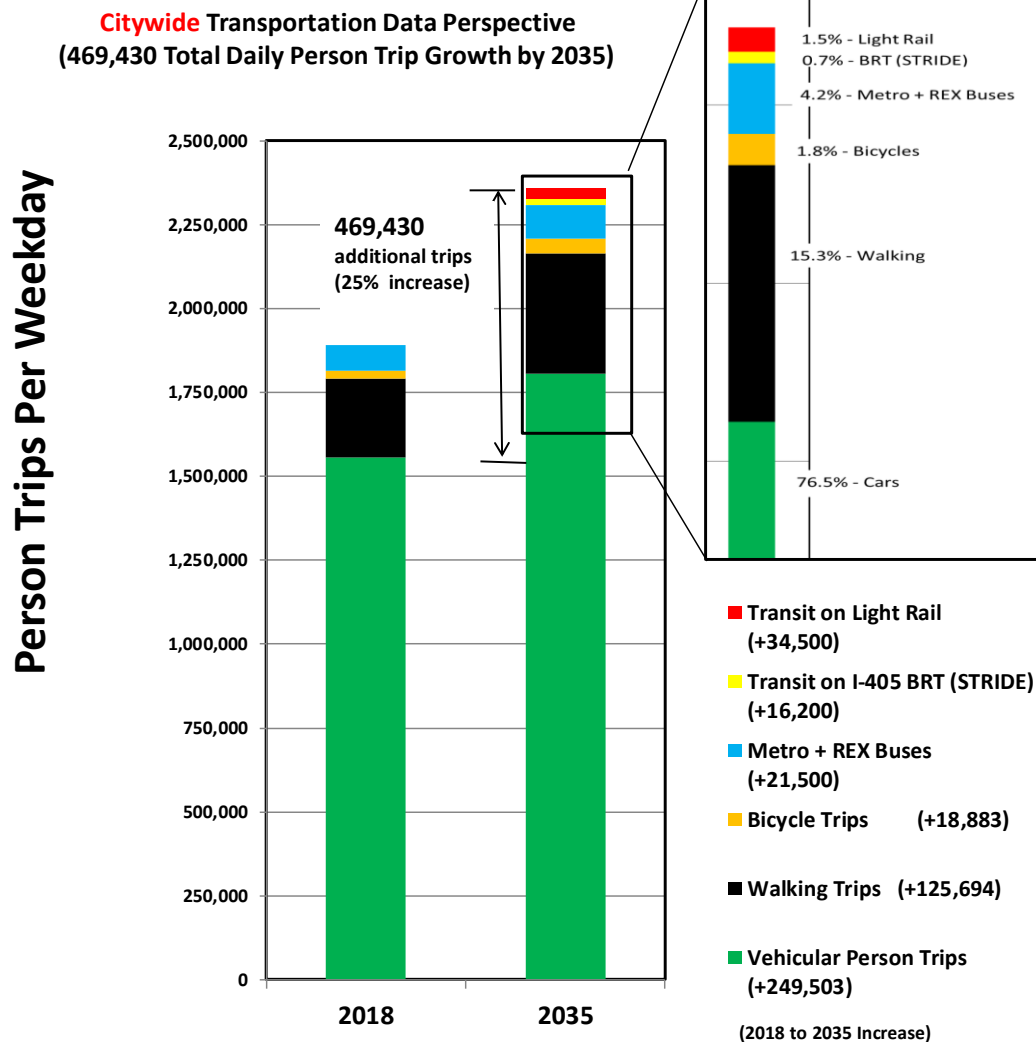
#### Notes:

1. Fourteen locations selected by city staff
2. North of Northup Way
3. East of 124th Ave. NE
4. East of 108th Ave. SE
5. 2019 data covers July 1, 2019 thru April 27, 2020;  
2020 and 2021 data are for calendar year

Compiled by Victor H. Bishop, P.E., from City of Bellevue and WSDOT data

# Bellevue Citywide Trip Growth

## Daily Person Trips 2018 & 2035



City of Bellevue Citywide Transportation Data Perspective				
From the South Downtown Access Study (SDAS), 2020				
All data from the SDAS BKR Model				
Average Weekday Trips (Citywide)	2018	2035	Increase	2035 - %
Total Person Trips	1,889,824	2,359,254	469,430	100.0%
Metro + REX Buses (+21,500)	74,581	99,200	24,619	4.2%
Transit on I-405 BRT (STRIDE) (+16,200)	0	16,200	16,200	0.7%
Transit on Light Rail (+34,500)	0	34,500	34,500	1.5%
Transit Trips (Boardings & Alightings)	74,581	149,900	75,319	6.4%
Bicycle Trips	24,731	43,614	18,883	1.8%
Walking Trips	234,524	360,218	125,694	15.3%
Vehicular Person Trips	1,555,988	1,805,491	249,503	76.5%

Victor H. Bishop, P.E. May 3, 2021





# BelRed Transformation

Capital Improvement Projects



0 800 Feet

## Information

정보  정보  
सूचना  सूचना

425-452-6800

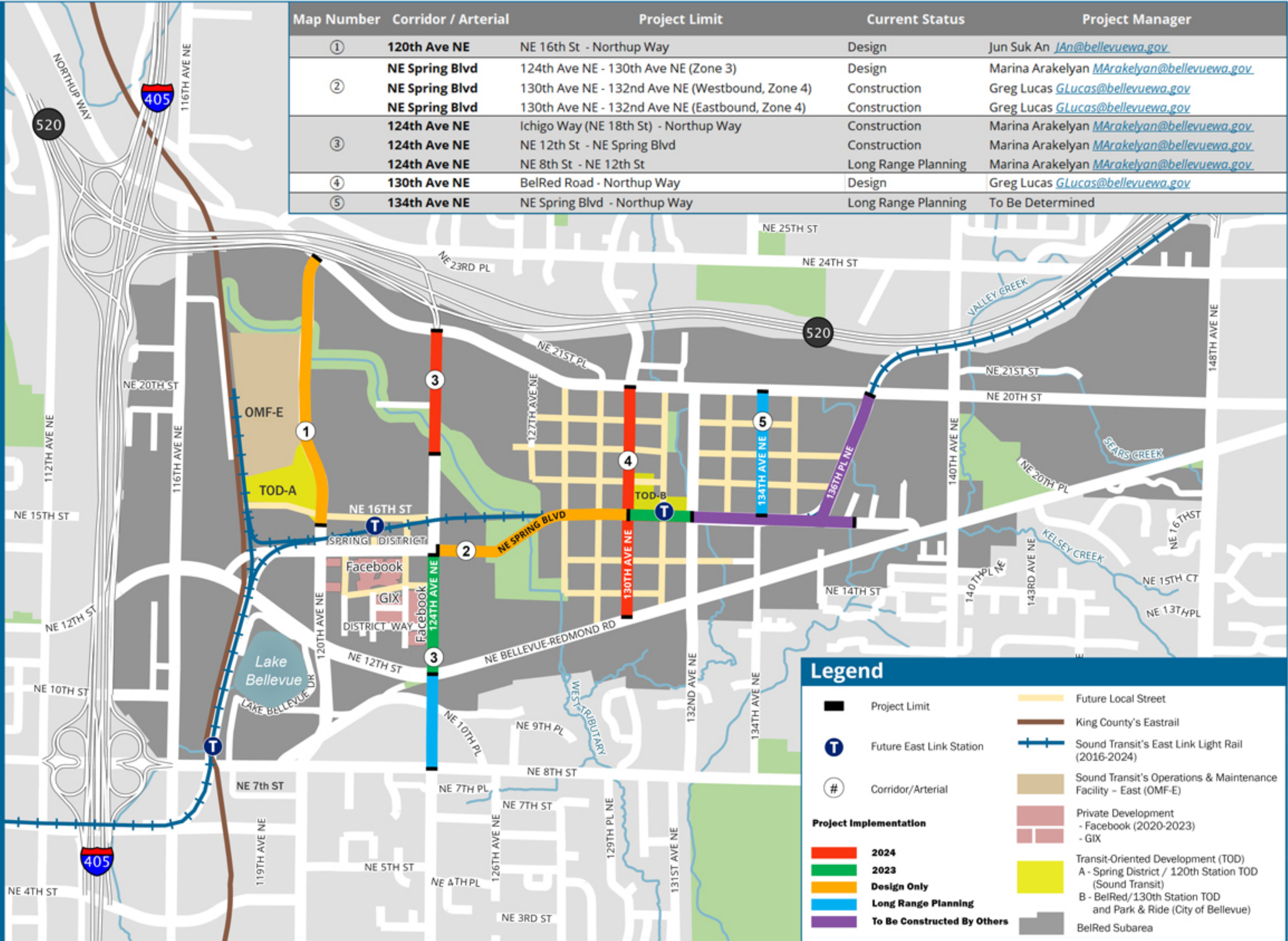
సమాచారం Thông Tin  
Información معلومات  
اطلاعات Информация

Source: City of Bellevue

Disclaimer: The City of Bellevue does not guarantee that the information on this map is accurate or complete. This data is provided on an "as is" basis and disclaims all warranties.

Coordinate System: NAD 1983 (2011)  
StatePlane Washington North FIPS  
4601 Ft US

Map Number	Corridor / Arterial	Project Limit	Current Status	Project Manager
①	120th Ave NE	NE 16th St - Northrup Way	Design	Jun Suk An <a href="mailto:JAn@bellevuewa.gov">JAn@bellevuewa.gov</a>
②	NE Spring Blvd	124th Ave NE - 130th Ave NE (Zone 3)	Design	Marina Arakelyan <a href="mailto:MArakelyan@bellevuewa.gov">MArakelyan@bellevuewa.gov</a>
	NE Spring Blvd	130th Ave NE - 132nd Ave NE (Westbound, Zone 4)	Construction	Greg Lucas <a href="mailto:GLucas@bellevuewa.gov">GLucas@bellevuewa.gov</a>
③	NE Spring Blvd	130th Ave NE - 132nd Ave NE (Eastbound, Zone 4)	Construction	Greg Lucas <a href="mailto:GLucas@bellevuewa.gov">GLucas@bellevuewa.gov</a>
	124th Ave NE	Ichigo Way (NE 18th St) - Northrup Way	Construction	Marina Arakelyan <a href="mailto:MArakelyan@bellevuewa.gov">MArakelyan@bellevuewa.gov</a>
	124th Ave NE	NE 12th St - NE Spring Blvd	Construction	Marina Arakelyan <a href="mailto:MArakelyan@bellevuewa.gov">MArakelyan@bellevuewa.gov</a>
④	124th Ave NE	NE 8th St - NE 12th St	Long Range Planning	Marina Arakelyan <a href="mailto:MArakelyan@bellevuewa.gov">MArakelyan@bellevuewa.gov</a>
	130th Ave NE	BelRed Road - Northrup Way	Design	Greg Lucas <a href="mailto:GLucas@bellevuewa.gov">GLucas@bellevuewa.gov</a>
⑤	134th Ave NE	NE Spring Blvd - Northrup Way	Long Range Planning	To Be Determined



## Legend

- Project Limit
  - Future East Link Station
  - Corridor/Arterial
  - Future Local Street
  - King County's Eastrail
  - Sound Transit's East Link Light Rail (2016-2024)
  - Sound Transit's Operations & Maintenance Facility - East (OMF-E)
  - Private Development
    - Facebook (2020-2023)
    - GIX
  - Transit-Oriented Development (TOD)
    - A - Spring District / 120th Station TOD (Sound Transit)
    - B - BelRed/130th Station TOD and Park & Ride (City of Bellevue)
  - BelRed Subarea
- Project Implementation**
- 2024
  - 2023
  - Design Only
  - Long Range Planning
  - To Be Constructed By Others





June 12, 2023

VIA ELECTRONIC SUBMITTAL

Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Re: Bellevue 2044 Comprehensive Plan DEIS

Dear Mr. Pittman:

We are the owners of nine parcels of land, totaling about 12 acres, all located immediately southeast of the I-90 / I-405 intersection in Factoria, and we are writing to provide comments on the Draft Environmental Impact Statement ("DEIS") prepared by the City of Bellevue ("City") for the Bellevue 2044 Comprehensive Plan Update. Our comments are as follows:

- We support Alternative 3 to be adopted as the Preferred Alternative in the FEIS. Alternative 3 provides the most flexibility in future uses in the City and supports the boldest vision for growth of housing and jobs in Bellevue. We further suggest the following:
  - There should be no GC zoning between Factoria Boulevard and I-405, north of SE 38<sup>th</sup> ST. This area is immediately next to where Sound Transit will ultimately construct a light rail station, and should therefore have high-density mixed use zoning.
  - All parcels inside the area bounded by Factoria Boulevard / SE 38<sup>th</sup> / I-405 / I-90 – because of their proximity to the future light rail station, should have higher density zoning than for properties south of SE 38<sup>th</sup> or east of Factoria Boulevard, due to proximity to future rail. In Alternative 3, this would mean designating all such parcels MU-H-2.
- As the DEIS notes, Factoria is the only Mixed Use Center in Bellevue that does not provide for mixed-use development. Our site totals about 12 acres immediately north of the Marketplace at Factoria and is suitable for a wide range of uses. In order to promote housing, jobs and place-making in Factoria, the Comprehensive Plan should support the widest possible range of allowable uses in this Mixed Use Center, including our properties.

- ST4 targets high-capacity transit service to Factoria and points east on I-90. The DEIS should consider ways to prepare the future land use in Factoria for this critical new regional transportation connection. Development in the core of Factoria that will be served by regional light rail should reflect the same scale and density as seen in Bel-Red and Wilburton.
- Future implementation of the new Comprehensive Plan should be discussed in the DEIS. Bellevue's land use planning system has historically been resistant to change on the micro level. Rezones are challenging without a foundation being laid in an area-wide update to the Comprehensive Plan. This makes it difficult for land uses in the City to evolve and adapt to changing circumstances. The Comprehensive Plan should create a process to accommodate such zoning changes and the DEIS should review alternative paths toward this end.
- The "air quality buffers" along pollution-generating arterials referred to in the DEIS should be eliminated. The logical location for density in the City is near arterials and transit corridors. A new regulation that limits future density in the very location where it belongs will just undermine the City's housing and jobs goals.

We appreciate the opportunity to provide these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Whitney Chou". The signature is fluid and cursive, with a long horizontal stroke at the end.

**From:** Wilson W <wilsonwucell@gmail.com>  
**Sent on:** Monday, June 12, 2023 7:30:42 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** Lily Xing <xinglij@gmail.com>; Board@bridletrailcommunity.org  
**Subject:** Add neighbors to be a party of record

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

To Whom it may concern,

We write to you with the comments below:

1) Among the four Alternatives, we consider Alternative 3 the most unfriendly to our Bridle Trails neighborhoods.

2) Please add us to be **a party of record** with [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Wilson & Lily Wu

13328 NE 55th Pl, Bellevue, WA 98005

Thank you.

Wilson Wu

----- Forwarded message -----

From: **Bridle Trails Community Club** <[board@bridletrailcommunity.org](mailto:board@bridletrailcommunity.org)>

Date: Sat, Jun 10, 2023 at 7:23 AM

Subject: Bridle Trails Up-zone? Last chance for 10 years to have Your Say on the Impact of Growth to Bellevue Monday 4:30 PM

To: <[wilsonwucell@gmail.com](mailto:wilsonwucell@gmail.com)>

**Bridle Trails Up-zone?  
Last chance for 10 years to have Your Say on  
the Impact of Growth to Bellevue  
Monday 4:30 PM**

Email DEIS comments or ask to be a party of record to [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Please cc [Board@BridleTrailsCommunity.org](mailto:Board@BridleTrailsCommunity.org)

Note: My understanding if you have not commented and/or became a party of record, you have no legal recourse on changes in the Environmental Impact Statement that could effect you and your property. studies different growth options to understand the impact & possible mitigations. - pamela johnston, co-president , 425-881-3301

[Housing Topic Sheet Link - Just 4 pages](#)

**Alternative 3 up-zones all of Bridle Trails**

**Citywide Zoning would allow 177,000 Housing Units and 358,000 Jobs**  
Current zoning has room for about 62,000 Housing Units. and 158,000 Jobs

**From:** <tonivincent@aol.com>  
**Sent on:** Monday, June 12, 2023 9:55:31 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** Board@BridleTrailsCommunity.org  
**Subject:** DEIS 2024-2044 Plan

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

To Whom It May Concern:

We support the opinion and views as stated below in the Bridle Trails Community letter and we want to be on record stating so. Thank you.

Toni Vincent  
Richard Fisher  
3825 132nd Ave NE  
Bellevue, WA 98005  
206-605-7071

## DEIS Letter from the Board

Bridle Trails Community Club Board commented on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS..



Bridle Trails Community Club  
6619 132nd Avenue NE. #133  
Kirkland, WA 98033  
[bridletrailscommunity.org](http://bridletrailscommunity.org)

June 11, 2023  
Subject: Comments on the Draft Environmental Impact Statement (DEIS) City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation  
To: Elizabeth Stead  
City of Bellevue Community Development Department  
450 110th Avenue NE  
Bellevue, WA 98004

Dear Ms. Stead:

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. Bridle Trails Community Club (BTCC) is a 501c(4) nonprofit organization dedicated to protecting and enhancing the character and livability of Bridle Trails area near Washington's Bridle Trails State Park in Bellevue and Kirkland. BTCC has been in operation since 1978.

Bridle Trails has about 3,000 multifamily and about 2,000 single family homes of various densities. Per city records, Bridle Trails is second in affordable housing including low-income senior housing. Some larger lots support the 455-acre State equestrian park. Residents have many choices without having to move outside of Bellevue. Bridle Trails has been a leader in protecting tree canopy. Bridle Trails offers a diverse choice of housing densities. Parks, both public and private trails, and right-of-ways work as a network for people and animals. These are hallmarks of our neighborhood, which have been planned and nurtured over fifty years.

BTCC has concerns regarding the adequacy of the DEIS because substantial City of Bellevue issues have not been addressed in the document. We are requesting that the DEIS is revised to address this missing information and then re-sent as a revised draft. Only in this way can our Bellevue residents understand how the comprehensive plan addresses the most significant issues of our City. We find that the DEIS does not have a reasonable thorough discussion of the significant aspects of the following and described below:

- House Bill 1220, 2022
  - Timeline of growth
  - Rapid growth
  - Management of growth, Dialing Growth in or up
  - Neighborhood plans
  - House Bills: 1110, 1337, and 1181
  - Changes in employment and housing as a result of Covid and remote working
  - Resources omitted in the analysis (parks and recreation and plants and animals;
- large and domestic animals
- Urban Forest Ecosystem
  - Water resources

**From:** Susie <spinnaker4@comcast.net>  
**Sent on:** Monday, June 12, 2023 9:54:07 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Request to be a party of record

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Susie Goett  
16712 SE 7th St  
Bellevue 98008  
Spinnaker4@comcast.net

Request to be a part of record comp plan 2044

Thank you



**From:** <schwab.s@hcsconstruction.com>  
**Sent on:** Monday, June 12, 2023 9:53:01 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** schwab. s <schwab.s@hcsconstruction.com>  
**Subject:** DEIS/ Com,p Plan

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

I agree with the Bridle Trails Community Club letter.  
There needs to be more time to research and study the impacts to our community.  
Sherry Schwab

**From:** Richard Hughes <richard\_hughes@outlook.com>  
**Sent on:** Monday, June 12, 2023 9:48:14 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Draft EIS

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Good Morning,

I would like to be **added as a party of record** and I also adopt the comments, concerns, and objections articulated by the Bridle Trails Community Club in their emailed letter dated June 11, 2023 (emailed to you today).

Thank you,

Richard Hughes  
13709 NE 48<sup>th</sup> Pl  
Bellevue 98005

**From:** phyllisjwhite <phyllisjwhite@comcast.net>  
**Sent on:** Monday, June 12, 2023 10:03:35 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** board@bridletrailscommunity.org  
**Subject:** BTCC Board letter for Draft Environmental Impact Statement.

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Ms. Elizabeth Stead,

Please include my/this DEIS public comment as a party of record.

I agree with the following Bridal Trails Community Club DEIS letter comments on the DEIS including the Wilburton area.

Respectfully,

Phyllis White

----- Original message -----

**From:** Bridle Trails Community Club <board@bridletrailscommunity.org>  
**Date:** 6/12/23 8:31 AM (GMT-06:00)  
**To:** phyllisjwhite@comcast.net  
**Subject:** Today @ 4:30pm is the Deadline for your comments to the City | BTCC Board letter for Draft Environmental Impact Statement.

## **Bridle Trails Up-zone? Last chance for 10 years to have Your Say on the Impact of Growth to Bellevue Today 4:30 PM**

How?

Email DEIS comments or ask to be a party of record to [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Feel free to use sections of the Board letter or say you agree with the Bridle Trails Community Club letter.

Please cc [Board@BridleTrailsCommunity.org](mailto:Board@BridleTrailsCommunity.org)

Note: My understanding if you have not commented and/or became a party of record, you have no legal recourse on changes in the Environmental Impact Statement that could effect you and your property. studies different growth options to understand the impact & possible mitigations. - pamela johnston, co-president , 425-881-3301

## **DEIS Letter from the Board**

Bridle Trails Community Club Board commented on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS..



Bridle Trails Community Club  
6619 132nd Avenue NE. #133  
Kirkland, WA 98033  
[bridletrailscommunity.org](http://bridletrailscommunity.org)

June 11, 2023  
Subject: Comments on the Draft Environmental Impact Statement (DEIS) City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation  
To: Elizabeth Stead  
City of Bellevue Community Development Department  
450 110th Avenue NE



June 12, 2023

City of Bellevue Comprehensive Plan Periodic Update DEIS Comments  
c/o Thara Johnson, Comprehensive Planning Manager  
City of Bellevue  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Via electronic mail: [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Re: Amazon comments on the City of Bellevue's 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement

Dear Ms. Johnson,

On behalf of Amazon, thank you for the opportunity to comment on the City of Bellevue's 2023 Draft Environmental Impact Statement for the 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation. We applaud city staff on their work to deliver a thorough draft analysis. We also appreciate the City of Bellevue's public engagement, including direct engagement with the business community as stakeholders.

As a major employer that is growing in Bellevue, we support the city's effort to chart a bold vision for how Bellevue should grow, locate housing and jobs, and make investments in transportation, utilities, and parks in the next twenty years. Amazon is committed to partnering with the City of Bellevue and the community on this important planning effort.

Amazon first opened an office in Bellevue in 2017 and we had about 450 employees in the city at the time. As customer demand increased through the years, we continued to hire and grow in the Puget Sound region. In 2019, we announced plans to invest much more on the Eastside—bringing 25,000 jobs, and making Bellevue and the Eastside the location of our future growth in the Puget Sound region.

Building off of our EIS Scoping letter submitted on October 31, 2022 where we emphasized the importance of striking balance between job growth and housing stock, we highlighted three areas for consideration:

- Study 80,000 housing units and 30,000 job capacity above the No Action Alternative
- Prioritize density around frequent and reliable transit
- Study multimodal solutions as mitigation of growth and dense, mixed-use development

We thank the Bellevue 2044 team for taking our comments into consideration in the draft analysis. Specifically, we see our inputs reflected in Alternative 3 where housing capacity increased from initially 65,000-70,000 housing units to 95,000 housing units and jobs capacity increase from 145,000 jobs to

2121 7<sup>th</sup> Avenue  
Seattle, WA 98121

200,000 jobs. Additionally, we see our comment to prioritize density around frequent and reliable transit and increase height and density in BelRed and Wilburton reflected in Alternative 3 where additional height and density was studied. Last, we support the city's use of a multimodal transportation analysis, based on the Mobility Implementation Plan (MIP) adopted by City Council in 2022, to evaluate various growth alternatives within the DEIS.

Consistent with those priority themes shared in our initial comment letter, Amazon offers the following comments for consideration for the final Environment Impact Statement (FEIS) and selection of the preferred alternative:

- **Alternative 3 Best Reflects Bellevue's Needs:** Upon review of the three Action Alternatives, we believe Alternative 3 allows for the diversity and density of housing and job growth that best reflect Bellevue's needs. Alternative 3 also focuses growth in BelRed, Wilburton, and Downtown, where there are existing and planned transit investments to encourage transit-oriented development. We also support the taller heights in Alternative 3 to allow for more flexibility for housing and better feasibility for high-rise building typologies.
- **Connection between Alternatives and Affordable Housing Programs:** We suggest the city clarify in the FEIS why each Action Alternative is paired with different affordable housing programs such as incentive zoning versus mandatory inclusionary affordable housing and whether they can be decoupled. Additionally, it would be instructive to study how various affordable housing programs and calibrations of those programs might yield different outputs in each of the Action Alternatives. We suggest the city show, in the FEIS, analysis that compares estimated market-rate and affordable housing unit output, broken down by area median income (AMI) affordability levels, for each of the Action Alternatives. The analysis should compare the different affordable housing policy tools that are being considered, including but not limited to incentive zoning, mandatory inclusionary (with and without fee-in-lieu and deed-in-lieu options), and MFTE. The analysis should account for how these different policy tools, such as incentive and mandatory inclusionary zoning, affects overall residential development decisions. The analysis should also take into consideration the role of other non-land use related affordable housing funding and financing tools such as the Washington State Housing Trust Fund and the federal Low Income Housing Tax Credit. This level of analysis would help the city select affordable housing policy approaches informed by data and modeling.
- **Simplify Land Use Designations:** The current maps show 53 land-use designations which is quite complicated. We suggest finding ways to consolidate them into more flexible 'mixed use' zones.
- **Reflect Phased Buildout Over 25 Years:** For baseline comparison, it would be informative to show in the FEIS previous pace of growth in Bellevue. For example, show the percentage of developable land that was redeveloped within the last 25 years. The city can apply that baseline to the alternatives to provide a data-informed, more realistic view on how each of the alternatives could potentially meet, not meet, or exceed the King County Growth Targets of 35,000 housing and 70,000 jobs over a 25-year span in Bellevue. In part, Amazon supports Alternative 3 because we understand that capacity does not necessarily result in development. Alternative 3 provides ample capacity, and therefore flexibility, to help the city accommodate the expected growth and achieve a more favorable housing to jobs ratio. Based on Figure 2-10 on page 2-32, in order to meet or exceed the 35,000-housing target, 59% of all developable residential capacity would need to be built in Alternative 1, 45% in Alternative 2, and most realistically, 37% in Alternative 3. The FEIS should reflect phased build out based on historic development data so that decision-makers and the public can use that information



to select a Preferred Alternative. On the contrary, the aesthetic visual analysis for Wilburton (pages 6-19 to 6-50) show a 100% buildout without distinction from undevelopable sites such as parks or wetlands. Without a disclaimer or clarification, we are concerned that the massing images shown will cause confusion and alarm.

- **Study Barriers to Fully Achieve Housing Capacity:** While we understand the primary requirements of an EIS is to identify growth target distribution approaches and evaluate the impacts of growth distribution, we believe there are gaps between zoning capacity studied in the EIS and what might actually get built after factoring in floor-to-area (FAR) ratios and development standards. Alternative 3 allows for 95,000 housing units but the DEIS does not specify FAR assumptions for any alternative which could dramatically alter actual unit output and development feasibility. It would be helpful for the city to clarify FAR assumptions used for modeling. The city should also analyze other potential barriers to fully achieving the housing capacity numbers, including development standards and parking requirements. For example, if zoning allows for residential development to achieve a certain height, other factors such as landscape buffers or setbacks may render it less feasible to fully achieve or max out on the development capacity. It would be helpful to understand how those factors might impact the city's ability to realistically meet housing targets.
- **Catalog Publicly-Owned Surplus Land Suitable for Affordable Housing Near Transit:** Through Amazon's Housing Equity Fund, we have invested \$514 million in loans and grants in the Puget Sound region to create and preserve 5,200 affordable homes for families making between 30% and 80% of Area Median Income (AMI). In Bellevue, we have increased the restricted affordable housing stock by approximately 20% as of August 2022 and continue to increase that number by supporting 233 new affordable housing units near Bellevue's 120<sup>th</sup> Street light rail station. Through our experience over the past few years, we have noted that increasing land costs presents further challenges to bringing more affordable housing online. It would be prudent for the city to identify publicly-owned land that is underutilized or surplus, particularly in Mixed-Use or Neighborhood Centers, and designate them as potential sites for affordable housing.
- **Bolster Mitigation Measures under Transportation:** We believe the stated Avoidance, Minimization, and Mitigation Measures in Section 11.6 is a good starting place to reduce the significance of the adverse impacts identified in the Action Alternatives. However, while we support building out pedestrian and bicycle network per the city's Mobility Implementation Plan, we encourage the city to consider additional vehicle and road-focused solutions to mitigate impacts on System Intersection V/C ratios, Primary Vehicle Corridor speed, and state facility LOS. For example, page 11-132 states, "vehicle capacity expansions may be warranted in strategic areas if the other project concepts and strategies do not adequately address vehicle performance target gaps." It would be helpful to clarify what those potential vehicle capacity expansions could be and how it might mitigate the adverse impacts.
- **Add Mention of the Grand Connection I-405 Non-Motorized Crossing Throughout the Transportation Chapter:** Given the City of Bellevue issued a Request for Qualifications for consulting firms to conduct preliminary engineering design for the Grand Connection I-405 Non-Motorized Crossing in April this year, the DEIS should include mention of the project in the Transportation section. This includes, but is not limited to, the following references:
  - In section 11.4. Regulatory Context, add mention of the I-405 non-motorized crossing within the list of 'Relevant Plans and Policies'.

- Clarify on page 11-43, under I-405 Corridor Program, whether the I-405 non-motorized crossing is counted as one of eight new pedestrian and bicycle crossings over I-405 referenced in that section.
- In Mitigation Measures M-TR-1, 2, and 3, reference Eastrail and I-405 non-motorized crossing as key strategies to expand pedestrian and bicycle network.
- Under Section 11.5.1, clarify if the Grand Connection I-405 non-motorized crossing between City Hall and Eastrail is assumed to be to be in place in at least one of the Action Alternatives. Also clarify whether in Alternatives 1-3 in the same section, which specific new multimodal connections in the Wilburton study area were included in the system performance modeling.
- **NE 6<sup>th</sup> Street Extension in the Wilburton Study Area:** Under Alternative 3A in the Wilburton Study Area (page 11-110), we agree with the city's analysis that a NE 6<sup>th</sup> Street extension to 120<sup>th</sup> Ave NE with an at-grade intersection at 116<sup>th</sup> Ave NE and Eastrail would greatly impact the experience for Eastrail users by adding another trail crossing and new modal conflict. We support a NE 6<sup>th</sup> Street extension to 116<sup>th</sup> Ave NE for local East-West access, not limited to HOV access to I-405.
- **Incentivize Trail-Oriented Development along Eastrail and Grand Connection I-405 Crossing:** As mitigation to aesthetic impacts in the Wilburton Study Area outlined in Chapter 6, we suggest the city consider incentivizing trail-oriented development along Eastrail and the Grand Connection I-405 non-motorized crossing. For example, Section 6.5.3 "Other Proposed Mitigation Measures", only references adding more regulations and requirements that could limit a project's flexibility to best deliver trail-oriented design on the ground-level. Adding incentives to the toolbox of mitigation measures could ultimately help realize the Wilburton vision.

Once again, we want to thank the City of Bellevue for your consideration of these comments. We appreciate Bellevue leadership and staff's work on this periodic update. We look forward to working together to ensure Bellevue is not only prepared for future growth, but is well positioned to continue to thrive and be a fantastic place to live, work, and play for all. Should staff have any questions or would like to discuss these comments further, please contact me at [phleung@amazon.com](mailto:phleung@amazon.com).

Sincerely,



Pearl Leung  
Senior Manager, Public Policy  
Amazon

CC:

Bellevue City Council  
Brad Miyake, City Manager, City of Bellevue  
Diane Carlson, Deputy City Manager, City of Bellevue  
Michael Kattermann, Director of Community Development, City of Bellevue  
Emil King, Planning Director, Community Development Department, City of Bellevue  
Liz Stead, Interim Development Services Director and Land Use Director, City of Bellevue

June 12, 2023

City of Bellevue  
450 110th Avenue NE  
Bellevue, WA 98004

**Re: BDA Comments on Draft Environmental Impact Statement for the Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation**

To Whom it May Concern:

We are writing on behalf of the Bellevue Downtown Association (BDA) to share comments on the Draft Environmental Impact Statement (DEIS) that serves to identify and analyze potential unavoidable or adverse impacts and mitigation measures that could result from the Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation.

The City's proactive policies and strategic investments in support of a thriving Downtown Bellevue has proven to be a highly successful and effective approach, supporting the long-term economic and cultural wellbeing of the entire City. Our comments reinforce this strategy and incorporate feedback from our BDA-member workgroup focused on the DEIS. Their discussion was framed by a set of principles for desired outcomes generated by the [BDA Board of Directors](#).

1. Balance uses to support sustainable growth and long-term viability.
2. Focus density around light rail and encourage transit-oriented development (TOD).
3. Promote flexibility to ensure plans can adapt to changing conditions.
4. Support maximum density to optimize development potential.

We recommend the City pursue land use Alternative 3 for both the City at-large and Wilburton study area as the preferred alternatives. The primary reason is because both options provide the most opportunities to increase development capacity for housing to match the City's needs and support flexibility for neighborhood development based on changing conditions. Furthermore, the workgroup identified additional information to include in the Final Environment Impact Statement (FEIS) to ensure it provides a holistic body of information to help inform future work on the Comprehensive Plan policies and Wilburton Vision Implementation. If topics outlined in our feedback do not fall within scope of the FEIS, we request the City clarify what future initiatives and/or body of work will cover the desired information so that the BDA and its members can plan appropriately.

Our feedback is outlined under two categories: 1) City at-large, representing the DEIS information about the Comprehensive Plan Update and 2) Wilburton, representing the DEIS information about the Wilburton Vision Implementation.

## **CITY AT-LARGE**

*Requests for additional information or analysis to be included in the FEIS.*

1. Analyze benefits and tradeoffs of development incentives versus mandates related to housing, particularly on affordable housing. The preferred alternative should not select a specific approach, instead it should recognize that an affordable housing program may be incorporated with the upzone, and it should study the pros and cons of each approach, including legality. The FEIS must also disclose all assumptions, economic study, and assumed number of housing units under the various programs studied.
2. Provide detailed information about how the multimodal transportation network will accommodate increased density, noting benefits and tradeoffs.
3. Clarify how the City plans to mitigate vehicular congestion impacts to meet performance targets and examine whether there are any significant impacts even if the identified mitigation measures are implemented.
4. Last-mile solutions will be critical to supporting the growth proposed in the land use alternatives. Provide more information about how transit and pedestrian pathways will be supported, noting benefits and tradeoffs.

## **WILBURTON**

*Key points regarding the Wilburton information and requests for include additional information or analysis for the following topics to be included in the FEIS.*

### **Key Points**

1. Add specific information about the Grand Connection and Eastrail, including the future I-405 non-motorized crossing that is part of the Grand Connection. These major investments will shape Wilburton's future. The FEIS must reflect these multimodal improvements to support the growth alternatives and the neighborhood's future potential.
2. Recognize Wilburton can be an important complement to Downtown that will develop as its own unique neighborhood over time with distinctive qualities and amenities. Future work to examine the relationship between Downtown and Wilburton's potential is important information to supporting the vision's implementation.
3. Recommend NE 6th Extension project end at 116<sup>th</sup> Ave NE. If built to 120th Ave NE, the project could negatively impact both the Grand Connection and Eastrail, as well as future housing and commercial development. Furthermore, the FEIS should disclose the transportation benefits and tradeoffs of this connection to inform future decision making.

### ***Additional Information or Analysis to Include in FEIS***

1. Share more information on how to support housing production, particularly affordable and workforce. Include 1) analysis regarding benefits and tradeoffs of development incentives versus mandates and 2) details regarding which development standards hinder or promote building forms that support multifamily midrise housing.
2. Provide more details on how land use scenarios can leverage East Link, Eastrail, and the Grand Connection. Also, provide insights into development incentives that can leverage these major multimodal projects.
3. Include more information about specific areas of Wilburton to support future consideration of potential subareas.
  - Examine the development viability of the growth areas based on constraints and opportunities associated with topography, existing built environment, mobility connectivity and access.
  - Share how master plan developments of a large parcel or series of parcels can impact the area; note benefits and tradeoffs.
4. Examine conditions that would support dynamic places in Wilburton with vibrant 18-24-hour amenities and attractions.
5. Provide more information about how the proposed street network interacts with existing conditions, such as topography, parcel constraints, properties likely or not likely to redevelop, and tools/methods to advance neighborhood buildout.
  - Examine lessons learned from Bel-Red's rezone and vision implementation.
  - Study whether the proposed street network is necessary or beneficial for neighborhood mobility.
6. Provide more information on the air quality findings and how these findings will impact future development. Examine how potential buffers compare to Downtown and East Main mitigation measures and study how air qualities standards measure up to market-driven solutions.

We appreciate the City's effort to undergo an intensive process to examine existing conditions and collect community input. Thank you for leading the City's growth and continued support of Downtown.

Sincerely,



Patrick Bannon  
BDA President & CEO



Matt Jack  
BDA Director of Public Policy



**From:** p johnston <pamjjo@msn.com>  
**Sent on:** Monday, June 12, 2023 9:14:10 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** BTCC Board <board@bridletrailscommunity.org>  
**Subject:** DEIS BELRED

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

BTCC has concerns regarding the adequacy of the DEIS because substantial BelRed issues have not been addressed in the document. We find that the DEIS does not have a reasonable thorough discussion of the significant aspects of the following and described below:

- Change of vision
- The scale of changes such as 24 story buildings
- Incorporation of feedback from the BelRed Look Back.
- Analysis of parks, greenspace, and water
- Timing of this change
- The maps are too small. Need the same maps and maps at the level of Wilburton.
- Impacts from and impacts from Redmond and Wilburton
- Impact from and mitigation on surrounding neighborhoods

We are requesting that the DEIS is revised to address this missing information and then re-sent as a revised draft. Only in this way can our Bellevue residents understand how the comprehensive plan addresses the most significant issues of our City.

Cordially,

*-pamela johnston*

Co-president Bridle Trails Community Club  
425-881-3301

Pamela Johnston, BTCC Co-President  
3741 122<sup>nd</sup> Ave NE  
Bellevue, WA 98005  
Margie Ye, BTCC Treasurer  
12916 NE 29th St  
Bellevue, WA 98005  
Norm Hansen, BTCC Member  
3851 136th Ave NE  
Bellevue, WA 98005  
Eva Orlowska-Emadi, BTCC Board Member  
2805 127th Ave NE,  
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Loretta Lopez, BTCC Co-President  
13419 NE 33rd Lane  
Bellevue WA 98005  
Barbara Hughes, BTCC Secretary  
13709 NE 48th Pl  
Bellevue, WA 98005  
Stuart Heath, BTCC Board Member  
13252 NE 47th Street  
Bellevue, WA 98005

**From:** NORMAN HANSEN <hansennp@aol.com>

**Sent on:** Monday, June 12, 2023 9:50:52 PM

**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>

**CC:** board@bridletrailscmmunity.org; onebellevue@googlegroups.com

**Subject:** Comments on the Draft Environmental Impact Statement (DEIS) City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

As a resident of Bridle Trails Bellevue, this email serves 1) as a request to become a party of record and 2) to express complete endorsement of the thoughtful and detailed commentary provided by the Bridle Trails Community Board (below).

Norman Hansen

3851 136th Ave NE, Bellevue, WA 98005

Subject: Comments on the Draft Environmental Impact Statement (DEIS) City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation

To: Elizabeth Stead

City of Bellevue Community Development Department

450 110th Avenue NE

Bellevue, WA 98004

Dear Ms. Stead:

Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. Bridle Trails Community Club (BTCC) is a 501(c)(4) nonprofit organization dedicated to protecting and enhancing the character and livability of Bridle Trails area near Washington's Bridle Trails State Park in Bellevue and Kirkland. BTCC has been in operation since 1978.

Bridle Trails has about 3,000 multifamily and about 2,000 single family homes of various densities. Per city records, Bridle Trails is second in affordable housing including low-income senior housing. Some larger lots support the 455-acre State equestrian park. Residents have many choices without having to move outside of Bellevue. Bridle Trails has been a leader in protecting tree canopy. Bridle Trails offers a diverse choice of housing densities. Parks, both public and private trails, and right-of-ways work as a network for people and animals. These are hallmarks of our neighborhood, which have been planned and nurtured over fifty years.

BTCC has concerns regarding the adequacy of the DEIS because substantial City of Bellevue issues have not been addressed in the document. We are requesting that the DEIS is revised to address this missing information and then re-sent as a revised draft. Only in this way can our Bellevue residents understand how the comprehensive plan addresses the most significant issues of our City. We find that the DEIS does not have a reasonable thorough discussion of the significant aspects of the following and described below:

- House Bill 1220, 2022
- Timeline of growth
- Rapid growth
- Management of growth, Dialing Growth in or up
- Neighborhood plans
- House Bills: 1110, 1337, and 1181
- Changes in employment and housing as a result of Covid and remote working
- Resources omitted in the analysis (parks and recreation and plants and animals; large and domestic animals)
- Urban Forest Ecosystem
- Water resources
- Salmon & Green space
- Tree Canopy
- Green Space & Streams
- Siting municipal development:
- Homelessness
- Historic Resources
- Accessible language

**Prioritization in the permitting process for construction on lots that will meet the city's overall target for tree canopy at time of occupancy will encourage tree retention and planting.** This would be much easier to accomplish with existing trees since newly planted trees are likely to be much smaller than their potential future size, but it will also provide flexibility for a builder to meet this target with new plantings.

Potential refinements:

I would expect the prioritization of affordable homes for birds to fall below the prioritization of affordable housing for people, of course, but I think it could stack within the affordable/non affordable categories as follows:

Affordable housing, >40% canopy

Affordable housing, <40% canopy

Market-rate housing/commercial with >40% canopy

Market-rate housing/commercial with <40% canopy

Trees more than 80' tall or landmark trees at least 40' tall should count as having double the canopy, maybe triple if they are over 100' tall.

I would also consider any plant over 10-15 feet to be part of the canopy; there are some glorious rhododendrons, lilacs, and camellias in my neighborhood that are capable of providing shade. Of course, if we expand the classification of canopy greenery we should also place restrictions on the use of nuisance/invasive plants to meet this goal, possibly with exceptions for root-spreading plants like bamboo as long as they are adequately boxed-in. Could also start by making a list of "good" plants that will count.

If a tree trunk is entirely on the property being developed, but it provides canopy that crosses over the property line, allow that canopy to count toward the total with the permission of the affected neighbor.

If a tree is in the roadside strip that's city property, perhaps the builder can decide whether to include that strip in the calculation of the canopy percentage, with trees in this area also counted double (it is harder to meet the goal percentage in this area because the driveway and construction equipment access take some room, but these trees contribute disproportionately to a better pedestrian experience).

The builder should be required to make a reasonable effort to maintain canopy between getting occupancy and when the property is sold.

The Vuecrest comment at the June 8th listening session was interesting, since I didn't know about their tree height restrictions for view protection, but perhaps they can use shorter species of trees to meet the canopy target.

It is easier to use a drone shot to validate canopy extent in summer than winter, but we can start to collect images that show sample overhead views of yards and construction sites in summer and winter, so that a calculation can be made from aerial imagery even when branches are bare.

**From:** Nicole Myers <nicolemikomyers@gmail.com>  
**Sent on:** Monday, June 12, 2023 9:47:31 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Draft EIS comments  
**Attachments:** Pedestrian centered streets.pdf (339.52 KB), Tree-based permit priority.pdf (43.58 KB)

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Greetings! I would like to comment for the Draft EIS that I think the highest priority for Bellevue's environment in the next few decades is to implement policies that ensure a lot with trees is more valuable than one without (avoiding preemptive clearings) and that there be positive incentives for protecting trees on-site throughout the construction process.

I am attaching two potential policies that I believe could facilitate this goal, and I hope they will be considered for tree protection.

- Pedestrian Centered Streets, where tree retention is rewarded with RPZ-based parking incentives
- Priority in the permitting process for projects that meet Bellevue's goal for tree canopy cover

We also have LUC 20.20.900.D.6, which incentivizes tree retention through a potential 10% reduction in required parking. This does not seem applicable to residential areas, however, and so much of Bellevue's tree canopy is in residential areas and should be protected. Perhaps this can be reworked to increase the scope of this parking-related positive incentive.

# Bellevue's Pedestrian Centered Streets

Pedestrian Centered Streets are like parks for walking. They have trees, birdsong, and a variety of plants to see in people's yards. Sidewalks may be pedestrian-friendly, but it's even better to walk on a smooth roadway with no sidewalks where pedestrians outnumber cars, trees shade the road, and sight lines aren't blocked by cars.

As we anticipate increased density, we can expect greater parking demand, which creates the possibility of using carrots rather than sticks to protect trees. A restricted parking zone (RPZ) with incentives for tree protection can be implemented at the same time as special rules to keep streets safe. Slower speeds and parking changes will ensure two-lane streets are pedestrian-friendly, so we get the good density (more residents) and avoid the bad kind of density (excessive on-street personal vehicle storage and lot clearings).



Bellevue Healthy Streets were chosen for their low traffic volumes and ability to create connections to parks and essential services (2023 photo)

## Key Elements

- Pedestrian sharrows
- Tree protection incentives
  - With a significant tree on your property, reduction in the minimum parking requirement by one parking space, and/or an additional RPZ permit for daytime street parking for every two significant trees on your property.
- Default RPZ allotment simply based on length of road frontage.
  - Homeowners can request a doubling of RPZ frontage credit by documenting that a segment is usable for parking a vehicle at least 10' from centerline of road.
- Car parking separation minimum 15' from a vehicle across the street
- Planned addition of speed cushions once street has 600 vehicles per day (presume pedestrian usage increases by the same proportion, multiplying ped-car conflicts)
- 20 MPH speed limit
- Routine, frequent RPZ enforcement
- Tree map online showing participating trees and arborist reports
- Parking strip classification map online

<b>For pedestrians:</b> Reduced heat island effect vs. a roadway with a 6' sidewalk More shade from trees close to roadway A smooth road surface is easier for strollers and wheelchair users to navigate than a sidewalk with curb cuts. Presence of trees and greenery close to the roads will encourage slower driving	<b>For drivers:</b> Never have to circle to find parking on the street Don't have the binary of fully on-street or fully off-street parking that is produced by a sidewalk. Opportunity to save fuel by having alternatives like cycling and walking in neighborhood be more appealing and accessible
<b>For property owners:</b> Keep flexibility in use of space along road frontage (ditch, planted slope, trees, gravel pullout, grass) Not responsible for sidewalk construction costs May get more flexibility in locating on-site parking on property if it is pervious and set back from ROW.	<b>For city:</b> Lower impact development (LID) principles can reduce costs associated with surface water management modifications. Less construction along roadways means fewer disruptions to residents Lower municipal carbon footprint Meet tree canopy goals



June 12, 2023

**VIA USPS AND EMAIL**

City of Bellevue Development Services Department  
Attn: Rebecca Horner, Land Use Director and SEPA Responsible Official  
Reilly Pittman, City of Bellevue Environmental Planning Manager  
Elizabeth Stead, Land Use Director  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004  
[CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Re: Bellevue College's Comments Regarding the Draft Environmental Impact Statement (the "DEIS") for the City of Bellevue's Proposed 2024-2044 Comprehensive Plan Periodic Update (the "Comprehensive Plan Update")

To whom it may concern:

These comments are provided to the City on behalf of this firm's client, Bellevue College, a public institution of higher education authorized under Chapter 28B.50 of the Revised Code of Washington ("Bellevue College"). As you are likely aware, Bellevue College's campus is located on approximately 100 acres in the City's Eastgate subarea. The future land use map in the City's current Comprehensive Plan classifies Bellevue College's campus as a Public Facility/Single Family-High Density land use ("PF/SF-H," or the "Current Comprehensive Plan Designation"). The City's current zoning map depicts the Bellevue College campus as within a Single-Family Residential 5-acre land use district (the "Current Zoning").

Bellevue College strongly supports the City's proposed redesignation of its campus from the current PF/SF-H designation to an "Institutional" designation in the proposed Comprehensive Plan Update. Bellevue College agrees with the City's acknowledgment in the DEIS that Bellevue College's campus is "not expected to redevelop as single-family" and, instead, should be developed in the future as an "Institutional" land use that contemplates development of "classroom[s], office[s], and dormitories in a campus setting" on the Bellevue College campus. We encourage the City, in the Final Environmental Impact Statement ("FEIS") and the Comprehensive Plan Update, to adopt the proposed reclassification of the Bellevue College campus to an Institutional land use as contemplated in the DEIS.

***Note, however, that this redesignation is just one of several steps the City should take, as soon as possible, to avoid hindering future development of Bellevue College's campus consistent with the College's educational purpose and mission.*** As you may be aware, the City has a legal duty to accommodate regional Essential Public Facilities ("EPFs") like the campus pursuant to the Growth Management Act ("GMA"). The proposed Comprehensive Plan redesignation is a step in the right direction, of course. Nevertheless, we and our client remain deeply concerned that the Current Zoning does not reflect the institutional uses present or planned on the Bellevue College campus. As you know, the GMA requires that the City adopt development regulations to implement the policy decisions made in any comprehensive plan update. *See, e.g.,* RCW 36.70A.040(3). We thus urge the City to take prompt action to also amend the City's Land Use Code ("LUC") to allow for the further development of this important EPF in the City. This should be done concurrently with—or, alternatively, promptly after—the City adopts the Comprehensive Plan Update.

In our review of the current LUC, we find no land use district that seems to implement an Institutional future land use designation under the City's Comprehensive Plan. So, to implement the Comprehensive Plan Update's redesignation of the Bellevue College campus as an Institutional land use, the City will not only need to rezone the campus on the City's zoning map, but also craft new development regulations to permit future Institutional development across the campus. These implementing actions should be reviewed as soon as possible to avoid further delay to final City action in furtherance of its obligation to accommodate this important EPF. Ideally, the City would initiate an expedited rezone of the Bellevue College campus following the City's adoption of the Comprehensive Plan Update, if it is not done concurrently.<sup>1</sup>

Time is of the essence for Bellevue College, as its campus needs to be rezoned as soon as possible. As you may be aware, a permitting agreement signed by the City and Bellevue College in 1985 (the "Permitting Agreement") broadly permitted institutional development on the campus. But the Permitting Agreement was recently terminated, leaving the campus subject to the underlying residential zoning regulations that are obviously a poor fit for the long-term development of an EPF like a college campus. The lack of Institutional zoning, together with the termination of the Permitting Agreement hinder Bellevue College's ability to develop facilities on its campus necessary to accommodate its growing student body and expanding educational mission. The City can remedy this problem by promptly processing a rezone and adopting Institutional development standards for the College.

---

<sup>1</sup> Bellevue College encourages the City, in its Comprehensive Plan Update or as soon as possible thereafter, to consider discussion of the baseline standards that should govern development within the LUC's new Institutional land use district that will be promulgated following the adoption of the Comprehensive Plan Update. In addition, the FEIS for the Comprehensive Plan Update should consider the types of development that could occur in the forthcoming Institutional land use district and study the potential environmental impacts that will result from a rezone of the Bellevue College campus from R-5 to Institutional.

June 12, 2023

Page 3

We appreciate your consideration of these comments. Please feel free to contact the undersigned with any comments or questions related to the issues raised in this comment letter.

Sincerely,

Davis Wright Tremaine LLP



Clayton Graham / Brent Droze

cc: Client

MAX CAPITAL LLC & ALCO INVESTMENT CO  
14510 NE 20<sup>TH</sup> STREET – SUITE 205  
BELLEVUE, WA 98007

June 12, 2023

City of Bellevue Development Services Department  
Attn: Liz Stead, Director and SEPA Responsible Official  
Reilly Pittman, Environmental Planning Manager  
450 110th Avenue NE  
Bellevue, WA 98004

*Via email to [CompPlan2044EIS@bellervuewa.gov](mailto:CompPlan2044EIS@bellervuewa.gov)*

Re: *Bellevue 2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation DEIS  
Comments for 411 116th Avenue NE*

Dear Director Stead and Mr. Pittman,

We appreciate the considerable time and work that has clearly gone into the City of Bellevue's (the "City") Draft Environmental Impact Statement for the 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation ("DEIS"). The DEIS represents a very promising leap toward our shared goal of building an equitable, transit-oriented, affordable, sustainable and economically healthy community.

Our group owns the nearly 4.5-acre Auto Nation Ford site located at 411 116th Avenue NE (the "Site"). We believe the Site could provide a significant opportunity for redevelopment that embodies the City's vision for a dense, multimodal and sustainable Wilburton, complementing Downtown and our community's many recent investments in transit and other infrastructure if zoned appropriately. We support the identified MU-H-3 designation for the site in Alternative 3, and request that designation be carried forward to the FEIS Preferred Alternative, along with addressing the other topics we've identified in this letter.

## **I. Background**

The Site is uniquely suited to dense, mixed-use, highrise development that will support a transit-oriented future for Bellevue. First, it is exceptionally well connected. The Site is adjacent to I-405 and NE 4th Street, within a quarter mile of both the Downtown and Wilburton Link light rail stations, and just one block from the City's future Grand Connection bridge and Eastrail. Located just across the NE 4th Street overpass from Downtown, the Site provides both a transition from Downtown that integrates seamlessly with the City's skyline and a gateway to Wilburton as a new, dense neighborhood. Finally, the considerable size of the Site can lend itself to master planning that will yield a unique identity with open spaces, pedestrian connections and a mix of land use types that activate the streetscape and build community.

We have completed a test fit of potential future development that has informed these comments, and that study reveals the site could deliver some 1,500 housing units, several hundred thousand square feet of commercial development, and an overall sustainable, smart and transit-oriented configuration. Our initial test fit is attached as Exhibit A, and incorporated herein by this reference.

14510 NE 20<sup>TH</sup> STREET – SUITE 205 BELLEVUE, WA 98007  
PHONE: 425-746-1500

Of course, realizing this development opportunity for the City depends upon the future zoning and development standards.

## **II. DEIS Comments**

### **1. To maximize efficient use of land, opportunity for affordable housing, and transit-oriented development, the City's Preferred Alternative should build upon DEIS Alternative 3.**

We appreciate the City's recognition in all of the DEIS action alternatives that the area between NE 8th Street on the north, NE 4th Street on the south, and 116th to the east is best positioned for the tallest, 450', heights for Wilburton. We agree with this conclusion. This area is closest to Downtown, and will be directly linked in the future by the Grand Connection, so it deserves the highest densities.

Although all action alternatives propose 450' heights for this area, we support the City advancing Alternative 3 because of the proposed "Mixed Use" versus "Office / Residential" designation. The City should provide the greatest flexibility in uses possible to ensure that development can occur, and the "Mixed Use" designation achieves this.

We caution being overly prescriptive with use designations. Instead, we encourage the City to study and devise a land use code that sets out the building forms necessary and achievable for a variety of uses, and to allow the market to dictate what uses are needed at any given time. On our Site in particular, we envision a mix of uses in both separate structures and mixed-use structures, and we encourage you to study a wide variety of uses as part of the FEIS Preferred Alternative.

### **2. Development standards must support the density envisioned.**

The DEIS notes that "development standards in the Wilburton study area would likely be informed by development standards established in other subareas." DEIS 1-22. We urge the City to look beyond the standards established elsewhere and avoid standards that advance form over function, efficiency, and cost. The FEIS must include more detail about the range of development standards contemplated for Wilburton to support the heights identified, including the assumed Floor Area Ratio limits. The Preferred Alternative should include study of up to 8 FAR for commercial use and unlimited residential FAR for the MU-H-3 designation. Our attached design study supplies additional specific comments on reasonable development standards that should be studied on page 9.

### **3. Instead of losing density to road buffers, the FEIS should acknowledge and embrace market-driven approaches to mitigate air and noise pollution impacts.**

The DEIS reasonably identifies a concern with air quality and noise associated with developing housing and other uses in freeway- and arterial-dense neighborhoods. *See, e.g.*, DEIS at 1-23 ("Reduce Exposure to Contaminated Sites and Traffic") and 1-28 ("Long-Term"); DEIS at 9-15. Although we question the appropriateness of using permitting thresholds for air quality in the DEIS



analysis as a basis for the City's conclusion on significant impacts, we certainly acknowledge that air quality is a concern and we all want to have abundant fresh air where we live and work. *See, e.g.,* DEIS at 1-35 (recognizing Air Quality as an area of potentially significant unavoidable adverse impacts); 5-16 through 5-18; and chapter 8. Similarly, homes should be reasonably free of ambient noise.

For air quality, the City's focus should be on realistic projections and appropriate mitigation measures. In the FEIS, the City should: (a) first account for the potential GHG reductions that will result from transportation mitigation measures like TMPs and transit-oriented development in measuring the expected air quality impact, and then (b) rely on the market to deliver technical solutions to HVAC design and indoor air quality filtration to mitigate concerns. Likewise, the City should focus on technical noise mitigation solutions. We are confident there are technical solutions to these issues and developers will implement these in a reasonable manner. Twenty-first century technologies provide cutting-edge ways to reduce exposure to traffic pollution and noise, whether by state-of-the-art, low-cost retrofits and electrification, alternative window materials, modern HVAC ventilation, filtration and air quality testing technologies, or other sustainability measures and best practices for the built environment. If developers do not address air quality and noise concerns voluntarily, then tenants would choose to live or work elsewhere, so this is an issue that the market will address without specific intervention or regulation by the City. We further caution against devising a one-size-fits-all technical approach to these issues because of the rapid pace of technological change, and because individual project circumstances are unique.

We also strongly oppose identifying any air quality or noise mitigation measures that rely on buffers and unnecessarily remove buildable land from the limited stock that can provide new housing and employment density. The DEIS contemplates, among other things, "land use buffers," "roadside barriers," and "limit[ing] residential uses within a certain distance of contaminated sites and freeways" as possible ways to mitigate the impacts of vehicle-borne air pollution and noise. *See, e.g.,* DEIS at 1-23, 1-28, 9-15 and Table 9-4. These strategies would remove buildable land from the City and limit development choices, thereby undermining the City's housing and employment density goals, and they should be especially avoided where, as here, there are technical solutions available that will be implemented by the market anyway.

#### **4. The FEIS should carry forward the progressive tools for traffic mitigation identified in the DEIS, but provide more detail.**

We are strongly supportive of the measures identified in M-TR-1 for PPM1 (that includes Wilburton), which focuses on coordination with transit agencies, building out the pedestrian and bicycle infrastructure, and only identifies adding street capacity as a last resort. *See* DEIS 11-130. This approach should be carried forward to the FEIS. But, in order to bolster the adequacy of the analysis, the City should also provide more details on the identified mitigation measures – including identifying specific locations for additional bike and pedestrian infrastructure, identifying specific streets or corridors targeted for BRT expansion, and identifying specific intersections where improvements could be implemented (and where they cannot) along with identified impacts on development potential for adjacent properties.

We note there are some potential transportation impacts disclosed proximate to our Site, and additional detail should be provided in the FEIS on how the City intends to address these specific impacts. For instance, the vehicle travel speed performance target is not satisfied on NE 4th next to our Site. Figure 11-45. However, this deficiency is true today and in the No Action Alternative (*see* Figure 11-33), and stems from the fact that the road cannot be widened over the interstate. The City should confirm in the FEIS that this is a situation that can only be mitigated through programmatic and not physical solutions. Similarly, the DEIS discloses the intersection V/C ratio is exceeded for the NE 4th and 116th intersection under Alternative 3 (*see* Figure 11-46), but it is unclear from the analysis whether there are possible physical intersection improvements that could mitigate this condition, or if it too is constrained by the existing infrastructure and surrounding uses. This should be disclosed in the FEIS. Fundamentally, the FEIS should include robust analysis of the trade-offs, feasibility, and environmental impacts of road widening and intersection improvements in contrast with other available mitigation options.

**5. The FEIS should study ways to create affordable housing through incentive programs calibrated based on construction type, not through mandates that have been shown to stifle development.**

We appreciate the City's dedication to creating a mix of affordable, workforce and market rate housing, and the City's thoughtful discussion of housing impacts in the DEIS. *See, e.g.*, DEIS at 1-26 ("Citywide Impacts"); Chapter 2, *passim*; Chapter 3 (in discussion of residential displacement); 7-38 through 7-39; 7-41. Abundant housing at all income levels to meet the needs of our community is a common goal. However, the FEIS must differentiate those housing policies that are shown to work in all economic conditions from those that have been shown to result in unintended consequences. Specifically, the Preferred Alternative should include incentive-based affordable housing systems where developers achieve density bonuses in exchange for constructing or paying an in-lieu fee for affordable housing, and should not contemplate mandatory affordability minimums that too often forestall new projects and work against housing goals.

Mandatory affordability minimums, or inclusionary zoning mandates, have been implemented in other cities in recent years as one tool in the municipal toolbox for providing affordable housing. However, the FEIS should acknowledge what the data shows: inclusionary mandates result in unintended consequences such as losses in density and transit-oriented development. A recent study of Seattle's MHA program by New York University's Furman Center for Real Estate & Urban Policy found:

"new construction fell in the upzoned, affordability-mandated census blocks. Our quasi-experimental border design finds strong evidence of developers strategically siting projects away from MHA-zoned plots—despite their upzoning—and instead to nearby blocks and parcels not subject to the program's affordability requirements."<sup>1</sup>

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<sup>1</sup> Krimmel, Jacob and Betty Wang. *Upzoning with Strings Attached: Evidence from Seattle's Affordable Housing Mandate*, [https://furmancenter.org/files/publications/Upzoning\\_with\\_Strings\\_Attached\\_508.pdf](https://furmancenter.org/files/publications/Upzoning_with_Strings_Attached_508.pdf), at 2.

A more tried and true method is *incentive zoning*, which has shown tangible results in Bellevue for decades. The critical difference between incentive zoning and mandatory affordability programs is that the mandatory model creates a “go-no-go” binary – if the mandated affordability is not economic, even with the upzone, then the site in question is likely to remain undeveloped or underdeveloped, with no resulting increase affordable or market-rate housing. By contrast, incentive zoning replaces the binary with an allowance for creativity – where an upzone with affordability is economic, the incentive will be seized. Where that combination is not economic, a lower density may be built, but at least the land won’t languish while it awaits a change in the City’s policy.

To be complete in its evaluation of alternatives, baseline assumptions and mitigation measures, the FEIS must acknowledge the effects of inclusionary zoning mandates in driving new housing away from sites where those programs are implemented and it should avoid this result by focusing on an incentive program for affordable housing production in the Preferred Alternative. An incentive-based program, especially one that is calibrated to make sense for different construction types and provide true incentives for development, is a powerful tool to create affordable housing and more housing overall.

## **6. The FEIS and Comprehensive Plan should support updates to Bellevue’s Critical Areas Ordinance.**

The DEIS does not clearly disclose how Critical Area Ordinance (“CAO”) requirements influence its density and development assumptions. This is a clear analysis gap that must be filled in the FEIS.

Additionally, the FEIS analysis should study the trade-offs of eliminating or providing exemptions to the CAO in Wilburton, similar to the current structure for Downtown. We support such an exemption given Wilburton’s importance as a future urban neighborhood that may accommodate upwards of 25% of the City’s future growth.

Bellevue’s CAO rightfully protects many of our City’s most beloved features, like its streams, wetlands and critical habitats. However, it is outdated in several important ways that undermine the City’s climate, transportation and housing development goals. By way of example, perhaps the most troubling shortcoming of the current CAO is that the presence of a critical area or buffer *automatically* reduces the development potential of a lot, without any consideration for the actual risks or ecological values implicated. The current CAO contains a mathematical, mandatory density reduction on CAO parcels *without regard to whether the proposed project actually has any impact to the critical area, or whether it improves the critical area*. See LUC 20.25H.045 (not permitting modification of formulae by critical areas report); *see also* LUC 20.20.010(13); 20.25L.030(9); 20.25P.060(7) (“Lot coverage is calculated after subtracting all critical areas and stream critical area buffers.”). This formulaic, inflexible loss of development capacity, without adjustment for qualitative factors, is categorically inapposite to the City’s density and sustainability goals. Even if a project were to demonstrably *improve* the environmental value or safety of an on-site or off-site critical area, the permitted density or envelope is still shrunk by formula. This can result in making a project non-viable regardless of its impacts or non-impacts, even if it had the potential to *improve* the environmental value of a critical area.

Due to the proximity of many streams and their buffers to new transit infrastructure and development centers, Bellevue is unfortunately full of instances where development capacity is lost by this rigid formula rather than retained through the use of creative architecture or critical area enhancement. On our site, for example, development may be reduced by the presence of an off-site portion of Sturtevant Creek that is within the WSDOT right-of-way and FHWA limited access zone, and therefore, is inaccessible for private mitigation. A development project could undoubtedly improve the creek conditions with off-site native plantings, upgraded stormwater systems and modern approaches to sustainability, but such a project should not also be penalized in available development capacity for improving onsite and offsite conditions.

Surely such results cannot be the City's intended policy outcome, so we look forward to working with you to update and improve the CAO or exempt Wilburton from its regulations altogether. Again, the Preferred Alternative should contemplate CAO updates, including a Wilburton-specific amendment or exemption during the forthcoming LUCA, so that outdated provisions of the CAO do not stymie the City's growth targets and policy goals.

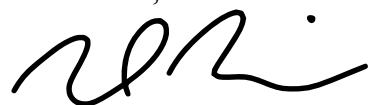
### **III. Conclusion.**

We appreciate the tremendous amount of time and effort that the City and its consultant team have clearly put into the DEIS, which is a remarkable and impressive body of work. We strongly support the MU-H-3 designation for our Site that is proposed in Alternative 3 and it should be carried forward in the FEIS Preferred Alternative.

We look forward to continuing to engage with you through the FEIS, Comprehensive Planning and LUCA processes, and your many other efforts to build a sustainable, affordable and economically healthy Bellevue.

Please do not hesitate to contact us if you have any questions or if there is any further support we can provide.

All the best,



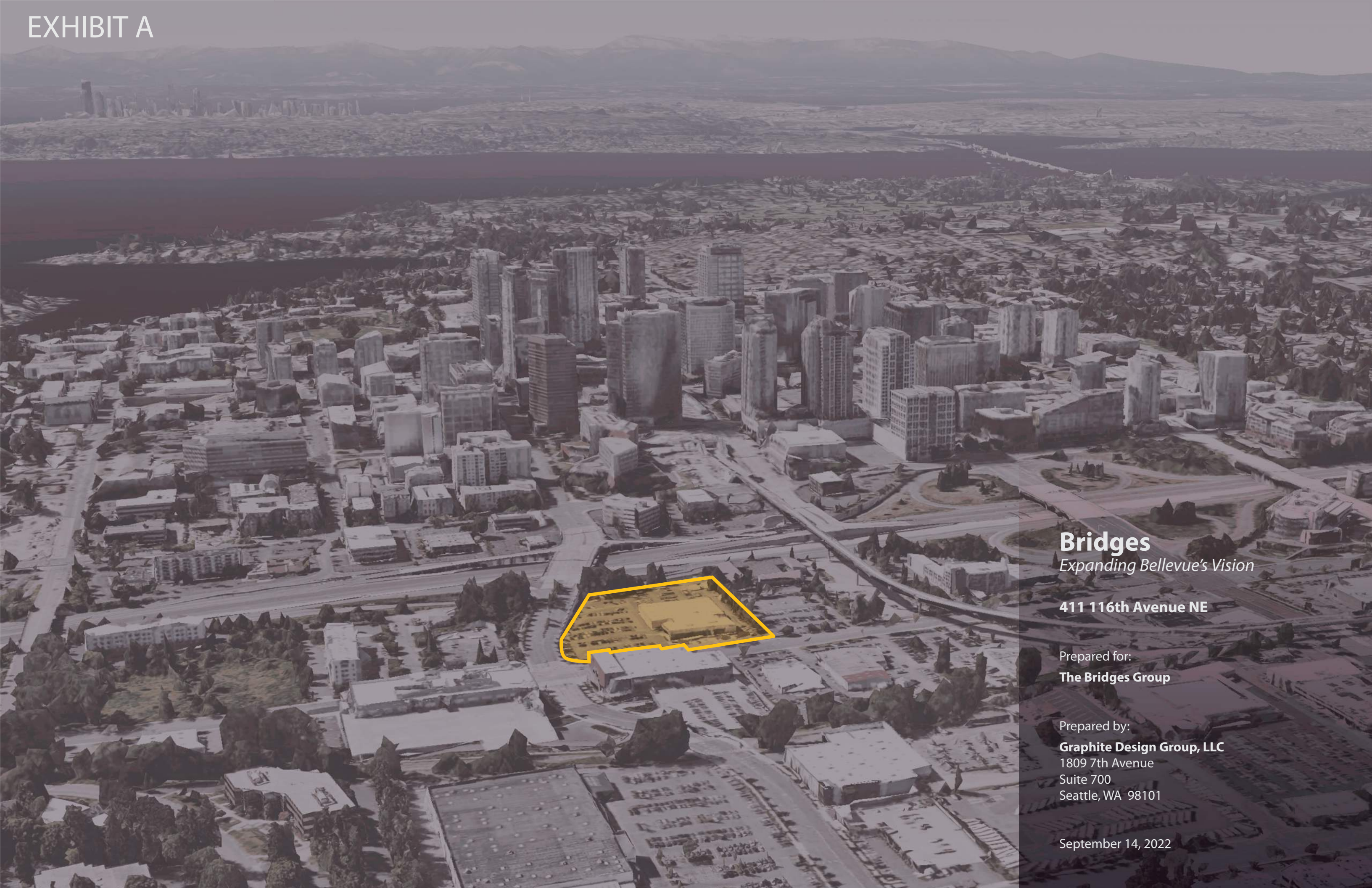
Neal Mulnick

On behalf of Max Capital LLC and Alco Investment Co

cc: Emil King, Planning Director  
Janet Shull, Strategic Planning Manager  
Justin Panganiban, Senior Urban Designer/Planner  
Abigail P. DeWeese, HCMP

MAX CAPITAL LLC & ALCO INVESTMENT CO  
14510 NE 20<sup>TH</sup> STREET – SUITE 205 BELLEVUE, WA 98007  
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## **Bridges** *Expanding Bellevue's Vision*

**411 116th Avenue NE**

Prepared for:  
**The Bridges Group**

Prepared by:  
**Graphite Design Group, LLC**  
1809 7th Avenue  
Suite 700  
Seattle, WA 98101

September 14, 2022



# Bridges Vision and Development Priorities

## Vision

To ensure site development will respond proactively to Bellevue’s long term housing needs and anticipated job growth, and to allow engaging and supportive design opportunities for exterior and interior environments.

The owner has developed the site concept herein that meets this vision, based on the concept of “Bridges.”

## Development Priorities

### 1. Flexible Mixed-Use

Contribute to a Vibrant, High-Quality, **Mixed-Use Wilburton Neighborhood**

### 2. High Density Development

Achieve High Density Development Complementary to Bellevue’s Downtown and Further Progress Toward **Growth Targets**

### 3. Grand Connection Destination

Provide a Destination Near the Terminus of the **Grand Connection**, and Proximity to both **Light Rail** and **EasTrail**.

## Site

The 4.5-acre property is situated at the gateway between Downtown Bellevue and the Wilburton neighborhood, with I-405 and Sturtevant Creek to the west, NE 4th Street to the South, 116th Avenue NE to the east, future Grand Connection to the north, and EasTrail one block to the east. Perhaps no site is better situated to shape the character of the transition between Downtown and Wilburton.













**Aerial View 4 - Looking Northeast**



**Street View 3 - Looking East from NE 4th**





# Streetscape and Ground Level Vision

## Design Goals

### 1. Ground Level Engagement

Design strong ground level **engagement** between **exterior** and **interior** spaces.

- Plaza spaces along 116th Avenue NE.
- Transparent and active facades along internal sidewalks, private roads, alleys and driveways.
- Walk up entries along streets where feasible.

### 2. Variety of Spaces

Incorporate a variety of spaces, both active and passive.

### 3. Integrated Perimeter Site Design

Merge service access, green buffer, and building access into a sustainable and secure site perimeter.





# Development Opportunities

Bridges vision has many opportunities helping support Bellevue’s current and future development goals. Inherent within flexible, multi-use, urban in-fill developments are economies of scale, synergistic neighborhood support, and reduced resource needs.

## Opportunities:

### 1. Uniqueness

The site is one of the remaining underutilized sites near Downtown that can accommodate large-scale development.

### 2. Grand Connection & Transit Proximity

The site is well-connected by the street and transportation network, with proximity to the Grand Connection and Light Rail.

### 3. Dwelling Unit Demand

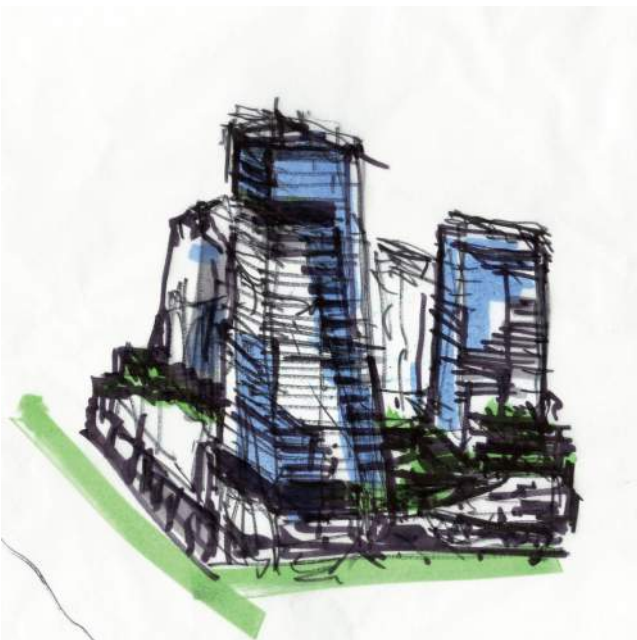
Potential delivery of more than 1,500 housing units to help meet the City’s demand for housing and growth targets. In order to achieve this, Wilburton zoning will need to be flexible rather than prescriptive in development standards and uses.

### 4. Sustainability

Environmental sustainability through high density residential development near jobs reduces impacts on public infrastructure and sprawl. Higher-density development lessens consumption of undeveloped land and reduced carbon emissions and fossil fuel consumption by residents. New buildings provide opportunities for sustainable construction and technology. In addition, ground-level landscaping furthers the City’s ethos to be a “City in a Park”.

### 5. Multi-Building Connections

Provide multi-level connections between project towers; ground level, podium level, and sky level.





# Development Challenges - Flexibility...Flexibility...Flexibility

Zoned **OLB** (*Office and Limited Business*), the 411 site does not currently support Bridges vision for a Multi-Use development. To support a **Live, Work, and Play** environment, the current Wilburton neighborhood zoning will need to be reviewed with emphasis given to higher-density, program flexible development approach's.

## Challenges and Requests:

### 1. Zoning Standards - FAR, height limits, and development standards must be calibrated to achieve appropriate density.

- **Density** - Bridges Group requests City to consider the following density limits:

**Residential Developments:** at least 8 FAR and up to unlimited FAR, 13,500 s.f. max. floor plate size, 450' height limit

**Commercial Development:** at least 5 FAR, 24,000 s.f. max. floor plate size,

- **Buffers** from off-site Sturtevant Creek should not count against allowed density. Sites with critical areas should be given additional flexibility in building design development standards to achieve density.
- **Incentive Amenity System** should allow development to achieve maximum density and heights above a base with flexible amenity options like affordable housing, flexible open space, and sustainability measures. The incentive system should allow fees-in-lieu in addition to on-site and off-site performance options for all amenities.

### 2. Flexible Development Envelope - Multiple tower projects share a connected podiums to support a variety of uses.

- **Large Podiums** - Allow podiums to be large as long as they are well-articulated and modulated.
- **Tower Spacing** - Determine reasonable tower separation standards. Tower spacing should be variable on multiple tower sites. Also, consider towers to be connected at upper levels so as to share usable spaces. (not just corridors)
- **Upper-level Setbacks** - Do not implement arbitrary upper-level podium setbacks that require a "wedding-cake" design.
- **Multiple Towers** - Provide additional design flexibility for multiple tower projects with a variety of proposed heights.

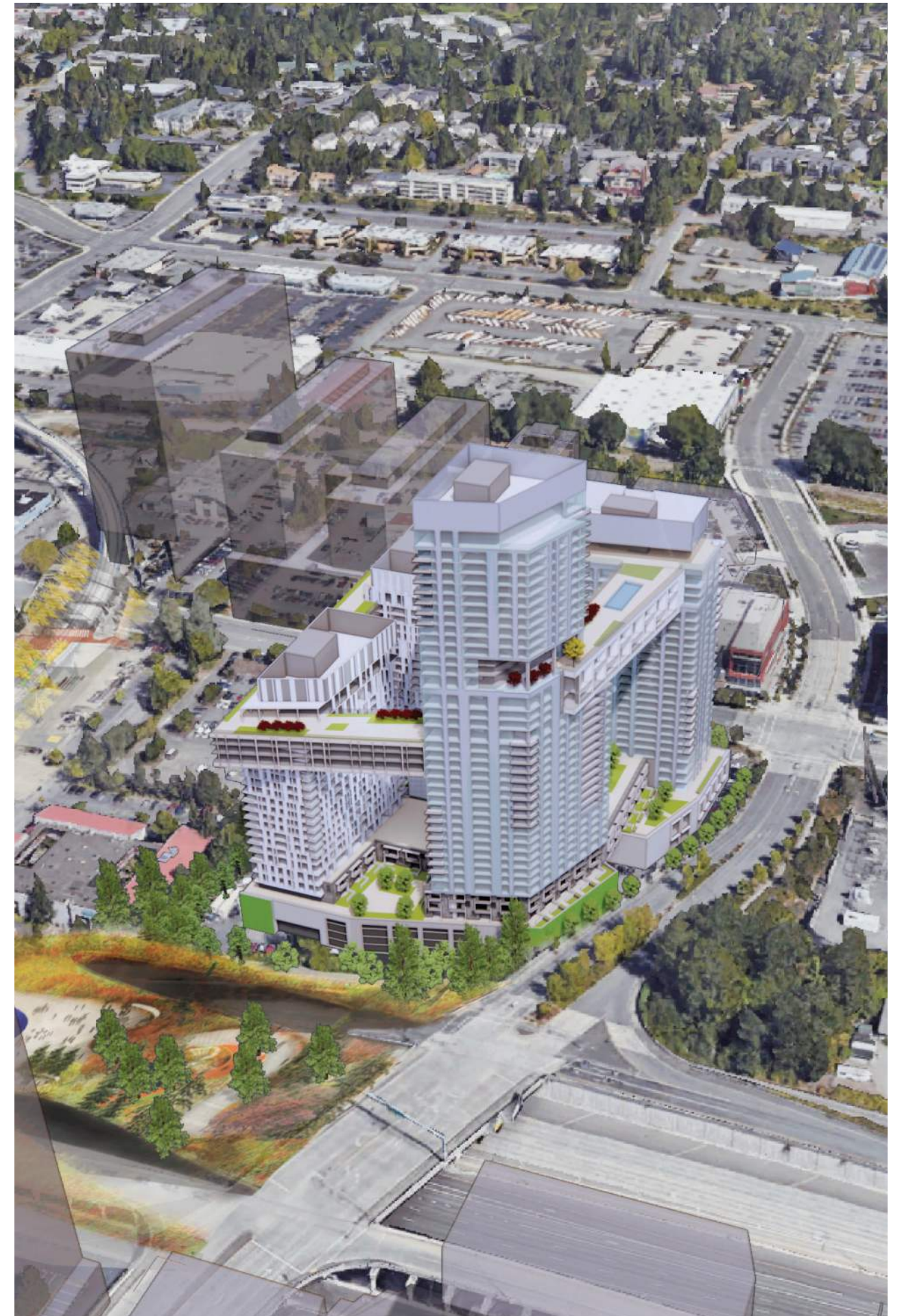
### 3. Flexible vs. Prescriptive Uses- Be flexible rather than prescriptive in allowed use designations.

### 4. Market Parking - Avoid parking requirements and allow on the market to supply adequate parking.

### 5. Hybrid Service/Access Road - Allow service uses like loading, trash collection, and others to be consolidated in a service road with modest 18' driveway width.

### 6. Reasonable Noise Reduction Standards - Set reasonable noise reduction level standards as part of development guidelines for residential developments.

### 8. Reasonable Emissions Standards - Rely on design standards as mitigating measures to prevent vehicle emissions from reducing air quality standards for public outdoor areas.





## Project Data

## Feasibility Scheme 1 - Residential and Hotel

## Tower 1

		flr. to flr.	bldg. ht	Residential	Retail	Rest/F&B	Parking
	mch screen		342				
mch	top of roof	30	312				
tower							
	L40						
	L39						
	L38						
	L37						
	L36						
	L35						
	L34						
	L33						
	L32						
	L31						
	L30						
	L29						
	L28	14	298	10,000			
	L27	10	288	13,500			
	L26	10	278	13,500			
	L25	10	268	13,500			
	L24	10	258	13,500			
	L23	10	248	13,500			
	L22	10	238	13,500			
	L21	10	228	13,500			
	L20	10	218	13,500			
	L19	10	208	13,500			
	L18	10	198	13,500			
	L17	10	188	13,500			
	L16	10	178	13,500			
	L15	10	168	13,500			
	L14	10	158	13,500			
	L13	10	148	13,500			
	L12	10	138	13,500			
	L11	10	128	13,500			
	L10	10	118	13,500			
L9	10	108	13,500				
L8	10	98	13,500				
L7	10	88	13,500				
L6	12	76	13,500				
L5	12	64	19,200				
L4	12	52	19,200				
L3	12	40	19,200				
L2	20	20	23,200		5,000		
L1	20	0	18,200	5,000	5,000		
below grade	P1	14		2,000			192,970
	P2	10		2,000			192,970
			Gsf	410,000	5,000	10,000	385,940

## Tower 2

		flr. to flr.	blgd. ht	Residential	Retail	Rest/F&B	Parking
mechanical	mech screen top of roof	40	436				
tower	L40	14	422	10,000			
	L39	12	410	11,600			
	L38	10	400	11,600			
	L37	10	390	11,600			
	L36	10	380	11,600			
	L35	10	370	11,600			
	L34	10	360	11,600			
	L33	12	348	11,600			
	L32	10	338	11,600			
	L31	10	328	11,600			
	L30	10	318	11,600			
	L29	10	308	10,000			
	L28	10	298	10,000			
	L27	10	288	10,000			
	L26	10	278	22,143			
	L25	10	268	22,143			
	L24	10	258	22,143			
	L23	10	248	14,428			
	L22	10	238	14,428			
	L21	10	228	14,428			
	L20	10	218	14,428			
	L19	10	208	14,428			
	L18	10	198	14,428			
	L17	10	188	14,428			
	L16	10	178	14,428			
	L15	10	168	14,428			
	L14	10	158	14,428			
	L13	10	148	14,428			
	L12	10	138	14,428			
	L11	10	128	14,428			
	L10	10	118	14,880			
	L9	10	108	14,880			
	L8	10	98	14,880			
	L7	10	88	14,880			
	L6	12	76	14,880			
	podium 2	L5	12	64	19,100		
L4		12	52	19,100			
L3		12	40	19,100			
podium 1	L2*	20	20	30,848			74,908
	L1*	20	0	36,548			49,572
below grade	P1			2,000			
	P2			2,000			
		GSF		213,089	0	0	124,480

**Tower 3**

[illegible]

## Tower 4

		fir. to fir.	bldg. ht	Residential	Retail	Rest/F&B	Parking
mechanical	mech screen		272				
	top of roof	30	242				
	L40						
	L39						
	L38						
	L37						
	L36						
	L35						
	L34						
	L33						
	L32						
	L31						
	L30						
	L29						
	L28						
	L27						
	L26						
	L25						
	L24						
	L23						
	L22	14	242	8,832			
	L21	12	230	17,411			
	L20	10	220	17,411			
	L19	12	208	17,411			
	L18	10	198	13,500			
	L17	10	188	13,500			
	L16	10	178	13,500			
	L15	10	168	13,500			
	L14	10	158	13,500			
	L13	10	148	13,500			
	L12	10	138	13,500			
L11	10	128	13,500				
L10	10	118	13,500				
L9	10	108	13,500				
L8	10	98	13,500				
L7	10	88	13,500				
L6	12	76	13,500				
tower	L5	12	64	13,500			
	L4	12	52	18,838			
	L3	12	40	18,838			
	L2	20	20	22,700		3,000	
podium 1	L1	20	0	16,000	5,000	4,700	
below grade	P1			2,000			
	P2			2,000			
		GSF		330,441	5,000	7,700	0

Project Site	
Site Area	192,970
FAR 8	1,543,760

Project Area Totals		
	Chargeable FAR	Non-Chargeable FAR
Residential	1,674,508	
Retail		10,000
Restaurant		17,700
Parking		510,420
Overall Chargeables GSF	1,674,508	
Project I FAR	8.68	

<b>Residential</b>	
<b>Amenity</b>	
Amenity Area %	0.05
Total Amenity Area	82,925
<b>Units</b>	
Floor Efficiency	0.85
Avg. Unit Size (s.f.)	850
<b>Total Project Units</b>	<b>1,576</b>

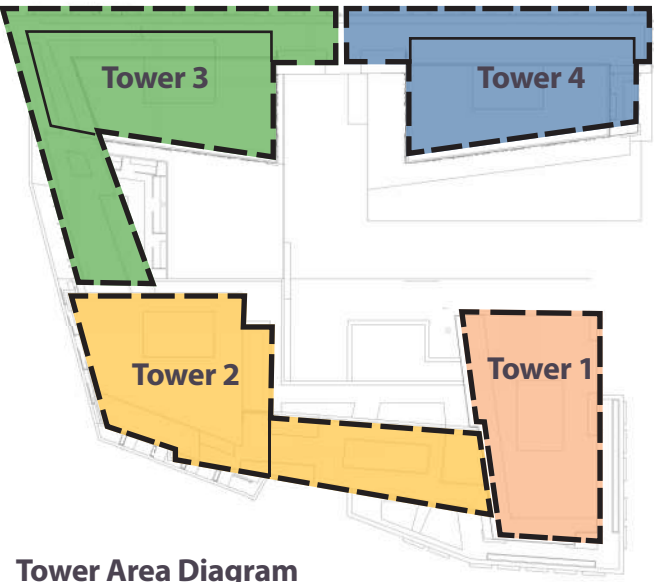
Parking Requirements Downtown - OLB	
Office	2.5/1000
Residential	.75/unit
Restaurant	10/1000
Retail	4/1000
SQ.Ft./Car	350

Parking	
Residential Parking Required	1,182
Residential Parking Provided	1,182
Retail Parking Required	40
Restaurant Parking Required	177
Total Parking Required	1,399
Total Parking Provided	1,458

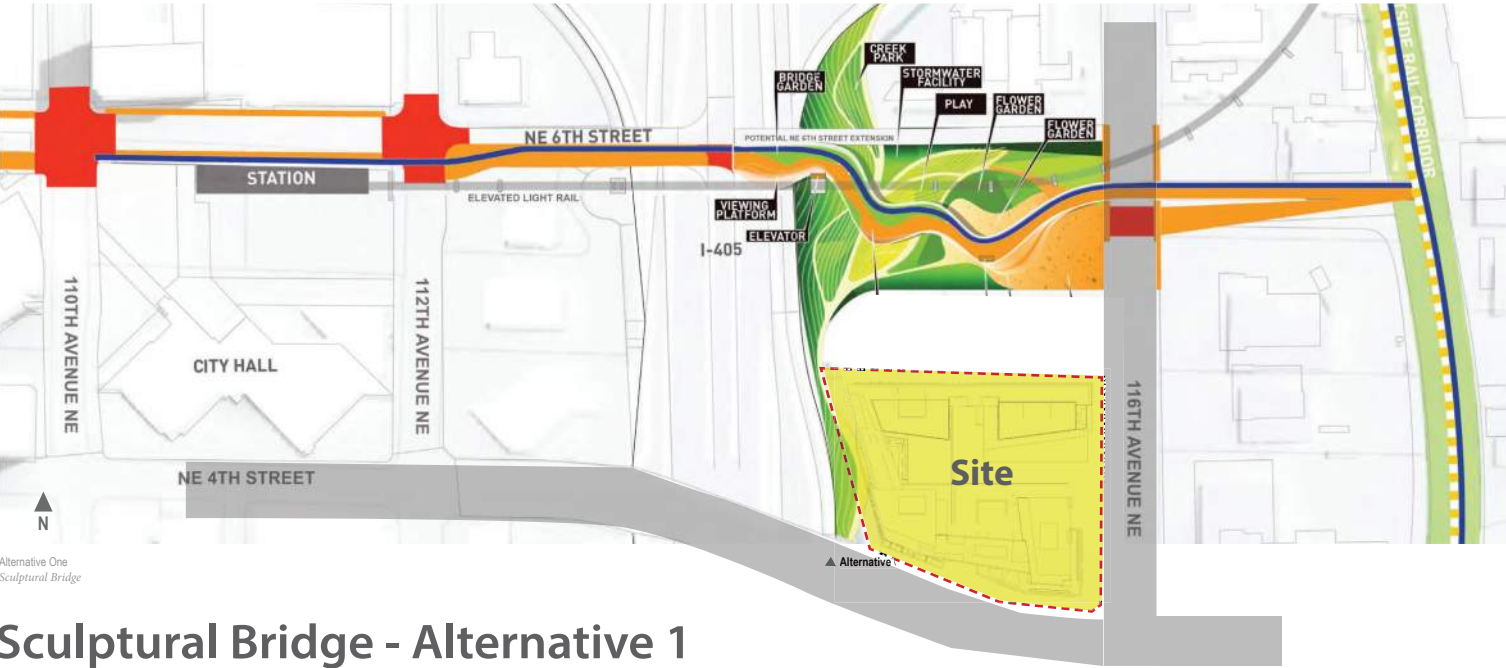
## PROJECT DATA

Site Area:	192,970 s.f.
Total Project FAR Area:	1,674,508 g.s.f.
Project FAR:	8.68
Total Project Units:	1,576 (850 s.f. avg.)
Total Project Parking:	1,576

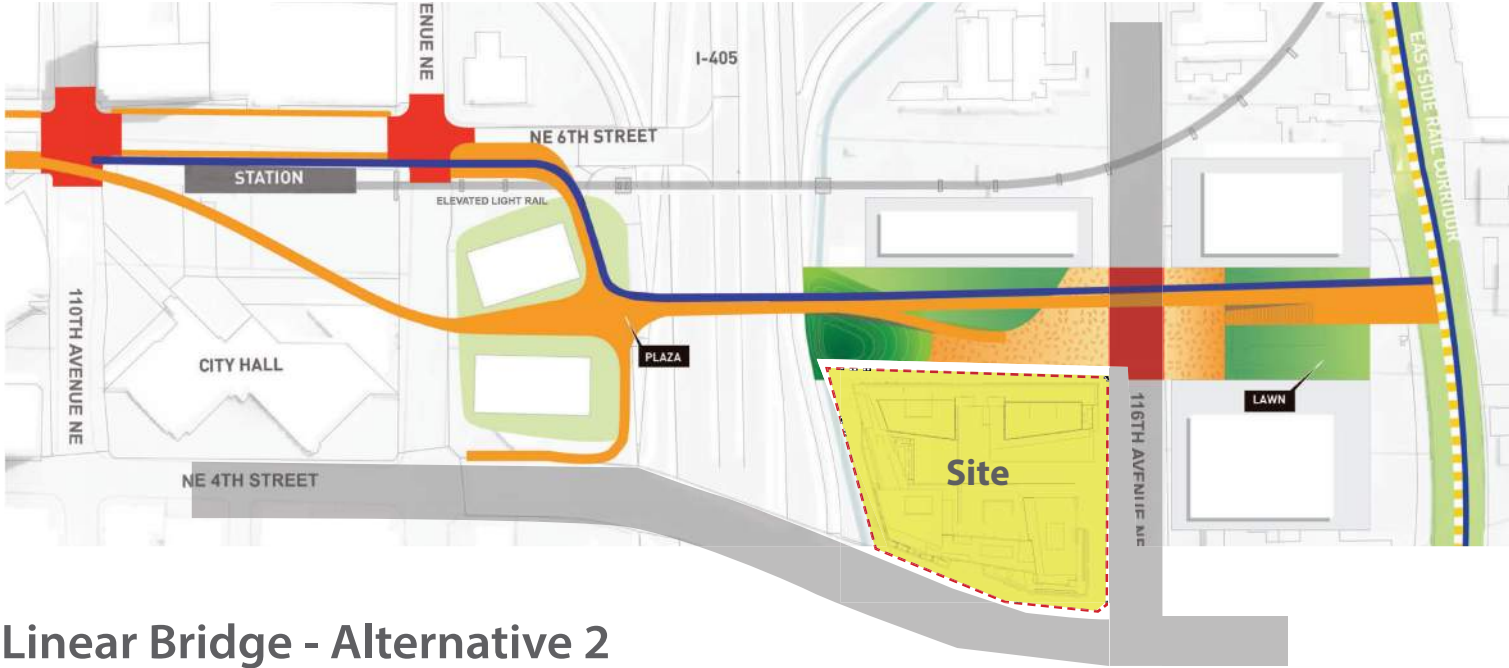
**\* This is an estimated FAR number based on gross square footage per floor. Actual calculated FAR would be lower if this were a project proposal as FAR typically excludes mechanical floor areas and other non-occupiable spaces.**



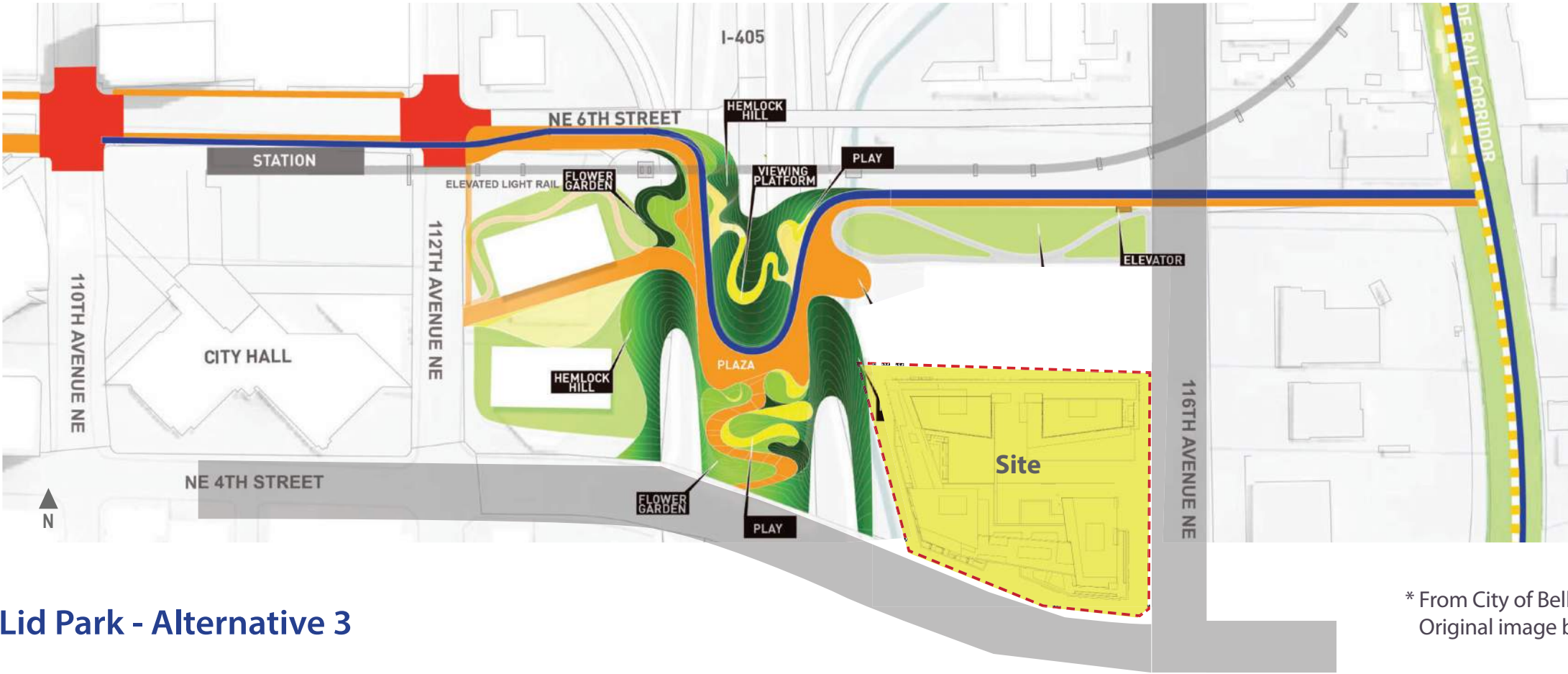
## Tower Area Diagram



Sculptural Bridge - Alternative 1



Linear Bridge - Alternative 2



Lid Park - Alternative 3

\* From City of Bellevue Development Website  
Original image by Balmori Associates



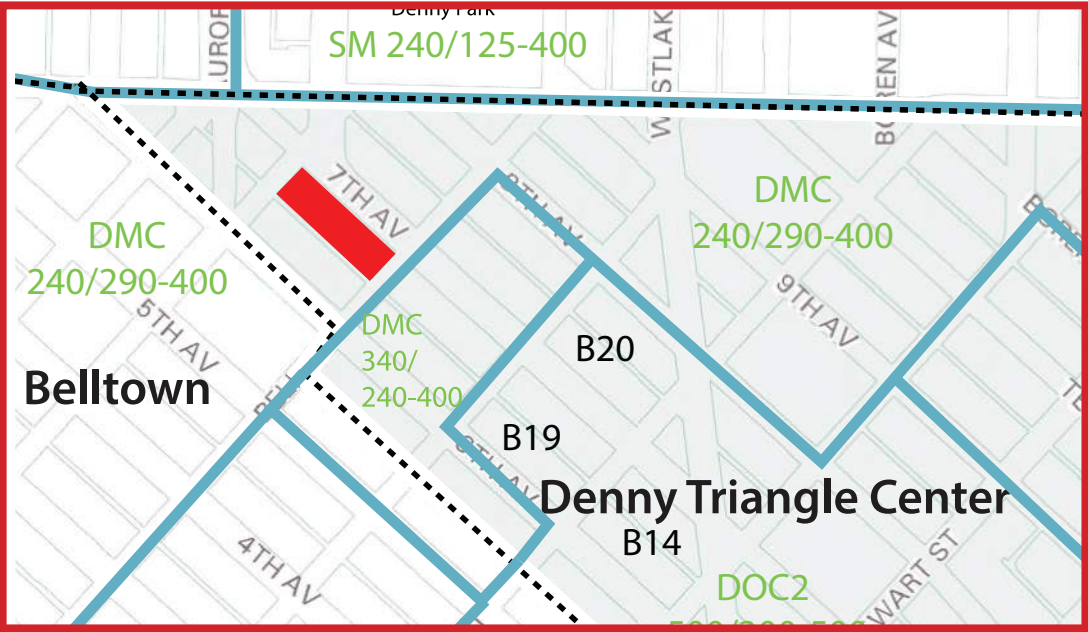
Flexibility...Flexibility...Flexibility

Bridges goal is to propose comparable zoning and development strategies from the region that are adjusted to suit Bellevue’s unique conditions. For comparison, located in the Denny Triangle neighborhood of Seattle , Onni’s mixed-use project 23071 7th Avenue is a high-density development with multiple residential towers sitting atop a podium of commercial office and ground level retail.

**2301 7th Avenue** utilized Seattle’s zoning code guidelines and residential incentives to maximize project development. With incentives, the maximum commercial FAR is 8 with unlimited residential FAR up to 440’.

2301 7th Avenue Project Data

Commercial Area:	311,000 s.f.	FAR equivalent:	8
Residential Area:	712,000 s.f.	FAR equivalent:	18.3
Project Total Area:	1,023,000 s.f.	FAR equivalent:	26.3
Site Area:	38,900 s.f.		





MOUNTVUE PLACE LLC  
14510 NE 20<sup>TH</sup> STREET – SUITE 205  
BELLEVUE, WA 98007

June 12, 2023

City of Bellevue Development Services Department  
Attn: Liz Stead, Director and SEPA Responsible Official  
Reilly Pittman, Environmental Planning Manager  
Bellevue City Hall  
450 110th Avenue NE  
Bellevue, WA 98004

*Via email to CompPlan2044EIS@bellevuewa.gov*

Re: *SEPA Comments on File No. 22-116423 LE, the City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement for 1150 124th Avenue NE in Bel-Red*

Dear Director Stead and Mr. Pittman:

This letter is submitted on behalf of Mountvue Place LLC (“Mountvue”) as part of the public comment process for the City of Bellevue (“City”) 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft Environmental Impact Statement (“DEIS”). Thank you for your work to date on the DEIS—we are impressed by the clear vision it sets out for bold growth in the City over the next two decades.

Mountvue owns the property located at 14506 NE 20th Street in Bel-Red (the “Site”). The Site is currently developed as a commercial office and retail center, but we believe it is a compelling location for residential development, and we offer the following DEIS comments with this future in mind:

**1. Retain the BR-MU-M designation in the Preferred Alternative.**

Alternative 3 identifies BR-MU-M for the Site. We support this designation as it would allow maximum flexibility for midrise residential development in wood frame construction, in addition to the retail and office uses that exist today. We request the BR-MU-M designation for the Site be incorporated into the Preferred Alternative. This designation will not only fit within the broader character of Bel-Red as it densifies, but it provides a transition to Redmond’s Overlake neighborhood, just one block east of the Site, which is being considered for significant additional density as well. The BR-CR designation in Alternatives 1 and 2 that reflects current zoning and would only allow development between 4 and 6 stories. Retaining current zoning would result in underdevelopment of the Site for a future housing project and this outcome should be avoided.

**2. Add FAR to make midrise multifamily development more feasible.**

A significant issue with the Site's current BR-CR zoning is the low FAR limit of 2.0. This limit is too low to support true midrise residential density across the Site the under current zoning, and it should be adjusted with the addition of the BR-MU-M designation. The Preferred Alternatives should clearly identify and study additional FAR of at least 6.0 in the FEIS to support the nine story building typologies envisioned.

**3. Allow connected floorplates up to height limit and adjust rear setbacks.**

Connected floorplates result in more efficient midrise buildings that still retain features like massing shifts, modulation, materials variation, and other design tools that break down building scale and result in more appealing structures. The current connected floorplate departure in Bel-Red zoning is only available to connect three stories above 40 feet in height. LUC 20.25D.080.B.1. To maximize midrise residential density and building efficiency, connected floorplates should be allowed in buildings up to the height limit in the BR-MU-M designation.

Further, the DEIS does not disclose assumed setbacks for the BR-MU-M designation as it would result in new zoning, however, the document does note that standards could be similar to current zoning. Several Bel-Red zones include significant, required 25' building setbacks from side and rear property lines above 40 feet if building height exceeds 80 feet. *See* LUC Chart 20.25D.080.A note 15. As with connected floorplates, this standard should be adjusted to apply to buildings that exceed 90 feet so that the midrise residential building envelope is more efficient and results in the creation of more housing units.

Adjustment of both of these standards should be clearly identified and studied in the Preferred Alternative in order to result in the most efficient building forms for housing.

**4. Retain Bel-Red's incentive zoning structure, but recalibrate incentives.**

As residential development has begun in Bel-Red in the last few years, the incentive zoning structure has resulted in affordable units and funds for affordable housing, especially when paired with the City's updated MFTE Program. We believe the incentive program coupled with MFTE can be powerful tools for housing creation. The Preferred Alternative should retain the current incentive structure for Bel-Red, and if the City's priorities for incentives have shifted, then it could study modifying the incentive tiers to reflect those shifted priorities. For instance, the Tier 1 affordable housing component for residential projects could be expanded to be a greater increment of the overall incentive, compared to the other components. We support recalibration and retaining the incentive structure compared to affordable housing mandates that have a high likelihood of halting redevelopment efforts as market conditions evolve. The FEIS Preferred Alternative should not include affordable housing mandates, and all assumptions of any mandatory program identified in the FEIS for other alternatives should be fully disclosed.

MOUNTVUE PLACE LLC  
14510 NE 20<sup>TH</sup> STREET – SUITE 205  
BELLEVUE, WA 98007

**5. Study exempting man-made slopes from critical area regulation.**

There are several historic rockeries on our Site and immediately adjacent that were created as a result of prior, permitted development. Because the City's current Critical Areas regulations treat rockeries as steep slopes if they exceed 10 feet of height, this condition impacts development capacity and allowed location of development on the Site even though these "slopes" do not provide any environmental or geologic function. The Preferred Alternative should identify excluding man-made slopes from Critical Area regulation and should study the impacts of doing so. The FEIS should also identify the potential housing versus ecological benefit of continuing to regulate man-made slopes. Thank you for this opportunity to comment. We look forward to working with you over the next year plus as the Comprehensive Plan and future Bel-Red zoning changes are implemented. Please do not hesitate to contact me if you have any questions.

Sincerely,



Neal Mulnick for Mountvue Place LLC

cc: Emil King, Planning Director  
Janet Shull, Strategic Planning Manager  
Justin Panganiban, Senior Urban Designer/Planner  
Abigail P. DeWeese, HCMP



# WILBURTON PROPERTY OWNERS GROUP

June 12, 2023

VIA ELECTRONIC SUBMITTAL

Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Re: Bellevue 2044 Comprehensive Plan DEIS  
Wilburton Property Owners Group comment

Dear Reilly:

The Wilburton Property Owners Group (“WPOG”) is the coalition of property owners representing the Wilburton Neighborhood. Together, the WPOG represents many of the property interests in the Wilburton subarea; WPOG was formed to ensure that the property owners’ voices are clearly represented in the Wilburton planning and implementation stages. WPOG believes it is important to plan Wilburton with development flexibility in mind, given that the upcoming plan change represents a 20-year planning horizon during which much will change in Bellevue. WPOG has been an active partner with City staff since the original Citizens Advisory Committee was formed in 2017. WPOG is incredibly excited about the arrival of Eastlink, EasTrail, and the Grand Connection. It cannot be understated how transformative these infrastructure projects can be when combined with the right zoning. The Wilburton neighborhood can be a world class example of transit-oriented and trail-oriented development.

WPOG appreciates all of the City’s work to date, the City’s commitment to its published timeline, and the City’s attention to the Wilburton subarea in the Draft Environmental Impact Statement (“DEIS”). We look forward to working with the City on the Wilburton amendments and LUCA in the near term. The following are WPOG’s comments to the DEIS:

- **WPOG supports Alternative 3 to be adopted as the Preferred Alternative in the FEIS.** Alternative 3 achieves the most amount of growth in an area well-served by transit and other means of transportation. It also provides the most flexibility in future uses in the Wilburton subarea.
- **Allow additional flexibility in future uses.** The City should take an additional step in allowing flexibility in future uses in Wilburton. Figure 3-26 of the DEIS shows “proposed land uses in the Wilburton Study area.” Many of the areas are called “Mixed Use,” however, some areas are labeled as “Residential/Commercial Midrise or Highrise.” One of the issues that has stifled growth in the City of Bellevue is an overregulation of use within Comprehensive Plan and Zoning designations—many areas can only build office, or residential, but not both or either. Some areas also have unworkable, prescribed ratios of office and residential uses. The City should move away from

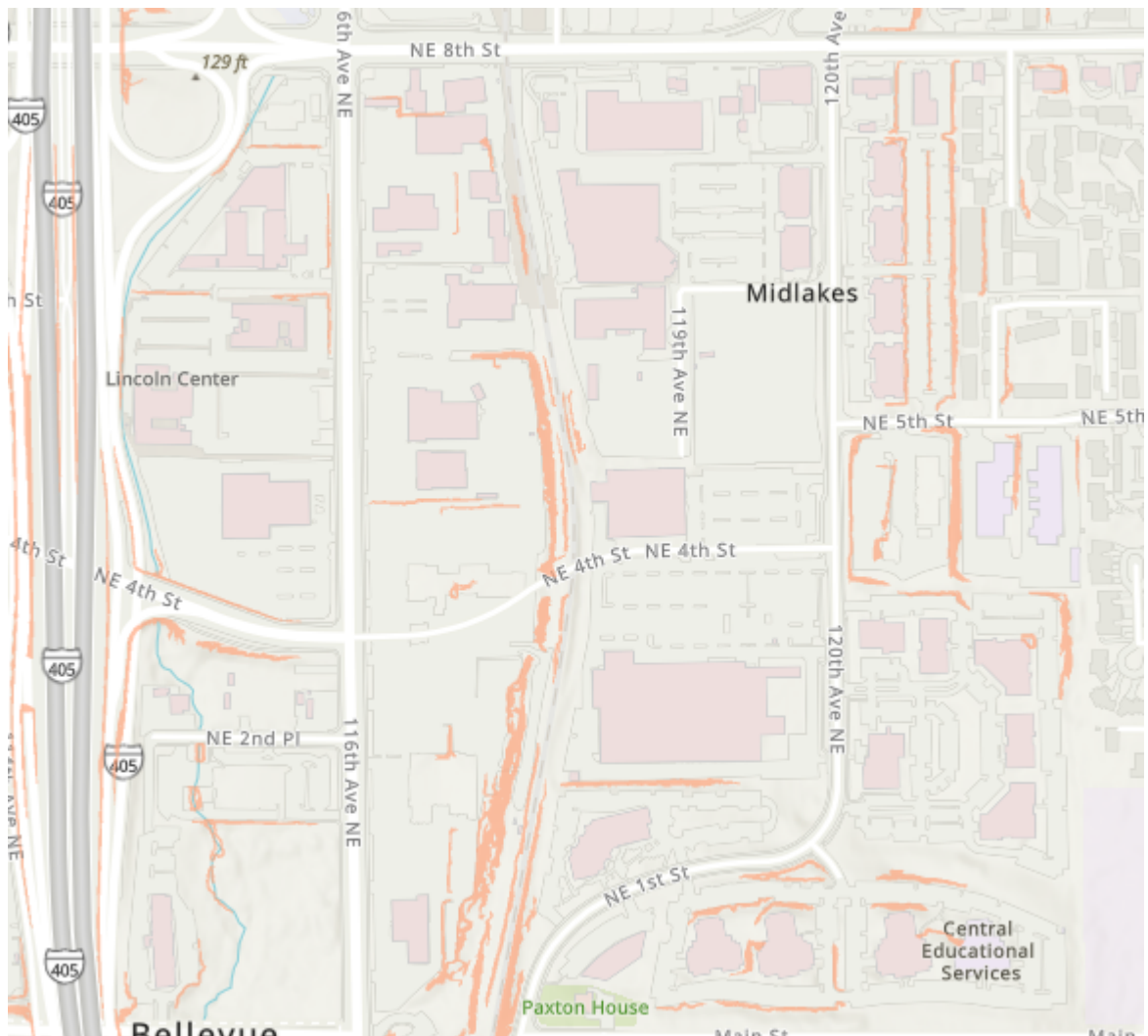
attempting to prescribe uses on a granular level. Instead, it should allow a broad array of uses across Wilburton with building forms that can support them.

- **Consider all areas of Wilburton as “Mixed Use” (in the purple shades) to allow the market to decide uses.** We cannot predict what uses will come to Bellevue in the next 20 years—indeed, we could not have predicted 20 years ago the growth that Bellevue is currently experiencing. Allowing wide flexibility in zoning helps the best businesses land in Bellevue; this approach is consistent with the City Council’s Economic Development Vision.
  - Mitigation Measure 2, Land Use Plans and Policies calls for development standards to be “informed by development standards established by other subareas.” While we think the Bellevue Land Use Code should remain internally consistent, we believe the City has an opportunity in Wilburton to more broadly allow for uses and development compared to other subareas such as East Main and Bel-Red. We encourage the City to be bold and flexible in its drafting of the Wilburton land use codes, and consider in the Preferred Alternative an analysis of this sort of flexibility in use.
- **Consider creating a “Wilburton” Comprehensive Plan designation in which all of the mixed use zoning may implement the Comp Plan designation—this allows for flexibility in zoning in the future and reduces private and City administrative burden when the market calls for a change of zoning.** This would allow for more efficient rezones of property and would reduce both private and public burden to make flexible land use changes in the 20-year horizon.
- **Learn from past mistakes and avoid implementing unworkable, expensive, and unnecessary road grids.** Figure 11-28 shows the “Wilburton Study Area Draft Circulation and Permeability” network, which appears to be a potentially proposed road grid. **WPOG does not agree that a road grid for automobiles is necessary. WPOG has significant concerns about a proposed road grid that appears to have no regard for property boundaries, existing topography or the City’s ability to effectively deliver the road grid in an efficient manner.** By all accounts the City’s requirement for a local street grid in Bel-Red has hindered development and added to housing costs for the properties that have developed. The City should learn from this record. Instead, in the Preferred Alternative, the City should study whether a built out road grid would have an impact on the various transportation significance thresholds, and if not, the City should reconsider whether a road grid that would add cars and congestion to the network is truly necessary. Moreover, the City should study whether the access/road grid should be required to include cars, or should the grid instead be required to connect with pedestrians and bicycles, in keeping with the transportation mitigation policies stated in M-TR-1 through M-TR-4.
  - It is significant that completion of the road grid is not identified as a required measure to mitigate either aesthetic or transportation impacts. WPOG supports this finding of the DEIS, we do not believe that a road grid is necessary to mitigate either aesthetic or transportation impacts.
  - We also note that the massing diagrams shown in the Aesthetics section (pp. 6-38 through 6-50) do not appear to show the road grid and the impacts to achievable density. Please include an analysis of the road grid on potential for achieved density.
  - **WPOG also applauds the City’s inclusion in its TFP for funding for EasTrail and encourages a Comprehensive Plan policy and inclusion in the TFP for flexible funding for the Grand Connection.** It cannot be overstated how important these multimodal connections are to the future of the City of Bellevue and to the development of the Wilburton neighborhood. Completing the first phase of the Grand Connection as fast as possible with a reasonable improvement that delivers baseline connectivity to the neighborhood should be a top City priority.



- **WPOG applauds the City’s proposed transportation mitigation measures stated in M-TR-1 through M-TR-4.** The City rightfully cites the land use/transportation connection as the best way to mitigate transportation impacts. Specifically, the City states that Alternative 3 has “inherent transportation benefits compared to the No Action Alternative.” WPOG agrees; in a dense urban environment, focusing on TDM strategies, encouraging transit use, and building out pedestrian and bicycle networks are the best way to move more people more efficiently. Creating a more walkable and bikeable area (not driveable area) also adds vibrancy to a neighborhood and supports ground level uses and neighborhood businesses.
- **WPOG has concerns regarding the GHG significance finding and “air quality buffers” along pollution-generating arterials.** Most of Wilburton could qualify for being located in a high air pollution area given its location proximate to I-405 and other major arterials. Yet, the DEIS admits that there is no applicable level of significance for air quality, and it also admits that the air quality analysis does not consider the impact of the TDM mitigation measures identified in the transportation chapter. Together, we are concerned these shortcomings overstate the GHG impact. The FEIS should study the mitigating impact of transportation mitigation measures on air quality as the first line of mitigation measures. Only then should the City’s suggestion for air handlers for residential projects near freeways be considered. Ultimately this should be left to the market to design solutions. Building designers can creatively deploy HVAC design to intake air away from major arterials and use other technology to ensure safe indoor air quality. The City should rely on the market to deliver solutions rather than requiring specific systems that would significantly increase the cost of housing in Bellevue. If the City does desire to proceed with air handler requirements, then it should carefully study what would happen to its density projections if such a mitigation measure is adopted. Again, reducing the source of pollution as much as possible should be the first mitigation rather than enacting stringent mitigation measure that would disallow much development in Wilburton.
- **WPOG is concerned about mitigation related to “Aesthetic Impacts” that will further reduce the efficient creation of density.** The DEIS states that additional transition measures or other measures to reduce Aesthetic Impacts could be considered as mitigation. Such mitigation measures should be limited, particularly given increases in density that will be required per new state laws throughout Bellevue. In addition, we believe that allowing flexibility in design is important such that buildings are constructed per market needs—i.e., medical office buildings, technology buildings, and residential buildings below 85’ should be allowed larger floor plates, and residential towers above 85’ should be sized such that efficient residential units can be delivered (upper level setbacks add cost to structures). Further, like Downtown, small sites less than 40,000 square feet should be given off-ramps from prescriptive standards to ensure efficient use of land. In addition, shadow impacts should not be regulated, and if the City seriously considers this mitigation, adequate analysis should be completed to determine impacts to density and cost to deliver projects (including increased appeal risk) related to such a regulation. Impacts on public views should also similarly not be regulated. The City already considered this and decided it was not the correct answer during the Downtown upzone with respect to views of Mt. Rainier from City Hall. This issue has been put to bed and should not be relitigated.
- **The City must study the Plan’s impacts to Critical Areas, or risk an inadequate EIS.** The DEIS does not include adequate analysis of the Plan’s potential impacts to critical areas, including streams and steep slopes. The lack of analysis renders the EIS potentially inadequate. As part of this analysis, the City should analyze the impacts of the Critical Areas Ordinance on the deliverance of density such that decisionmakers can understand the impacts the steep slope regulations and stream buffers may have on density. Developable area portrayed by the DEIS as being feasible is oftentimes rendered infeasible due to the application of steep slope buffers, wetland buffers (like around Lake

Bellevue), and stream buffers; this misleads decisionmakers into thinking building may occur in certain areas when it will not. Sturtevant Creek runs through the heart of Wilburton and many steep slopes (manmade and otherwise) exist within the Wilburton subarea. A snip of the City-mapped steep slopes (in orange) in a portion of Wilburton is included to show how impacted this area is by Critical Areas and buffers. The City should analyze impacts of changing the critical areas ordinance to allow man-made steep slopes to be redeveloped and not require buffers. The City should also analyze the impacts of the Critical Areas Ordinance “density penalty” on development in Wilburton and determine how the penalty would impact the ability of the Wilburton vision to be achieved. The critical area penalty should not be applied in Wilburton, similar to how it does not apply in Downtown. Please incorporate such analysis into the Preferred Alternative.



- WPOG has **concerns with additional potential mitigation measures:**
  - Requiring displaced businesses be given a “right to return” or Community Benefit Agreements in a development raises troubling legal and procedural questions. If the City determines it should act to assist displaced small businesses, it should incentivize space for small businesses with bonuses in the Land Use Code, and it should do other things to encourage ease of movement for small businesses like no parking minimum for a relocated

business, streamlined tenant improvement and sign permits for small businesses, traffic impact fee waivers, and consider an increase in SEPA thresholds for relocated businesses so that relocation does not require onerous SEPA review. The City's idea of an "MFTE" program for small business location is a creative idea that could actually result in small business retention. The City should first review policies and procedures that currently exist in Bellevue that reduce the ability of a business to locate and operate in the City of Bellevue before reducing redevelopment opportunity. The impact of such mitigation measures should be studied and disclosed in the FEIS.

- Requiring interior noise requirements along noisy arterials of 45 dBA or lower will place a significant cost burden on new projects that will be passed along to tenants. No other City has as onerous noise requirements as Bellevue. Please study the impact of a potential noise buffer area or expensive windows that would reduce the ability for density to locate in Wilburton or increase the cost of housing. The impact of such mitigation measures should be studied in disclosed in the EIS.

- **The Preferred Alternative should include affordable housing incentives, not mandates.**

- We recognize and agree that creating abundant housing affordable to all income levels is one of the biggest challenges facing our City and the region as a whole. We believe private development has two roles to play in addressing this issue: first, private development of new housing increases the supply of housing overall, easing market pressures on rent and price; second, private development can be successfully incentivized to incorporate or pay an in-lieu fee for affordable housing through thoughtfully calibrated height and density bonuses and tax programs like MFTE. Beyond these roles, there are limits to what private development can deliver, and we strongly believe exacting affordable housing mandates that increase the cost of housing overall and carry a high risk of freezing the development pipeline are not the right answer for Bellevue. The City identified components of a mandatory inclusionary affordable housing program in Alternative 3, and it should not move forward with this concept in the FEIS Preferred Alternative.
- Instead, in the Preferred Alternative, the City should study expansion of a thoughtfully calibrated height or density-based affordable housing incentive program in Wilburton, and it should identify other tools and funding sources that do not rely on private development to create affordable housing. Further, such an incentive-based program should consider the total cost of development in its calibrations, including the cost of infrastructure, updated building codes, development standards, and current market conditions, when determining the value that is available for such a program. Last, the City should provide an in-lieu-fee alternative in the incentive program, which can be a valuable funding tool for the City to deploy to directly fund housing subsidies or new affordable units. Such an in-lieu fee should be priced based on the value of the incentivized square footage to the development.

WPOG believes that the confluence of light rail, regional trails, easy access to freeways and arterials, make the Wilburton neighborhood unique in the region and a great opportunity for the City of Bellevue. We look forward to working with the city to create a regulatory environment that leads to future development that brings real benefits to everyone in the larger community and helps address some of our region's most pressing challenges. We appreciate the City's undertaking of Bellevue 2044 and appreciate the City's bold

vision in planning for growth in the next 20 years. Please do not hesitate to contact us if you have questions about our comment. Thank you for the opportunity to comment.

Sincerely,

## **WPOG**

Gardner Morelli, Eastridge Partners LLC

Panfilo Morelli, Eastridge Partners LLC

Bill Finkbeiner, Finkbeiner Building LLC | Bellevue Vista Properties LLC

Jon Roskill, Bellevue Vista Properties LLC.

Sydney Ostrem, RCJ Properties

Jenifer Thornton, RCJ Properties

Lew Brunhaver, Beta-Bellevue Auto Center LLC

Steve Kramer, Bellevue Development LLC | Bellevue Development Westridge LLC | 8th Street BK LLC

Andrew Coates, KG Investment Properties LLC | Bellevue 116th Avenue LLC | Bellevue 116th Avenue South LLC | 457-120th Avenue NE LLC

Roger Kuula, American Capital Group

BJ Kuula, American Capital Group

David Sinnett, American Capital Group

Levi Singleton, American Home Builders

Sean Thorson: ACG Development

Kenny Dudunakis, Berkadia

Kirk Mathewson, Midlakes, LLC | Ditty Properties

Campbell Mathewson, Midlakes, LLC | Ditty Properties

T.J. Woosley, Hal Woosley Properties, Inc. | Brierwood Center LLC

Todd Woosley, Brierwood Center LLC.

David Woosley, Brierwood Center LLC

Doug Exworthy, TRF Capital LLC

Jane Blair, Lindsey Properties

Kendall Anderegg, President and CEO Mutual Materials

Bob Griffith, The Pumphouse Bar & Grill

Paul Etsekson, Max Capital LLC

Michele Mulnick, Max Capital LLC



Neal Mulnick, Max Capital LLC

Doug Rosen, Alco Investment Company

Adam Rosen, Alco Investment Company

**From:** Nancy Jacobs <bnjacobs@frontier.com>  
**Sent on:** Monday, June 12, 2023 11:06:08 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Comments

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Dear Ms. Stead,

We have read the comments sent by the Bridle Trails Community Club and appreciate the time and effort they took to address concerns in this area. Our comments are much shorter.

We have been residents of the Pike's Peak neighborhood in the Bridle Trails community since 1985. Since then we have seen much progress made in Bellevue as it has become a much larger city with many more impacts on this region. We have also seen some changes in the Pike's Peak neighborhood, mostly with construction of new homes to replace older ones on the same property.

Overall, though, the Pike's Peak neighborhood has retained the same character it had when we moved here. With its acre zoning, it has remained an area with multiple huge trees on each lot. It is still an equestrian area, with many residents having horses and barns on their property. Even when horses no longer live on some of those properties, the barns remain. The trails through here and the greenbelt area offer not only peace and quiet, but also an avenue for increasing wildlife visitation, often from Bridle Trails State Park next door. Coyotes and bobcats often are urban dwellers, but in Pike's Peak we also have deer and now more frequently, black bears.

Pike's Peak is a unique neighborhood in Bellevue. When we were searching for a home 38 years ago, this was the only neighborhood like this. It still is. Bellevue is fortunate to have such a neighborhood, and we are appreciative that it exists.

We hope that when you consider zoning changes in Bellevue, you will preserve this unique part of the Bridle Trails community. We hope that you will retain the R-1 zoning.

Thank you for your consideration.

Robert and Nancy Jacobs  
12203 NE 37<sup>th</sup> Street  
Bellevue, WA 98005-1210

**From:** Nancy Jacobs <bnjacobs@frontier.com>  
**Sent on:** Monday, June 12, 2023 11:06:08 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Comments

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

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Thank you for your consideration.

Robert and Nancy Jacobs  
12203 NE 37<sup>th</sup> Street  
Bellevue, WA 98005-1210

**From:** Michal Makar <michal.makar@hotmail.com>  
**Sent on:** Monday, June 12, 2023 11:22:25 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** I wish to be a party of record for the comp plan

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

I wish to become a party of record regarding the 10 year comp plan and ask that I receive email and updates on the plan and the process. I fully support the thoughtful response submitted by the Bridle trails community organization, and hope that the issues raised will be given a full hearing.

Thank you.

Michal Makar

3550 140<sup>th</sup> Ave NE  
Bellevue, Wa 98005

Email:

[Michal.makar@hotmail.com](mailto:michal.makar@hotmail.com) NOTE -THERE IS NO "E" IN MICHAL  
t

Sent from [Mail](#) for Windows

**From:** Maria Lau Hui <maria@matchaagency.com>  
**Sent on:** Monday, June 12, 2023 11:00:07 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** EIS comment - Bellevue Comp Plan 2044

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Thank you for the opportunity to review and comment on the EIS.

The four alternatives in the EIS will certainly impact the growth of the BelRed arts district, which is currently undergoing major transformation as light rail expands into the region. Existing small creative businesses may be priced out as developers and others take advantage of the economic benefits in the redevelopment of this area. However, there are opportunities to preserve, support, and attract creative businesses and organizations. Outlined below are some thoughts and ideas.

Support the creative economy - incentivize BelRed development.

1. Preserve, support, and attract.
  - a. Incentivize developers to create new rental and business spaces for small scale creative businesses.
  - b. Incentivize developers to keep existing creative businesses as tenants within their redeveloped projects.
  - c. Incentivize developers/ parcel owners to support opportunities for pop ups at unoccupied storefronts.
  - d. Incentivize developers to provide affordable housing/ work/live spaces for artists.
2. Provide dedicated help with permitting (Tenant improvement) for space buildouts for small business owners. Shorten permit acquisition timetable.
3. Increase publicly accessible gathering space. (There are only 3 community gathering space in BelRed (Theatre33 and two active parks, pg. 3-24 EIS))
  - a. Activation beyond ground plane.
    - i. Incentivize developers to partner with city in creation of green or public spaces that are open and accessible to all. i.e. opening up rooftop gardens and allowing access to the general public.
  - b. Implementation of festival streets or area within BelRed.
    - i. More favorable permitting process for activities that would bring the community together. Ability to close off certain streets.
    - ii. Activation of empty parking lots for festivals. Figure 3-9 shows the majority of the BelRed are parking and vacant lots.
4. Improve connectivity from surrounding area and walkability within.
  - a. There are no continuous sidewalks from the future 130<sup>th</sup> light rail station to BelRed Rd on the stretch of 130<sup>th</sup> Ave NE. There are no direct walkable paths from Spring district to BelRed outside of BelRed Rd.

Thank you again for this opportunity to comment.

Sincerely,  
Maria Lau Hui  
Former Chair and Member of Arts Commission, City of Bellevue (2015-2023)  
Co-Founder, BelRed Arts District Community Alliance  
Bellevue Resident

**Maria Lau Hui** | AIA, LEED AP, MBA  
**Matcha Agency** Architecture & Development Reimagine  
e. [maria@matchaagency.com](mailto:maria@matchaagency.com)  
p. 206.523.8899



**From:** Loretta Lopez <llopezmsl@gmail.com>  
**Sent on:** Monday, June 12, 2023 11:33:46 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>; Stead, Elizabeth <estead@bellevuewa.gov>  
**CC:** BTCC Board <board@bridletrailcommunity.org>  
**Subject:** Fwd: Comments on the Draft Environmental Impact Statement (DEIS) City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation  
**Attachments:** Letter on DEIS Comprehensive Plan June112023BridleTrailsCommunityClub.pdf (843.29 KB)

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

I would like to be added as a party of record. I adopt the comments, concerns and objections set forth by the Bridle Trails Community Club in the BTCC comments sent to Elizabeth Stead dated June 11, 2023. See the BTCC message to Liz Stead in the email message stream below.

In addition my objections are as follows:

1. Including the Wilburton Vision Implementation in the DEIS created unnecessary confusion. There were no other specific areas or subareas included in the DEIS. It is not clear from the DEIS the reason that the Wilburton area was included in the DEIS. The result is that residents had to read additional chapters and were distracted from the main reasons to read and comment upon the DEIS.
2. The public comments on the DEIS should be made in public so that residents attending the meetings are able to hear comments. At the meeting that I attended at Crossroads Community Center the City had a separate small room with a court reporter for participants to make comments. In the past, residents could and did make comments at the public meeting in the presence of all those attending. For example, the comments on the DEIS for the PSE project, Energize Eastside, were all made at the public meeting in the presence of all residents and a court reporter. The advantage to such an approach is that residents hear concerns from other residents, which generates ideas and builds community. The City should not have created a small private space for comments. Such an approach prevented other residents from hearing the concerns of other residents.
3. In Chapter & Housing, page 7-43, the DEIS states: "Alternative 0, (No Action) would have capacity for 41,000 additional housing units (6,000 units above the 35,000 CPP housing target) There would be capacity for 124,000 new jobs under this alternative, which is above the regional growth target of 70,000 jobs. On page 7-44 the DEIS states: However, the city's adopted policy framework and development of regulations contain provisions meant to encourage housing supply and diversity and increase affordability. Recent development trends have increased the development of multi family housing in the city and thereby increased its housing diversity. Even though new capacity is relatively lower on the No Action Alternative, it is higher than the King County growth target for the city. Therefore no significant adverse impacts are expected with respect to housing supply and diversity under the No Action Alternative."

The section below then states that the No Action Alternative has the potential to have a significant adverse impact on affordability.

There is a reference in footnote 2, page 7-43 that the No Action Alternative does not meet other new planning requirements including affordable housing across income bands.

The DEIS should have made it clear in the the No Action Alternative, 7-43 and 7-44 section, how the term affordability is defined. In addition, there should have been a reference to how housing across income bands is defined. Is it the income band in Bellevue? And if not, then why not?

Loretta Lopez  
 13419 NE 33rd Lane  
 Bellevue WA 98005

----- Forwarded message -----

**From:** Elliott Bay <elliottbay@yahoo.com>  
**Date:** Mon, Jun 12, 2023, 11:21 AM  
**Subject:** Re: Comments on the Draft Environmental Impact Statement (DEIS) City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation  
**To:** CompPlan2044EIS@bellevuewa.gov <compplan2044eis@bellevuewa.gov>, Adams (PXT), Eric <ecadams@amazon.com>  
**Cc:** Board@BridleTrailsCommunity.org <board@bridletrailcommunity.org>, Cathleen Adams <cathleenadams@comcast.net>

Good Morning,

I would also like to be added as a party of record and I also adopt the comments, concerns, and objections articulated by the Bridle Trails Community Club in the above email and as set forth in the attached Bridle Trails Community Club June 11, 2023 letter.

Thank you,  
 Stuart Heath  
 13252 NE 47th Street  
 Bellevue, Washington 98005  
 425-881-8808  
 ElliottBay@yahoo.com

On Monday, June 12, 2023 at 07:47:20 AM PDT, Adams (PXT), Eric <ecadams@amazon.com> wrote:

City of Bellevue,

As a resident of Bridle Trails Bellevue, this email serves 1) as a request to become a party of record and 2) to express complete endorsement of the thoughtful and detailed commentary provided by the Bridle Trails Community Board (below).

**From:** lkshulman <lkshulman@gmail.com>  
**Sent on:** Monday, June 12, 2023 11:08:36 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Comp plan

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

I want to trees. I believe bridle trails no longer has the character it has because huge homes were built on the horse properties. I believe ADU should be allowed in Bridle trails and even 2 or max 3 homes or s Duplex . These are not taking any more trees away and there should be control (prohibit)not to plant invassive species that damage the native trees.

I acre zoned areas can accomodate it and providr addition housing in this lovely area not just a huge home for families  
Thsnk you  
Linda shulman  
908-946-5709

Sent from my iPhone

**From:** Kristine Linn <kristinel@smalaw.biz>  
**Sent on:** Monday, June 12, 2023 11:05:11 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** DEIS: comments on the draft

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

To whom it may concern:

I own an office condo in the 9 Lake Bellevue building. We also own a parking lot directly adjacent to the light rail station, soon to open.

I actually live in South Seattle, near the Columbia City light rail station. Our neighborhood there has seen a kind of renaissance because the zoning allowed for more housing and commercial use right next to the rail station. Folks can walk to the station from their homes, and take public transportation to their work at another stop on the same light rail. I really hope we don't lose the opportunity to revitalize the Lake Bellevue/Wilburton neighborhoods in the same manner.

I hope you will consider allowing all the planning alternatives for the Lake Bellevue area, including those right next to the light rail, to include TOD, including midrise and highrise office and residential developments.

Thank you,

Kristine Linn  
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4800 49<sup>th</sup> Ave. S  
Seattle, WA 98118  
(206) 960-1902

*Kristine Linn*  
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June 12, 2023

VIA ONLINE PORTAL, EMAIL, AND U.S. MAIL

Elizabeth Stead  
Bellevue Development Services  
City of Bellevue  
450 110<sup>th</sup> Ave. NE  
Bellevue, WA 98004  
Email: [CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Re: Wilburton Vision DEIS Comment

Dear Ms. Stead:

This Firm represents the Nine Lake Bellevue Owner's Association, which consists of members of the Nine Lake Bellevue Condominium (sometimes referred to as Nine Lake). On behalf of the Association, we submit this comment letter in response to the DEIS for the Bellevue Comprehensive Plan Periodic Update and Wilburton Vision Implementation.

The Nine Lake Bellevue Condominium contains a 25-unit office building on the west side of Lake Bellevue in the Wilburton study area. The Condominium also owns a surface-level parking lot south of the office building and southwest of the Lake. The Nine Lake parking lot is adjacent to the Link light rail Wilburton Station, which is anticipated to open in 2024 or 2025. Right next to the Station, the parking lot is a prime location for sustainable, transit-oriented development (TOD).

Per the [City website](#), the primary goals of the Wilburton Vision Implementation are to "facilitate redevelopment in the Wilburton study area, improve amenities, incentivize transit- and trail-oriented uses and establish a unique identity for the area." Similarly, the Scope of Work Summary for Wilburton Vision states that the City hopes to "realize the vision of a vibrant, inclusive and sustainable future for Wilburton." The broader DEIS touches on similar themes of sustainability, TOD, and increased housing capacity.

The Nine Lake Bellevue Condominium owners share the City's goal of building a sustainable future with vibrant neighborhoods, greater housing choices, and TOD. Thus, the owners were disappointed to learn that only Alternative 3 of the DEIS proposes upzoning on the Lake Bellevue properties, including the Nine Lake property (parcel no. 6093500000). Alternatives 1 and 2 show no upzoning to the Lake Bellevue properties. The DEIS does not explain why Alternatives 1 and 2 propose no upzoning around

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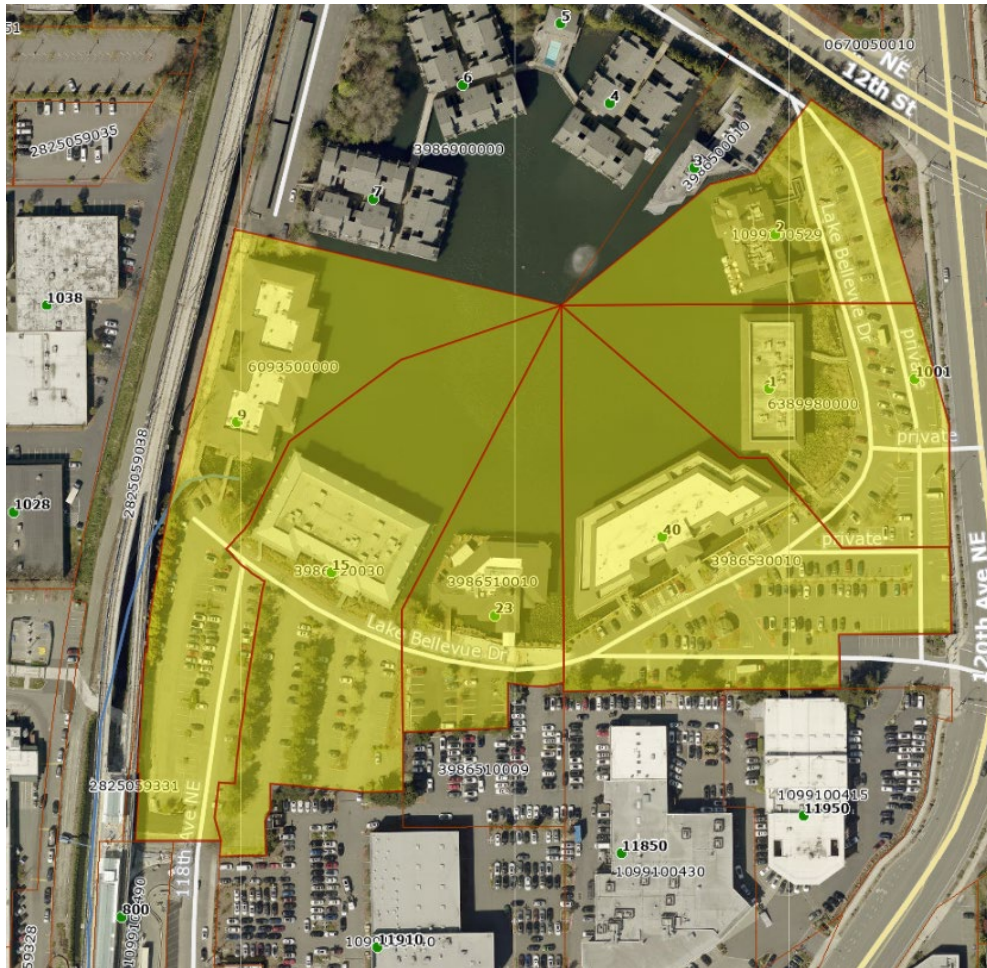
[jhempelmann@cairncross.com](mailto:jhempelmann@cairncross.com)  
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Elizabeth Stead  
June 12, 2023  
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Lake Bellevue while Alternative 3 does propose upzoning. Given the many opportunities at Lake Bellevue for TOD adjacent to the new Wilburton Station, omitting TOD options in Alternative 1 and 2 makes no sense.

Almost all of the dry land on the Lake Bellevue properties consists of parking lots:



Failing to upzone the Lake Bellevue properties would most likely cause those parking lots to remain as such—parking lots—even though the Wilburton Station will be within a few minutes of level walking distance of those lots. That would be totally incongruent with the City’s stated goals of adding capacity for sustainable development, TOD, and housing.

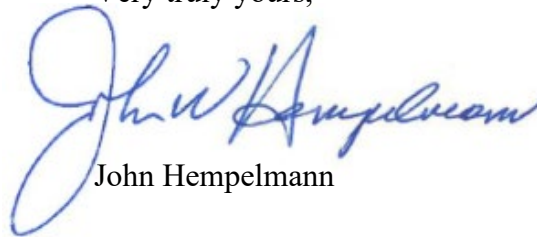
Therefore, we respectfully request that **all** of the FEIS alternatives propose upzoning on the Lake Bellevue properties, including Nine Lake Bellevue.



Elizabeth Stead  
June 12, 2023  
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Thank you, and we look forward to working with you in building a vibrant and sustainable future.

Very truly yours,



John Hempelmann



Maxwell Burke

June 12, 2023

VIA EMAIL AND US MAIL

City of Bellevue Development Services  
Attn: Elizabeth Stead  
450 110th Ave NE  
Bellevue, WA 98004  
CompPlan2044EIS@bellevuewa.gov

Re: Wilburton Vision Implementation DEIS  
RCJ Properties, LLC Comment

Ladies and Gentlemen:

Thank you for the City's careful thinking and process about the future of the Wilburton neighborhood. Thank you also for the opportunity to comment on the proposed Wilburton Vision. We represent RCJ Properties, LLC, the owner of the land where the Whole Foods Market is located northeast of the intersection of NE 8th and 116th NE. The family that owns RCJ has owned this Property for approximately 50 years, and has a deep commitment to the City. The Property is adjacent to, and subject to easements benefiting the new Wilburton Light Rail Station and the Eastrail Multi-use Corridor. RCJ is proud to have played a direct role in completing the multi-modal connections that are transforming the Wilburton neighborhood into one of the best-connected neighborhoods in the region. While the Property is now developed, RCJ, like the City, is very interested in looking out and planning decades in the future to ensure the Wilburton neighborhood continues to be an important contributor to transit and trail oriented development and the City's future growth.

RCJ strongly supports the City's adoption of Alternative 3 detailed in the Wilburton Vision Implementation DEIS. We have seen our City grow for many decades and we know that it will continue to grow much more in the future. Thus, providing for the broadest options for new development in the Wilburton neighborhood makes the most sense. This is particularly true because the region is spending tens of billions of dollars in Wilburton on high-capacity transit infrastructure including, most prominently, the Sound Transit East Link Light Rail and the I-405 Bus Rapid Transit project. Bellevue must take advantage of these huge investments in our City. All the properties within the 1/4-1/2 mile walking distance of the Wilburton Light Rail Station should be planned for intense development that can rely upon and benefit from the Light Rail and reduce dependence upon automobiles. As you are aware,

studies show that people who have access to high-capacity transit stations can reduce reliance on automobiles and have more dollars available for housing, education, recreation, and other priorities that positively grow communities.

Alternative 3 provides for maximum development flexibility, allowing the market to determine the right mix of office, retail, and residential uses. Alternative 3 allows for the most effective development of offices closer to new homes and retail amenities to support both office and residential uses. We know our region is facing a housing crisis. We need more housing of every type, closer to transit, office uses, and retail. The Wilburton area has many acres of underdeveloped property that can be developed for more housing and mixed uses. In addition to the ability to move via mass transit, the development of Eastrail will provide a wonderful amenity that not only attracts new residents and office users but facilitates movement without automobiles.

The Wilburton Light Rail station also will serve our hospitals and medical services sectors. This sector will continue to grow, and the Wilburton Vision should actively support this growth. Alternative 3 provides the best way to support health care-related business and housing opportunities to both grow quality jobs for medical centers and take advantage of easy access to those medical centers.

Alternative 3, with its focus on mixed use and density close to the City's existing arterials, new transit systems, and Eastrail, represents the best approach to smart, transit-oriented development over the next several decades. For these reasons, RCJ strongly supports Alternative 3 in the Wilburton Vision Implementation DEIS.

Very truly yours,



Stephen P. VanDerhoef

SPV:kmc



## PLUSH COMMITTEE

Planning, Land Use, Sustainability, & Housing

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Re: Bellevue 2024-2044 Comprehensive Plan Periodic Update DEIS  
Bellevue Chamber PLUSH Committee Comments

Dear Reilly:

The Bellevue Chamber and PLUSH Committee applaud the City of Bellevue for the projected capacity, building heights, and thoughtful analysis proposed in the DEIS. The alternatives proposed target significant amounts of employment and housing in close proximity to transit, which will serve Bellevue's growth well in the next twenty years. The length of this comment letter should not indicate a poor opinion of the City's work—to the contrary, PLUSH considers this to be a strong document—but as a reflection of the wide range of topics the City is pursuing to improve its ability to handle growth in Bellevue.

PLUSH would like to submit the following comments to the DEIS:

- **We strongly endorse Alternative 3. Alternative 3 best accommodates housing that must be built in Mixed-Use Centers.**
  - Bel-Red, Wilburton, and Downtown accommodate most of Alternative 3's growth. This is true "smart growth" as placing most of Bellevue's growth in Mixed-Use Centers and surrounding transit will minimize traffic impacts by leveraging transit investment in these TOD areas.
  - Taller heights incorporated in Alternative 3 (above 16 floors) allow density to spread out vertically, rather than sprawl horizontally. Higher building heights can translate into more open space and human-scaled ground planes. Taller heights also enable high-rise building typologies to be more feasible economically than height limits between 8-16 stories.
- **General Questions and Comments:**
  - What are the DEIS's "informed build-out" assumptions? How is developable and re-developable land defined? Please provide this in the FEIS to determine that impacts were studied adequately.
  - What are the DEIS's FAR or density assumptions for the alternatives? Please provide these details in the FEIS to help inform our analysis of the impacts that were studied.

- We understand that an economic analysis was included in the study of the affordable housing options, and possibly in the study of the informed build-out assumptions. This economic analysis should be attached as an appendix in the FEIS so that economic assumptions can be publicly reviewed.
  - What was the City's methodology/criteria used to designate new land use designations? Particularly with respect to the MU-L and MU-M designations in Neighborhood Centers? We understand the City may not have accounted for frequent transit proximity in identifying these designations. If that is the case, the Preferred Alternative should revisit these designations and identify sites for MU-M if they are within transit proximate areas.
  - The property at 12<sup>th</sup> and 8<sup>th</sup>, known as Evergreen Court and Glendale is listed at 16 floors in Alternative 2 but only 7-10 floors in Alternative 3. Please state the difference in assumptions and the outcome; is this reduction of height related to affordable housing assumptions? We prefer the higher density on this property in Alternative 2.
- **Uses / Mapped Land Use Designations:**
    - We recommend studying a more agnostic mix of uses between residential and commercial uses in Mixed-Use Centers in the FEIS. In Mixed-Use Centers, consider allowing residential and commercial generally interchangeably, rather than tightly controlling uses. This will greatly simplify the Land Use Code and drafting of future regulations, and result in a code that is more responsive to market conditions. While we recognize and strongly support housing as a priority, the overall velocity of both commercial and residential projects will increase as flexibility increases.
    - Consider the wide application of a "Mixed-Use" zone in the Mixed-Use Centers. For example, is there a reason to have East Main-focused, Wilburton-focused, Bel-Red-focused, and Eastgate-focused separate land use codes? Utilizing one "Mixed-Use" zone in each of these centers will give the City the ability to more easily and quickly rezone centers. It would also result in permitting efficiency as staff would have fewer zoning designations to apply.
    - Study a less prescriptive approach with Comprehensive Plan map designations. Currently there are 53 different land use designations listed in the Comp Plan cityside (page 653). For example, in Wilburton, rather than including individual designations on each parcel, consider determining the whole area as "Wilburton Mixed Use Center" in the Comp Plan. Consider including a range of implementing zones that can be utilized to implement the Comp Plan map. Similar approaches could be used in Downtown and Bel-Red. Decoupling the Comp Plan/FLUM from the zoning map is allowed by the Growth Management Act and allows flexibility in zoning in the future.
    - Office ("O") zones are not designated for any growth, nor for any ability to have more flexible uses or additional FAR in Alternative 3. We consider this to be a lost opportunity in the 20-year horizon; these 1-2 story office buildings are the buildings that are being hit the hardest by the current office leasing crisis (these buildings are most often older Class B office). This is an opportunity to incentivize development or reuse of underutilized buildings/properties in areas typically close to transit or major arterials. Please study the ability to do all residential / mixed use buildings in the O zones, with heights up to 6 stories, and up to 4 FAR.
    - Plan for future density along corridors that will likely have transit in the 20-year horizon. For example, the Bellevue Way corridor may have more transit in the future running locally between Bellevue and Kirkland. As a major arterial, particularly north of Bellevue, there



should be additional density considered in this corridor in the 20-year horizon. Consider the R-High designation or an MU designation along this and other similar corridors.

- We support the creation of a medical / hospital district surrounding Overlake and to the north—consider sufficient densities and heights that will allow MOB and life sciences to develop. Consider allowing some residential, retail, R&D and other supportive uses in this subarea to support hospital workers and those needing to stay longer term for medical treatment; Bellevue currently lacks these housing options near the hospital. Given the current lack of traditional office market, medical office/lab space is more likely to develop in the short term. Consider adding more space to the Wilburton Study Area (north of 12<sup>th</sup>) that is designated for medical use to allow for these properties to develop in the shorter term.
- Please study higher densities than currently shown in Alternative 3 in the areas along 520, south of NE 24<sup>th</sup>, along Northup Way, and near the border of Redmond’s Overlake Urban Center (especially at the intersection of 156<sup>th</sup> and Bel-Red Road). These areas are currently designated generally MU-L, which would only allow low-rise buildings in a mix of 2-4 stories. BR-GC is also only 1-2 stories. Extend Bel-Red zoning to these areas with the BR-MU-M designation or a similar zone. Again, in the next 20 years it is very likely that the buildings along 520 will need to be redeveloped. More density will also fit better with the future context. For example, on the Redmond side of the of NE 20<sup>th</sup> and 148<sup>th</sup> intersection, Redmond is planning for high density/25-story towers. Bellevue should match the height and density that Redmond is planning in Overlake in border areas. These are areas of potential growth that do not impact single-family neighborhoods or lower density zones, and placing growth in these areas could be traded for growth currently designated in neighborhood centers that may also be not well served by transit or create problematic transitions to single family zones.
- Please study a higher density for OLB zones (OLB and OLB2). It is our understanding that OLB zones will be a part of the Phase 2 code amendments. In Eastgate, a large area of OLB exists along the freeway, up 139<sup>th</sup> and in the vicinity of 161<sup>st</sup>. Is there a better designation for this area given its proximity to Bellevue College and its need for housing? Or is it more appropriate to add density to OLB zones and keep this area OLB? Consider a more flexible zone like an MU zone in the Eastgate area.
- Along 116<sup>th</sup> south of Downtown, please study a “future vision” for this area rather than designating generally what exists today. This area is close to downtown and is served well by transit near SE 8<sup>th</sup>. For example, consider whether an LI zone should remain in this area for the next 20 years?
  - Study all center boundaries and ensure parcels are not split zoned (half in centers, half out). For example, on the southwest corner of the downtown boundary, parcels are split zoned downtown and R. This inhibits development in a key corner of downtown along Old Main. Similar conditions may exist in the other centers, particularly in Eastgate. Please review these edge conditions in all Centers and ensure parcels are adjusted to be fully in or out of Centers. Review Centers and determine whether they should be expanded slightly given context.
- The Preferred Alternative must repeal any existing subarea plan policies that restrict multifamily housing choice. As noted in Section 4.2.4, the City has 14 neighborhood subarea plans. Some of the existing subarea plans include policies that specify areas where certain uses are prohibited, such as Northeast Bellevue Subarea Plan Policy S-NE-7 and Crossroads Policies S-CR-63 and S-CR-80. These policies are inconsistent with the Growth Management

Act regulations that encourage vibrant housing options in zones that allow for residential uses. The DEIS should evaluate the impacts of these Subarea Plan policies that restrict housing choices and frustrate the implementation of the 2044 Plan's vision and applicable housing laws, including HB 1220 and HB 1110. The Final EIS should evaluate the Subarea Plans for such inconsistencies, and where identified, repeal them with the 2044 Plan.

- **Aesthetic Visual Analysis – Wilburton.** (pages 6-19 through 6- 50): We have concerns that the massing model may appear to overstate the density possible in Wilburton. The public could misunderstand what these models represent failing to understand that the EIS needs to show 100% re-developable build out to show a “highest-growth case scenario.” Understandably, the massing doesn't reflect existing property configurations and shows built form on unbuildable wetlands, the existing substation, and does not leave space for planned city parks and the planned bridge for the Grand Connection, all of which would reduce the extent of built form. The City should also develop more realistic propensity diagrams that take into consideration these real-world conditions so that the public has more accurate information to gauge impacts. We feel the EIS should also include additional written explanation to accompany the current diagrams. We suggest inserting the following:

*Please note these massing diagrams represent 100% development capacity expressed as built form for each alternative. Many property and land-use determinants that would reduce buildable areas were not considered when creating these diagrams. There is no real estate development precedent to support 100% build out as shown in the next 25 years.*

- We also caution the City against increasing transition zones in the Mixed-Use Centers. In a City, fewer step-down transitions are expected. Transition zones are better suited adjacent to single-family zones, and the City should consider whether the reduction in density currently deployed by transition zones is an effective approach to “mitigate aesthetics” or whether it simply stops redevelopment from occurring.
  - The mitigation related to viewsheds should be tightly defined and controlled. Private views are not protected by SEPA, and any public views to be protected should be very specifically defined.
  - We are concerned about mitigation related to “Aesthetic Impacts” that will further reduce the efficient creation of density. We strongly suggest that such mitigation measures be limited, particularly given increases in density that will be required per new state laws throughout Bellevue. In addition, we believe that allowing flexibility in design is important such that buildings are constructed per market needs—i.e., medical office buildings, technology buildings, and residential buildings below 85' should be allowed larger floor plates, and residential towers above 85' should be sized such that residential units can be delivered more efficiently (upper-level setbacks add cost to structures). The City should not look to current upper-level tower limits, but instead, look to the market to inform the most efficient forms to avoid adding unnecessary cost to projects. Inserting a cost/benefit analysis of potential mitigation measures may assist decision-makers. In addition, shadows on private property should not be regulated, and if the City seriously considers this mitigation, adequate analysis should be completed to determine impacts to density related to such a regulation.
- **Critical Areas/Stormwater/Trees.** The City should analyze impacts to critical areas; the current 4-page memorandum in the Appendix is insufficient. The City should study implementation of the following:
    - Exempting man-made steep slopes from critical areas requirements. The proposed alternatives show much growth in areas where it is currently impossible given man-made

steep slopes such as rockeries. The City should study this so the code can be changed, this is a major impediment to urban development in Bellevue and does not reflect best available science.

- The “critical areas penalty” should not apply in any Mixed-Use Center. Currently the penalty does not apply in downtown. If it applies in the City at all, the penalty should only apply in low density zones; it is inappropriate given the stringent stormwater codes and other regulations that we now have in Bellevue that protect critical areas, and a reduction of density on top of critical areas regulations and buffers is not necessary. Please include this analysis in the study such that future rezones can utilize the environmental review.
- The current Bel-Red neighborhood plan includes a policy that seeks to incentivize daylighting of creeks. However, the incentives within the land use code do not properly incentivize developers to daylight and improve creeks. Please study an incentive in which a 20-or 30-foot buffer and building setback could occur with daylighting of currently piped creeks, with restoration of ecological function. Impacts/outcomes of such an approach should be disclosed to decision makers. There is no possible way the City can afford the massive daylighting undertaking that should occur, and developers will not be able to accomplish this unless buffers are appropriately set and do not prevent redevelopment. If daylighting is properly incentivized, developers will build creek daylighting into their projects, and the City’s current comp plan goal can be achieved. A similar study should be undertaken for Sturtevant Creek in Wilburton, and other streams that run underneath urbanized areas in Bellevue. The City must also recognize that areas of Sturtevant Creek in Wilburton are on WSDOT property within the “limited access area” that is highly regulated by FHWA and no daylighting or additional mitigation may be possible in these areas. The City should account for this in the regulatory context section of the FEIS.
- The FEIS should study the loss of housing units and consequently affordable housing if the current critical areas requirements remain; these impacts should be disclosed to decision-makers.
- The FEIS should study the use of Mitigation Banking.
- The FEIS should study alternate stream designations such as the “Urban Stream” designation used by the City of Woodinville, these designations recognize that even a salmon-bearing stream can be properly protected in an urban area without large 100-foot buffers, and that it may actually be positive for stream function to incentivize improvement of current stream function.
- The FEIS should study properties in Bel-Red and Wilburton that are most impacted by critical areas and determine whether redevelopment will be possible given current critical area requirements.
- The FEIS should study alternate forms of mitigation and ways in which the sites most impacted could still re-develop. If the critical area requirements are so onerous so as to prevent any re-development from occurring, then the critical area will never realize any improvement, which is exactly the opposite of the intent of the critical area requirements.
- Tree Ordinance: Since the DEIS does not assume or address any new tree standards or regulations, we recommend not implementing any revised tree regulations until the Comprehensive Plan and subsequent LUCA amendments are in place. The City should complete a supplemental FEIS analysis on tree impacts following Comprehensive Plan implementation and disclose how any tree ordinance could impact the density assumed in the FEIS. All Mixed-Use Centers should be exempt like downtown is exempt.

- Impervious Surfaces. The City's requirements of substantial pervious surfaces in dense urban environments runs contrary to the infill goals of Alternative 3 of the DEIS. The requirement of significant pervious areas on dense urban sites should not be a part of future Wilburton or Mixed-Use Center regulations. Most other urban jurisdictions have identified ways to address storm water quality without the need to impose major penalties on site usability. Bellevue should update its regulations accordingly.

- **Housing Affordability**

- Any approach to affordable housing must be legal. Affordable housing requirements cannot exceed the impacts created by new development, and must meet the requirement of WAC 365-196-870, that increased density can be achieved given the affordable housing requirements and other development regulation constraints.
- The City should also consider itself as an essential partner in the housing affordability issue. Rather than focusing solely on market-rate developer-created funding or housing, which is generally limited to 80% AMI and above, the City should explore and disclose in the FEIS the many tools it may deploy to address housing affordability, such as a housing levy, housing vouchers, impact fee waivers for market-rate units that have performed inclusionary housing at a lower AMI, parking reductions, expanded MFTE, expedited land-use and building permits, financing programs and resources, making underutilized or surplus public properties available, raising SEPA thresholds, etc. and other ideas. WAC 365-196-870 requires the City to review and apply these incentives.
- The FEIS should include each affordability program applied to each alternative to show decision makers the relative efficiency of each program. There is no housing production data associated with the different programs or alternatives, please provide this data in the FEIS.
- The FEIS should recognize that inclusionary zoning housing policies need a sustained level of market-rate development in the local market or IZ policies will not generate a meaningful number of new affordable housing units. In most cases, jurisdictions provide development incentives to ensure the feasibility of development projects affected by an IZ policy. The principal incentives are direct subsidies, density bonuses, tax abatements (MFTE), and reduced parking requirements. Individually, and especially in combination, these incentives can substantially enhance the feasibility of development projects affected by an IZ policy.
- The FEIS should disclose the option of a fee in lieu of developing IZ units, and the city can use those collected fees to support construction for lower-income households directly. Setting the in-lieu payment amount affects IZ outcomes. If the payment amount is set high, developers may not be able to feasibly support the in-lieu payments and will either be able to deliver the below-market units within a project or not build at all. Further, the fee needs to be context-oriented and calibrated with the bonus received to yield better results for both developers and policymakers such as considering market prices, development types, and macroeconomic conditions.
- To the extent that land use requirements and/or fee arrangements impact the building envelope or constructability of buildings, the city should conduct a more cumulative analysis of the effects. For example, land use incentives for affordable housing and childcare facilities must be considered concurrently to ensure they can complement each other.
- Affordable housing is just one "spoke" of the livable City wheel. Other needs that are often obtained via development projects include park dedications/fees, deep green development, trails, sidewalks and street furnishings, roads/road dedications, daycare, community facilities, and stream restoration. Depending on the extent of the affordability program, disclose in the

FEIS via an economic analysis the ability of a project to “do it all” — most projects cannot do it all, and will not develop if regulations are collectively too onerous.

- **State Legislation Analysis / General SEPA**

- SB 5412. This state law requires jurisdictions to exempt from SEPA review all projects that include one or more housing unit. Please include the required analysis according to the new RCW 43.21C.229(2)(d) such that Bellevue can comply with the state law and allow for streamlined permitting of residential units following adoption of development standards.
- HB 1293. This state law requires jurisdictions to apply only “clear and objective development regulations governing the exterior design of new development” and limits design review application to only the exterior of buildings, not interior uses. Design regulations also may not result in a reduction in density, height, bulk, or scale below the applicable development regulations for the zone. Compliance with this state law is required within 6 months of the adoption of the Bellevue 2044 Comprehensive Plan. Please incorporate analysis of this state law within the Preferred Alternative as it relates to the adoption of Wilburton Design Guidelines (p. 6-63), as well as mention of the new state law regarding all other applicable design guidelines and how these must be augmented to meet the requirements.
- SB 5290. This state law requires consolidated permit timelines. The City should include study of the following items that would significantly streamline permit timelines:
  - Define SEPA thresholds for changes of use / procedures for change of use more clearly and increase SEPA thresholds generally for commercial uses.
  - Eliminate parking requirements for changes of use; allow existing nonconformities to continue; this will allow for the more flexible use of existing spaces.
  - Allow an administrative land use exemption process to modify issued MDPs between uses; this will allow for a better reuse/adoption of existing MDPs in an era when permitted office spaces may not be built.
  - Standardize the permit review process for both land use and technical (building, utility, shoring) permits; currently many different permits are reviewed in different ways with corrections being emailed rather than stored on the permit system. Study ways to make the clear and grade permit process happen more smoothly and more predictably.
- In general, the FEIS should include a basic statement about what the FEIS mitigation suggestions are, and what they are not. Under SEPA, impacts of the proposed action have already been determined to be significant. SEPA does not require impacts to be mitigated to a level of non-significance as part of the FEIS process. As such, mitigating measures are suggestions only, and are not required by SEPA. Decision-makers and the public should be made aware of this distinction.
- As of January 2023, parking is no longer an element of the environment required to be reviewed by SEPA. The FEIS should recognize the connection between car usage and free ample parking (free parking promotes car usage) and should continue to discuss parking policy in the context of transportation mitigation.

- **Transportation**

- For Wilburton, we believe SE 6<sup>th</sup> should be extended only to 116<sup>th</sup>, not to 120<sup>th</sup>. The DEIS shows that there is almost no difference between the traffic impacts of Alternative 3 and 3A, and that traffic may be a bit worse for the extension option. In addition, the impacts to Eastrail of another crossing are not acceptable.



- Prioritize the Grand Connection’s connector bridge as an essential public investment in a broader range of mobility choices. The usefulness of the Eastrail system is contingent on this link to downtown. This connection should be a top priority in city funding; SB 5452 has been passed allowing pedestrian and bicycle improvements to be paid for by transportation impact fees. Further, consider the use of zoning incentives in the bonus amenity program for adjacent sites to respond.
- Figure 11-28 shows a street grid in Wilburton. Just as in Bel-Red, we have significant concerns about a road grid that does not reflect property boundaries or the City’s ability to effectively deliver the road grid in an efficient manner. The City should study whether a built out road grid in Wilburton would have an impact on the various transportation significance thresholds, and if not, the City should reconsider whether a road grid that would add cars and congestion to the network is actually necessary from a transportation standpoint. Moreover, the City should study whether the access/road grid should be required to include cars, or should the grid instead be required to connect with pedestrians and bicycles, in keeping with the transportation mitigation policies stated in M-TR-1 through M-TR-4.
  - It is significant that completion of the road grid is not identified as a required measure to mitigate either aesthetic or transportation impacts. The Chamber supports this finding of the DEIS, we do not believe that a road grid is necessary to mitigate either aesthetic or transportation impacts.
  - We also note that the massing diagrams shown in the Aesthetics section (pp. 6-38 through 6-50) do not appear to show the road grid and the impacts to achievable density. Please include an analysis of the road grid on potential for achieved density.
  - Similarly, in Bel-Red, we believe that the existing “required” road grid should be studied and reconsidered. It does not appear that completion of the road grid is a component of the transportation analysis. In general, it has been exceedingly difficult to obtain a road grid in Bel-Red, again due to the fact that the proposed road grid had no regard for property boundaries or cost or ability to build-out. Please study whether the road grid is necessary from a transportation standpoint, and if not, reconsider whether adding additional cars and congestion is necessary. Much has changed in Bellevue (including the building of light rail) since the Bel-Red code was adopted, and we would like to see a study of the Bel-Red grid system with the transportation policies stated in M-TR-1 through M-TR-4 in mind.
- **Mitigation**
  - **Commercial displacement.** Requiring displaced businesses be given a “right to return” or Community Benefit Agreements in a development raises troubling legal and procedural questions. If the City determines it should act to assist displaced small businesses, it should incentivize small businesses with bonuses in the Land Use Code, and it should do other things to encourage ease of movement for small businesses like no parking minimum for a relocated business, streamlined tenant improvement and sign permits for small businesses, and consider an increase in SEPA thresholds for relocated businesses so that relocation does not require onerous SEPA review. The City’s idea of an “MFTE” program for small business locations is a creative idea that could result in small business retention. The City should first review policies and procedures that currently exist in Bellevue that reduce the ability of a business to locate and operate in the City of Bellevue before reducing redevelopment opportunity. The impact of such mitigation measures should be studied and disclosed in the FEIS such that decision-makers can truly weigh and balance the relative benefits of such mitigation measures.

- **Noise.** Requiring interior noise requirements along noisy arterials of 45 dBA or lower will place a significant cost burden on new projects that will be passed along to tenants. No other City has as onerous noise requirements as Bellevue. Please study the impact of a potential noise buffer area or expensive windows that would reduce the ability for density to locate in large swaths of the City. The impact of such mitigation measures should be studied and disclosed in the EIS. As an alternative, we suggest raising the dBA to make Bellevue consistent with other cities that have high-rise buildings near these arterials. Seattle is one example of this.
- **“Air quality buffers”.** The DEIS suggests air quality “buffers” for development along arterials and requiring very expensive air handlers for residential projects near freeways, all of which would significantly increase the cost of housing in Bellevue. It would seem that this mitigation is better placed in the “environmental health” section, as the DEIS identifies freeways as an environmental health hazard. Based on Wilburton’s location, most of Wilburton could qualify as for such a buffer. Worse, these targeted arterials are also the City’s key transit corridors, so the implementation of such buffers would completely undermine the City’s urban density and mobility strategy for the Plan. More important, the DEIS does not demonstrate that actual air quality impacts would occur to nearby residents or employees; demonstrating such significant adverse impacts is a precondition to any discussion of mitigation. The City has identified a significant impact without an applicable threshold and without taking into consideration the impact of transportation mitigation measures on GHG emissions. This analysis is flawed and must be updated in the FEIS. Further, the City’s 2017 rezone of Downtown and recent rezone of East Main – both located along I-405 – included no such mitigation requirements. Selective application of such unwarranted restrictions in Wilburton, Bel-Red, Factoria, and Eastgate would only impair urban development in the area, without justification and in a manner inconsistent with regulation in similar areas. The FEIS should eliminate this recommendation.
- **Greenhouse Gas Emissions.** The DEIS relies upon existing and future building and energy codes to reduce the impact of the listed future development alternatives. In addition, the DEIS relies upon the Eastside Electrification Project and Puget Sound Energy to provide the increased electrical capacity necessary for future development. But upcoming building and energy codes will soon shift to full electrification for building heating and increasing cooling loads as temperatures increase. Consistent with the City’s published Environmental Stewardship Plan, the FEIS should encourage and incentivize new developments to adopt strategies to reduce their greenhouse gas emissions and reliance upon electrification that goes beyond code. This should be done while decreasing demand on the electrical grid through renewable energy alternatives and encouraging local development of district energy systems and infrastructure. Incentives to incorporating district energy systems should be explored in zoning codes and in the FEIS.

Since building form and bulk controls influence multiple chapters in the DEIS, the Chamber recommends the following adjustments to LUCA development standards be considered in parallel with the Comp Plan Update and studied in the FEIS as much as possible. Many of the standards addressed below are currently barriers to housing production and positive economic development.

1. **Plan BelRed and Wilburton Concurrently.** Continue to simultaneously plan for Wilburton and BelRed as both areas are concurrently responding to the light rail investment and both areas have tremendous redevelopment propensity. As you shape the LUCA amendments, we urge you to update these areas with common development standards and incentive programs. These neighborhoods can and will evolve as distinct districts and subdistricts, but the approach to land-use and zoning controls should have the same underpinnings. This amendment process is a great opportunity to make the

code more consistent, concise, approachable for the public and more workable for the city staff and the real estate development community.

2. **Revisit the 53 land use designations in the DEIS.** We suggest reducing these in number and making them more “use-agnostic” as mixed-use zones. Redmond is currently doing this in Overlake.
3. **Industrial Uses.** Consider eliminating future Industrial/Manufacturing uses in Bel-Red and Wilburton that create pollution, noise, or dust. These uses are incompatible with livable TOD neighborhoods at high-capacity light rail stations. Compatible light industrial uses could be a conditional use in certain perimeter locations while current industrial/manufacturing uses would remain until those properties redevelop. The existing use framework in Bel-Red has proven fair, and it should be retained and could be expanded to Wilburton.
4. **Floor Area Ratio.** Traditional floor area ratios do not translate well in Bel-Red/Wilburton due to a concentration of both extremely large and small parcels, critical areas, and lack of a street grid.
  - a. Eliminate Residential FAR. We believe residential development is better managed and ultimately encouraged by just using bulk controls (height, floor plate, setbacks, tower separation, etc.) and administrative design review rather than setting FAR limits. Some of Seattle’s SM-SLU and downtown codes use this methodology. Base/minimum FAR can still be used for calculating incentive programs, or the City could use a height model for incentives, like Downtown.
  - b. Commercial FARs should remain but be increased from current limits to utilize increased heights and floor plate limits. Specifically, commercial FARs should be increased within a quarter mile around all light rail stations. A balance of jobs and housing around all stations is key to create a vibrant station area, provide both daytime (office worker) and evening (residents) to support local retail, and to maximize the transit benefits and reduce vehicular traffic.
5. **Height Limits.** We applaud the bold heights proposed in the DEIS alternatives.
  - a. Exclude elevator/mechanical screens/stair overruns/solar panels/railings/parapets from floor/height limits and provide adequate additional heights or provisions for these important features. As energy codes evolve, even more height is needed to accommodate rooftop mechanical equipment and we encourage the City to be flexible rather than prescriptive with these standards.
  - b. Work with the building official and fire department to consider allowing “6 over 2” construction (6 levels of Type III-A wood frame over 2 levels of Type I-A concrete). This is allowed in Seattle and is a very popular and more feasible way of building rather than 5 over 3 construction.
6. **Floor Plate Limits:**
  - a. Commercial
    - i. No floor plate limit under 85’ tall
    - ii. Increase maximum floor plates on buildings between 85’ and 180’ tall to 50,000 SF to attract more national/international tech, medical and life science users.
    - iii. Heights over 180’ – 24,000 SF Floor plate.
  - b. Residential - Size by typology to allow efficiency and better feasibility as follows:
    - i. Midrise to 85’ Unlimited

- ii. Highrise 85' to 180': 20,000 SF
    - iii. Highrise above 180': 12,000 SF
  - c. Allow averaging of floorplates above and below the sizes listed above.
  - d. Create new design guidelines and administrative design review for modulation, articulation, top expression, etc.
7. **Upper-Level Setbacks and Step Backs.** Eliminate this standard for midrise and make it only a design guideline for tower buildings over 85' tall. This would enable better feasibility and more housing production. Step backs force large, inefficient units that do not stack, which can prevent projects from pursuing MFTE. Using design guidelines to allow flexibility and case by case/ site specific/ context/ affordability/ materials/ modulation issues can be considered. Also, when the setback is required for towers, raise the podium transition height from 40' to 48' so taller floor heights can be achieved in a 3-story commercial or 4 story residential podium with higher retail ceilings at the ground level.
8. **Parking:**
- a. Ratios: Reduce or eliminate minimums. The market will provide parking as necessary and affordable housing projects near high-capacity transit and unusual shaped properties can respond appropriately. We support the DEIS's page 74 statement on parking that *"...Bellevue should focus on...parking code reforms to eliminate parking minimums near Link light rail stations, and potentially add further maximum parking limits..."*
  - b. Compact parking: Allow at least 50% of stalls to be compact, and up to 65% in Mixed Use Centers.
  - c. Allow additional flexibility (height, locations, exemption from FAR, exposure to public ROW) for above-grade parking where critical areas and high-water table are key development determinants.
  - d. Do not require additional parking requirements for changes of use; this will allow existing spaces to be re-tenanted more easily.
9. **Build to Lines.** Eliminate this requirement. We feel this is an outdated suburban planning tool that has historically been used to keep surface parking out of streetscapes. This is no longer necessary as new projects consistently create urban street wall conditions as they generally need every square foot of land to make projects feasible. Also, plazas and public open spaces are incentivized and encouraged, but the built to line standard requires granting a departure.
10. **Critical Areas, Manmade Slopes, Grading and Streams:**
- a. Exempt all man-made slopes/grading from critical area setbacks. Allow for historic/natural grades to set criteria for critical area mapping and steep slope setbacks.
  - b. Reduce setbacks from manmade stream channelization or consider flexibility where streams have been altered.
  - c. Allow creative habitat and ecological solutions to be explored as an alternative to a linear setback.
  - d. Measure stream buffers from ordinary high-water mark rather than "top of bank". Consider exemptions like Seattle.
  - e. Alternate stream designations, such as the "Urban Stream" designation used by Woodinville should be adopted.

- f. Approve the use of mitigation banks in lieu of critical area setbacks. For example, The Keller Farm mitigation bank is already approved for the Lake Washington watershed (approved by Corps, Ecology, WDFW, EPA and Muckleshoot Tribe).
- 11. **Noise Ordinance.** Revisit the thresholds in the noise ordinance to better accommodate urban conditions.
- 12. **Lot Coverage & Impervious Surface Limits.** Allow 100% coverage in all Mixed-Use Centers and areas considered to be more urban zones, which is typical in dense, urban, and transit-rich areas. Focus more on encouraging bigger consolidated open spaces, green belts, green roofs, habitat improvements at streams and creative storm water and landscaping solutions.
- 13. **Landscape Buffers.** Elimination of the 10' landscape buffer on interior lot lines. Building codes and fire separation will determine setbacks from lot lines and in most cases, assure setbacks if window openings are provided. Focus more on encouraging bigger consolidated open spaces, green belts, green roofs, habitat improvements at streams and creative storm water and landscaping solutions.
- 14. **Multifamily Play Areas.** Current standards are too onerous. The market already demands/provides amenity space. Also, public investment in our parks system (including park impact fees) should be taking care of play equipment. We feel the public would rather have larger, high-quality playgrounds shared by all versus dozens of segregated, privatized ones that are mediocre.
- 15. **Bonus Amenity Incentives.** Beyond the current lists, consider including the following as Tier 1 Priorities:
  - a. Larger, family-sized units (2 & 3 bedroom)
  - b. Affordable and mid-market housing at 80-120%
  - c. Daycare/early learning centers
  - d. Green building/LEED/Passive House/Living Building Challenge / Salmon Safe
  - e. Enhancement, construction, public amenities, and active retail adjacent to the Grand Connection Bridge and Eastrail bike/ped network.
  - f. Construction of missing street grid (see below)
  - g. Allowing large properties to allocate a portion of the site to a non-profit development partner for a standalone affordable building and to receive credit for the affordable housing bonus as "on site" or "inclusionary" for the whole property.
- 16. **Street Grid Challenges.** Revisit the aspirational 660' square street grid in Bel-Red, which is based on the historic 1785 BLM Township and Range land divisions.
  - a. Consider the realities of topography (e.g., streets can follow contour lines rather than go off a cliff).
  - b. Look for ways the city can fund construction, better incentivize, or facilitate achieving this with multiple landowners to complete street segments already started.
  - c. Continue to include these easement areas as the FAR property basis. Flexibility and public funding may be needed to create useful and complete rights-of-way.
  - d. For unconnected spur streets - focus on creating interim uses rather than requiring full build out until adjacent properties can also respond. These include pedestrian connections, bike paths, shared or private fire access lanes on permeable paving and community uses such as playgrounds or pea patches.



- e. Ensure that these challenges are also addressed in the Wilburton “street grid.”

**17. Administrative Flexibility.** In Mixed Use Center and Neighborhood Center zones, **allow** administrative design review departures from all standards aside from height and commercial FAR to ensure projects can best respond to their unique site conditions.

**18. Large Property Flexibility & Discretion:**

- a. Study and identify sites, such as those larger than 5-acres and within walking distance of light rail, that have potential to be Catalyst Projects and/or anchor sites. These larger sites offer the opportunity to have a wider range of allowed uses for commercial, residential, retail, R&D, healthcare, etc. which will work to anchor the station area. This will then drive housing, create retail opportunities, and support an 18-hour neighborhood.
- b. Study allowing more flexibility and discretion in the application of key development standards for large properties with multi-building/multi-phase development with development agreements. These include:
  - i. Height averaging for towers to allow for a sense of building hierarchy, to better manage shadowing/neighbor impacts and to create an interesting skyline profile.
  - ii. Dedication of a portion of the site to a dedicated affordable building that would meet the entire properties requirement for onsite inclusionary housing.
  - iii. Open space consolidation with partial completion by phase.
  - iv. Allowance of “alleys with addresses” in areas of the City other than downtown that allow private roads to function as alleys that still access public roads. Introduce the new concept of a service alley that can consolidate back of house activities away from public and private streets and pedestrian activities, which will benefit the public realm and transportation system. Such service alleys would not have pedestrian facilities.

Thank you for the opportunity to comment on the City of Bellevue’s DEIS. The Chamber and PLUSH look forward to continuing this important work alongside City staff, the Planning Commission, and City Council.

Sincerely,



Jodie Alberts  
Vice President, Government Affairs



Jessica Clawson  
PLUSH Committee Chair

June 7, 2023

Development Services Department  
City of Bellevue  
Attn: Reilly Pittman  
450 110th Avenue NE  
Bellevue, WA 98004

Re: Bellevue 2044 DEIS comment letter

Dear Reilly:

Henbart and Gorlick own several properties across the street from the 132<sup>nd</sup> Light Rail Station, near the intersection of 132<sup>nd</sup> and Spring Boulevard (the "Property"). Together, the Property totals 202,952 square feet. We write to provide comments in response to the 2044 Comprehensive Plan DEIS. Please see the attachment for a depiction of the referenced properties ("Property").

- Alternatives/Uses/Urban Form
- We Support Alternative 3, with the following items that should be studied:
  - The Property is designated as BR-RC-H-2, which is "Bel-Red Residential/Commercial Highrise-2; Residential highrise towers including ground floor active uses up to around 25 stories." While we appreciate the height and apparent density being contemplated for this area, we also believe that a variety of uses should be studied. It is true that today the office market would not support new development, but that might not be the case in the 20-year horizon. Consider allowing more flexible uses in all of the Bel-Red zones generally. Please study this in the FEIS.
  - We do not believe the Alternatives 1 and 2 that designate the property as BR-RC-1 (Mostly housing, with limited office, retail, and services in buildings between 2-14 stories) is adequate density within ¼ of a light rail station. We do not support Alternatives 1 or 2.
  - Consider a broader "Bel-Red" comprehensive plan designation that allows many zones to implement the plan. Please study this in the FEIS.
  - Please disclose the FARs utilized to achieve the density model used by the DEIS. A minimum of a 6 FAR should be allowed within ¼ mile of a light rail station. We encourage the City to "go big" on FAR as this is a 20-year plan.
  - As the City is considering the Bel-Red code and the various mitigating measures under aesthetics, revise floor plate restrictions to 28,000 below 85', and 13,500 above 85'. Attached is a buildout scenario for our property. As you can see, larger floor plates still result in appropriate light and air and a developable

scenario. Under current zoning, upper level setbacks and floor plate limitations have created an unbuildable situation.

- Eliminate lot coverage and impervious surface limitations. This is an urban area and should be treated as such. The result is appropriate urban development next to light rail.
- Reduce setbacks and eliminate upper level setbacks. Again, this is an urban area. Design review can provide for modulation and articulation of larger building facades.
- Provide incentives for residential development, without imposing restrictions on commercial uses within the available development envelope.
- Exempt below-grade areas from FAR. This will maximize positive urban development above-grade.
- Allow FAR to be freely allocated within a master-planned site, without requiring upgrades to remaining nonconforming conditions. In an evolving urban environment, retained uses and structures will likely redevelop in the near term. Allowing continued economic use of such structures without the need for major capital re-investment will promote the immediate redevelopment of other portions of the master-planned site.
- Maximum residential heights in TOD areas should not be less than 250 feet, in order to support viable high-rise development as well as low-rise (5-8 story) development. Historical experience has shown that the extraordinary costs imposed in high-rise development are best amortized at heights above 250 feet. Below 250 feet, high-rise development is difficult to underwrite in these urban centers. We appreciate the City's inclusion of 25 stories on our property and believe it is appropriate height and density.
  - We understand the City's focus on affordable housing in all areas of the City. We note that properly-calibrated incentive zoning, combined with the ability to utilize MFTE, has resulted in affordable housing being provided in other cities in the region, and is beginning to produce more market-created affordable units in Bellevue. We encourage the City to review these policies and calibrations to determine an appropriate outcome in Bellevue. High rise development should not be written off as "not affordable," because with the correct policies, it can create on-site affordable housing units, and/or fees-in-lieu for lower levels of affordability that would not be constructed on-site.
- Appropriately-scaled upper-level connections between buildings should be allowed and should be exempt from maximum floorplate limitations. Above-grade connections make urban development more efficient and provides an opportunity to connect tenants, user and residents more directly. The code should promote these kind of connections.
- Tower spacing should be limited to 40 feet, as in the Downtown.
- Allow a wide range of uses consistent with urban center and TOD locations; avoid the restriction of uses within the available development envelope, which only reduces development capacity and flexible future proofing of buildings.

- Provide flexibility to allow nonconforming uses and structures to continue and maintain necessary investment. Such sites will redevelop over time, but prior to redevelopment they can provide useful services in the urban environment.
- Avoid being prescriptive about timing, sequencing and scale of different uses; allow the market to dictate development over time. In the past, the city has at times restricted the development of certain uses, in an effort to force the market. The city would be better positioned to allow all uses, but incentivize those that are preferred.
- Allow interim, low-intensity uses in master-planned sites, such as parking and low-intensity commercial uses, so that sites may remain financially productive as development is being phased in. Allowing such interim uses will help to support the sooner urban development of other portions of master-planned sites. The future code should endorse such measures to promote near-term development in accordance with the new plan.
- Critical Areas/Trees
  - The DEIS does not adequately study the impact of the Critical Areas Ordinance on the density portrayed in the different alternatives. For example, the “critical area penalty” does not appear to have an impact on any of the density presumed in the DEIS. Critical areas should be mapped and the penalty should be applied, and the results should be disclosed to the public and decisionmakers. Please include this specific analysis in the DEIS.
  - The DEIS should also study an alternative that includes no critical area penalty in any urban center, including Bel-Red, and disclose the impacts to density when the critical areas penalty is removed.
  - The DEIS should study the impact of the steep slope critical area and buffers on the density portrayed in the different alternatives. Many sites are shown as including towers when towers may not be able to be built due to the presence of a man-made steep slope. Decisionmakers should be made aware of the impacts of the application of the critical areas ordinance to man made steep slopes so that they can make decisions accordingly. Please include this study, as well as an alternative that specifically removes manmade steep slopes from the critical areas ordinance, in the FEIS.
  - A revised tree ordinance is being contemplated by the City. Bel-Red should be exempted from tree regulations, as in downtown. Requiring a reasonable tree replacement / tree planting ratio may lead to an expansion of the urban tree canopy rather than pitting trees against urban development across from light rail. Consider also a fee-in-lieu system that will assist the City in planting right-of-way trees and park trees when trees cannot fit in a right-of-way or on a project site (see Seattle’s recent tree ordinance).
- Bel-Red Grid System
  - The DEIS transportation analysis should look at whether the currently-required Bel-Red road grid system is needed to reduce traffic congestion in Bel-Red. Please run the transportation model with either no grid system or a significantly reduced grid system. The Bel-Red grid system currently bisects properties in an

inefficient manner that has hampered property developers' ability to construct the network, and the City has not participated in most of the grid buildout. Please also run a model that includes pedestrian and bicycle connectivity rather than car connectivity in areas of the grid system.

- Transportation Mitigation/Approach

- We applaud the City's proposed transportation mitigation measures stated in M-TR-1 through M-TR-4. The City rightfully cites the land use/transportation connection as the best way to mitigate transportation impacts. Specifically, the City states that Alternative 3 has "inherent transportation benefits compared to the No Action Alternative." We agree; in a dense urban environment, focusing on TDM strategies, encouraging transit use, and building out pedestrian and bicycle networks are the best way to move more people more efficiently. Creating a more walkable and bikeable area (not driveable area) also adds vibrancy to a neighborhood and supports ground level uses and neighborhood businesses, and supports light rail use.
- We note that the transportation model presumes 100% density build-out; this is an extremely conservative model as 100% density build-out is almost impossible in the 20-year horizon. We appreciate the City utilizing a conservative model to ensure that all impacts are properly studied.

- Parking

- Parking is no longer an "element of the environment" under SEPA as of January 2023. We strongly recommend eliminating minimum parking standards. The market should decide parking requirements; it is very effective at determining parking need and demand.
- Eliminate parking requirements for street-level retail and restaurant spaces. Code requirements for such uses are so excessive that they are an obstacle to the development of such uses. Ample street parking should be available to support street-level retail and restaurant spaces; on-street parking adds to vibrant street life and calms traffic by potentially narrowing roads.
- Eliminate parking requirements for changes of use. This allows uses to be reused more easily should they become vacant.
- On-site loading standards should be made more flexible. In urban environments, loading can be accomplished with a variety of vehicles and times of day and does not need to occur entirely within a structure. Code requirements should reflect this. The FEIS should analyze these parking issues in a similar way to the discussion in the transportation section.

- Affordable Housing

- Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options, avoid mandatory inclusionary requirements. Alternative 3 should be studied with an affordable housing goal in mind, and an economic analysis should be completed that shows how an incentive system can create the highest number of market rate and affordable housing requirements.




- Avoid utilizing market-rate developers as the only “solution” for creating affordable housing. The City is an important partner in the affordable housing discussion. The EIS assists decision makers in making future zoning decisions. Please discuss and study in the FEIS the wide variety of tools in the affordable toolkit that the City could deploy to address housing affordability. These tools could include a housing levy, housing vouchers, and other funding sources to help build affordable housing.
- Aesthetics:
  - In urban centers, transition zones should not be utilized. In a City, it is expected that buildings will be large.
  - If viewpoints/views are protected as a mitigation measure, they should be very closely defined. Private views are not protected under SEPA and protection of public views is limited.
- Air quality:
  - The air quality discussion appears to be an “environmental health” discussion rather than an air quality discussion. Ironically, if “air quality buffers” are incorporated around freeways and major arterials, more growth will be pushed farther away from transportation systems, and more auto-oriented emissions will occur. We do not support an “air quality buffer” and believe the impacts of the mitigation on density should be adequately studied in the FEIS such that decision makers can make an informed decision.
- General: The FEIS should include a guide for decision makers related to their policy choices. When an FEIS is completed, SEPS does not require decisionmakers to mitigate impacts below a level of significance. Rather, mitigation is at the option of the decisionmakers. Currently, the DEIS infers that mitigation is “necessary” when it actually is optional. Please include additional information regarding this process for the public and decision makers.

We appreciate the opportunity to make comments, and we look forward to working with you through the Comprehensive Plan process.

Sincerely,

Mark Craig



President, Henbart, LLC





# 132nd Bel-Red Assemblage

*Building Up Bel-Red's Vision*

Prepared for:  
**Henbart LLC. and Gorlick Properties**

Prepared by:  
**Graphite Design Group, LLC**  
1809 7th Avenue  
Suite 700  
Seattle, WA 98101

October 31, 2022



# Project Goal and Development Priorities

## Goal

To ensure site development within the Bel-Red area will meet Bellevue’s long term housing needs and anticipated job growth.  
This document shows what the current code allows on the project sites, and a vision for more dense development to the help achieve the goal statement.

## Development Priorities

### 1. Increased Development Density

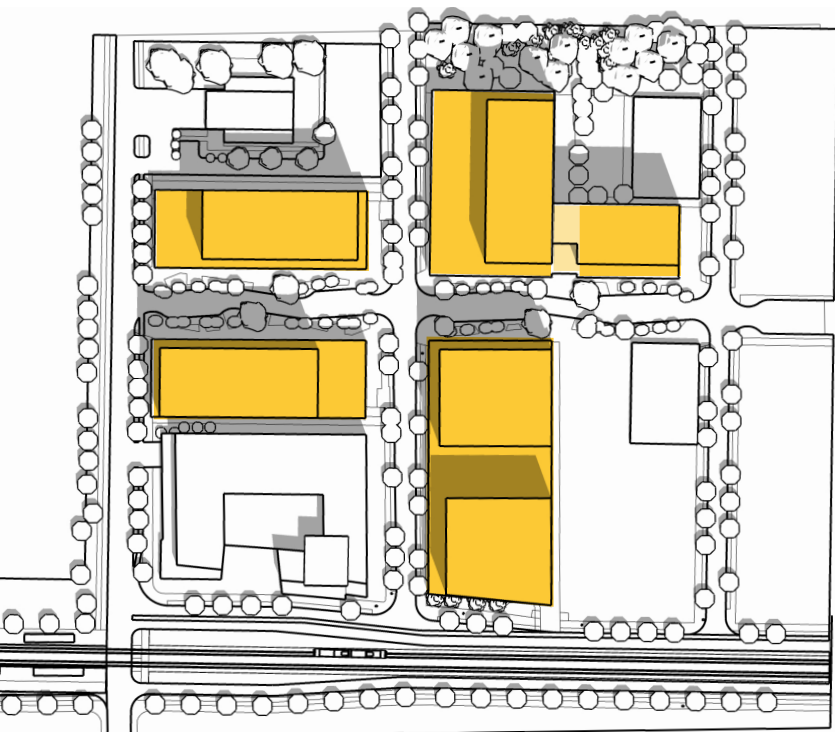
Increase development density throughout the Bel-Red sub area, further progressing toward Bellevue’s Growth Targets.

### 2. Leverage Proximity of 132nd Link Station

Increase development adjacent to Link Stations, promoting mass transit use and reducing single occupant vehicles.

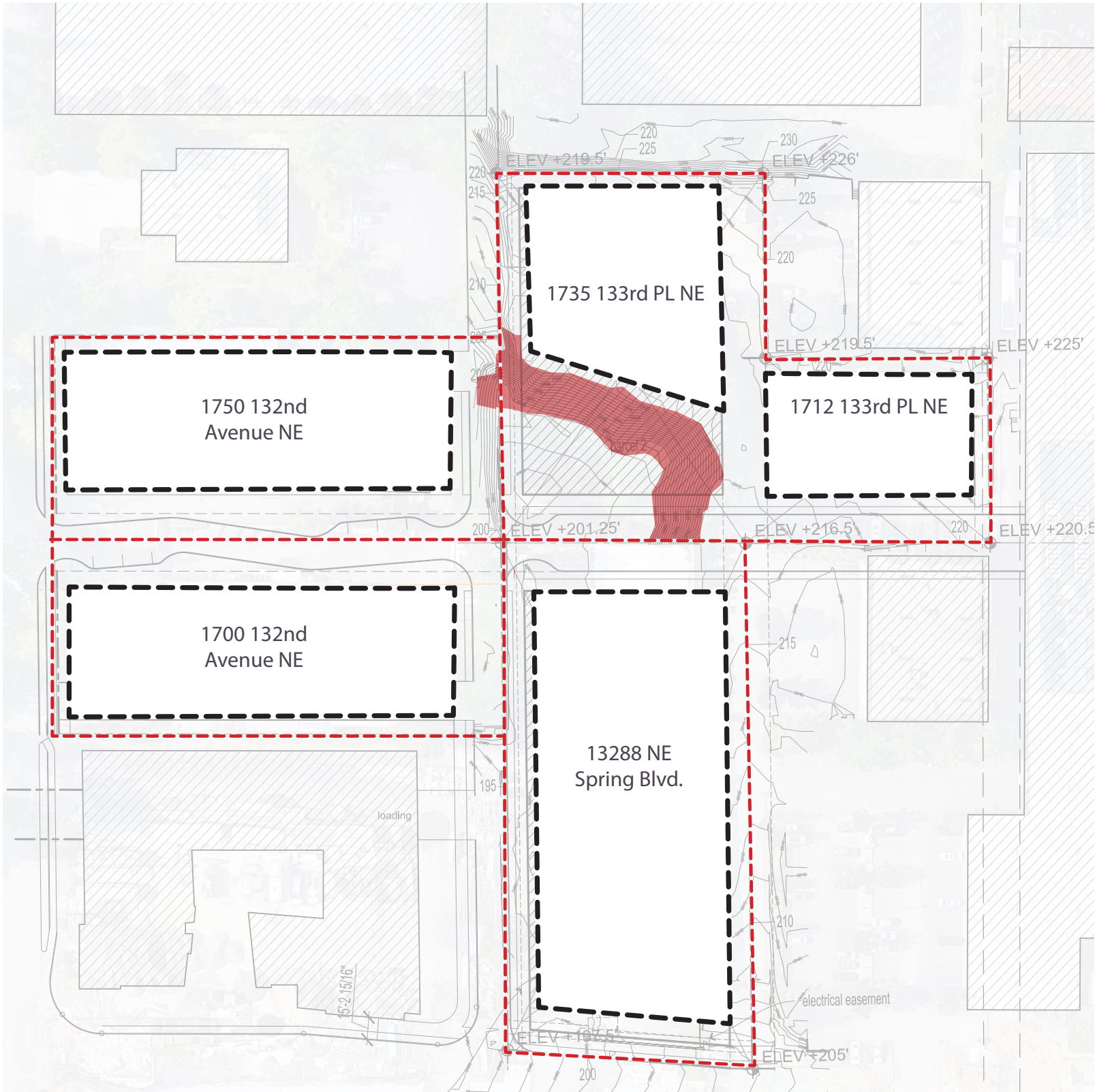
### 3. Increase Flexibility in BelRed Zoning

Allow projects to propose sensible zoning modifications in response to varying site constraints.





# Site Plan With Critical Areas



## Critical Areas:

- Exempt Bel Red from the Critical Areas Ordinance, similar to Downtown
- Where the Critical Area Ordinance applies in urban centers and TOD areas:
  - Eliminate the critical area density penalty entirely. In a dense urban environment, the density penalty does nothing to protect critical areas – it only reduces the long-term opportunity for TOD. Critical areas can be well-protected without reductions in on-site density.
  - Provide for an exemption from (steep slope) critical areas, in cases where new development will provide properly-engineered construction to maintain the stability of the slope. Seattle has employed this exemption to good effect for many years. Preservation of isolated slope areas in a dense urban environment only creates orphaned, unusable land that could be put to better urban uses.

Site Plan



Critical Area/Buffer  
(Steep Slope)



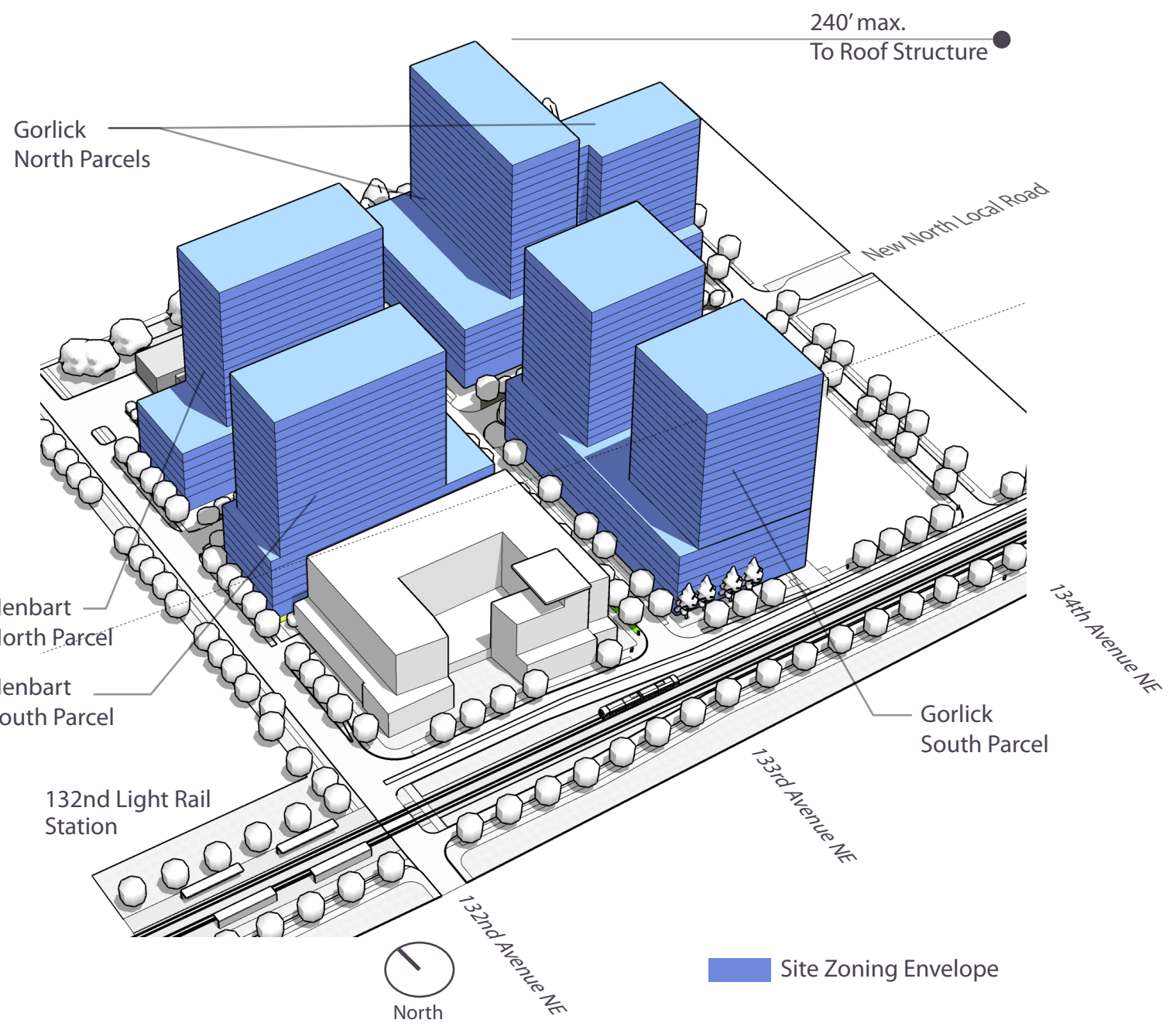
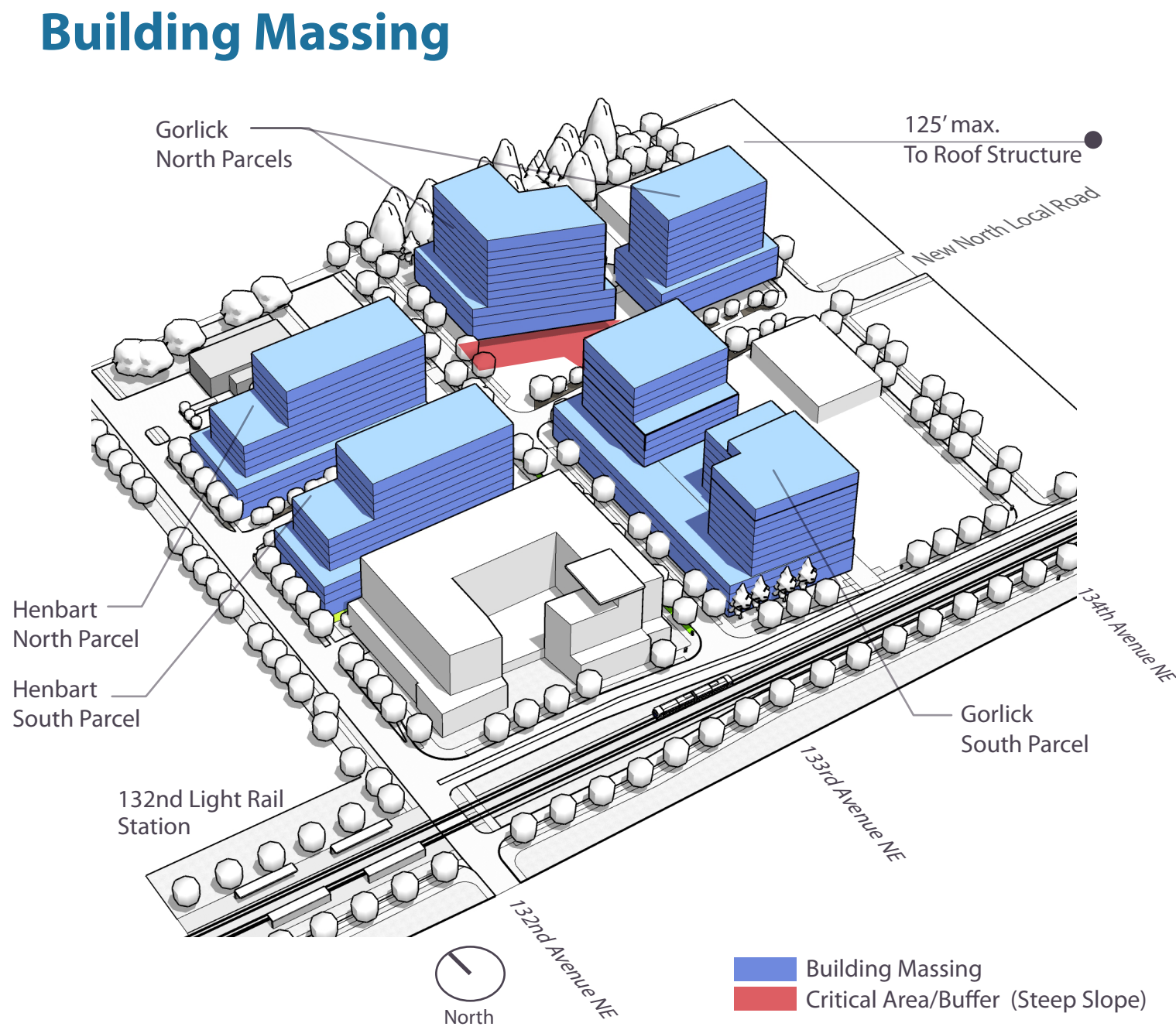
Buildable Area



Property Line



Building Massing



Current Zoning

Zone:	BR-RC-2
FAR Max.	4
Building Height:	45' base, 125' max.
Front Setbacks:	15' at 40' height
Side and Rear Setbacks:	25' at 40' height
GSF above 40':	28,000 GSF Commercial 12,000 GSF Residential
GSF above 80'	28,000 GSF Commercial 9,000 GSF Residential
Lot Coverage Max:	75%

Current Zoning Data

Combined Total Area:	202,952 GSF
(All 4 Parcels)	
Total Residential Area:	<b>629,070 GSF</b>
Approx. Total Residential Units:	<b>744 units</b>
(@650 SF/Unit)	

Proposed Zoning

FAR Max.	4 Commercial Unlimited Residential
Building Height:	85' base, 240' max.
Front Setbacks:	10' at 85' height
Side and Rear Setbacks:	10' at 85' height
GSF up to 85':	28,000+ GSF Commercial 28,000+ GSF Residential
GSF above 85':	28,000 GSF Commercial 13,500 GSF Residential
GSF 85' to 240':	13,500 GSF Residential
Lot Coverage Max:	100%

Proposed Zoning Data

Combined Total Area:	202,952 GSF
(All 4 Parcels)	
Total Residential Area:	<b>1,572,320 GSF</b>
Approx. Total Residential Units:	<b>1,935 units</b>
(@650 SF/Unit)	



# Development Challenges and Opportunities

## Challenges and Requests:

Zoned **BR-RC-2** (*Bel-Red Residential/Commercial Node 2*), the project property’s multi-parcel development capacity is currently underutilized given the projected job growth for The City of Bellevue and the Puget Sound Region as a whole. Increasing the project’s development potential supports Bellevue in achieving their growth targets.

### 1. Zoning Standards - FAR, height limits, and development standards must be calibrated to achieve appropriate density.

- **Density** - Request the City of Bellevue to consider the following density approaches:

- Maximize heights and densities within ½ mile of light rail stations
- Provide incentives for residential development, without imposing restrictions on commercial uses within the available development envelope
- Exempt residential uses from FAR. This is the single most effective way to promote residential development in new development regulations.
- Exempt below-grade areas from FAR. This will maximize positive urban development above-grade.

- **Floor Plate Sizes and Tower Standards**

- Maintain appropriately-sized residential floor plates above 85 feet, while permitting residential floor plates larger than 28,000 s.f. below 85 feet. The objective should be to maximize housing development opportunities, which means larger floor plates below 85 feet and smaller ones in towers above.
- Appropriately-scaled upper-level connections between buildings should be allowed and should be exempt from maximum floor plate limitations. Above-grade connections make urban development more efficient and provides an opportunity to connect tenants, user and residents more directly. The code should promote these kind of connections.

- **Incentive Amenity System** should allow development to achieve maximum density and heights above a base with flexible amenity options like affordable housing, flexible open space, and sustainability measures. The incentive system should allow fees-in-lieu in addition to on-site and off-site performance options for all amenities.

- **Critical Slope Areas** - Allow flexible solutions like building structure to help mitigate slope impact and remove additional buffer requirements currently required within the zoning code.

### 2. Flexible Development Envelope - Reduce and/or remove some of the current Zoning Envelope Requirements

- **Podium Height** - Allow podiums to have flexible programs and increased height, maximizing development at lower levels.
- **Tower Spacing** - Determine reasonable tower separation standards. Tower spacing should be variable on multiple tower sites. Also, consider towers to be connected at upper levels so as to share usable spaces. (not just corridors)

- **Upper-level Setbacks** - Do not implement arbitrary upper-level podium setbacks that require a “wedding-cake” design.

- **Ground-level Setbacks** - Consider flexibility in required ground level setbacks beyond development R.O.W’s

- **Site Coverage and Impervious Surface Req’s.** - Urban centers and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on LID and hard surface coverage regulations, similar to Downtown.

### 3. Parking Density - Eliminate minimum parking standards. The market should decide parking requirements, it is very effective at determining parking need and demand.

## Opportunities:

The Project’s vision supports Bellevue’s current and future development goals. As a flexible, multi-use, urban in-fill developments it achieves economies of scale, creates a synergistic neighborhood, and reduces the need to consume natural resources.

### 1. Multi-Parcel Neighborhood

The combined sites affront newly created streets, creating a 4 corner neighborhood with residential lobbies and retail adjacent the pedestrian walkway creating engaging and synergistic connections between the 4 development sites.

### 2. Mass Transit Proximity

The sites are well positioned to fully utilize mass transportation networks given proximity to the Link Rail Station.

### 3. Dwelling Unit Demand

Potential delivery of more than **1,900** housing units to help meet the City’s demand for housing and growth targets. In order to achieve this, Bel-Red zoning will need to be flexible rather than prescriptive in development standards and uses.

### 4. Sustainability

Environmental sustainability through high density residential development near jobs reduces impacts on public infrastructure and sprawl.

Higher-density development lessens consumption of undeveloped land and reduced carbon emissions and fossil fuel consumption by residents.

New buildings provide opportunities for sustainable construction and technology like Mass Timber.

In addition, ground-level landscaping and “Woonerf” strategies create a unique, safe, and engaging ground level experience furthering the City’s ethos to be a “City in a Park”.



**HOUSING  
DEVELOPMENT**  
*consortium*

City of Bellevue Development Services Department  
Attn: Elizabeth Stead  
450 110th Ave NE, Bellevue WA 98004

**Subject: Eastside Affordable Housing Coalition Comment on Bellevue 2024-2044 Comprehensive Plan Update Draft Environmental Impact Statement**

The Eastside Affordable Housing Coalition is committed to advancing housing affordability through Bellevue's Comprehensive Plan update. We thank you for the opportunity to comment on this once-in-a-decade major update and appreciate the work Bellevue has done to prepare the Draft Environmental Impact Statement (DEIS). **We are writing to express our strong support for allowing an abundance of homes to be built, alongside expanded funding and robust inclusionary zoning policies to create new homes affordable for low-income families.**

Bellevue faces a housing crisis. Home prices and rents in Bellevue have spiraled out of reach for so many people. This reflects Bellevue's desirability as a city and a basic job-to-housing imbalance that forces workers to commute long distances into Bellevue. To sustain itself, Bellevue must build homes affordable to its essential workers—the teachers, nurses, firefighters, and restaurant workers that make the city's economy and society function.

Bellevue has a window to make significant progress in advancing affordability and the opportunity to be a regional leader in addressing the housing crisis. This Comprehensive Plan Update is a major opportunity to create a more livable, equitable, and vibrant Bellevue.

**Alternative 3, by allowing the highest amount of housing capacity alongside implementation of mandatory inclusionary zoning, goes the furthest to realize a vision of abundant, affordable housing throughout Bellevue.** Allowing more housing to be built will help address Bellevue's housing shortage and job-to-housing imbalance. Mandatory inclusionary zoning allows the public to capture some of the added value from upzoning and ensure we are directly creating homes affordable to low-income people.

Alternative 3 will also help create a better city for Bellevue residents, by creating complete neighborhoods with a mix of housing options, jobs, services, and multimodal transportation. It will expand walkable access to small businesses and retail, giving more people the choice to meet their daily needs without a car. It will support investments in frequent and convenient transit and safe and connected walking and biking routes. And it will help more Bellevue residents of all income levels and life stages find a place to call home in a city they love.

**Housing Development Consortium  
of Seattle-King County**

1326 5th Avenue, Suite 230, Seattle, WA 98101  
206.682.9541 | [www.housingconsortium.org](http://www.housingconsortium.org)

Beyond our general preference for Alternative 3, the Eastside Affordable Housing Coalition has a number of specific recommendations and comments on the DEIS. We hope you carefully consider our recommendations, as you judiciously work to shape a preferred alternative and the Final Environmental Impact Statement (FEIS).

## Detailed Policy Comments & Recommendations

**Mandatory Inclusionary Zoning** – In this Comprehensive Plan update, Bellevue has the opportunity to build many more homes, harness private development, and create broad-based and equitable growth. **It can only maximize this potential and meet Bellevue’s substantial need for homes affordable to low-income people by pairing strong inclusionary zoning with ambitious housing growth.** Furthermore, the preferred alternative should incorporate a commercial fee-in-lieu, to ensure new commercial and office development also contributes to the development of affordable homes.

**Affordable Housing Need** - Bellevue’s housing need allocation demonstrates the need to build many homes affordable to low-income people over the course of this Comprehensive Plan Update—over 29,000 affordable at less than 80% of Area Median Income (AMI), including 18,000 affordable at less than 30% AMI.<sup>1</sup> All of the alternatives should quantitatively analyze the impact of various growth strategies and housing production rates on the total homes affordable by area median income (AMI) band, with special attention paid to residents making less than 30% of AMI, 30-50% of AMI, and 50-80% of AMI.

Additionally, while inclusionary zoning is an important policy for scaling up the production of affordable housing in Bellevue, it will likely need to be complemented by other funding sources for affordable housing. **The FEIS should analyze the gap between current available funding for affordable housing and the resources it would take to meet the need for affordable housing.**

**Midrise Housing** - While any new housing requires subsidies to be affordable to low-income people, lower cost typologies like midrise apartments will reduce the subsidy required, and should therefore be maximized in the preferred growth strategy. According to the Department of Commerce’s draft guidance for jurisdictions to meet their allocated housing needs across the income spectrum, as is required under HB 1220, higher-cost cities can *only* demonstrate the ability to meet housing need allocations for low-income (0-80% AMI) housing with zoning that allows for midrise multifamily development.<sup>2</sup>

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<sup>1</sup> [King County Housing Needs Dashboard](#).

<sup>2</sup> Washington Department of Commerce, [Draft Guidance for Land Capacity Analysis](#), p. 14, Exhibit 9. December 2022.

Alternative 3 goes the furthest to permit midrise, mixed-use apartments within walking distance of frequent transit service and neighborhood centers. We believe that the Future Land Use Map designations in areas currently zoned for multifamily and/or commercial use are broadly appropriate in Alternative 3, though we specifically recommend that the “R-High” land use designation be revised to incorporate midrises up to 8 stories, from the current 4-6 stories. This reflects the maximum height that can be feasibly developed using cost-effective wood-frame construction typologies. Revising the midrise height to 8 stories would better allow tree canopy to be preserved and enhanced, by reducing the footprint of new buildings.

However, comparing the Future Land Use Map of Alternative 3 to the Transit-Proximate Areas Map reveals that many transit-rich, high-opportunity locations currently zoned for single-family housing are not contemplated for land use changes to allow for midrise housing. **The Future Land Use Map of Alternative 3 should be revised to align with the high-level policy intent and description of this alternative, by allowing for midrise housing within the full ¼ mile walkshed of frequent bus transit in all residential zones.** Allowing midrise housing near transit in single-family zoned areas will advance environmental justice, as few, if any, of these areas are located within 500 feet of highways.

**Light Rail & Transit-Proximate Areas** – Light rail will transform transit mobility on the Eastside. A plan for the next 20 years of growth and development in Bellevue must holistically consider all of the light rail station areas. The Transit-Proximate Areas and commensurate housing density should expand as the transit service increases over time, and projections for future transit nodes should be incorporated into the FEIS alternative selected. **To this end, the FEIS should map the ½ mile walkshed around each of the light rail stations in Bellevue. This analysis of light rail access should then inform the development of preferred alternative, which should allow midrise housing or greater in the ½ mile walkshed around each of the light rail stations.**

**Middle Housing** – Alternative 3 would legalize a range of middle housing options, including duplexes, triplexes, and cottage housing, throughout the entirety of Bellevue. Allowing middle housing across the city is key to equitably distributing growth and creating more options for people. These options can create new affordable rental and homeownership options while still reflecting a residential character and allowing space for trees. **To comply with HB 1110, the middle housing bill, the preferred alternative must go further than Alternative 3, to increase the range of middle housing options allowed throughout Bellevue to accommodate fourplexes citywide, and sixplexes when two of the homes are affordable or near transit.**

**Distinguishing Economic & Physical Displacement** – It is important to clearly distinguish physical and economic displacement. Physical displacement is the result of direct demolition, while economic displacement occurs when residents and businesses cannot afford escalating rents or property taxes. The DEIS notes the likely directional effect of the alternatives on physical and economic displacement (*"physical displacement may be lower in the No Action Alternative because of its lower overall capacity for housing growth. Economic displacement will be higher in the No Action Alternative given that it does not include additional strategies to increase affordability"*). **The FEIS should go beyond this qualitative directional assessment, to quantify the expected impacts of each of the alternatives on economic and physical displacement.**

Economic displacement can far outpace physical displacement, as the price of existing housing is bid up in the context of a housing shortage. The City of Seattle analyzed rates of economic and physical displacement between 2010 and 2018, finding a net loss of over 24,000 rental homes affordable at less than 50% AMI—even after accounting for new affordable housing development—while physical displacement of low-income tenants due to demolition was measured at 5,264.<sup>3</sup>

As the DEIS notes, Alternative 3 has the greatest potential to reduce economic displacement relative to the other alternatives, by creating more housing overall and more affordable housing. This effect should be quantitatively estimated, to accurately compare overall residential displacement risks between the alternatives and develop appropriate anti-displacement strategies.

**Surplus Land and Land Acquisition Strategies** – Land costs are a major driver of the increasing cost of building affordable housing. Bellevue has made strides in recognizing the importance of leveraging underutilized land owned by public, religious, and non-profit entities through the C-1 Affordable Housing Density Bonus. **As part of the FEIS, Bellevue should catalog the locations of such surplus or underutilized land across and designate these sites for midrise housing,** especially in locations served by frequent transit or within walking distance of neighborhood centers.

**Development Standards** – Requirements for setbacks, upper-level stepbacks, modulation, and articulation increase development costs, reducing feasibility and the value that can be captured for affordable housing, in exchange for limited or subjective aesthetic benefits. Such development standards require more complex building envelopes, directly reducing energy efficiency and making innovative construction methods like cross-laminated timber or modular construction more difficult. **Therefore, we recommend against advancing development standards such as setback, stepback, or building form requirements as mitigation measures for aesthetic impacts in the FEIS.**

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<sup>3</sup> City of Seattle, [Displacement Risk Indicators](#).



The Eastside Affordable Coalition looks forward to working with the City of Bellevue throughout the Comprehensive Plan Update process. We are committed to shaping Bellevue's land use to allow more affordable homes to be built, and to creating a more equitable, affordable, and green city.

Thank you,

Chad Vaculin  
Advocacy and Mobilization Manager  
Housing Development Consortium

Jesse Simpson  
Government Relations and Policy Manager  
Housing Development Consortium

Cliff Cawthon  
Co-Chair  
Eastside Affordable Housing Coalition

# McCULLOUGH HILL PLLC

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June 12, 2023

VIA ELECTRONIC SUBMITTAL  
[CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Reilly Pittman  
Planning Manager  
City of Bellevue  
Department of Community Development  
450 110<sup>th</sup> Avenue NE  
Bellevue, WA 98004

Re: Bellevue 2044 DEIS Comments

Dear Mr. Pittman:

We are writing on behalf of KG Investment Properties and Rockwood Capital to provide comments in response to the Draft Environmental Impact Statement (DEIS) prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, KG Investments and Rockwood Capital own 7 acres on the east side of 116<sup>th</sup> Avenue NE, between NE 4<sup>th</sup> Street and NE 6<sup>th</sup> Street (the “Property”) – the heart of the Wilburton subarea and the point at which the Grand Connection and Eastrail will one day intersect. A map of the Property is attached for your reference. The Comprehensive Plan update will be important to the future use and development of our property and the role it will play in Bellevue’s growth as a regional center.

## General

- We support Alternative 3 as the Preferred Alternative in the FEIS. Alternative 3 achieves the most amount of growth in an area well-served by transit and other strong local and regional means of transportation, including bicycle and pedestrian connections, as well as a host of community-serving uses, such as grocery stores, medical services, restaurants, department stores and entertainment. It also provides the most flexibility in future uses in the Wilburton subarea.

## Land Use

- Uses. Like Downtown, the range of permitted uses in Wilburton zones should be very broad, including all typical urban uses. The Plan should not attempt to micro-manage land uses within the Subarea, but it should instead allow flexibility for future development to follow market demand.
- Urban Form. Bellevue has traditionally used setbacks, building setbacks and floorplate restrictions to achieve an end result in the built environment. These types of prescriptive regulations create their own repetitious buildings as designers substitute these dimensional tables in place of creative and site-specific design solutions. These types of regulations increase the cost of construction, reduce building efficiencies and the financial viability of new development – new development which is critical to realizing the Plan vision. Since the DEIS is an evaluation and disclosure document, it should also explore other options to solve the issues of building massing, human scale proportionality, site permeability and design rather than limiting the analysis to prescriptive and strict dimensional requirements. Developers should be allowed flexibility in how they achieve these urban design goals in lieu of prescriptive numbers.
- Build-out of the Grand Connection and Eastrail. The Grand Connection overlays the existing Pedestrian Corridor downtown and in many ways represents an extension of this Corridor to the west and east. In Wilburton, Eastrail will extend the Grand Connection north and south throughout the region. The City created Code provisions decades ago to promote the dedication and development of the Pedestrian Corridor. These provisions have and continue to be successful in incentivizing the development of the Corridor, and these same approaches should be used for the extended areas of the Grand Connection and Eastrail. Specifically, we suggest that the Final EIS evaluate the use of the “superbonus” provided in the Downtown Code for the future dedication and development of the Grand Connection and Eastrail in Wilburton. As in Downtown, the dedication and development of the Grand Connection and Eastrail could create FAR amenity points at a 16:1 ratio and those bonuses could be used to develop floor area above the height and density limitations otherwise applicable in the Wilburton zone. This has been a successful approach to the build-out of the pedestrian corridor downtown, and its use in Wilburton would promote the implementation of the Grand Connection. [ In addition, we note that the State Legislature adopted SB 5452 in this year’s session, allowing transportation impact fee revenue to be dedicated to the development of bicycle and pedestrian facilities. The Final EIS should discuss the importance of making this new tool available to support the future development of the Grand Connection and Eastrail.
- City Property. The City-owned property on the west side of 116<sup>th</sup> Avenue NE near NE 6<sup>th</sup> Street (as extended) is a key element in formulating future land use patterns in Wilburton. Its location at the eastern end of the future Grand Connection I-405 Non-Motorized Crossing makes it an ideal location for potential public open space and neighborhood facilities. We encourage the City to explore such options in the Final EIS.

- Unit Density. The maps outlining future housing density by alternative (see, for example, Figure 2-2) establish 141 units per acre as a maximum residential density. This figure is quite low for an urban center environment; one would expect actual average densities in core areas to be much higher. The Final EIS should discuss actual projected residential densities in these core areas and determine whether this adjustment requires a refinement to the analysis.
- Future Land Use Map. The DEIS depicts the City's Future Land Use Map (FLUM) in Figure 3-6. However, this depiction does not accurately reflect the City's FLUM. Figure 3-6 is instead a highly generalized version of the FLUM, aggregating dozens of different actual land use categories into more general buckets. This generalization may be helpful for the reader, but it tends to mask a significant shortcoming of the City's Comprehensive Plan which the Final EIS should discuss. Bellevue's Comprehensive Plan in many areas employs FLUM designations that effectively mirror the zoning, so that in many cases there can be only a single implementing zone for a FLUM designation. The result in these cases is to prevent a rezone from being approved with a corresponding and prior amendment to the FLUM. This substantially reduces the ability of the rezone process to be used as a tool for land use evolution in the periods between major Comprehensive Plan updates. The Final EIS should discuss converting the FLUM to a more generalized map, such as shown in Figure 3-6, to allow greater flexibility in zoning decisions going forward.
- Development Agreements. State law broadly authorizes the use of development agreements by cities, but the City of Bellevue has traditionally limited the availability of the entitlement tool. As a result, the City is foregoing opportunities to achieve even higher-quality urban development and public benefits in its growth centers. The Final EIS should discuss making the development agreement process generally available for projects in the City's growth centers like Wilburton.

## Transportation

- The DEIS Transportation Analysis is Excessively Conservative. It is appropriate for the DEIS to adopt a "worst-case" analysis of transportation impacts, but the DEIS far exceeds this standard. For all impact analysis, the DEIS adopts a "market factor" of 100%; that is, the DEIS assumes that the entire new zoned capacity identified in each alternative will be developed and placed in service within the next 20 years. The DEIS properly notes the conservatism of this analytical approach. However helpful this worst-case approach is for SEPA review purposes, it is important that the EIS also characterizes the likelihood of this worst-case scenario. Otherwise, the process of legislative policy review of the Plan will be infected by an unrealistic view of future impacts.

For example, the Downtown Plan adopted by the City in the 1980's never approached anything resembling full build-out over the ensuing 35 years, with probably less than 50% of full build-out. The Bel-Red Plan was adopted in 2010 and actual development over the succeeding 13 years has been only a small fraction of the theoretical full build-out. The Final

EIS should note that the likelihood of such 100% build-out occurring for any alternative within the life of the Plan is essentially zero. To ensure that the legislative policy discussion regarding the Plan is rooted in reality, the Final EIS should also provide comparative impact analysis for lesser build-out scenarios for each of the alternatives.

- NE 6<sup>th</sup> should terminate at 116<sup>th</sup> Avenue NE. Alternative 3A proposes an extension of NE 6<sup>th</sup> Street to 120<sup>th</sup> Avenue NE and the DEIS properly notes the reasons to reject this concept. We suggest that Alternative 3A be eliminated from the Final EIS. The intersection of the Grand Connection with Eastrail is a special opportunity for trail-oriented development that could become the gateway to Bellevue from the regional trail system. The extension of NE 6<sup>th</sup> Street to 120<sup>th</sup> Avenue NE would not only destroy this potential, but it would also require an enormous investment of funding, resources and time. Introduction of yet another Eastrail crossing with thousands of vehicles each day would destroy the unique urban pedestrian junction where the Grand Connection meets Eastrail and dramatically undermine the pedestrian development potential and experience between NE 4<sup>th</sup> and NE 8<sup>th</sup>. We believe extending NE 6<sup>th</sup> Street with a termination at 116<sup>th</sup> Avenue NE is the best option for Wilburton for all of the reasons cited in the DEIS. Introducing another auto crossing of Eastrail does not meet the neighborhood or City vision for Eastrail and introduces significant safety issues to Eastrail (DEIS, p. 11-110). In addition, extension of SE 6<sup>th</sup> to 120<sup>th</sup> achieves nothing material in terms of transportation or circulation benefits (DEIS, p. 11-111).
- Street Grid. Figure 11-28 shows the “Wilburton Study Area Draft Circulation and Permeability” network, which appears to be a proposed road grid. No requirement of a “street grid” should be imposed on Wilburton. Grid streets can work well, as in Bel-Red, when they can be developed on generally flat or gently sloping topography and when they truly provide connections through and across a larger neighborhood to various destinations. Neither is the case here. The significant grades across the Property impair the use and activation of any such grid streets and those streets would not connect to any larger network – they would only dead-end into Eastrail or a retaining structure that supports it. The development of the Property can and should accommodate east-west pedestrian connections between 116<sup>th</sup> Avenue NE and Eastrail, but the introduction of vehicular access through the Property would be a mistake.
- Access from 116<sup>th</sup> Avenue NE. The Plan proposes to redevelop 116<sup>th</sup> Avenue NE into a new boulevard street. We endorse this design concept for 116<sup>th</sup> Avenue NE, but it must also be recognized that 116<sup>th</sup> Avenue NE will provide the only vehicular access for the high-density urban development sites adjoining it. Therefore, 116<sup>th</sup> Avenue NE must be planned and designed to satisfy these fundamental access requirements.
- Parking requirements. Required parking ratios should be flexible, demand-based and consistent with market requirements across other urban centers in Bellevue. Parking ratios that are too high or too low will only impede new urban development in this area. Furthermore, new development in Wilburton may reflect greater parking requirements than



seen in Downton and Bel-Red, based on potential technology tenants. The DEIS should address this reality.

- Grand Connection I-405 Non-Motorized/Bike/Ped Crossing of I-405. In April 2023, the City initiated the process of preliminary engineering design for the Grand Connection I-405 Non-Motorized Crossing (the “Grand Connection Crossing”). As we know, the Wilburton Subarea Plan includes an evaluation of the Grand Connection in general, which includes the Grand Connection Crossing. The vitality and design of future land uses in Wilburton will be significantly improved by the completion of the Grand Connection Crossing. The Final EIS should include a more thorough evaluation of the Grand Connection Crossing within the future transportation network. The Grand Connection Crossing should be identified as a key mobility mitigation measure both for Wilburton and the City as a whole.
- Transit Proximate Areas. The depiction of Transit Proximate Areas in the DEIS is based on current data as of 2023. This fails to account for the likely expansion of transit service throughout the City over the next 20 years. The Final EIS should evaluate the potential for such transit expansion and should recommend possible land use changes to accompany such expansions, if they occur.
- Eastrail Design. The DEIS should address the land use/urban design impacts of a grade-separated Eastrail crossing of NE 4th Street. In particular, the Final EIS should evaluate the potential impacts of a grade-separated alternative, including:
  - Minimum slopes required to allow accessibility and to achieve adequate crossing height over NE 4th Street will require approaches that stretch 500 feet north and south into key redevelopment areas under the Plan. Approximately 80% of the unique pedestrian experience along the Eastrail between 4th and 8th would be substantially degraded if these imposing ramp structures were to be implemented.
  - Such ramp structures will create a wall down the center of the Plan area and will divorce much of the Eastrail from adjoining development in precisely the area in which that connection is critical (i.e., the junction of the Grand Connection and the Eastrail).
  - The substantial cost of a grade-separated crossing will make its implementation unlikely and, in the best case, significantly delayed.

An at-grade crossing option for NE 4th Streets was supported by the Wilburton CAC and has no adverse transportation impacts. It also allows a much-improved relationship between the Eastrail and adjoining land uses and avoids the construction of a wall through the middle of the Plan area. The Final EIS must fully evaluate the at-grade option in all Plan alternatives and undertake a complete assessment of the impacts of the grade-separated alternative as well.

## Other Issues

- “Air quality buffers”. The DEIS suggests air quality “buffers” for development along arterials and requiring very expensive air handlers for residential projects near freeways, all of which would significantly increase the cost of housing in Bellevue. Based on Wilburton’s location, most of Wilburton could qualify as for such a buffer. Worse, these targeted arterials are also the City’s key transit corridors, so the implementation of such buffers would completely undermine the City’s urban density and mobility strategy for the Plan. More important, the DEIS does not demonstrate that actual air quality impacts would occur to nearby residents or employees; demonstrating such significant adverse impacts is a precondition to any discussion of mitigation. Further, the City’s 2017 rezone of Downtown and recent rezone of East Main – both located along I-405 – included no such mitigation requirements. Selective application of such unwarranted restrictions in Wilburton would only impair urban development in the area, without justification and in a manner inconsistent with regulation in similar areas. The Final EIS should eliminate this recommendation.
- Mitigation. The DEIS includes potential mitigation measures for many elements of the environment. It should be noted in the Final EIS that adoption of new comprehensive plan policies and zoning will be a legislative decision of the Bellevue City Council, and that since an environmental impact statement is being prepared, no mitigation is required under SEPA to address any adverse environmental impacts. The listing of potential mitigation measures in the DEIS only provides the City Council with options in the decision-making process. Ultimately, whether to adopt any mitigation measure identified in the DEIS lies in the sole discretion of the City Council.
- Critical Areas. Although the DEIS addresses a full comprehensive Plan update, it fails to address the City’s critical areas regulations. This is a significant omission. Bellevue’s critical areas regulations are outdated and inconsistent with the nature of urban development contemplated by the DEIS. The Final EIS should fully address this issue and identify revisions to the City’s critical areas regulations to promote urban development. These revisions for Wilburton would include:
  - Eliminating the density penalty included in the critical areas ordinance.
  - Rationalizing the ability of urban developments to address steep slope conditions with engineered retaining structures as an exemption to critical area ordinance compliance. This will be particularly important to ensure that development can occur alongside Eastrail and that the Eastrail experience can provide urban activation.
- Impervious Surfaces. The City’s requirements of substantial pervious surfaces in dense urban environments runs contrary to the infill goals of Alternative 3 of the DEIS. The requirement of significant pervious areas on dense urban sites should not be a part of future Wilburton regulations. Most other urban jurisdictions have identified ways to address storm water quality without the need to impose major penalties on site usability. Bellevue should

update its regulations accordingly.

- Views. The DEIS should acknowledge that future development will impact views and solar access. The DEIS evaluates the impacts of future development in Wilburton on views from public places and on shadows on other public places, such as Eastrail. The Final EIS should acknowledge that Wilburton redevelopment will inevitably impact view and shadows in this way. Redevelopment of Wilburton is not possible without creating such impacts; but it is not likely that any of these impacts would be significant. The segment of Eastrail between NE 4th Street and NE 8th Street is a unique opportunity on the entire trail for activation and urban-scale trail-oriented development. While there will be outstanding opportunities for light and view along the full Eastrail system, this is the one location on the entire Eastrail where there is the opportunity for significant trail-oriented urban development. This opportunity should not be limited or lost in an effort to address views and shadows on this limited segment of Eastrail. In addition, shadows on private property should not be regulated, and if the City seriously considers this mitigation, adequate analysis should be completed to determine impacts to density related to such a regulation. Private views should also similarly not be regulated, and impacts to density should be reviewed. If public views are regulated, the City should specifically define a public view (from what viewpoint, views of which features are protected), and the impacts to potential density and the tradeoffs of protecting views and shadows in this manner should be adequately studied

The DEIS should also evaluate the ways in which Plan implementation will create new views and solar access. Implementation of the Plan will create enormous new areas of open space and pedestrian paths and connection, which in turn will offer new viewpoints and opportunities for solar access throughout the Plan area. The Grand Connection by itself will become perhaps the best and most unencumbered viewpoint in the City to take in views of Mt. Rainier, the cityscape and the Cascade Mountains. Further, the Plan will transform the Wilburton area from one that is currently hostile to pedestrians to an urban village with robust new pedestrian activity, meaning that thousands more will be able to enjoy the new views created by the Plan. These comparative impacts should be evaluated in the Final EIS.

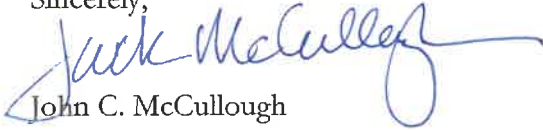
- District Energy Solutions. The DEIS relies upon existing and future building and energy codes to reduce the impact of the listed future development alternatives. In addition, the DEIS relies upon the Eastside Electrification Project and Puget Sound Energy to provide the increased electrical capacity necessary for future development. But upcoming building and energy codes will shift to full electrification for building heating and increasing cooling loads as temperatures increase. Consistent with the City's published Environmental Stewardship Plan, the Final EIS should encourage and incentivize new developments to adopt strategies to reduce their greenhouse gas emissions and reliance upon electrification that goes beyond code while decreasing demand on the electrical grid through renewable energy alternatives and encouraging local development of district energy systems and infrastructure.

June 12, 2023

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We appreciate the City's work on Bellevue 2044. Please do not hesitate to contact us if you have questions about our comment. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "John C. McCullough", with a stylized flourish extending from the end.

cc: Rockwood Capital  
KG Investment Properties

**From:** Heidi Dean <technogeekswife@yahoo.com>  
**Sent on:** Monday, June 12, 2023 11:28:14 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** Pamela Johnston <pamjjo@msn.com>; Phyllisjwhite <phyllisjwhite@comcast.net>; pdf3@comcast.net; Vic Bishop <vicbishop@earthlink.net>; davidc@clearfocusengineering.com  
**Subject:** Comp Plan 2044 DEIS comments

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Good afternoon:

I have submitted to be a party of record, but would also like to note my support for comments submitted by the Bridle Trails Community Club Board and the Eastside Transportation Association, as well as comments submitted by Bellevue residents Phyllis White, David Plummer, and David Cagle.

I do wish to note the following areas of concern:

1. Use of "capacity" numbers for each Option vs use of the 2044 target #s Bellevue agreed to (35K housing/70K jobs)

- It's my understanding the 4 different options were supposed to provide a variety of ways to meet the \*target\* #s

- Use of \*capacity\* #s is confusing to stakeholders and doesn't make clear that CoB isn't legally bound to reach those numbers, nor that it could take decades longer than 20 years to reach them

2. The DEIS is based upon pre-pandemic #s that don't take into account the changes that have occurred in the workforce (where/how people work), traffic patterns & modes of transportation, and projected growth with a falling birth rate

3. Options 2 & 3: push for density at Neighborhood Centers

- Displacement of the local small businesses at the Neighborhood Centers means very few, if any, of the businesses will be able to return to service the neighborhood due to the cost of displacement and the high rent costs associated with redeveloped areas

- Removal of small neighborhood-serving businesses will put people in their cars & driving out of their neighborhoods to seek the services to which they could once walk & bike, creating traffic & environmental impacts, as well as economic impacts

- CoB's LUC for mixed use zoning, including Neighborhood Business (Newport Hills), doesn't contain a minimum square foot amount of retail/commercial space that must be included to be categorized "mixed use". That means nothing but residential and 500 sf of retail can be built and qualify. That's not "neighborhood-serving" and will again have traffic, economic, and environmental impacts upon the neighborhoods.

Thank you for the opportunity to comment.

Sincerely,

Heidi Dean  
Newport Hills  
11661 SE 56th St.  
Bellevue, WA 98006  
425-240-2510



**From:** Heidi Dean <technogeekswife@yahoo.com>  
**Sent on:** Monday, June 12, 2023 10:58:19 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**CC:** Nhccboard <nhccboard@googlegroups.com>; board@bridletrailcommunity.org  
**Subject:** Please add as Party of Record

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello:

It's my understanding that unless an individual and/or organization is added as a "party of record" there is no legal recourse for commenting on the final EIS.

The board of the Newport Hills Community Club recently became aware of the EIS, what it is, and the opportunity to comment on potential environmental impacts to our neighborhood and the city as a whole. Our board has not had time to study the document to determine the impact to Newport Hills, but we have seen the Bridle Trails Community Club submission with their list of concerns for their neighborhood and the city. We wish to study the DEIS as it moves forward into a final draft and to have the legal opportunity to provide comment on that.

**Please add me individually as a party of record:**

Heidi Dean  
technogeekswife@yahoo.com

**Please add our neighborhood organization as a party of record:**

Newport Hills Community Club  
nhccboard@googlegroups.com

Thank you,

Heidi Dean  
NHCC Past President, Merchant Liaison, Advocacy Committee  
11661 SE 56th St.  
Bellevue, WA 98006  
425-240-2510

City of Bellevue Development Services Department  
Attn: Elizabeth Stead  
450 110th Ave NE, Bellevue WA 98004

June 12, 2023

Subject: Eastside Housing Equity Coalition Comment on Bellevue 2024-2044 Comprehensive Plan Update Draft Environmental Impact Statement

The Eastside Housing Equity Coalition is a group of BIPOC-led organizations organizing our communities to advocate for more affordable housing in our neighborhoods. We know that people of color, immigrants, and low-income households are disproportionately impacted by our housing crisis. Our communities face higher barriers to access homes affordable to their incomes and have significantly higher rates of being housing cost burdened. We are dedicated to pursuing policies through a racial equity lens that will make more housing affordable in Bellevue. The Comprehensive Plan Update is a rare opportunity to lay the groundwork for an inclusive city that we all desire. We appreciate the opportunity to provide input on the Draft Environmental Impact Statement (DEIS) and look forward to working together to make Bellevue a healthy and affordable place for all.

Bellevue is currently facing a housing crisis, with home prices and rents skyrocketing beyond the reach of many people. The communities we speak to tell us repeatedly that it is getting harder and harder to find an affordable place for their family to live in Bellevue. Too many families have told us that while they want to live in Bellevue because that is where they work, go to worship, or where their kids go to school, they have been forced to move out of the city or move in with other families. For Bellevue to thrive, it must prioritize the construction of affordable homes for its essential workforce, including teachers, nurses, caregivers, and service workers, who all contribute to the city's thriving economy and vibrant culture.

The Comprehensive Plan Update presents a unique opportunity for Bellevue to make significant progress in addressing the housing crisis and become a regional leader in promoting affordability. **By embracing Alternative 3, which allows for the highest amount of housing capacity and implements mandatory inclusionary zoning, Bellevue can work towards its vision of abundant and affordable housing throughout the city.** Allowing more homes to be built in more areas will help alleviate the housing shortage. Mandatory inclusionary zoning ensures that the public benefits from increased development capacity, that affordable homes are directly created for low-income individuals, and that mixed-income communities are created so that people from all incomes have access to high-opportunity areas.

Alternative 3 will also contribute to creating a better community for all Bellevue residents. It aims to develop complete neighborhoods with a mix of housing options, jobs, services, and accessible transportation. This will enhance walkability, promote local businesses, reduce dependence on cars for daily needs, improve public transit, and provide safe walking and biking routes. Ultimately, it will enable Bellevue residents from diverse ages and income levels to find affordable homes in the city.

In addition to supporting Alternative 3, the Eastside Housing Equity Coalition has specific recommendations and comments on the DEIS. As the preferred alternative and Final Environmental Impact Statement (FEIS) are developed, we hope that the following recommendations are considered to improve the ultimate outcomes for our communities.

## Comments & Recommendations:

### **Affordable Housing Need**

The allocation for affordable housing in Bellevue highlights the urgent need to build many homes affordable to low-income individuals during the Comprehensive Plan update. Each alternative in the FEIS should thoroughly analyze the effects of its growth strategy and housing production rates on the total number of homes affordable to various income levels. Because people of color and immigrants are disproportionately represented in the lower income levels, paying particular attention to those making less than 30% of the Area Median Income (AMI), 30-50% of AMI, and 50-80% of AMI is crucial.

It is also important to note that housing costs are forcing households to move out of Bellevue. This is most publicly visible with the shrinking of the Bellevue School District enrollment numbers. High housing costs and families moving to more affordable areas have been noted by the district as key factors in enrollment decline.

Additionally, while inclusionary zoning is crucial for increasing affordable housing production, it will likely require additional funding sources. The FEIS should analyze the funding gap between the currently available resources for affordable housing and the resources required to meet the demand.

### **Mandatory Inclusionary Zoning**

Bellevue should seize the opportunity presented by the Comprehensive Plan update to maximize housing growth and achieve broad-based and equitable development. Strong inclusionary zoning policies must be paired with ambitious housing growth to meet the substantial need for affordable homes. Moreover, the preferred alternative should include a commercial fee-in-lieu provision to ensure that new commercial and office developments also contribute to affordable housing.

### **Environmental Justice**

When considering places throughout the city for increased housing capacity, it is essential that the city incorporates the long-term health of the residents residing in those homes. Housing that is affordable and healthy communities are not tradeoffs of one another, but rather two ingredients that are foundational for a thriving community. The city should consider its Air Quality and Land Use Planning report and Seattle's ADU FEIS for mitigation strategies that will appropriately balance housing capacity and health concerns, and ultimately create more housing options that generate healthy communities.

One recommendation from the report that is especially important from an environmental and health equity perspective is the application of a land use buffer within Air Pollution Exposure Zones (a minimum of 500 feet from high-volume roadways) for new sensitive land use capacity. To retain housing capacity along with a land use buffer, midrise housing should be considered in transit areas to gain more housing capacity for housing near transit.

### **Midrise Housing**

Maximizing the use of lower-cost typologies like midrise apartments are an economically efficient way to bring more homes that are affordable to the city. Although subsidies are necessary for affordable housing production, midrise housing can reduce the subsidy required. The preferred growth strategy should prioritize midrise multifamily development, as recommended by the Department of Commerce's draft guidance. This will enable higher-cost cities, like Bellevue, to meet their housing needs for low-income individuals. Of the three alternatives, Alternative 3 aligns most closely with this goal by

permitting midrise, mixed-use apartments near transit and neighborhood centers. The Future Land Use Map should be revised to incorporate midrise housing up to 8 stories, utilizing cost-effective wood-frame construction.

### **Middle Housing**

Allowing middle housing across the city is essential for distributing growth equitably and providing more options for residents. Alternative 3 proposes legalizing duplexes, triplexes, and cottage housing throughout Bellevue. These options can create affordable rental and homeownership opportunities while maintaining the residential character and preserving green spaces which are important to residents. It is important to note that Alternative 3 must go further to increase the range of middle housing options permitted in the city to be in compliance with the newly adopted middle housing bill, HB 1110.

### **Light Rail & Transit-Proximate Areas**

Bellevue growth and development planning for the next 20 years must carefully consider all light rail station areas throughout the city. The FEIS should assess the ½ mile walkable area around each light rail station as part of this analysis. This analysis should ultimately inform the development of the preferred alternative, which should allow for midrise housing or greater within the ½ mile walkable area of each light rail station.

### **Displacement**

Many people of color and low-income households face the greatest risk of displacement. It is crucial that a growth strategy is pursued that mitigates these risks. In this analysis, it is also important to differentiate between physical and economic displacement. Physical displacement occurs through direct demolition, while economic displacement results when residents and businesses can no longer afford the rising rents and/or property taxes. The FEIS should quantify the expected impacts of each alternative on economic and physical displacement, going beyond a qualitative assessment. Households are especially susceptible to economic displacement when housing shortages lead to the bidding up of the price of existing homes. Understanding these impacts in depth will help develop appropriate anti-displacement strategies. The DEIS notes that because Alternative 3 creates more housing overall, including more affordable housing, it is expected to have the highest chance of reducing economic displacement as compared to other alternatives.

### **Surplus Land and Land Acquisition Strategies**

Land costs significantly contribute to the rising costs of building affordable housing. Bellevue's work around the C-1 Affordable Housing Density Bonus has been a great opportunity to capitalize on affordable housing production opportunities. To complement this work, Bellevue should seek additional ways to leverage underutilized land. As part of the FEIS, the city should identify surplus or underutilized land and designate these sites for midrise housing.

### **Development Standards**

Development standards such as setbacks, upper-level stepbacks, modulation, and articulation can increase development costs and reduce the feasibility of capturing value for affordable housing. These standards also limit energy efficiency and hinder innovative construction methods. In the FEIS, we recommend not to advance development standards as mitigation measures for aesthetic impacts. This will enable more cost-effective and sustainable housing development.

By considering these recommendations, Bellevue can make significant progress in promoting racial equity and ensuring housing affordability for all residents. We request that you involve our coalition in future planning and decision-making processes related to housing so the voices of the community can be heard during the planning and implementation.

Sincerely,

Mohamed Bakr  
Executive Director, Muslim Community Network Association

Debbie Lacy  
Executive Director, Eastside For All

Patience Malaba  
Executive Director, Housing Development Consortium of Seattle-King County

Lalita Uppala  
Executive Director, Indian American Community Services



**From:** Fritz Fritz <fritzfritz93@yahoo.com>  
**Sent on:** Monday, June 12, 2023 11:30:10 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** be a party of record

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hi,  
this is Fengxi Luan. I want to be a party of record.  
thank you very much.  
Fengxi Luan

# 1515 Bellevue Way LP

June 12, 2023

VIA ELECTRONIC MAIL

Development Services Department  
City of Bellevue  
Attn: Reilly Pittman  
450 110th Avenue NE  
Bellevue, WA 98004

Re: Bellevue 2044 EIS Scoping Comments

Dear Mr. Pittman:

We are submitting this letter to provide comments in response to the Draft Environmental Impact Statement (DEIS) prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

1515 Bellevue Way LP owns “The Park in Bellevue” apartments at 1515 Bellevue Way NE, immediately north of Downtown in the Northwest Bellevue Subarea (the “Property”). The Property comprises an area of approximately 9.4 acres and is developed with 23 multifamily residential buildings containing a total of 184 dwelling units – a density of 20 units per acre.

Our comments are as follows:

- We support Alternative 3 in the DEIS. However, the DEIS should also include a study of the enhancement of zoning in the Bellevue Way corridor just north of the Downtown. The Property is presently zoned R-20. Outside of the mixed-use and urban center zones, the densest multifamily zones in Bellevue are the R-20 and R-30 zones, allowing a maximum of 20 and 30 dwelling units per acre, respectively. These zoning designations are now over 40 years old. They date back to a time when the predominant multifamily typology in Bellevue was two-story walk-up apartments with large areas of surface parking.
- This 40-year-old zoning reflects a density that is 80% to 90% less than comparable 6 or 7 storey (5-over-1 or 5-over-2) apartment development that is predominant in the market throughout the Puget Sound. It would be appropriate to update this zoning to current standards in locations adjacent to major urban centers as it would add hundreds, if not thousands, of units to the City’s housing inventory. Bellevue Way is a major arterial and the Property is located adjacent to Downtown so upgrading the site zoning to accommodate 5-over-2 development is appropriate. We note that upgrading the zoning in this key location, to expand the housing inventory, can be accomplished while still providing generous usable open space and neighborhood buffers.

- It is widely acknowledged that there is a housing crisis in Bellevue and The City cannot afford to forego this opportunity to update 40-year-old zoning in an effort to address this issue. Failure to update this zoning adjacent to the densest development center in the City – the Downtown – would be a reaffirmation of the small-scale suburban development pattern rejected in Alternative 3.
- The City should be looking to add density in areas where transit is in place today, and also where it prefers transit to be in the future. In 2019, Bellevue Way north of the Downtown experienced 22,600 average weekday car trips. Given the high volumes of traffic and the direct access from Downtown to SR 520 along Bellevue Way (bypassing 405 and serving more of West Bellevue), it would seem likely that this will become a more transit-heavy corridor in the future. Anticipating the additional transit service, sound urban planning practices suggest it would be appropriate to update the zoning with increased density along Bellevue Way north of the Downtown core.

Finally, we note that the land use analysis in the DEIS does not accurately depict the structure of the City's Comprehensive Plan. The DEIS collates the many various Comprehensive Plan land use designations in a smaller, simpler list of land use categories. In fact, the Comprehensive Plan future land use map simply mirrors the many distinct zoning categories throughout the City and includes far too many classifications. This unnecessary complexity in the future land use map is an obstacle to zoning evolution in the City, since a rezone application must also be supported by an associated Comprehensive Plan amendment. Instead, the Comprehensive Plan should be based on a simpler list of land use categories. The DEIS should note this distinction and should discuss the merits of transitioning the future land use map to a more flexible structure with far fewer land use categories.

We appreciate the opportunity to provide these comments.

Sincerely,



1515 Bellevue Way LP

# HEARTLAND

---

June 12, 2023

City of Bellevue Planning Commission  
c/o Thara Johnson

Send via email:

[CompPlan2044EIS@bellevuewa.gov](mailto:CompPlan2044EIS@bellevuewa.gov)

Thara Johnson: [TMJohnson@bellevuewa.gov](mailto:TMJohnson@bellevuewa.gov)

Re: DEIS Comment Letter-Neighborhood Centers & Newport Hills Shopping Center

Planning Commissioners:

Heartland LLC is a Seattle based real estate advisory firm that has been engaged by Rainier Northwest, the owner of Newport Hills Shopping Center (NHSC) to help them reposition their property to be the vibrant center of the Newport Hills neighborhood for generations to come.

We appreciate the hard work that City Staff and the Planning Commission have put into the Comprehensive Plan process so far and look forward to working collaboratively to ensure that NHSC contributes to the City's ability to achieve its long-term goals. This letter provides some important background about the NHSC and offers some observations and recommendations for the City to consider as it moves forward with the FEIS and the formation of zoning and development standards.

The following summarize our findings, which are discussed in more detail in the body of the letter:

- Revitalization of the NHSC has been a stated objective of the City for decades. The current, low-density NB zoning has been cited by City commissioned studies and several private developers as one of the major obstacles to realizing the vision for a vibrant mixed-use neighborhood center. The other major impediments to redevelopment include the limited growth of new households in the surrounding neighborhood and fundamental shifts in retail over the last 40 years.
- While we support growth Alternative 3 in principle, it only just begins to address the need for more households to support retail in Newport Hills by modestly increasing housing options surrounding the NHSC. As discussed below, the proposed MU-L zoning is entirely insufficient to support mixed use redevelopment and provide desperately needed housing outside of the expensive, high-density growth centers of Wilburton and the Bel-Red. The MU-M zoning designation provides the bare minimum residential density necessary to support redevelopment of NHSC and we encourage the Planning Commission to consider it for NHSC.
- At almost 6 acres, NHSC is a unique opportunity to convert a downtrodden 1960s strip center into a true mixed-use neighborhood center. Large sites like this offer flexibility to configure buildings to incorporate public amenities that can have a profound impact on placemaking (e.g., public plazas) and are otherwise unachievable on typical sites. In addition to the densities allowed in the MU-M zoning (Base FAR), we encourage the Planning Commission to apply an incentive zoning system to MU sites in Neighborhood Centers, that are greater than 4 acres so

that the neighborhoods can benefit from the type of site-specific development standards and process employed in other parts of the city.

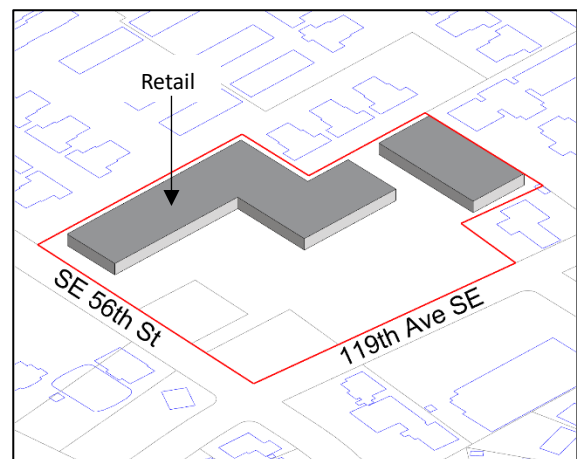
**Context:**

Located at the intersection of 119<sup>th</sup> Ave SE and SE 56<sup>th</sup> St, NHSC is a 5.89 acres (256,583 SF) site. Three of four buildings on the property were built in 1963 totaling to a gross building area of 55,310 SF. The vacant retail store at the northwest corner of the site was built in 1977 with a gross building area of 6,128 SF. The property is dominated by surface parking at 53% followed by buildings at 24%. The existing tree canopy is approximately 5% of the site area and almost 95% impervious surface.



**Existing Zoning and Policy:**

The site is currently zoned Neighborhood Business District (NB). NB zones are small scale, mixed-use commercial areas that provide housing opportunities, retail, and service businesses for the surrounding residential community. Though NB zoning encourages a mix of uses, the combination of a 20 feet height limit, maximum lot coverage of 35% and restrictions against locating residential uses on ground level has made redevelopment of this site infeasible. The existing shopping center maxes out the current development capacity making potential for redevelopment of site unattractive.





In its Threshold Review of the 2018 Comprehensive Plan Amendment Application, city staff summarized the ineffectiveness of the City's land use policy on NHSC over the last two decades:

*While passage of time is not a significantly changed condition, the Comprehensive Plan anticipated that Neighborhood Business would be up to the task of revitalizing this aging neighborhood commercial center. Instead, the history of revitalization attempts including land use and feasibility analyses, proposed code changes, Bill Pace's farmers market tenure, two (2) ten-year GMA updates of the general Plan, development applications, and now two comprehensive plan amendments, demonstrate the unanticipated consequence of the marginal success of NB. Lacking the intent to deliver on three promises of Subarea Plan policy, the designation has failed to bring these revitalization efforts together: 1) mixing in housing as a new ingredient; 2) sustaining local business; and 3) maintaining the "third place" role of the center in the community.*

*The Neighborhood Business designation and zoning on the Newport Hills Shopping Center site were established with the 1993 Newport Hills annexation and 1994 adoption of the Newport Hills Subarea Plan. The subarea has seen nine comprehensive plan amendment actions since then.*

Application	Proposal	Date	Outcome
Newport Hills Subarea	Plan adoption	October 1994	Resolution 5823
West Ravine	SF-L to SF-UR and SF-H	October 1995	Ordinance 4803
Olson Coal Creek	SF-M to MF-M	December 1998	Ordinance 5118
Wittman Open Space	Open Space Taxation designation	May 1998	Withdrawn
The Oaks	Delete trail requirement	December 1998	Denied
113th Pl SE	West Ravine SF-UR to O	December 2001	Denied
Dana	SF-H to MF-L	October 2003	Denied
Lakevue Luxury Storage	West Ravine SF-UR to LI	April 2004	Withdrawn
Newport Hills Village	NB to MF-M and NB	June 2016	Withdrawn
Newport Hills Shopping Center Redevelopment	NB to NMU	January 2018	Withdrawn

The Newport Hills Subarea Plan supports the overarching goal of a vibrant, mixed-use redevelopment at NHSC:

*Redevelopment opportunities in the Newport Hills commercial district could include a mixed-use component where retail and housing are integrated. Introducing housing to this neighborhood business area may help support a greater variety of retail uses.*

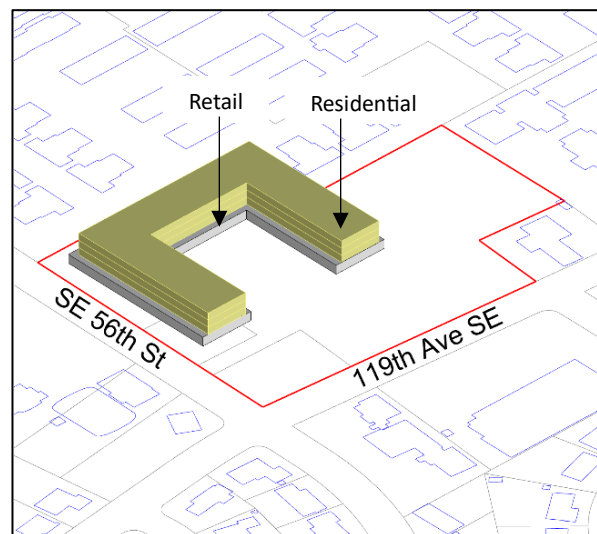
- *POLICY S-NH-10. Support development proposals that include housing opportunities in all Neighborhood Business (NB)-zoned land in the Newport Hills commercial district.*
- *POLICY S-NH-25. Recognize the Newport Hills commercial district as a neighborhood center, now, and in redevelopment efforts.*
- *POLICY S-NH-26. Emphasize unique retail uses which enhance Newport Hills identity in a redeveloped shopping and commercial district.*
- *POLICY S-NH-27. Encourage new commercial and residential development and redevelopment to minimize impervious surfaces.*
- *POLICY S-NH-28. Ensure that all new development and redevelopment includes measures to protect and enhance surface water quality.*

- *POLICY S-NH-50. Include the following elements in a redeveloped commercial district:*
  - *street tree beautification plan;*
  - *pedestrian access from streets to shops that is separated and buffered from auto areas;*
  - *parking which is convenient and accessible, but which is in back or to the side of new buildings;*
  - *new commercial buildings at the street edge;*
  - *a consistent architectural identity, including facades, materials, signs, seating areas, street lighting, and Metro bus stop shelters; and*
  - *an outdoor information kiosk.*

The 2044 Bellevue Comprehensive Plan is the opportunity to create the conditions necessary to support redevelopment at NHSC and finally achieve these policy objectives for the benefit of the residents of Newport Hills.

### **Proposed Comp Plan Designation:**

The densest alternative in the Bellevue Comprehensive Plan Update DEIS proposes the single-family areas around NHSC to be designated as Residential Low (R-Low) which may, over time, result in some infill housing units. While all new housing units are helpful to support neighborhood retail, this modest allowance for incremental change cannot alone make redevelopment of NHSC feasible. The DEIS calls for NHSC to be rezoned to Mixed Use–Lowrise (MU-L), which is defined as “a mix of residential & commercial use in lowrise buildings between 2-4 stories.” The housing density range in each alternative is assigned at 8 – 30 du/acre. At 30 du/acre the site yields approximately 175 units.



The existing buildings at NHSC are long past their usefully life so the vision for Newport Hills outlined in the comprehensive plan and subarea plan cannot be achieved without redevelopment. The MU-L zoning will not support redevelopment of the NHSC in a manner that is consistent with the objectives in the Comprehensive Plan in large part because housing drives the economics of mixed-use projects, not the retail which is, at best, a break-even component of the project. Where substantial amounts of retail space is required (and the high parking demand that comes with it) there must be sufficient residential for the project to be economically viable. Additional housing density is also needed to fund extraordinary public amenities. In the case of Newport Hills, both the retail and amenities are crucial to placemaking therefore a reasonable baseline of housing density needs to be allocated as well as a process for securing bonus density to fund the public amenities that will emerge from future site planning process.

The ownership of NHSC is committed to working collaboratively with the City and neighborhood stakeholders throughout the comprehensive planning process to formulate a land use designation and master planning process that will finally allow for redevelopment of NHSC.

Sincerely,

HEARTLAND LLC

A handwritten signature in blue ink, appearing to read "Matt Anderson", is enclosed in a thin black rectangular border.

Matt Anderson  
Principal & Senior Project Director

[NAIOP Letterhead]

June 12, 2023

City of Bellevue Development Services Department  
Attn: Liz Stead, Director and SEPA Responsible Official  
Reilly Pittman, Environmental Planning Manager  
Bellevue City Hall  
450 110th Avenue NE  
Bellevue, WA 98004

*Via email to CompPlan2044EIS@bellevuewa.gov*

*Re: SEPA Comments on File No. 22-116423 LE, the City of Bellevue 2024-2044  
Comprehensive Plan Periodic Update and Wilburton Vision Implementation Draft  
Environmental Impact Statement*

Dear Director Stead and Mr. Pittman:

On behalf of NAIOP Washington State, the Commercial Real Estate Development Washington State (NAIOP) and our more than 1,000 members, we are writing to comment on the City's Draft Environmental Impact Statement ("DEIS") for the Comprehensive Plan Periodic Update and Wilburton Vision Implementation that will shape the future of the City. NAIOP commends the City on embracing growth and thinking strategically about where and how the City should grow in the next two decades. By 2024, the City will undoubtedly look much different, and now is absolutely the time for bold action. We have reviewed the proposed DEIS and are impressed. It is a long document with much detail, but overall Alternative 3 provides a strong initial framework to locate growth in the City and meet its housing and jobs needs. We support advancing Alternative 3 to be the Preferred Alternative in the FEIS, with the noted changes below.

**I. The City should adopt Alternative 3 as the Preferred Alternative, with modifications that add even more density within Mixed Use and Neighborhood Centers and the following additional modifications:**

1. All commercially zoned land within Mixed Use or Neighborhood Centers that are near frequent transit currently or will be within a 10-minute walkshed of a future light rail station should be upzoned to allow for midrise housing. For the most part, Alternative 3 advances this approach, but we understand that transit proximity was not accounted for in identifying future land use map and zoning changes in Neighborhood Centers specifically. The Preferred Alternative must account for this, specifically in areas along the SR 520 corridor north of Bel-Red, immediately outside the Bel-Red subarea near Redmond's Overlake neighborhood, and in the I-90 corridor near Factoria and Eastgate. Additionally,

the FEIS should study and, where necessary, eliminate neighborhood policies and historic concomitant agreements that frustrate the purposes of multifamily midrise zoning.

2. The City should retain its model for Bel-Red that focuses office density near the 120th / Spring District Link station and residential density near the 130th Link station. We note that Alternative 3 includes significant expansion of the BR-RC zoning and only modest expansion of BR-OR zoning. The 120th station node is already established as a strong jobs center because of The Spring District, and this should continue in the future. As an alternative to expanding BR-OR-H-1 and -2 zoning designations, the City could modify the OR and CR designations to allow greater use flexibility with a “MU-H” designation. Specifically, the Preferred Alternative should also study getting rid of the minimum residential component in the BR-OR zoning that applies to large sites.
3. The City should rezone all OLB areas in Eastgate to at least OLB2, and add additional height and density, to facilitate development for residential uses and student housing near Bellevue College
4. MU-L and MU-M areas identified in the DEIS need to be rethought in terms of heights. The MU-L areas allow only between 2 and 4 stories, and the MU-L areas allow between 7 and 10 stories. Neither of these height designations correlate closely to specific construction types. More information in the FEIS should be provided to describe the types of development envisioned, and the MU-M areas should allow up to 85 feet plus for midrise residential to maximize “five over three” wood frame construction.
5. Expansion of the BR-MO area is critical for Hospital-adjacent uses including preventative care, stem cell research, and medical office. The Preferred Alternative should consider expanding zoning that supports these uses in the 120th station node and in Wilburton to ensure there is sufficient flexibility to realize the needed development. The zoning should provide clear use designations that allow research and development labs, biotech incubators, medical office buildings, and life sciences campuses. Further, the Preferred Alternative should consider allowing residential uses in these areas to provide needed housing options for medical workers and patients who may travel to the area for treatment.

**II. The City’s Preferred Alternative should study an incentive-based affordable housing model, not an inclusionary mandate.**

1. Although we support advancing Alternative 3 to the Preferred Alternative, we do not support any mandatory inclusionary system for affordable housing. We believe the market functions best when affordable housing is incentivized, not



mandated. Between COVID, rising interest rates, inflation escalation, and the recent banking crisis, there are many headwinds to development and we are skeptical it is possible to design a mandatory inclusionary program that accounts for the complexities of the market. There are high risks of incorrect calibration—namely that development will not occur—that will result in Bellevue not meeting its goals and our regional housing crisis worsening. The Preferred Alternative should focus on an incentive-based affordable housing program that is legal and calibrated to incentivize housing development and affordable housing. The FEIS must further disclose the economic and development assumptions underlying any program, and it should provide unit creation assumptions so it is possible to evaluate whether the study of housing impacts is adequate.

2. We understand the City also intends to use the FEIS as a basis to implement the “Phase 2 LUCA” work on affordable housing. If true, that should be clearly disclosed in the FEIS, along with all economic and development assumptions. Again, we support incentives, not mandates, and the Phase 2 program should be calibrated to encourage overall housing development to occur.
3. Further, as part of the Preferred Alternative, the City should consider the existing incentive systems across the City and identify if they can be updated to be (a) more consistent, and (b) more reflective of the City’s current priorities. We are confident that an incentive-based system can meet the City’s goals for producing affordable housing, especially at the 80-120% AMI level, but that must also be a goal of the system. There are areas of Bellevue, like Downtown, where this is not the current goal, so the priorities should be revisited if affordable housing creation is the City’s top goal.

**III. Mixed Use areas should allow the market to control the uses that are constructed.**

Zoning codes function best when they are focused on height, bulk, and form standards and do not overregulate uses. As much as possible, we encourage the Preferred Alternative to move to “mixed use” designations that do not prescribe specific uses in specific areas. This will allow development to meet market conditions and the City’s needs over the full twenty-year planning horizon.

**IV. The City should rely on TOD and the market to address Air Quality impacts, and not implement any buffers.**

The DEIS identifies an air quality impact from anticipated GHG emissions, yet the threshold of significance appears inapplicable and the analysis does not account for identified transportation mitigation measures like TDM programs and electric vehicles. The analysis should be updated to confirm whether there will be a significant impact or not. But, even if emissions rise to the level of significance, the City should remove air quality buffers from consideration as a mitigation measure. Owners want to build buildings with safe indoor ambient air quality, so they will already deploy both design and mechanical measures to ensure this is the case. Further, adding in such

a buffer is directly contrary to the conversations around where density is most appropriate at the state level—which is proximate to transit—so such a buffer could frustrate compliance with future state legislative mandates.

**V. The FEIS should continue to focus transportation mitigation measures primarily on TDM programs, not adding street capacity.**

1. We are impressed with the transportation mitigation measures identified for Mixed Use Centers that focus primarily on multimodal connectivity and programmatic interventions like TDMs as this focus recognizes it is not possible to accommodate growth and build our way out of all traffic congestion with new streets.
2. The DEIS transportation analysis does not appear to rely on the Bel-Red local street grid to support the transportation network. The FEIS should acknowledge this clearly, and should study removing the unopened portions of the grid as requirements on future development. Our members have consistently identified the street grid as a barrier to development that should be rethought in future zoning changes.
3. Similar to Bel-Red, we do not support adding streets to Wilburton unless they are shown to be a significant benefit to the transportation network. The Preferred Alternative should remove references and figures that imply streets, and instead focus on how to best mitigate any impacts using existing facilities. Although we recognize there is a concern about large block lengths in Wilburton, these will be naturally broken down by master planned developments in the future, and specific projects should have the flexibility to plan driveways, private streets and service alleys, and other pedestrian connections in the manner that best fits their development and contemporary surrounding uses. Further, at the land use regulation and planning level there needs to be clear policy guidance that any identified street or pedestrian pathway connections are conceptual only and there is a clear project-level path to modify and implement connections in the manner that best supports project development

**VI. The FEIS must disclose the City's actual assumptions related to density and dimensional standards and it should study modifying current standards that result in inefficient buildings and added cost.**

We hear from our members that there are many development standards in current zoning in the City's Mixed Use Centers that add cost to development that is ultimately passed on to the end users. The FEIS should clearly state assumptions about development standards, and we recommend the City consider the following changes as the top priorities in the Preferred Alternative:

1. Density limits:

- Eliminate residential FARs and dwelling unit per acre limits. Instead of these limits, residential development should be limited by height, bulk, and scale standards. Layering on additional density restrictions is another artificial limiter on housing production solely based on site size, and not desired building forms. This should be avoided. Incentive programs for affordable housing can be based on height, not FAR, similar to Downtown.
- Retain FAR standards for commercial development, but increase FAR to better align with proposed heights.

2. Floorplate size recommendations:

- The City's floorplate sizes are too low for efficient development to support various uses. Instead, the City should implement the following limits:
  - Residential: (a) unlimited below 85', (b) 28,000 gsf/f, plus connected floorplate allowances up to 160', (c) 13,500 gsf/f for 240' towers, and (d) 12,500 gsf/f for 450' towers.
  - Commercial: (a) unlimited up to 48', (c) 50,000 gsf/f up to 180', and (c) 24,000 gsf/f beyond 180'.

3. Parking minimums should be eliminated in all transit proximate areas, and areas within 1/2 mile of future light rail stops.

**VII. The FEIS should identify modifications to the Critical Areas Ordinance to exclude man-made slopes from regulation.** The City's current Critical Areas Ordinance ("CAO") treats all man-made slopes and rockeries as critical areas if they meet the City's size, height, and slope definition. This is true even if there are historic permits that approved the grading activities that created the slopes. These "slopes" do not have environmental value, and modern grading approaches and removing the slopes often results in safer geotechnical conditions. Sites with these features have reduced development capacity and constrained building configurations because of setbacks and buffers under the current code. This is not the right result. Consistent with existing Comprehensive Plan policies, the FEIS should identify removal of man-made steep slopes from regulation as part of Comprehensive Plan implementation.

**VIII. The Preferred Alternative's Future Land Use Map Designations Must Be Streamlined.** Last, we encourage the City to create more general Future Land Use Map designations as part of the FEIS and Comprehensive Plan update. This is allowed by the Growth Management Act, and would more easily facilitate future rezones and zoning changes.

We recommend different subareas are just identified with “Downtown,” “Wilburton,” or “Bel-Red” designations, or the City could simply use “Mixed Use Center” and “Neighborhood Center” designations, then it could identify implementing zones. This approach is frequently used in other jurisdictions to achieve more streamlined results in the interactions between Future Land Use Map and zoning designations.

Thank you for this opportunity to comment on behalf of our members. We are excited about working with the City to realize the growth it has identified for the next two decades. Please do not hesitate to contact me if you have any questions.

Sincerely,

Danielle Duvall, NAIOPWA Interim Executive Director

**From:** Curt Allred <curtallred@live.com>  
**Sent on:** Monday, June 12, 2023 11:23:46 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Comprehensive Plan DEIS comments

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello,

I am a 23 year resident of Bellevue. I am concerned that none of the alternatives covered by the Comprehensive Plan DEIS sufficiently address these 3 topics:

- 1 - Greenhouse Gas Emission
- 2 - Tree Canopy
- 3 - Traffic Gridlock

#### **Greenhouse Gas Emission**

The Plan and DEIS do not contain sufficient metrics, monitoring plans, and corrective actions to ensure that we will achieve a 50% reduction in GHG emission by 2030. The city is already falling short of that goal, and the growth alternatives will certainly add more GHG emission impact. All new construction must be net-zero emission or even net-negative to offset existing GHG sources. This will be difficult to institute, and major backlash from developers can be expected. I do not believe that, as-written, this Plan has a chance of meeting the city's emission goals.

#### **Tree Canopy**

The Plan and DEIS do not contain sufficient provisions and analysis to ensure that we will achieve and maintain a 40% tree canopy. Bellevue is losing trees at an alarming rate, with little to no mitigation. Developers are currently allowed to clear-cut property when building their oversized, energy-inefficient monster houses. The few cases of mitigation are basically shrubs or small trees to replace the 100-200 year old evergreens that were cut down. The new tree code being developed should be an integral part of this Comprehensive Plan, and must be written to insure growth in tree canopy, and incorporate enforcement with serious consequences to violators. This topic will also cause major backlash from developers and property owners. Unless this is addressed in the Plan with additional analysis and actions, I believe it has no chance of achieving a 40% tree canopy.

#### **Traffic Gridlock**

Traffic throughout Bellevue is a major problem, resulting in lost productivity hours, road rage incidents, pollution, and presumably mental and physical health problems for drivers. This will only be exacerbated by permitting higher density construction in neighborhoods far from convenient public transit. Growth in remote neighborhoods should NOT be encouraged or allowed unless sufficient transit is put in place to compensate for the additional traffic. All approved housing expansion must be located within walking distance (5 min) of a major transit corridor. Encouraging growth outside transportation corridors is irresponsible and should not be part of the plan.

Thank you for the opportunity to submit my comments.  
Curtis Allred  
13609 SE 43rd Pl, Bellevue



**From:** Curt Allred <curtallred@live.com>  
**Sent on:** Monday, June 12, 2023 10:38:52 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Comprehensive Plan DEIS comment re: GHG reduction

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Hello,  
I completely agree with and support Barbara Braun's comments submitted to you earlier, and copied below for your convenience.

Thank you.  
Curtis Allred  
13609 SE 43rd Pl, Bellevue

The City's commitment to reducing greenhouse gas emissions by 50% by 2030 is not sufficiently analyzed or addressed in the Comprehensive Plan. The Washington Department of Commerce's Climate Element Review Group has been working on an optional Climate Element section guideline for Comprehensive Plans that should be included in the final EIS for Bellevue. [Link](#)

From the Department of Commerce's website:

"The Washington Department of Commerce is developing a model element to help cities and counties address climate change in their comprehensive plans. The model element will include mitigation (greenhouse gas reduction) and resilience (climate impacts preparedness, response, and recovery) planning guidance, as well as a model chapter with goals and policies (Menu of Measures) that communities may voluntarily adapt or adopt into their comprehensive plans as part of their periodic update. The model element – described in the [2021 budget \[Section 129 \(126\)\]](#) – must be completed by **June 2023** and must integrate input from fellow state agencies and other partners."

The draft Guideline and development timeline can be found here:

1. [Draft Guideline](#) – post as of May, 2023
2. [Development Timeline](#) - The initial products – the model elements – are due by June 30, 2023.

Bellevue should adopt this guideline into our Comprehensive Plan even if this requires us to be a pilot city. The preferred Alternative should be analyzed on its ability to meet our climate goals using this Guideline and appropriate mitigations should be outlined in the Final EIS.

Included in the Final EIS should be numerical estimates of future GHG emission metrics along with the key actions and mitigations that will enable us to achieve those measurable targets.

The final Comprehensive Plan should not be adopted without full confidence that our climate goals will be met. The timing of the final EIS should be modified to allow time for the inclusion of this planning element, and the schedule for completing and adopting the Comprehensive Plan should be modified accordingly.

Bellevue should stand out as a large municipality who is taking climate action seriously.

Thank you!

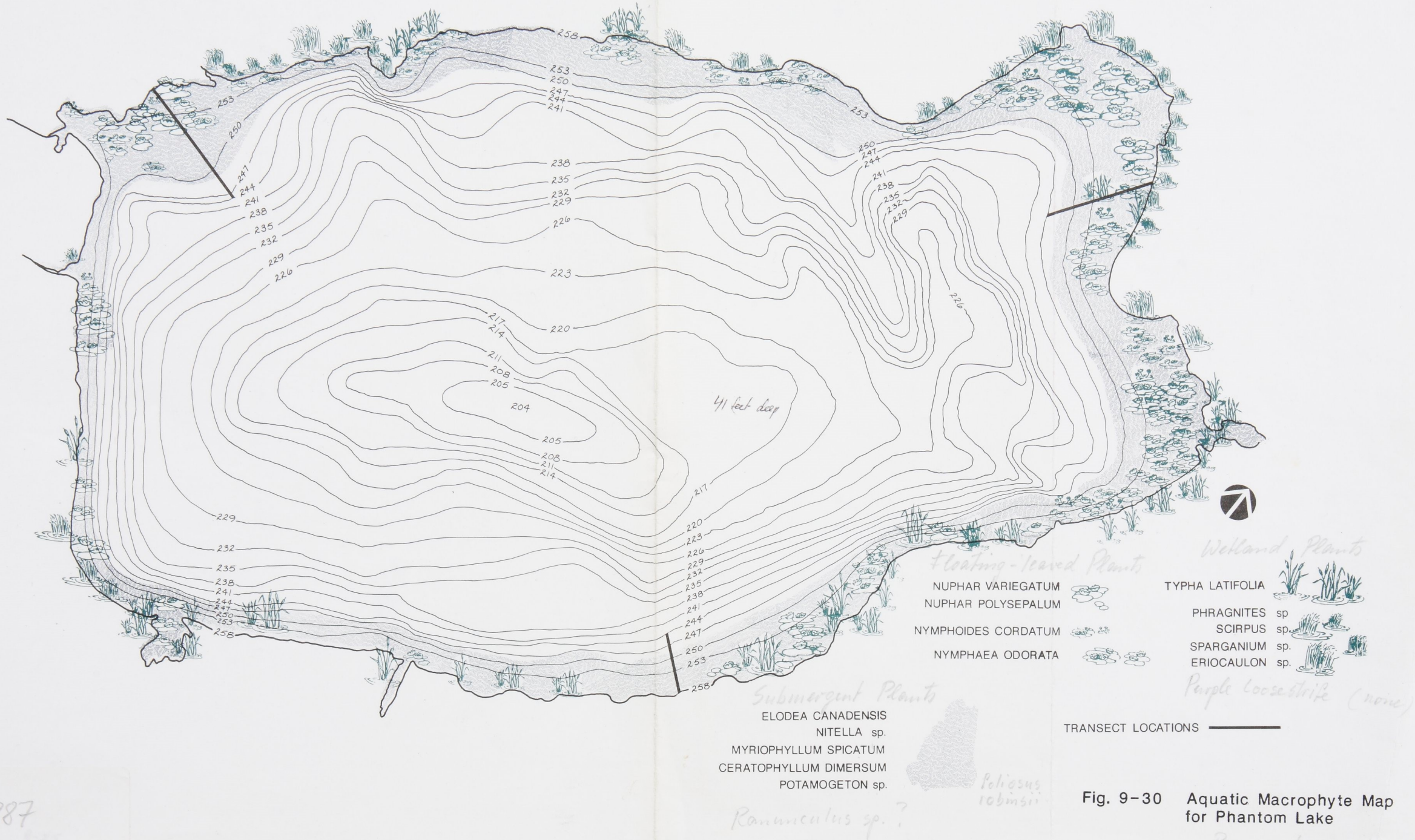


Fig. 9-30 Aquatic Macrophyte Map for Phantom Lake

1987

**From:** Brian Parks <prodphotog@yahoo.com>  
**Sent on:** Monday, June 12, 2023 9:38:56 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Phantom Lake Homeowners Association as party of record Comp Plan & EIS

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

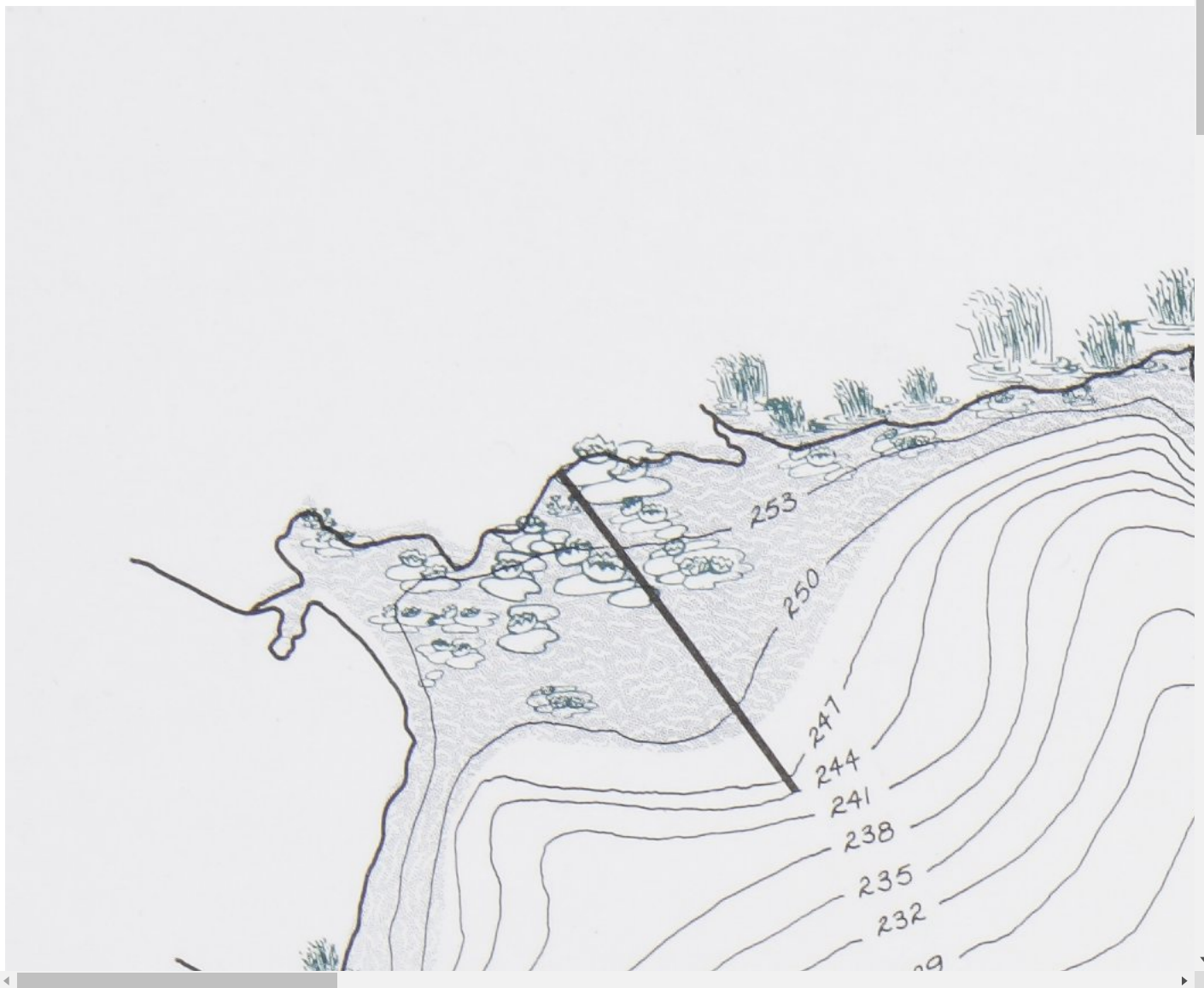
Please add Phantom Lake Homeowners Association to be a party of record in both EIS and Comp Plan Drafts.

Also, one correction is DEIS states Phantom Lake has maximum depth of 45' deep (transposed typo?), however the City commissioned 1986 Kramer Chin & Mayo, Phantom-Larsen Lake Restoration Plan Study indicates 54ft maximum depth\*. (See attached Map from KCM Study; 258 NGVD-204 NGVD= 54ft. \*BTW 258 NGVD= modern NAVD 261.6, which would be a peak flood level above Phantom Lake's Ordinary high Water Mark ~260.7, so I would argue a depth of 53' based on standard OHWM methodology; lake's gauges have been proven faulty and in error, indicating heights never reached since I've lived here.)

A second concern I saw in the DEIS is the repeated phrase "smaller lakes that are considered by some to be wetlands (Larsen Lake, Lake Bellevue, and Phantom Lake)". I don't think it is proper to broadly categorized entire water bodies as "Wetlands" (some areas are, some not).

Thank you and we eagerly await the release of Comp Plan Drafts affecting our subarea.

Brian Parks  
PLHO President  
16011 SE 16th St  
Bellevue WA 98008  
425 562 0816  
[prodphotog@yahoo.com](mailto:prodphotog@yahoo.com)







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p. (206) 343-0681  
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June 12, 2023

City of Bellevue Development Services Department  
Attn: Reilly Pittman  
450 110th Avenue NE  
Bellevue WA 98004

***Re: Futurewise Comment on the Bellevue 2024 Draft Environmental Impact Statement***

Dear Development Services Department:

Thank you for the opportunity to comment on the draft environmental impact statement (“DEIS”) for the 2024 Periodic Comprehensive Plan Update at the City of Bellevue (“the City” or “Bellevue”). We will share our comment on the DEIS below.

**Mission Statement**

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters throughout Washington State, including in Bellevue.


**DEIS Comments**

Based on the limited information provided, we believe that Alternative 3 is most likely to meet the goals and responsibilities of the City of Bellevue provided it fully complies with the Growth Management Act (“GMA”), Puget Sound Regional Council (“PSRC”) VISION 2050, multicounty planning policies (“MPPs”), and King County Countywide Planning Policies (“CPPs”) requirements, goals, and objectives. We recommend additional analysis to show how the alternatives comply, or do not comply, with the GMA, VISION 2050, MPPs, and CPPs.

**Housing.** Additional analysis is needed to meet new planning requirements under HB 1220. In alignment with Washington State Department of Commerce (“Commerce”) guidance, we recommend that the City of Bellevue “plan for and accommodate housing affordable to all economic segments of the population” with the following analyses:

- **Inventory and analysis of all housing needs ([draft guidance](#)).** We appreciate that the City of Bellevue, through the December 2022 [Housing Needs Assessment](#) (“HNA”), documented projected housing needs for moderate, low, very low, and extremely low-income households as well as emergency housing, emergency shelters, and permanent supportive housing (“PSH”). Housing need inventory and analysis must be consistent with





the CPP allocation through the Growth Management Planning Board and [ratified by the King County Council](#). This means that the alternative “gap analysis by affordability levels” methodology in the HNA cannot be used to update Bellevue’s Comprehensive Plan.

- **Identify sufficient capacity of land for each income level and housing type, including special housing needs, based on current and proposed comprehensive plans and zoning ([guidance](#)).** City of Bellevue staff have indicated that this analysis is currently under review by Commerce. In advance of that feedback, we recommend that Bellevue consider some of the following implications of HB 1220:


- The housing element of the comprehensive plan must show sufficient capacity for each income level and housing type (including PSH, emergency housing, and middle housing) based on current zoning. The resulting analysis should relate zone designations and generalized zone categories to potential income levels and housing types, summarize residential capacity by zone category, and compare this capacity to projected housing needs. If a deficit is found, zoning actions must be implemented to increase capacity for one or more housing needs (income level and/or type).

Due to its economical form, low- and mid-rise wood frame housing types (4-8 stories) are most likely to provide housing affordable to 0-80% AMI households. According to the CPP allocations, Bellevue has a deep need for 0-80% AMI housing, with 29,646 units out of the total 35,000 unit growth target falling in this range. That represents 85% of Bellevue’s growth target from 2019-2044.

We recommend that the City of Bellevue analyze each Alternative’s ability to meet housing capacity requirements by income level with a special focus on low-rise and mid-rise wood frame construction typologies (4-8 stories). The analysis should include both affordable housing and market rate housing needs. Depending on the results of the analysis, this may require adjustments to the Future Land Use Map in the currently proposed DEIS Alternatives to accommodate additional mid-rise housing.

- **Make adequate provisions for all housing needs, including documenting barriers to housing availability ([guidance](#)).** The updated GMA does not require jurisdictions to construct housing. However, jurisdictions are required to identify what kinds of barriers exist and programs and actions that, when implemented, have the potential to overcome barriers to housing production.
  - We appreciate the City’s consideration of inclusionary zoning and incentives in the Alternatives as tools that can reduce barriers to, and increase funding for, 0-80% AMI housing.
  - To remove barriers to housing availability, we encourage the City to identify and consider a wider range of policies, funding, development regulations, and processes in addition to inclusionary zoning, existing incentives, and programs.





Housing tools will vary by market. Thus, Bellevue should study a contextualized range of housing tool options to understand what actions can remove barriers to housing. This analysis must be included in the Comprehensive Plan.

In particular, we suggest including a funding gap analysis to understand the relationship of existing funding tools and the need in the 0-80% AMI range. The market does not typically produce housing in this range and increased funding will be necessary to create this housing stock.

We also recommend exploration of surplus and land acquisition strategies. Land costs often represent a major barrier to housing development, especially for 0-80% AMI and special needs housing.

To remove barriers to housing availability, we encourage the City to identify aspects of the permitting process that limit housing, especially for lower AMI level housing and for types of housing such as permanent supportive housing, emergency housing, and emergency shelter. This should include an evaluation of the conditional use permit process for emergency housing and shelter now that the city has a better understanding of what constitutes a sufficient number of these housing types.


Housing policies, regulations, funding, and processes interact comprehensively. We therefore suggest a cumulative impact analysis of housing affordability tools to understand how they might function in totality vs. isolation.

- We thank the city for considering public transportation networks and employment locations in the growth alternatives. We agree with an approach that focuses more housing growth in areas that have high quality transit serving employment centers and areas of planned employment growth than elsewhere. This includes planning for housing types that are affordable to different segments of the local workforce.

Consider the wage level of jobs in the neighborhoods of Bellevue and the alignment with local housing affordability. Use [Census on the Map](#) to look at job counts and wage levels in census defined places.


We encourage Bellevue to map a ½ mile walkshed around future light rail stops to better understand the transit-proximate areas analysis. We further encourage Bellevue to consider a minimum zoning density around light rail stops that can accommodate mid-rise construction typologies (at least 4-8 stories), similar to the proposed provisions in [SB 5466](#). This can dually encourage transit-oriented development while creating capacity for zones compatible with 0-80% AMI housing development types.

- **Address racially disparate impacts, exclusion and displacement risk in housing through policies and regulations ([guidance](#)).** We look forward to reviewing the



Racially Disparate Impacts analysis that has been released in advance of the June 14<sup>th</sup> Planning Commission meeting. As the DEIS rightfully recognizes, this analysis is part of the new requirements in RCW 36.70A.070(2) that jurisdictions must now adopt into their housing element.

- Depending on the results, the racially disparate impacts analysis may require adjustments to the Alternatives that can address and begin to undo identified racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions. We recommend providing staff with the opportunity to adjust Alternatives based on the analysis findings.
  - For example, consider a hypothetical low-density neighborhood currently zoned single-family only. Consider also that this neighborhood has a documented history of racially restrictive covenants. If this neighborhood still has indicators of exclusion in housing—such as a smaller proportion of communities of color than the County or other parts of the City of Bellevue—then actions are required to document, address, and begin to undo this pattern of exclusion. Some policy options, recommended by Commerce on pg. 107 of their guidance, include:
    - Rezoning [to allow relatively more affordable housing types]
      - “Zoning that may have a discriminatory effect” is specifically mentioned in RCW 36.70A.070(2)
    - Local programs to help build middle housing
    - Accessory dwelling units
    - Support programs that provide financial assistance and education to low-income homeowners
- Consult impacted communities when assessing existing conditions, impact effects, and mitigation measures. VISION 2050 in MPP-DP-8 directs cities to “[c]onduct inclusive engagement to identify and address the diverse needs of the region’s residents.” Futurewise strongly recommends the City consult directly with members of the impacted communities for each type of environmental impact assessed in the DEIS. This engagement is especially pertinent in the racial disparate impacts analysis.
- Based on the information provided in the available DEIS, we recommend that the City clarify the discussions and analysis on displacement. The DEIS should more clearly distinguish between the impacts of economic and physical displacement in each alternative. For example, lower growth targets may create less physical displacement but more economic displacement over time. The DEIS should also include cultural displacement impacts and distinguish between commercial and residential displacement. Knowing the type of displacement that has or is occurring is important for identifying policy or regulatory options to reduce the adverse impacts of displacement.
  - **Economic displacement:** Displacement due to inability to afford rising rents or costs of homeownership like property taxes.

- 
- **Physical displacement:** Displacement resulting from eviction, acquisition, rehabilitation or demolition of property, or the expiration of covenants on rent-or income-restricted housing. Climate-related displacement falls into this category.
  - **Cultural Displacement:** Residents are compelled to move because the people and institutions that make up their cultural community have left the area.

Additionally:

- The City should demonstrate how alternatives comply, or do not comply, with HB 1110 requirements. While compliance for HB 1110 does not begin until 6 months after the 2024 CPPU, we recommend aligning the Bellevue Comp Plan with these requirements now to avoid a costly off-cycle update 6 months later.
- We appreciate that the action alternatives look at residential targets higher than those provided by King County. The PSRC 'RGS-Action-8' provides that "Metropolitan and Core cities experiencing high job growth will take measures to provide additional housing capacity for a range of housing types and affordability levels to meet the needs of those workers as well as the needs of existing residents who may be at risk of displacement."
  - Considering bold alternatives for housing growth can help correct the housing-jobs imbalance we currently observe in Bellevue. We know that housing capacity is not equivalent with projected housing growth due to many factors like funding availability for low-income housing, market conditions, and the life-cycle stage of existing buildings on parcels. We believe that Alternative 3 will most realistically provide capacity for redevelopment to occur to meet Bellevue's 35,000 residential growth target provided it complies with the Growth Management Act, VISION 2050, the multicounty planning policies, and the countywide planning policies.

**Climate Change and the Environment.** We appreciate the analysis in Appendix G that examines the relationship of climate change vulnerability to the Alternatives. This adequately analyzes climate change impacts.

We encourage the city to consider the implications of the findings in Appendix J, and to consider air quality when planning for housing growth next to freeways. This is especially pertinent if air quality is expected to disproportionately negatively impact low-income and communities of color as Bellevue grows.

**Transportation.** Futurewise appreciates that the DEIS uses a multimodal transportation analysis as the State Environmental Policy Act ("SEPA") and the GMA require. We recommend adding a discussion about how each Alternative complies, or does not comply, with the GMA, VISION 2050, MPP, and CPP goals and requirements.

Futurewise recognizes the connection between transportation planning and climate change impacts. The [Washington State Department of Ecology](#) attributes nearly 40% of statewide annual greenhouse gas emissions to transportation. Emissions from on-road gasoline — personal cars and trucks — make up over half of total emissions in this category. As Bellevue continues the



transition from a suburban jurisdiction to a more urban one, we understand the importance of simultaneously transitioning the transportation network from a car-centric model to a multimodal model with increased investments in biking, walking, and public transportation infrastructure. Futurewise recommends that the EIS:

- Emphasize transportation investment and mitigation strategies that provide and encourage alternatives to single-occupancy vehicle travel and increase travel options, especially to and within centers and along corridors connecting centers (VISION 2050, MPP-T-12).
  - Based on the provided analysis in the DEIS, vehicle miles traveled (“VMT”) increases for Action Alternatives. We recommend exploring additional mitigation measures through dense, mixed-use land use patterns and locating growth close to jobs to further reduce VMT. We also recommend more transportation investments and allocation of street space that prioritize active transportation and transit alternatives to single occupancy vehicle trips.
- Increase the proportion of trips made by transportation modes that are alternatives to driving alone... by ensuring availability of reliable and competitive transportation options (VISION 2050, MPP-T-13).
  - We appreciate that other transportation modes, like walking and biking, are expected to increase in Action Alternatives.

In some alternatives, however, transit mode usage for Bellevue workers is expected to decrease. Consider mitigation measures and supporting the ongoing implementation and expansion of transportation demand management strategies and programs, such as those mentioned in the DEIS.

On page 11-122, the DEIS states that added density in Alternatives 1-3 will result in higher mode shares for walking, cycling, and transit than the No Action Alternative. However, the transportation model shows only very small increases for these modes from the higher density alternatives and shows a steep drop in carpooling, leading to an overall increase in single occupancy vehicle mode share. The city should explain why the transportation model shows these mode share outcomes in seeming contradiction of its own assertions. If this outcome is the result of an error in the model, this error should be corrected.

We challenge the City of Bellevue to consider the implications of certain planning goals, such as the 2.0 ‘transit travel time ratio’ performance target set in the Mobility Implementation Plan. This performance target ratio would mean that a transit trip takes no more than twice as long as the trip made by private vehicle. This goal seems insufficiently ambitious to ensure availability of reliable and competitive multimodal transportation options. In dense urban areas, transit with dedicated right of way is the only transportation option that provides rapid mobility to large numbers of people. In such locations, transit travel times are faster than private vehicle travel times. As Bellevue adds more residents and



workers, transit will need to be given greater priority to maintain overall mobility in corridors with limited space for additional lanes. Setting an unambitious transit goal will reduce the emphasis on transit in the consideration of mitigation strategies.

- Avoid mitigation strategies that do not minimize the environmental impact of transportation (VISION 2050, MPP-T-8), such as road expansions. Instead, prioritize investments in transportation facilities and services in the urban growth area that support compact, pedestrian- and transit-oriented densities and development (VISION 2050, MPP-T-15). Road widening will not help Bellevue achieve the goals of MPP-T-15. Additionally, increased vehicle traffic and vehicle speeds are a barrier to pedestrian and bicycle safety. Road diets should be considered instead as mitigation strategies for corridors with significant traffic safety impacts.
- Prioritize transportation safety in alignment with the VISION ZERO initiative goal of eliminating traffic deaths and serious-injury collisions on city streets by 2030 and VISION 2050 MPP-T-3.

Safety is an important metric for transportation impacts. Bellevue should provide more detailed information on the geographic distribution of vehicle collisions than is provided in figure 11-22. In the current figure, collisions on I-90 and I-405 interchanges obscure patterns of collisions on city streets. Separating out collisions on city streets from collisions on grade-separated interstate highways and separating out collisions with more vulnerable street users like people walking or riding bicycles will show a clearer picture of where actions can be taken to increase safety that are under the City of Bellevue's control.

Additionally, Bellevue should consider the implications of using vehicle travel speed as a positive environmental metric. Increased vehicle speeds increase the chance that a collision will lead to serious injury or death. This is especially concerning when Bellevue sets higher speed requirements for residential neighborhoods where children are more likely to be crossing the street and vulnerable to being hit by a car traveling at high speeds. In fact, increased safety at intersections inherently slows vehicle traffic.

- We recommend that Bellevue analyze impacts to Eastrail and the Grand Connection that might results from a NE 6<sup>th</sup> St extension to 120<sup>th</sup> Ave NE.

Thank you for considering our comments. If you require additional information, please contact me at telephone 253-886-2099 or email [brady@futurewise.org](mailto:brady@futurewise.org).

Sincerely,

Brady Nordstrom  
Eastside Program Coordinator, Futurewise





Puget Sound Energy  
P.O. Box 97034  
Bellevue, WA 98009-9734  
[PSE.com](http://PSE.com)

June 12, 2023

Reilly Pittman, Senior Planner  
City of Bellevue Development Services Department  
450 110<sup>th</sup> Avenue N.E.  
Bellevue, WA 98004

Re: 2024-2044 Comprehensive Plan (Periodic Update) and Wilburton Vision Implementation  
Draft Environmental Impact Statement

Dear Mr. Pittman:

This letter from Puget Sound Energy (PSE) pertains to the Draft Environmental Impact Statement (DEIS) issued on April 27, 2023. The DEIS has been prepared to address both existing conditions and potential impacts based on three Action Alternatives. These alternatives will be considered in the Final Environmental Impact Statement (FEIS) established for the City's 2024-2044 Comprehensive Plan and Wilburton Vision Implementation documents.

First and foremost, the DEIS is well composed and provides a comprehensive analysis of the Action Alternatives proposed. It articulates the interrelatedness of other plans, policies and regulations that are part of the periodic update. Without a doubt, there has been a lot of change in conditions since 2015. This is certainly true for Puget Sound Energy where planning and implementation programs like PSE 2030 and Beyond Net Zero are part of the comprehensive plan framework.

As part of the scoping process, PSE submitted a letter on October 31, 2022. We acknowledge that these comments have generally been reflected or referenced in various Chapters of the DEIS. We offer the following comments on the DEIS:

Chapter 1. Summary

The DEIS states that citywide impacts to public services and utilities will be identified through the City's capital facilities planning process as the means to address potentially adverse impacts.

This suggests that the evaluation and mitigation strategies specifically address only city owned utilities and not non-city owned utilities. The mitigation measures list does identify that non-city utility providers may need to plan for new or improved facilities. It is important for the City to work with non-city owned utilities to support needed improvements in a timeframe that is concurrent with the growth forecasted in the Action Alternatives. This includes identifying mitigation measures to address potentially adverse impacts.

This is consistent with the City’s Comprehensive Plan framework to ensure that people who live, work, learn, and play in Bellevue: “Have a resilient built and natural environment”; and “Receive equitable and quality public service and capital facilities that support their daily needs”.

#### Chapter 2. Alternatives

While it is not PSE’s role to agree or disagree with how cities and counties plan for growth in their comprehensive plans; we do believe that it is our responsibility to convey how potential growth may or may not impact electric and natural gas facilities and services. After review of the DEIS, PSE believes that all of the proposed Action Alternatives including the No Action alternative will have potential impacts upon electric and natural gas systems.

	Existing Conditions	No Action Alternative	Alternative 1	Alternative 2	Alternative 3
2022 Population	153,900				
Capacity for Additional Housing Units	62,000	41,000	59,000	77,000	95,000
Capacity for Additional Jobs	158,000	124,000	179,000	177,000	200,000
Capacity for Commercial Development		40M SF	58.5M SF	58.3M SF	67.3M SF

PSE would like to continue working with the City on how these Action Alternatives may or may not potentially impact electric and natural gas systems. These potential impacts could be reflected in the FEIS and/or the 2024-2044 Comprehensive Plan.

#### Chapter 3. Land Use Patterns and Urban Form

PSE believes that guiding additional growth to concentrated areas can be supported. However, addressing the growth may require additional and/or upgraded system improvements such as electric substations, transmission and distribution facilities. In general, these new and/or

upgraded facilities should be located proximate to the area creating the additional demand for services. Proposed land use and zoning should recognize, support and compliment the need for additional utility facilities in or near urban centers as well as citywide.

#### Chapter 4. Relationships to Plans and Policies.

The DEIS identifies numerous plans and policies which are connected to the successful implementation of the 2024-2044 Comprehensive Plan and subsequent development regulations. We appreciate the City's understanding that PSE is a regulated electric and natural gas utility in the state of Washington. As such, PSE is required to have an approved Integrated Resource Plan (IRP) with the Washington Utilities Transportation Commission. The IRP and other plans are developed, approved and implemented to meet the state's energy, climate and equity requirements. PSE encourages the City to continue integration of these plans including PSE's to address the final Preferred Alternative in the FEIS.

#### Chapter 5. Population and Employment

The DEIS aptly addresses the methodologies for population, housing and employment forecasts. It will be helpful to ensure that the City and PSE are utilizing similar data to address utility impacts for the Preferred Alternative in the FEIS and the 2024-2044 Comprehensive Plan.

#### Chapter 6. Aesthetics

While the DEIS is considered to be a programmatic (non-project) action, all of the Action Alternatives will necessitate the construction of new and/or upgraded infrastructure to meet the demands of growth. PSE understands that when proposed, these new and/or upgraded facilities will identify project related impacts and mitigations measures through a separate process. We believe that the DEIS could identify in broad terms the overall potential impacts to all facilities and services.

With an increased focus to examine infrastructure decisions through an equity based lens, the City's existing goal to preserve "neighborhood character" can at times reinforce the imbalanced placement of facilities and potential impacts to areas of the City not deemed "residential character neighborhoods," which typically correlates with multifamily and multipurpose zones, where lower income communities are often located. PSE looks forward to working with the City to shift land use practices away from utility placement decisions prioritizing character compatibility, and instead based primarily on service level demand, and their equitable distribution.

#### Chapter 7. Housing

The City's DEIS presents numerous strategies to implement new requirements to address immediate housing challenges as well as those anticipated over the planning horizon. With the requirement to transition away from fossil fuel energies, PSE will continue to be engaged with development code amendments that increase electrification of heating and cooling systems in residential and other building uses. This includes the addition of new and/or upgraded energy facilities such as electric vehicle charging facilities; battery storage facilities, solar facilities, and other Distributed Energy technologies.

#### Chapter 8. Air Quality

With the continued transformation away from vehicles which use fossil fuel combustion engines to those that use electrical/battery engines, the DEIS should better address the potential for improved air quality over the planning horizon. We also suggest that some of the information outlined in Appendix J - Air Quality and Land Use Planning be integrated into Chapter 8.

#### Chapter 9. Noise

The DEIS sufficiently addresses the potential noise impacts under the Action Alternatives. Any potential noise impacts from PSE's electric and natural gas facilities will be addressed at the project level application and will be regulated through city, state and federal requirements.

#### Chapter 10. Public Services and Utilities

As mentioned above, the DEIS identifies potential impacts to public service and utilities especially city owned facilities. PSE encourages the City to include more discussion about other non-city owned services especially since the DEIS states, "Non-city utility providers will also experience increased demand for services and will need to plan for new or improved facilities". PSE has well-established processes for planning and constructing its electric and natural gas facilities (e.g., IRP). One component of PSE's planning involves referring to local government comprehensive plans including potential land use and zoning densities.

#### Chapter 11. Transportation

The DEIS provides a comprehensive analysis of the Action Alternatives and the potential impacts to traditional types/modes of transportation facilities and services. Where applicable, these transportation impacts should also address the electrification of the transportation system including the network of charging infrastructure to support it. While the City has referred to the electrification of its fleet, there does not appear to be much analysis or mitigation measures for citywide transportation electrification whether located on public or private property.

Reilly Pittman, City of Bellevue  
June 12, 2023  
Page Five

Will the City's Transportation Demand Management (TDM) Strategies include transportation electrification in the update to the 2015 Plan?

Chapter 12. Cumulative Impacts

The DEIS has considered several direct, indirect and cumulative impacts of the Action Alternatives. Again, PSE proposes working with the City to recognize potential cumulative impacts to the electric and natural gas systems in the FEIS and 2044 Comprehensive Plan.

PSE would like to thank the City for the opportunity to provide comments throughout the update process. Should there be any questions or information that we can provide to assist the City, please do not hesitate to contact me at (206) 517-3432 or at [justin.mcconachie@pse.com](mailto:justin.mcconachie@pse.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "Justin McConachie".

Senior Municipal Liaison Manager  
Puget Sound Energy

Cc: Elizabeth Stead, City of Bellevue  
Thara Johnson, City of Bellevue  
Matt Larson, PSE



**From:** Tousley, Amy <Amy.Tousley@pse.com>  
**Sent on:** Monday, June 12, 2023 10:20:51 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>; Pittman, Reilly <RPittman@bellevuewa.gov>; Stead, Elizabeth <estead@bellevuewa.gov>; Johnson, Thara <TMJohnson@bellevuewa.gov>  
**CC:** McConachie, Justin <Justin.McConachie@pse.com>; Larson, Matt <Matt.Larson@pse.com>; Beckwith, Jeff <jeff.beckwith@pse.com>; Perry, Matthew <Matt.Perry@pse.com>  
**Subject:** Bellevue DEIS - Puget Sound Energy  
**Attachments:** Final Bellevue DEIS - Puget Sound Energy 6.12.2023.docx (107.11 KB)

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Good afternoon,

Please find attached, Puget Sound Energy's comments on the City of Bellevue's Draft Environmental Impact Statement for the 2024-2044 Comprehensive Plan.

You'll note in the letter that we would greatly appreciate the opportunity to meet with City staff. Our letter is really a summary of issues and less of getting into the specific potential impacts to PSE's current and future electric and natural gas systems. In addition to Justin McConachie and Matt Larson, we would involve PSE strategic/regional electric system planners as well as staff working on our decarb strategy. Thank you for your consideration.

Respectfully,  
Amy

**Amy L. Tousley**

*Puget Sound Energy- Senior Municipal Liaison Manager*

*Lead coordination with local government Growth Management Comprehensive Plans and Regulations*

*Lead coordination with WSDOT Southcentral, Olympic & Southwest Regions*



2711 Pacific Avenue Southeast  
Olympia WA 98501

[amy.tousley@pse.com](mailto:amy.tousley@pse.com)

Cell: (206) 604-3103

**From:** Alison Cole <thecoles.1@gmail.com>  
**Sent on:** Monday, June 12, 2023 11:21:52 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Bridle Trails Upzone

[EXTERNAL EMAIL Notice!] Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

I agree with the Bridle Trails Community Club letter.

Alison Cole

**From:** Karen and Ted Yellman <karenandtedyellman@gmail.com>  
**Sent on:** Tuesday, June 13, 2023 12:33:48 AM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>  
**Subject:** Environmental concerns

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

As Bellevue plans for increasing housing needs, I request that protecting natural areas be a top concern.

**From:** Nicole Myers <nicolemikomyers@gmail.com>  
**Sent on:** Tuesday, June 13, 2023 3:04:24 PM  
**To:** CompPlan2044EIS <CompPlan2044EIS@bellevuewa.gov>; Johnson, Thara <TMJohnson@bellevuewa.gov>  
**Subject:** Transit proximate areas

**[EXTERNAL EMAIL Notice!]** Outside communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Thara,

I am confused as to why Draft EIS Figure 3-12, the map of transit proximate areas (key says it is based on 2021 BRT network) shows BRT service along NE 8th St west of downtown Bellevue. This area is served by Route 271.

I had previously noticed that this section on NE 8th St was erroneously shown in the State of the Curb Figure 22 to be a location for future RapidRide transit service. This is in disagreement with the map of RapidRide B and RapidRide line K future alignment found on the King County Metro site.

This area is also under study for TFP-304 for the downtown to Eastgate Transit connection, but I do not believe the possibility of future expanded or BRT service should be reflected in the map in Figure 3-12.

If this is an error, please let me know. I am sure you must be very busy with all the submissions that came in yesterday, but I think it is also an important clarification to have.

Thanks,  
Nicole

## **Public Comment Period - Day 3**

**In re: City of Bellevue's Comprehensive Plan Update**

**June 1, 2023**



**206.287.9066 | 800.846.6989**

1325 Fourth Avenue, Suite 1840, Seattle, Washington 98101

[www.buellrealtime.com](http://www.buellrealtime.com)

email: [info@buellrealtime.com](mailto:info@buellrealtime.com)





CITY OF BELLEVUE

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City of Bellevue Comprehensive )  
Plan Periodic Update and Wilburton )  
Vision Implementation )  
Draft Environmental Impact ) File No. 22-116423-LE  
Statement (DEIS) )

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PUBLIC MEETING  
PUBLIC COMMENT PORTION

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Taken at Bellevue City Hall  
450 110th Avenue Northeast  
Bellevue, Washington 98004

DATE TAKEN: June 1, 2023, at 6:00 p.m.

REPORTED BY: Sierra Zanghi RSR, CCR 22004202

BELLEVUE, WASHINGTON

THURSDAY, JUNE 1, 2023

6:00 P.M.

--oOo--

JIM LAUNER: Good evening. My name is Jim Lauinger, L-a-u-i-n-g-e-r. I live at 202 118th Avenue Southeast, Apartment C-12, in the Wilburton area of Bellevue, 98004.

I come to you with a statement relative to my work with BDAN. I'm a member of the Bellevue Diversity Advisory committee. And when we start talking about increasing housing and affordable housing, I want to remind you that as we look at making Bellevue an equitable place to live in, much of that has to do with making sure that we have affordable housing for everybody. Everybody can belong. If it's not, then a lot of people cannot belong and live in Bellevue. Right now, 89 percent of the people that live in Bellevue commute; so that's kind of a frightening statistic to be looking at.

From another committee that I sit on, the ARCH, affordable housing committee, we're looking at a lot of plans relative to helping Bellevue and other cities with affordable housing. If Bellevue is going to make its affordable housing goals -- the

1 housing goal is 35,000; the affordable portion at 50  
2 percent and below AMI is 10,400 units. If we're going  
3 to be able to do that, I strongly urge that you make  
4 your housing policies, choose which one or two can  
5 certainly be mandatory rather than voluntary on the  
6 part of developers. This is going to be critical.

7 If Redmond can do it, and they did it  
8 about two decades ago with their inclusionary zoning  
9 and have built about 600 apartments -- affordable  
10 apartments in downtown Redmond; and if Kirkland can  
11 more recently do it with their, I believe, multifamily  
12 tax incentive; then Bellevue can certainly do it. And  
13 that is the key to making sure you make your affordable  
14 targets in the next number of years.

15 I saw an old quote from a plan. I don't  
16 know how old it is. It might go back to before 2000.  
17 But it mentioned that Bellevue's MFTE program -- this  
18 is made by Bellevue -- has not produced any units of  
19 affordable housing in that period of time. So if it  
20 didn't back then, it probably still hasn't. Thank you  
21 for listening.

22 ALEX ZIMMERMAN: My name is Alex  
23 Zimmerman, and I'm candidate for Bellevue Council  
24 position No. 3. You can start.

25 "Sieg Heil," Nazi pig. What is you

1 doing? It's exactly what I told you first time in '96  
2 when Microsoft come. I told you only freaking idiot  
3 can open factory with 50,000 people. And this exactly  
4 happened. Well, we destroy it totally.

5 But what is you doing? This only smell  
6 like a Nazi Gestapo principle. Why we cannot talking  
7 together? You separate because you don't want people  
8 to listen one to another, make a discussion. You are  
9 real Nazi pig. And I go to council chambers all over,  
10 speak more than 3,000 times. I speak right now, every  
11 week, approximately 10 to 15 times everywhere. It's  
12 exactly what is you doing: You separate people.

13 You, by definition, are bandito, are  
14 mafia. That's exactly who you are. Why we cannot  
15 speak together? It's a room with 100 people who  
16 interest in making discussion. Somebody can talking  
17 for three minutes, somebody can have different opinion.  
18 You are Nazi pig -- Nazi, Nazi, Nazi pig.

19 So situation, what we have right now, is  
20 simple: Dirty government with absolutely Democrat Nazi  
21 psychopath council in Amazon bandito. You know what  
22 this means? There's three companies who want to  
23 control us. This is the point.

24 But as I talk many time everywhere, and  
25 exactly in Bellevue because I am candidate right now:

1 Go more money, more money, more money. This three  
2 group of crooks -- you know, what this means? -- a  
3 bandito, a mafia, a Nazi pig -- have only one goal.  
4 Make money from us.

5 Who pay for this? Who pay for traffic?  
6 Who pay for housing? Who pay for service? We pay.  
7 Low-income pay for this. People who make less than  
8 \$50,000. We all move out for another three year when  
9 Amazon brings this year start bringing 30,000 slave  
10 from jungle. You know what this means? Bellevue right  
11 now a nightmare.

12 And I live here very long and talk about  
13 this a thousand times. And nobody listen to me because  
14 by definition you are bandit, you are mafia, you are  
15 criminal. You understand what this mean? You destroy  
16 America. You destroy people. You destroy people's  
17 life. It's exactly what's happened.

18 A hundred thousand -- Amazons brings us  
19 30,000. A hundred thousand low-income people will be  
20 moved out from Bellevue. They cannot afford.  
21 80 percentage from what? From \$150,000? So you give a  
22 good apartment to people who make 100, 120 grand? This  
23 exactly 80 percentage? How about people like me who  
24 have only social security? And another 50,000 people  
25 who very, very low income: Disabled senior citizens,



1 people who make \$15 per hour.

2 What's happening, Nazi fucking pig?

3 CHRISTOPHER RANDELS: My name is

4 Christopher Randels. I live at 2501 148th Avenue

5 Southeast, Apartment C-5, Bellevue, Washington 98007.

6 Okay. Awesome. And I just want to make  
7 clear that I'm commenting in a personal capacity  
8 tonight, just a personal resident, and wanted to  
9 express my strong support for Alternative 3.

10 I attended the pride ceremony celebration  
11 today at City Hall, and we were talking about the  
12 sweeping anti-trans, anti-gay legislation that's being  
13 passed around the country. And thinking about how  
14 there's attacks on civil rights, attacks on queer  
15 rights, attacks on women's rights.

16 Thinking about how, with climate change  
17 happening, we're actually one of the areas that is  
18 slated to undergo the least dramatic effects from  
19 climate change, it feels like a moral imperative that  
20 we really need to grow as much as we can to make as  
21 much space for as many neighbors as we can, because  
22 people are going to be coming here.

23 And really, my comments are just to make  
24 Alternative 3 better, in my view: One, just do want to  
25 make sure that the final EIS incorporates state

1 legislation HB 1110 and 1337.

2 Also just want to provide the comment that  
3 all missing middle housing typologies should be allowed  
4 in all neighborhoods. Please don't do the 75-percent  
5 threshold thing, or if you meet the 75-percent  
6 threshold, you meet the conditions of 1110. Don't do  
7 that, because that's not equitable. That's just going  
8 to create some neighborhoods that have middle housing  
9 and some that don't, and that doesn't line up with the  
10 City's equity goals.

11 Additionally, I would say that the City  
12 should be really proactive with TOD development and how  
13 that relates to frequent transit service via buses.

14 As mentioned, I live in -- oh, I guess I  
15 haven't mentioned that yet. I live in the neighborhood  
16 of Lake Hills. I've lived there for eight years.  
17 There is extremely frequent transit service there. I  
18 would say it's the most frequent transit service in  
19 Bellevue outside of downtown. I use it all the time.  
20 It's really great. It could be better, but it's good.

21 But Alternative 3, the land use map still  
22 only has us going to low residential, and I think  
23 there's room to really up that a bit to get to mixed  
24 use or even higher residential capacities. There's  
25 poll data out there that exists that shows that a

1 majority of Bellevue residents would support mixed-use  
2 development -- more mixed-use development near frequent  
3 transit, and I think Lake Hills is very primed for  
4 that. So would really encourage that be evaluated  
5 further for Alternative 3.

6 And finally, I would push the City evaluate  
7 opportunities for small-scale commercial space,  
8 thinking about a garage business. So for example,  
9 small doctors' offices, small bars or cafes or corner  
10 stores. Allowing these in all of our residential area  
11 creates that really 15-minute city, that 15-minute  
12 neighborhood, and enables more people to access their  
13 daily needs within walking and biking distance. So  
14 would want that evaluated more.

15 CLIFF CAWTHON: So my name is Cliff  
16 Cawthon. I'm the advocacy and policy manager for  
17 Habitat for Humanity in Seattle, King and Kittitas  
18 Counties. We're located in Renton. I personally live  
19 in Kent and actually work in Bellevue part-time as a  
20 teacher at Bellevue College. So both, you know, doing  
21 the Millennial thing, full-time and part-time gig.

22 But I say all that to say that I've  
23 testified several times in front of the planning  
24 commission, in front of -- sorry, Bellevue City  
25 Council, and at these public meetings. So I've stated

1 our position before. But one thing I want to state is  
2 that as the DEIS process is starting to turn a corner  
3 that Alternative 3 really is the greatest -- holds the  
4 greatest potential to produce more affordable housing  
5 and really leverage the kind of value that is coming  
6 from the kind of economic growth that we see in  
7 Bellevue.

8 89 percent of the workforce, myself  
9 included, doesn't live here. As I teach at Bellevue  
10 College online, or if I were to even teach in person, I  
11 have no economically feasible way of living here in  
12 Bellevue, and neither do many of my colleagues that  
13 live either on the Eastside, in Kirkland or Redmond, or  
14 as far away as Newcastle or Renton, or they live in  
15 south King County alongside myself. And that's not  
16 sustainable in order to really continue the kind of  
17 economic growth that Bellevue has seen.

18 And I've heard so many residents talk  
19 about the environmental impact that they are concerned  
20 about when it comes to tree conservation, when it comes  
21 to energy use, and all various types of ecological  
22 impact. And utilizing middle housing types and really  
23 leaning into exploring ways to leverage density and  
24 leverage neighborhood centers, mixed-use centers to be  
25 able to build affordable housing so people can live in

1 15-minute neighborhoods, is the best  
2 ecologically-conscious strategy to address growth.

3 And then last but not least, you know,  
4 one of the things I want to applaud but also highlight  
5 is the City's commitment to racial equity. And we know  
6 Bellevue has had a history dealing with exclusion. And  
7 the best way to address the mistakes of past is to  
8 chart a really intentional future, and that means  
9 having a diversity of different housing types,  
10 including affordable home ownership opportunities, in  
11 order to address those kind of exclusionary policies of  
12 the past.

13 So I'm grateful to the staff for really  
14 pushing this process forward and for their hard work,  
15 as well as the City. And I would encourage the City to  
16 really lean into this, for the FEIS (sic) to focus on  
17 Alternative 3, and to keep it pushing forward. Thank  
18 you.

19 RICHARD HUGHES: So my name is Richard  
20 Hughes, 13709 Northeast 48th Place, Bellevue 98005 in  
21 the Bridle Trails neighborhood.

22 Okay, three points. One, I'm concerned  
23 that the DEIS does not consider the impact of the  
24 recently passed House Bill 1110. The impact of this is  
25 not yet known. It's only just passed into law. The



1 comment time of June the 12th is perilously close.  
2 More time is now needed for the City to assess the  
3 impact of HB 1110 in DEIS Alternatives 0 to 3.

4 As the DEIS is written today,  
5 Alternative 0 would need to be completely rewritten. A  
6 new DEIS is needed so residents can review and comment  
7 on the current reality rather than how things used to  
8 be.

9 Two, I'm concerned that DEIS does not  
10 fully consider the impact of the COVID pandemic on work  
11 patterns and locations. Many tech staff left their  
12 offices to work from home. Some have now returned to  
13 their offices part-time, yet others remain working from  
14 home, and yet others have moved out of the City to  
15 Eastern Washington.

16 We do not currently know what the future  
17 of remote versus office work will be. We do not know  
18 how many offices and homes will be needed in Bellevue.

19 Three, the City proposes to update the  
20 tree code this year. Bridle Trails already has a  
21 stronger tree code, yet significant and landmark trees  
22 are cut down, sometimes on a weekend, as houses are  
23 torn down and rebuilt on larger footprints. The DEIS  
24 needs to be rewritten to consider the updated tree  
25 code.

1 I'm especially concerned, from where I  
2 live, about how the removal of large trees will impact  
3 the wildlife in Bridle Trails. I live a five-minute  
4 walk from the Bridle Trails State Park and have seen  
5 deer, bobcats, bear -- I've heard of the bear -- barred  
6 owls, bald eagles, coyotes, raccoons, and numerous  
7 other birds in my yard and using the trails surrounding  
8 my yard. I'm aware of cougar sightings in the state  
9 park.

10 I've also heard the park rangers say  
11 that the state park is, quote, "a perfectly balanced  
12 ecosystem." Does the DEIS rigorously address what will  
13 happen to the wildlife and trees when you permit  
14 greater development in Bridle Trails? Bridle Trails is  
15 currently considered a rural neighborhood by the City.  
16 Where would the wildlife go when you cut down their  
17 homes? Have you studied the impact of noise on  
18 wildlife?

19 The DEIS needs to be rewritten to  
20 rigorously consider the impact on the state park and  
21 the entirety of Bridle Trails.

22 DON MARSH: I'm Don Marsh. I live at  
23 4411 137th Avenue Southeast.

24 Good evening. My name is Don Marsh, and  
25 I am speaking tonight on behalf of the nonprofit

1 organization 300 Trees, which I founded to distribute  
2 thousands of free native trees to Bellevue residents,  
3 schools, houses of worship, and small businesses.

4 I recently served on the Bellevue 2044  
5 strategy team, providing input regarding the  
6 comprehensive plan update.

7 We commend Bellevue for its effort to  
8 thoughtfully address our city's housing and traffic  
9 challenges through the comp plan update. However,  
10 given the importance of Bellevue's urban tree canopy in  
11 maintaining the health of residents and the ecosystem,  
12 the beauty of our city in a park, the mitigation of  
13 climate issues such as summer heat islands and winter  
14 flood risk, we must ask why the DEIS avoids any  
15 quantitative analysis of tree canopy impacts?

16 It seems obvious that the different  
17 growth alternatives described in the DEIS would have  
18 varying impacts on the tree canopy.

19 For example, increasing the zoning  
20 density in parts of Cougar Mountain or Bridle Trails,  
21 as envisioned in at least one of the alternatives,  
22 would require removal of hundreds or thousands of  
23 trees. That might be a sacrifice we are willing to  
24 make to achieve other goals, but without a shred of  
25 information about the trade-offs, the DEIS leaves us

1 blind in an area that most Bellevue residents care  
2 deeply about.

3           The DEIS evaluates the alternatives' impacts  
4 related to land use compatibility, air quality, noise,  
5 and aesthetics. The document concludes that these  
6 impacts would be similar for each of the alternatives;  
7 however, each of these metrics would be impacted by the  
8 tree canopy and therefor some alternatives might be  
9 more attractive than others if a credible analysis of  
10 tree canopy is done.

11           We ask that tree canopy impacts be considered  
12 in the final EIS or a supplemental EIS. For the sake  
13 of our city and future generations, we need to have a  
14 unifying vision regarding the importance of a healthy  
15 tree canopy and a shared understanding of what kind of  
16 tradeoffs will be allowed between trees and  
17 development.

18           If too many trees are removed, it's not just  
19 trees that would be harmed; the quality of our lives  
20 and the lives of our kids and grandkids would also be  
21 diminished. Thank you.

22           JOHN DARVISH: My name is John Darvish.  
23 I live in 7835 Southeast 42nd Street in Mercer Island,  
24 98040.

25           Hi. My name is John Darvish, and I'm

1 here to speak to the three alternatives that the  
2 committee has determined. I want to express my support  
3 for the Alternative 3 with respect to Wilburton area.  
4 I can only speak to that because that's been the area  
5 of interest for me.

6 We have owned a business and have owned  
7 a property in the area that's under consideration for  
8 the past 20-plus years, and we have been following this  
9 development very closely. And I can tell you that we  
10 are all really excited about the possibilities that it  
11 will create.

12 One of the things that I think it would  
13 add to the life of the residents of Bellevue is to be  
14 able to gather together in an environment and meet and  
15 greet with each other. And I think this alternative  
16 would create that, concentrating the residential  
17 around the TOD would be an amazing opportunity for  
18 people to get to know each other as well as creating a  
19 community in Bellevue.

20 I think by allowing the mixed-use area,  
21 extending it all the way to north Bel-Red Road, I think  
22 we may lose some medical office buildings in that area,  
23 but I think we can supplement that by looking at the  
24 area that's north of Bel-Red, on 116th, and to see how  
25 we can up-zone that area to create some more dense



1 medical office buildings there.

2 I think that's about all I have. I just  
3 didn't really prepare for anything, but I think that's  
4 all I have. Thank you so much.

5 KATE SAYERS: Kate Sayers, 832 170th  
6 Place Northeast, Bellevue 98008.

7 All right. My question is, number one,  
8 do the assumptions about 70,000 new workers in Bellevue  
9 still hold, given what's happening with COVID?

10 Why aren't there more variable heights  
11 in the EIS around Wilburton rather than making  
12 everything standard throughout the thing? I would like  
13 to see tall buildings, low buildings, and everything  
14 mixed up.

15 I would like to see stacked housing for  
16 people so that there are no stairs for seniors.

17 I would like to see a driverless train  
18 connecting the area with that area in Wilburton but  
19 also with downtown.

20 I would like them to buy the Tech Center  
21 so we can use that for housing and keep the park as-is.

22 I would like the City to develop an  
23 ownership and equity program so low-income people can  
24 buy housing and develop equity.

25 I would like to see more multiuse around

1 schools, six-story apartments, et cetera.

2 I would like the area around Somerset  
3 and Bridle Trails to have more density. Specifically,  
4 I'd like red density coming down Highland Drive, and  
5 I'd like transit added there.

6 I want to make sure that all trees are  
7 protected.

8 I don't see density as being put in  
9 high-income areas, and I think that's a big disservice  
10 to normal people.

11 I would like the City of Bellevue to  
12 insist that all City workers live in the city and pay  
13 them enough so that they can.

14 I think the land density use is not  
15 appropriate. And given that we're all going to have  
16 ADUs, I'd like to see a more bold and less boring  
17 practice.

18 I'd like to see tall housing around the  
19 golf course and around some of the other parks we have  
20 in the city.

21 I'd like to make sure that COVID has not  
22 changed the work patterns entirely so that we have  
23 livable areas that are smaller where people who are  
24 working from home can go.

25 I would like to see more rezoning,

1 especially around the well-served housing areas.

2 I'd like to see mandatory housing in any  
3 building that is an employer building. I'd like to see  
4 those apartments made to be bought so that people can  
5 have equity, and that every building that we have in  
6 downtown Seattle has housing for low-income people that  
7 they own.

8 Oh, one more comment. I don't think the  
9 City program is bold enough. I think it's more of the  
10 same old claptrap. I don't think they're innovative or  
11 creative, and I think they need to rethink this whole  
12 thing.

13 WALTER SCOTT: My name is Walter Scott.  
14 My address is 400 112th Avenue Northeast,  
15 Suite No. 230, Bellevue, Washington 98004.

16 I am in the commercial real estate  
17 business. We have two properties that are relevant in  
18 this case. One is five acres across the street from  
19 Bellevue City Hall between 6th and 4th Street, along  
20 the freeway, along the west side of the freeway. And  
21 our second property actually has more relevance to  
22 Wilburton because it's in Wilburton, and it's across  
23 the street from Overlake Hospital. It's also five  
24 acres.

25 And my comments are not necessarily

1 about those properties, other than to say that, in  
2 general, I think it's important that the City allow for  
3 more freedom of the developers to choose the uses  
4 within certain guidelines. Because the developers have  
5 a vested interest, they're going to be the ones making  
6 the investment, and they have to pay for that  
7 investment.

8 And so there's some examples I can give  
9 of controls gone awry, like there's some retail in  
10 Bellevue that got built recently, like in the last  
11 10 years, where they don't allow some kind of medical  
12 uses but they allow others, which is confusing to the  
13 market and to the developers.

14 And I just want to make the point that  
15 wherever the City can give flexibility on uses and  
16 provide incentives for doing what they want to do --  
17 what they want people to do, and maybe disincentives  
18 for less density, for things they don't want people to  
19 build, that may be the way to handle it, as opposed to  
20 strictly saying it's prohibited.

21 And I think that retail is the glue that  
22 holds all neighborhoods together. And my example is  
23 Old Main. It's heavily, heavily retailed by  
24 independent locals, for the most part, and it works  
25 really well. It's an exciting place to go. And I'd

1 like to see that happen along 6th Street, from 405 all  
2 the way -- or actually, from City Hall across from 405  
3 all the way to 120th.

4                   There happens to be some room in between  
5 Uwajimaya and Mutual Materials for bike trails --  
6 mountain biking trails with a down-route and an  
7 up-route. It could be a real amenity, not only for  
8 people who are using their bikes to get to and from  
9 work, but they're also using their bikes to have free  
10 time.

11                   (Concluded at 8:00 p.m.)

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## C E R T I F I C A T E

STATE OF WASHINGTON )  
 ) ss.  
COUNTY OF SNOHOMISH )

I, Sierra Zanghi, Certified Court Reporter in and for the State of Washington, reported the within and foregoing hearing on Thursday, June 1, 2023; that pursuant to RCW 5.28.010 the witnesses were first by me duly sworn; that said hearing was taken by me in shorthand and thereafter under my supervision transcribed; and that the same is a full, true and correct record of the proceedings including all testimony and questions, answers, and objections, if any, of counsel.

I further certify that I am not a relative or employee or attorney or counsel of any of the parties, nor am I financially interested in the outcome of the cause.

This transcript and billing has been prepared/submitted for final preparation and delivery in accordance with all Washington State laws, court rules, and regulations.

Rules regulating formatting and equal terms requirements have been adhered to. Alterations, changes, fees, or charges that violate any of these provision are not authorized by me and are not at my direction or with my knowledge.

IN WITNESS WHEREOF I have set my hand this 13th day of June, 2023.

*Sierra Zanghi*  
SIERRA ZANGHI, RSR,  
WA CCR NO. 22004202



# **Public Comment Meeting - Day 2**

**In re: City of Bellevue's Comprehensive Plan Update**

**May 23, 2023**



**206.287.9066 | 800.846.6989**

1325 Fourth Avenue, Suite 1840, Seattle, Washington 98101

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CITY OF BELLEVUE

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City of Bellevue Comprehensive )  
Plan Periodic Update and Wilburton )  
Vision Implementation )  
Draft Environmental Impact ) File No. 22-116423-LE  
Statement (DEIS) )

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PUBLIC MEETING  
PUBLIC COMMENT PORTION

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Taken at Crossroads Community Center  
16000 Northeast 10th Street  
Bellevue, Washington 98008

DATE TAKEN: May 23, 2023, at 6:00 p.m.

REPORTED BY: Sierra Zanghi RSR, CCR 22004202

BELLEVUE, WASHINGTON

TUESDAY, MAY 23, 2023

6:00 p.m.

--oOo--

KRISTINE LINN: So my name is Kristine Linn, and I work at 9 Lake Bellevue.

And I'm really excited about the development plans all over the City, but mostly I'm excited about transit-oriented housing. I live in Seattle, and when the light rail came through, it just revamped our neighborhoods near, you know, like, the three-block area around the light rail with all kinds of new housing and different, like, condos but also apartments, low-income housing, and cafes, mixed-use. And now those are amazing neighbors that are connected with light rail.

And so I'm really hopeful that that kind of development can happen around the new light rail in Bellevue too, because it just -- it's made community, I feel like, in South Seattle, and it could do the same thing on that side of Bellevue; so.

But very specifically, to the plans, I think that only the third option, I think, out of the three has increased development around Lake Bellevue, and that's right at the light rail station. So I think

1 that that plan to develop that area should be in all  
2 three options for more housing and kind of focusing on  
3 right there at that station. So that's my input.

4 DAVE PLUMBER: My name's Dave Plumber.  
5 I live in Bellevue.

6 Okay. What I'd like the City to do is  
7 to publish information that explains where they got the  
8 numbers for jobs and housing units in the three action  
9 alternatives. They came up with those numbers somehow;  
10 so I'd like to get some information like studies,  
11 reports, something, put into the EIS that shows where  
12 those numbers came from. Okay. Thank you.

13 CLIFFORD CAWTHON: So my name is Cliff  
14 Cawthon. I'm the advocacy and policy manager for  
15 Habitat for Humanity, and we're based in Renton. And,  
16 fun fact, I actually teach part-time at Bellevue  
17 College; so I'm here quite frequently. And I'm really  
18 happy with the outreach that the City of Bellevue is  
19 doing, really grateful to be welcomed here.

20 And so we, as an organization, support  
21 Alternative 3, that we think it's the best way forward  
22 when it comes to not just building affordable housing  
23 and setting the stage for a more inclusive city, but we  
24 also urge that the City pursue Alternative 3,  
25 particularly because these mixed-use centers create a



1 great opportunity to create more affordable housing for  
2 more people at a time where our entire region just  
3 really needs it, and Bellevue is a hub of the Eastside.

4 But also, spreading that throughout the  
5 city will also, or spreading density throughout the  
6 city, will eliminate the kinds of patterns of  
7 residential segregation we've seen historically, as  
8 well as, you know, fully utilizing the value of the  
9 increased heightened neighborhood centers with a  
10 variety of different affordable housing tools,  
11 everything from inclusionary zoning as well as using  
12 fee-in-lieu tools will allow the construction of more  
13 affordable housing. So with affordable housing,  
14 obviously I've mentioned several times, it needs to be  
15 a priority.

16 And with that, in terms of the EIS, that  
17 we would definitely like to see displacement quantified  
18 in the DEIS, because we want to be clear that when  
19 we're talking about economic displacement, we're  
20 talking about people who have been either  
21 disenfranchised or who are economically disadvantaged  
22 people like many of our homeowners who are now living  
23 as homeowners in many of our developments.  
24 Particularly, you know, we have development over here  
25 at Holy Cross where we are working with community to

1 develop affordable homes for folks.

2                   So to sum it all up, that Bellevue, in  
3 this process, can chart the way, utilizing all these  
4 tools as well as non-profit owned land for affordable  
5 housing as well and, you know, including duplexes and  
6 triplexes and cottage housing, all the way up to the  
7 four- and six-plexes, albeit affordable, new transit in  
8 order to build on the requirements in 1110.

9                   Because right now, we have a city where  
10 about 89 percent of the people who work here do not  
11 live here. In order to become a livable, vibrant,  
12 inclusive city and make sure that housing security is  
13 more of a reality for more people, that we should -- I  
14 encourage the City of Bellevue to move boldly ahead.

15                   DAN RENN: I'm Daniel Renn. I live at  
16 603 129th Place Northeast, in the middle of Wilburton.

17                   First comment is that I wish we would  
18 call it the "Wilburton Commercial Area" or "Wilburton  
19 West Edge," because when people talk about the  
20 "Wilburton vision implementation," everybody in my  
21 neighborhood panics that you're going to change our  
22 single-family homing area. And all we're talking about  
23 is "Wilburton West Edge." I was on the CAC back in '17  
24 and '18 when we discussed that, and we tried to be very  
25 careful about calling it the "Wilburton Commercial

1 Area."

2                   The second thing I'd have to say is that  
3 back in about 1980 or so, when the City Hall was down  
4 where the Lexus dealer is, I was involved with City  
5 Council talking about the same kind of thing we're  
6 talking about today. And they said, "Oh, well, we have  
7 to have more development. We have to have more  
8 businesses. We have to have more housing to keep our  
9 tax rate lower."

10                   And my comment at that time was, "Are  
11 you trying to tell me that the tax rate in Manhattan is  
12 lower than the tax rate in Fall City?" I don't believe  
13 that's true. I think we're pushing more towards  
14 Manhattan and less like Fall City. It will make it a  
15 less desirable place to live and less like Bellevue  
16 should be. We've got so much commercial going on that  
17 we can't manage it all now.

18                   And the other thing is that our transit  
19 system is underutilized and probably overbuilt and not  
20 going to be developed. We need to have parking places  
21 for all the cars that the people have in their  
22 apartments, and the idea of building apartments with  
23 200 apartments and 150 parking places is not  
24 satisfactory. We have to have enough parking for all  
25 the apartments, because many of these apartments are

1 going to have two cars in them, not just one, and  
2 certainly not a half.

3 That's really my comments for today.  
4 And as I say, I was on the Citizens Advisory Committee,  
5 I know what's happening in Wilburton's West Edge. And  
6 I understand that we need some development and some  
7 increased population, but we don't push it too far.  
8 Thank you.

9 ALIA ATWELL: I am Alia Atwell. I live  
10 at 541 166th Avenue Northeast.

11 And I just wanted to say how excited I  
12 am by the second and third alternatives, because I see  
13 the importance of increasing density even in my  
14 single-family area.

15 I think it's really important because we  
16 just don't see people on the streets anymore. Like,  
17 there's not -- there's not children playing, and that  
18 means our schools get shut down. And, like, because  
19 it's kind of shutting out, like, who can live there,  
20 because my house has doubled in price in the last  
21 six years since I bought it. There's -- it's outside  
22 of the price range that I would look for if I were  
23 searching for a home again.

24 And so unless we increase housing, then  
25 we continue to have that problem. And unless we

1 increase the density of that housing, you can't get the  
2 purchase prices low enough for most people. And when  
3 most people can't live there, the only people who move  
4 there are people also like me, who are double-tech  
5 incomes and don't have kids and don't, like, get as  
6 involved with community and, you know, tend to stay a  
7 little bit more isolated.

8 And then that breaks down the community,  
9 and the community becomes isolated, and then the people  
10 who move there extra don't want to be involved with the  
11 community because it's a cycle that creates a community  
12 that's not advantageous for us, going into the future.

13 I really appreciate everything that  
14 people are doing to increase the number of people who  
15 can live here, the people who can live here from  
16 different backgrounds, and really restart that cycle of  
17 where people can move in, people can care for their  
18 families, which means they can get involved with the  
19 schools here, they can be involved with the local area,  
20 we support more diversity of businesses, you know, all  
21 the great restaurants and cafes we're, you know,  
22 getting from being so multicultural, you know, that  
23 further drives more people to want to live here, and  
24 that's how we make a really positive community in a  
25 place like Bellevue that is never going to not be



1 urban. We just are urban. So, like, we should act  
2 like it. And so I appreciate that.

3 MATT GARDNER: My name is Matt Gardner.  
4 I live at 161 165th Avenue Northeast in Bellevue.

5 And as far as what we've seen today, I'm  
6 most interested in Option 3. I like to see more mixed  
7 use. I like that there is housing around the lake in  
8 that option.

9 More broadly, I think what they're  
10 looking to do in Wilburton is great. You know, I'm in  
11 support -- the whole neighborhood looks like it's going  
12 to be really cool.

13 I'd really like to see more small  
14 commercial stuff spread throughout the city, in  
15 addition. I think that's one of the things that we are  
16 missing most. I imagine that's probably not something  
17 that's been, you know, one of the things they studied  
18 in the Environmental Impact Plan, and I know doing that  
19 is a lot of work, and I'm not trying to suggest slowing  
20 down and redoing all of that.

21 But I think, you know, if people could  
22 get to more things that are much closer to their house,  
23 that's going to reduce traffic congestion, maybe even  
24 get them out of their cars entirely for a lot of trips.  
25 And I would love to see that in the City of Bellevue.

1                   LORETTA LOPEZ: My name is Loretta  
2   Lopez. I'm here to represent the Bridle Trails  
3   Community Club. The address of the club is 6619 132nd  
4   Avenue Northeast, No. 193, Kirkland, Washington 98033.

5                   Our comments concern the issues that are  
6   not addressed in the DEIS. And the Bridle Trails  
7   Community Club, BTCC, requests that the DEIS be revised  
8   to address the issues and reissued with that  
9   information.

10                  The main issues that have not been  
11   addressed are, No. 1, the passage of HB 1110 that was  
12   signed into law by Governor Inslee on May 8th, 2023,  
13   and that bill overrides local zoning. It fundamentally  
14   changes the way zoning has historically been  
15   addressed -- significant, major change.

16                  The DEIS was prepared in advance of the  
17   passage of that bill. That bill has not been analyzed,  
18   I think, by most people. And as in the case with new  
19   legislation, it requires an attention to detail and the  
20   assessment of many issues, including unintended  
21   consequence and loopholes. Since this was passed into  
22   law on May 8th, it's almost impossible that that has  
23   been done by the City. Perhaps the City has done that,  
24   and if so, it should be stated in the DEIS.

25                  The alternatives that have been

1 presented in the DEIS need to be revised or they need  
2 to address the changes that are going to be required by  
3 HB 1110, including the no-action alternative, and that  
4 has not been done. And that is a significant  
5 deficiency in the DEIS.

6 No. 2, on the issue of COVID. I haven't  
7 read every word in the DEIS; however, in my review of  
8 it, I don't see that there has been any consideration,  
9 or not much consideration, of the changes that COVID  
10 has brought to the entire world and that the world has  
11 changed. So the numbers and the data that's used to  
12 determine how many people would be commuting downtown,  
13 how many would be living here and there -- that has not  
14 been addressed in the DEIS and is another deficiency.

15 In addition, the City is going to change  
16 its tree code, and the tree code has not been addressed  
17 in this DEIS. Thank you.

18 (Proceedings concluded at 7:56 p.m.)

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## C E R T I F I C A T E

STATE OF WASHINGTON )  
 ) ss.  
COUNTY OF SNOHOMISH )

I, Sierra Zanghi, Certified Court Reporter in and for the State of Washington, reported the within and foregoing hearing on Tuesday, May 23, 2023; that pursuant to RCW 5.28.010 the witnesses were first by me duly sworn; that said hearing was taken by me in shorthand and thereafter under my supervision transcribed; and that the same is a full, true and correct record of the proceedings including all testimony and questions, answers, and objections, if any, of counsel.

I further certify that I am not a relative or employee or attorney or counsel of any of the parties, nor am I financially interested in the outcome of the cause.

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Rules regulating formatting and equal terms requirements have been adhered to. Alterations, changes, fees, or charges that violate any of these provision are not authorized by me and are not at my direction or with my knowledge.

IN WITNESS WHEREOF I have set my hand this 6th day of June, 2023.



SIERRA ZANGHI, RSR,  
WA CCR NO. 22004202



Count	Submitter	Organization	City	State	Text Comment (if applicable)
1	Pinda Bazley		Bellevue	WA	<p>(Comment on City of Bellevue Comprehensive Plan 2044) My name is Pinda Bazley, 13615 NE 48th Pl, Bellevue 98005 in the Bridle Trails Neighborhood. I also want to be a "party of record".</p> <p>1. I am concerned that the DEIS does not consider the impact of the recently passed House Bill 1110. The impact of this is not yet known as it has only just been passed into law. More time is now needed for the City to assess the impact of HB 1110 in DEIS Alternatives 0-3. As the DEIS is written today, alternative 0 will need to be completely rewritten. A new DEIS is needed so residents can review and comment on the current reality, rather than how things used to be.</p> <p>2. I am concerned that the DEIS does not fully consider the impact of the Covid Pandemic on work patterns and locations. Many tech staff left their offices to work from home. Some have now returned to their offices part time, yet others remain working from home and yet others have moved out of the city to Eastern Washington. We do not currently know what the future of remote versus office work will be and do not know how many offices and homes will be needed in Bellevue.</p> <p>3. The City proposes to update the Tree Code this year. Bridle Trails already has a stronger tree code, yet significant/landmark trees are cut down (sometimes on a weekend) as houses are torn down and rebuilt on larger footprints. The DEIS needs to be rewritten to consider the updated Tree Code. I am especially concerned about how the removal of large trees will impact the wildlife in Bridle Trails. I live a 5 minute walk from the Bridle Trails State Park and have seen deer, bobcats, bear, barred owls, bald eagles, coyotes, raccoons and numerous other birds in my yard and using the trails surrounding my yard. I am aware of cougar sightings in the State Park. I have also heard the park ranger say that the State Park is a perfectly balanced ecosystem. Does the DEIS rigorously address what will happen to the wildlife and trees when you permit greater development in Bridle Trails? Bridle Trails is currently considered a rural neighborhood by the City. Where will the wildlife go when you cut down their homes? Have you studies the impact of noise on wildlife? The DEIS needs to be rewritten to rigorously consider the impact on the State Park and entirety of Bridle Trails.</p>
2	Sherri Anderson	Law Offices of Sherri M. Anderson Inc PS	Bellevue	WA	<p>*Thank you for letting me comment on the DEIS for the Comprehensive Plan. I want to comment about the Wilburton Vision. I support maximizing TOD opportunities around the new Light Rail Station. TOD is the smart way for the City to grow. I am one of the owners at the Nine Lake Bellevue Office Condominiums. Our parking lot is right next to the new Light Rail Station. It should be planned for intense TOD. A big surface parking lot right next to the station is a lost opportunity for smart development. Sherri Anderson</p>



3	Tobi Maggi	Vanir Construction Management Inc.	WA	<p>2.Hello - I'm an Affordable Housing Advisory Committee member for CIRC, formerly called DASH, an affiliate of Transforming Age. I'm advocating for alternative 2 overlay on two of our locations in the Wilburton Vision Implementation. Our agencies are committed to increasing access to affordable housing at its locations Evergreen Court Retirement, 900 124th AVE NE, and Glendale Apartments, 12640 NE 10th PL, through a future redevelopment. Additionally, Transforming Age made a significant commitment to this redevelopment under a contract acquisition of a third contiguous lot located at, 12520 NE 10th PL, which I'm advocating to include in the Wilburton study area with alternative 2 overlay. While a redevelopment is several years away, the City has a unique opportunity to achieve great gains in reaching its affordable housing targets and responding to Wilburton's neighborhood preference to develop more housing, by supporting a height variance of 16 stories for these locations. I appreciate the City's work, and consideration in overlaying alternative 2 height variance on these two properties.</p>
4	Sue Harms			<p>Do not build any further! Our infrastructure can't handle it!!!! When a 10min commute has turned into an hour to an hour an a half... the quality of life in this community has now become a disgrace!</p>
5	HOWARD EDWA	BehaveNet Inc	Bellevue WA	<p>After attending numerous meetings and reading the materials connected with the proposals, as well as looking at the downtown areas of Redmond and Kirkland, it is my opinion that Bellevue should implement a slow to moderate approach to growth and development. I feel that the growth proposed in the first alternative proposal provides significant increase in both housing and jobs. Yet there is less chance of over-building and irrevocably ruining the environment along the way with this plan.</p>
6	Laura Balent		Bellevue WA	<p>After attending numerous meetings and reading the materials connected with the proposals, as well as looking at the downtown areas of Redmond and Kirkland, it is my opinion that Bellevue should implement a slow to moderate approach to growth and development. I feel that the growth proposed in the first alternative proposal provides significant increase in both housing and jobs. Yet there is less chance of over-building and irrevocably ruining the environment along the way with this plan.</p>

7	Tenzin Zhedon	Kirkland	WA	After reviewing the policies as well as the alternatives, I have concluded my thoughts on each of the topics; housing, connection, environment, and accessibility. It has become clear that housing is a major worry since relocating from Minnesota to Washington. Upon careful examination of the project's vision and policies, I am able to assert with confidence that the general satisfaction of the people will not be achieved. While the accessibility of affordable housing is on the rise, it is imperative that we remain mindful of the fact that the essence of Bellevue's appeal lies in its family-centric community. As for the environment, The substantial presence of commuters in Bellevue for occupational reasons constitutes a noteworthy factor in the expansion of noise and pollution levels within the area. The adoption of upzoning policies, density augmentation, removal of parking mandates, and streamlining of construction procedures would lead to a significant rise in the number of residential units in the Bellevue region. Consequently, this would facilitate a greater populace while alleviating the adverse effects of vehicular congestion, environmental contamination, and acoustic disturbance.
8	Ryder Wiess		WA	Alternative 3 for the Housing: Diversity and Choice; Alternative 3 has much higher jobs and housing available than alternative 2 yet transit numbers near housing are almost the same. What can be done to improve the transit numbers near housing for Alternative 3? Does the issue reside due to lack of public transit or due to location of housing and lack of transit in said area?
9	Timber Solomon			Alternative 3 I believe is a great option. Allowing growth to be spread out through the city but still focusing on transit and jobs is really important. The growth shown in the study area shows a large amount of new jobs as well as housing units and seeing the idea for the whole city is large. 200,000 jobs coming from this growth would help so many people. SO excited to see what comes from this
10	Mark Nash			Alternative 3 is the only alternative close to inspiring passion for buisenesses and citizens to want to do things in the city. Ship it!
11	Sheli Hadari	Artma Pop-Up	Bellevue WA	Artma Pop-Up is excited about the progress of the Bel-Red Art District. We think it is important to remember that creating an art district in Bellevue can not happen organically because of the lack of affordable rent and facilities in the area. Rather a focused effort has to be made to create the right conditions. In order for artists and art businesses to thrive, we need a leadership that is committed to promoting and sustaining an art district through legislation and financial investment.

12	CHRISTOPHER KINSELLA		Bellevue	WA	As a resident, I care about homelessness and crime. The projected increase in crime under each plan is not discussed. The projected increase in homelessness for each plan is not discussed. Some mention of ARCH and other services for give housing to homeless is discussed, but this does not work and has not worked where implemented. I am left to assume that every measure that increases population in Bellevue and increases access to Bellevue will increase crime and homelessness.
13	Karla Gonzalez				As Bellevue gets more dense and the Seattle area implements on zoning requirements get adjusted (to allow for more affordable housing and a bigger density) I am very worried about protecting the existing trees. The tree canopy is very important, it is beautiful and it is one of the unique things about Bellevue. We need to protect trees inside private property ( size restrictions). Otherwise developers will maximize the land and chop down everything. Thanks
14	William Barnes	Brentwood Lane Property Owners Association	Bellevue	WA	As President of Brentwood Lane (NE48th Place) a smaller Bridle Trails' neighborhoods, I concur with the DEIS comments submitted by the Bridle Trails Community Club. Please make this request as a party of record and send future correspondence regarding City efforts to refine the DEIS.

Bellevue 2044 Draft EIS – comment / Steve Williams, 38 year Wilburton resident – 6/11/2023 It is difficult to evaluate these job and population projections, but one thing is clear, this is a development blueprint, not an Environmental Impact Statement. The environmental consequences are not even looked at, or worse - "no adverse environmental impact" is stated. The population numbers are astounding. Even at 2 persons per household unit in Wilburton, the result is 33 times the current population of 546 stated in Ch. 5-2. ( Alt.1: 9,200 units x 2 = 18,400 people). ( Alt. 2: is worse, 14,200 units x 2 = 28,400, or 52 times current population). In other words, Alt.1 gets us over 33 times the current number of people on our streets, in our schools, stores, and parks; all needing water, sewer, garbage and power; putting huge demands on supply stores, roads, transit, police, fire, medical and library services, etc. Utilizing the US 'urban household average' of 2.6 persons per household, the increase is 23,920 or 43.8 times more people for Alt.1. / If our future has more single employees and retired apartment dwellers, the increase is still over 26 times current population. ( 1.6 x 9,200 = 14,720 ). / In our small, seven house cul-de sac, five houses have new families moved in – with a total now of 7 young children and at least two more expected. With the new law allowing unrelated occupants and 'mega houses' being built, it looks like the Wilburton neighborhood average will be 2.6 or larger.... As a 38 year resident, I still can't envision a life here with 43 to 52 times more people than we have now. Quality of life will suffer. ---  
----- As to environment - the impact will be huge: What is the carbon footprint of 28,000 people? Where will all the water come from? Where will all the waste water and garbage go? Where will the needed power and food come from? How many schools will we need? How can even our sidewalks handle that many people? How can we save park lands? Our trails and parks will be overwhelmed by new people wanting escape from cubicles & city life. Will any native creatures remain with all the disruption, noise, heat, polluted air & water? Where does a person find peace, quiet, solitude, communion with nature? In addition to all the utility and infra-structure questions, I think we need to address the human and emotional needs for freedom of movement, access to nature, 'elbow room' and 'green space.' If there are high-rise, tiny apartments and work spaces, there will need to be adjacent gymnasiums and gardens, playfields and parks. We may need mid-tower school rooms, open courtyards and inside farms and

16 Dale Hutson	Bellevue WA	Bellevue is a forward thinking city, with growth in business, education, parks and shorelines, and many new workers. I am concerned with the new Mid Rise structures and volume of people that it will change the culture of the Old Bellevue, as the small town it was. Over-expanding may be good for the City's mitigation fees, tax bases, but please don't forget the growth can erode the very thing we love about this City. Increasing values of property, taxes, and rent both residential and business need to be considered as we add to this rapid pace of growth. Please be aware of how much growth is needed, unless that is your intention. Dale Hutson
17 Roy McMurtrey homeowner	Bellevue WA	Bellevue should make sure there is most of the train track devoted to a generous walking and bicycling track through Bellevue.. Presently, the tracks and controls of the Transit repair station make the pathway narrow and uncomfortable.



18 Jianxia Gao

Bellevue WA

BELLEVUE'S DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) Jianxia Gao 12806 NE 2nd st, Bellevue, WA, 98005 6/11/2023 Dear Ms. Stead: Please include me as a party of record. Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. The Wilburton subarea and its residents are dedicated to protecting, restoring, and enhancing the character and livability of Wilburton, including the Kelsey Creek Watershed system. Natural elements play a vital role in enhancing the quality of life for Wilburton residents, and the Kelsey Creek Watershed Basin system, and all of its other basin streams such as Goff stream, sub-tributaries, and wetlands flowing throughout Wilburton. King County's DRNP Water Quality Index rated Kelsey Creek at NE 8th with a "Moderate" score, and its Oxygen levels, a "Poor" rating score. As a resident of Wilburton, I support the inception of the Wilburton/NE 8th Subarea Plan Goals: "Wilburton/NE 8th Subarea Plan Goals · To separate residential, recreational, and open space areas from commercial areas and to protect space. · To improve pedestrian accessibility and attractiveness of commercial areas for residents of Bellevue. · To support the provision of commercial services in Wilburton that complement Downtown..." and: "...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues." I also support the following Land Use Policies and aligning with the Wilburton/NE 8th Subarea Plan: "...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas. and are committed to supporting policies protecting and preserving Wilburton's Natural Determinants Policies. The natural environment in our Wilburton neighborhood plays a crucial role in providing a sense of well-being. Natural Determinants Policies: "Policies POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin. POLICYS-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek. POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan." Wilburton is home to many animals that fall into Washington Fish and Wildlife's priority and endangered habitat and species. They include the Great Blue Heron, the Bald Eagle, Chinook Salmon, Coho Salmon,

19 Steve Jamieson

Bellevue WA

Bicycles. We need to think about what makes sense. First, the idea that bicycles are going to reduce traffic congestion or provide a sustainable 'low carbon' alternative is not feasible. The number of people who will choose to commute by bike is minimal and will make no difference. In fact, bicycles contribute to traffic congestion when they ride on roads intended for cars. Bicycles are primarily for RECREATION, and the plan should be focused on that. Separate bicycle paths should be provided for safety, and in fact, bicycles should be DISCOURAGED from riding on roads with cars. You would not expect people to do Zumba in the middle of a highway, so why do we allow recreational riders to disrupt our traffic? I am a recreational biker, and really appreciate our local trails and how interconnected they are, but I avoid riding on roads at all costs, it is just too dangerous.

20 Julie Beffa

Bellevue WA

Comment on Draft Environmental Impact Statement/Bellevue 2044 Comprehensive Plan: My priority in commenting on the DEIS is to implore you to consider 1. the negative environmental impact on the city Tree Canopy that is diminishing because of weak tree code enforcement and protection and 2. the need for clarification of quantitative analysis of this impact. I see nowhere in the any of the Alternatives that any detailed study will be included to preserve/protect/growth one of the most vital parts of any city in a growth stage. It is apparent that the City has chosen to avoid the subject of the obvious benefits trees provide, especially in a DT core area and where higher density is proposed. No part of any of the Alternatives for housing and job growth are specifics for tree canopy growth or destruction of, included. After reading the Alternatives proposed, I could not endorse any of them without concrete numbers, data and an effort to present mitigating factors of losing more canopy for the sake of growth. Growth for growth's sake is not a good choice and I have the feeling that the city is bent on development of more citadels of cement. In this momentum for growth, the city is sacrificing air quality, building fewer parks with more trees not just open spaces, contributing to more traffic and finally as a result, producing less healthy communities. Why has the city been so keen on allowing developers/builders, residential and commercial, to build what they want, where they want? It is so disappointing to see the results of so much unaffordable housing spiraling upward, taking away our sidewalk sunshine and creating vertical pillars in place of friendly neighborhood streets where people actually speak. Building housing density within existing single family neighborhoods is not the answer either. With the new paradigm of employees working from any place in the world, this overreach of building "affordable housing" wont' need to be because there is already an over-abundance of empty real estate office space. This 2044 Plan is way too aggressive and way too expensive. None of the Alternatives are necessary. But what is most worrisome is the omission of any tree canopy protection in any of the proposals. Please consider revising this position. All communities deserve the benefits of what trees provide. Hazardous materials in concrete can cause health issues, not to mention soil erosion, water pollution and flooding. Nothing was noted of these negative environmental factors in the DEIS that I read. Thank you. Julie Beffa

21 Chris Marks

Bellevue WA

Comments Comprehensive Plan DEIS #2 The City's commitment to reducing greenhouse gas emissions by 50% by 2030 is not sufficiently analyzed or addressed in the Comprehensive Plan. The Washington Department of Commerce's Climate Element Review Group has been working on an optional Climate Element section guideline for Comprehensive Plans that should be included in the final EIS for Bellevue. Link From the Department of Commerce's website: "The Washington Department of Commerce is developing a model element to help cities and counties address climate change in their comprehensive plans. The model element will include mitigation (greenhouse gas reduction) and resilience (climate impacts preparedness, response, and recovery) planning guidance, as well as a model chapter with goals and policies (Menu of Measures) that communities may voluntarily adapt or adopt into their comprehensive plans as part of their periodic update. The model element — described in the 2021 budget [Section 129 (126)] — must be completed by June 2023 and must integrate input from fellow state agencies and other partners." The draft Guideline and development timeline can be found here: 1. Draft Guideline – post as of May, 2023 2. Development Timeline - The initial products – the model elements – are due by June 30, 2023. Bellevue should adopt this guideline into our Comprehensive Plan even if this requires us to be a pilot city. The preferred Alternative should be analyzed on its ability to meet our climate goals using this Guideline and appropriate mitigations should be outlined in the Final EIS. Included in the Final EIS should be numerical estimates of future GHG emission metrics along with the key actions and mitigations that will enable us to achieve those measurable targets. The final Comprehensive Plan should not be adopted without full confidence that our climate goals will be met. The timing of the final EIS should be modified to allow time for the inclusion of this planning element, and the schedule for completing and adopting the Comprehensive Plan should be modified accordingly. Bellevue should stand out as a large municipality who is taking climate action seriously. Thank you!

22	al dietemann	none	BELLEVUE WA	<p>Comments on Bellevue 2044 draft EIS by Al Dietemann May 11, 2023 The growth drunk City planners believe growth will never end and recession isn't possible. They have little recognition or historical memory of what a major downturn in the tech sector would mean to the City in terms of jobs and housing. Examine the City's employment statistics and note that Bellevue does not have a diverse employment base, it is mostly technology, retail, and services. Manufacturing, government, military, and other recession proof employment is almost non existent. When a big tech downturn happens, and it most certainly will, the City population and housing will rapidly empty out. Nothing in the EIS recognizes a recession scenario. The EIS fails to consider future demographic changes. Twenty-five percent of Bellevue residents are already over age 55. Many older folks will be leaving Bellevue, they are being taxed and priced out of the housing market. Others will leave to escape the growing traffic and high density life style they don't appreciate. Many retired seniors won't be able to afford or desire the new high rise construction. Where is the accounting for these type of vacancies in the growth statistics? A similar large percentage of people in Bellevue are young large families who may not be attracted to the high density high rise construction being planned. They need large homes but can't afford them as they are already being priced out of the City's single family homes. The assumption that all this increased population being planned will desire to live in high density multi-story buildings needs to be reexamined. The EIS is building growth scenarios on weak unsupported assumptions without a firm foundation built on public opinion surveys. Consider a growth option where many of the new employees being planned for may not want (or afford) to live in a high density Bellevue. Another aspect needing consideration in the EIS is the demographics of a city population rapidly moving from home ownership to renting. Seattle has more renters than home owners. Bellevue will be there too by 2044. This needs discussion as part of the growth options presented in the EIS. Renters have very different perspectives than homeowners about their communities. The EIS should anticipate and consider the impact of these likely changes. The EIS gives only minimal and token reference to the major problems created by rapid urban growth. Where is the analysis of utility infrastructure needed to support these growth scenarios? Major upgrades will be needed in capacity for water, sewer, fire protection, solid waste, gas, electricity, and cable. These will have</p>
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23 Willam Anderso Bellevue Towers  
Homeowner  
Association

Bellevue WA

Dear City of Bellevue,  
Thank you for seeking input on the Comprehensive Plan DEIS. There are many aspects that I support:  
Continued housing growth to alleviate the housing affordability crisis  
Concentration of growth around public transportation to confer environmental benefits and attenuate traffic congestion  
Improving key recreational corridors and connections to them like Eastrail  
This growth can occur in full and without impediment while also considering a concern I have together with hundreds of fellow neighbors. I live at Bellevue Towers, downtown's largest condominium communities with 1200 residents. Depending on how buildings are situated on the block between 4th & 6th and I-405 & 116th, hundreds of residents from our community stand to lose one of the last remaining views of nature to the East.  
It is completely possible to develop properties to the most intensive alternative in the comprehensive plan and also preserve that small remaining view - by having requirements for siting and massing. Again, this would not lower the developable capacity in any way!  
As an added benefit, this would also enhance eastern views from the proposed I-405 Lid Park as well, so there is a broader public benefit as well.  
A proposal that I and fellow neighbors support is to have slim towers on the northern end of the block, with the tower portion sited as north as possible. Towers on the southern end of the block have a smaller impact but would benefit from a mirror treatment.  
While it may seem small to some, retaining a connection to nature from home is proven to have positive health effects (especially since as Americans we spend over 87% of our lives indoors) and given that this impacts hundreds of residents, I think it is a worthwhile request. Again, I fully support the development to its fullest extent, this is a harmless way to achieve multiple goals at the same time.  
Thank you for considering my and my fellow neighbors' feedback.  
Ed Anderson, President, BoD Bellevue Towers Homeowners Association

24 virginia miller

Bellevue WA

Dear City of Bellevue, I am writing to express my sincere support for the implementation of higher density living solutions within our city. As the demand for housing continues to surge, it is crucial that we prioritize affordable options and ensure accessibility for the many workers at the Microsoft campus. By embracing higher density living, we have an opportunity to alleviate the pressing issue of skyrocketing housing costs while simultaneously providing proximity and convenience for those employed in one of the largest tech companies in the world. Bellevue has witnessed rapid growth in recent years, attracting a significant number of talented professionals seeking employment opportunities in the thriving tech industry. With Microsoft's expansive campus serving as a major employer in the area, it is essential that we develop innovative strategies to address the housing needs of the workforce. Higher density living offers a practical solution by maximizing land use and promoting the construction of multi-story buildings and mixed use developments. By embracing this approach, we can create more housing options within the existing urban fabric of Bellevue, reducing the strain on available land and promoting efficient land utilization. Moreover, higher density living encourages the development of vibrant, walkable neighborhoods that foster a sense of community and social interaction. By constructing housing in close proximity to workplaces, such as the Microsoft campus, we can reduce commute times, traffic congestion, and carbon emissions. This not only benefits the workers who will enjoy a shorter and more sustainable commute but also enhances the overall quality of life for all residents by creating a more sustainable and inclusive city. In conclusion, I strongly urge the City of Bellevue to embrace the concept of higher density living as a viable solution to the pressing need for affordable housing and accessibility for the workers at the Microsoft campus. By adopting this approach, we can foster a more sustainable, affordable, and socially vibrant city that meets the needs of both current and future residents. Thank you for your time and consideration. Sincerely, Virginia

25 Renzee Sto Tomas

Dear City of Bellevue, it's important our city pushes for better access and safety to multi modal transportation to meet its climate change goals and vision zero goals. The recent designs on our streets have all been in favor of making one mode, motor-vehicles, the most dominant. In addition, mixing bicycles and pedestrians with motor-vehicles have been critical in recent years. Please, first reconsider who you're designing streets for: Is it people or cars? Thank you!

26 Anton Babadjanov

Bellevue WA

Dear City of Bellevue, Thank you for seeking input on the Comprehensive Plan DEIS. There are many aspects that I support: • Continued housing growth to alleviate the housing affordability crisis • Concentration of growth around public transportation to confer environmental benefits and attenuate traffic congestion • Improving key recreational corridors and connections to them like Eastrail This growth can occur in full and without impediment while also considering a concern I have together with hundreds of fellow neighbors. I live at Bellevue Towers, downtown's largest condominium communities with 1200 residents. Depending on how buildings are situated on the block between 4th & 6th and I-405 & 116th, hundreds of residents from our community stand to lose one of the last remaining views of nature to the East. It is completely possible to develop properties to the most intensive alternative in the comprehensive plan and also preserve that small remaining view - by having requirements for siting and massing. Again, this would not lower the developable capacity in any way! A proposal that I and fellow neighbors support is to have slim towers on the northern end of the block, with the tower portion sited as north as possible. Towers on the southern end of the block have a smaller impact but would benefit from a mirror treatment. While it may seem small to some, retaining a connection to nature from home is proven to have positive health effects (source 1 below) (especially since as Americans we spend over 87% of our lives indoors (source 2 below)) and given that this impacts hundreds of residents, I think it is a worthwhile request. Again, I fully support the development to its fullest extent, this is a harmless way to achieve multiple goals at the same time. As an added benefit, this would also enhance eastern views from the proposed I-405 Lid Park as well, so there is a broader public benefit as well. Thank you for considering my and my fellow neighbors' feedback. Anton Source 1: <https://theconversation.com/why-daily-doses-of-nature-in-the-city-matter-for-people-and-the-planet-106918> Source 2: <https://nepis.epa.gov/Exe/ZyPDF.cgi/9100LMBU.PDF?Dockey=9100LMBU.pdf>

27	Daniel Deutsch	Bellevue	WA	<p>Dear City of Bellevue, Thank you for seeking input on the Comprehensive Plan DEIS. There are many aspects that I support:</p> <ul style="list-style-type: none"> <li>• Continued housing growth to alleviate the housing affordability crisis</li> <li>• Concentration of growth around public transportation to confer environmental benefits and attenuate traffic congestion</li> <li>• Improving key recreational corridors and connections to them like Eastrail</li> </ul> <p>This growth can occur in full and without impediment while also considering a concern I have together with hundreds of fellow neighbors. I live at Bellevue Towers, downtown's largest condominium communities with 1200 residents. Depending on how buildings are situated on the block between 4th &amp; 6th and I-405 &amp; 116th, hundreds of residents from our community stand to lose one of the last remaining views of nature to the East. It is completely possible to develop properties to the most intensive alternative in the comprehensive plan and also preserve that small remaining view - by having requirements for siting and massing. Again, this would not lower the developable capacity in any way! A proposal that I and fellow neighbors support is to have slim towers on the northern end of the block, with the tower portion sited as north as possible. Towers on the southern end of the block have a smaller impact but would benefit from a mirror treatment. While it may seem small to some, retaining a connection to nature from home is proven to have positive health effects (source 1 below) (especially since as Americans we spend over 87% of our lives indoors (source 2 below)) and given that this impacts hundreds of residents, I think it is a worthwhile request. Again, I fully support the development to its fullest extent, this is a harmless way to achieve multiple goals at the same time. As an added benefit, this would also enhance eastern views from the proposed I-405 Lid Park as well, so there is a broader public benefit as well. Thank you for considering my and my fellow neighbors' feedback. Source 1: <a href="https://theconversation.com/why-daily-doses-of-nature-in-the-city-matter-for-people-and-the-planet-106918">https://theconversation.com/why-daily-doses-of-nature-in-the-city-matter-for-people-and-the-planet-106918</a> Source 2: <a href="https://nepis.epa.gov/Exe/ZyPDF.cgi/9100LMBU.PDF?Dockey=9100LMBU.pdf">https://nepis.epa.gov/Exe/ZyPDF.cgi/9100LMBU.PDF?Dockey=9100LMBU.pdf</a></p>
28	John Van Duzor	Bellevue	WA	<p>Do not eliminate small businesses we need the auto repay and other small retailer/ specialty shops. keep the bell red district as is. No more high rise or apartments.</p>
29	Zhanbing Wu	Bellevue	WA	<p>Doing nothing seems not a good option. Alternative 3 has gone way too far. Between Alternative 1 and Alternative 2, at the high level, the latter seems to make more sense, though the former is acceptable too. One thing I don't see is the focus on safety - unfortunately this has become a big concern, both personal safety and property safety. The city's planning should take that into account, perhaps even the highest priority -- try to mitigate the issue at the planning stage. Thank you for listening.</p>

30	GARDNER MORI Eastridge Partners	BELLEVUE	WA	<p>Eastridge Partners wants to thank Staff for their ongoing support in working with interested parties to ensure we collectively find a win - win solution for the Wilburton rezone. We recognize that this is no easy task with sometimes opposing goals and objectives however all parties acknowledge that change will occur and that we must be prepared to get the maximum benefit for the City, its Constituents and the other Eastside cities. See PDF</p> <p><a href="https://s3-us-west-2.amazonaws.com/comment-tracker-upload/29/11c7c5d0-0951-11ee-8d9f-21e87903da63.pdf">https://s3-us-west-2.amazonaws.com/comment-tracker-upload/29/11c7c5d0-0951-11ee-8d9f-21e87903da63.pdf</a></p>
31	Paul Nienaber	Bellevue	WA	<p>Environmentally, we need to keep our city in its current condition, i.e., well maintained parks, roads, excellent planning etc. We cannot let any public land be used for tenting or 'squatting.' Police must be fully funded so they can respond to the calls we place to them; I have had one experience where the police seemed to fault me for being concerned about an excavation project going on at 3 AM. We need full responses to any burglaries, theft from stores or any unlawful actions. We will not stand by and let the type of behavior that is currently going on in Seattle to go here in our city. Seattle has become the Bain of the conversations I've had with friends from around the country.</p>
32	Katherine Nye	Bellevue	WA	<p>Every person I know, including myself, is unhappy about making Bellevue more densely populated. I fled from L.A. for that very reason. Who is happy about our city becoming packed in like rats? The developers and people who stand to make money. After all, money talks. Why are you allowing Bellevue to be wrecked? I probably won't hear back from you. As for me, we may have to move to avoid this calamity.</p>
33	Paul Perkins	Bellevue	WA	<p>Fig 11-4 Bicycle Network LTS Vision has no bike routes. It should indicate existing routes such as the 520 Physically Separated Bikeway and 120th Ave NE Striped bike lane, etc.. Plus the planned bike routes including estimated completion dates. Also, include the LTS designation for both the existing and proposed bike lanes.</p>



34	Patsy Neher	Bellevue	WA	<p>First of all, two of your hypertext links (to provide feedback) are broken. Please look under "Ways to Comment During DEIS Process." The online portal is broken as well as the virtual meeting registration option. Thank you. I completed the Engaging Bellevue Survey. So, I have provided my overarching thoughts on growth. We have lived in an old SF neighborhood for the last 20 years. We have experienced a lot of growth and changes over the years. Much of it has been positive; however, we have very GRAVE concerns about the Pinnacle South and North projects. It's shocking to learn that Bellevue has allowed such an irrational amount of towers to be built right next to neighbors' homes. Makes me wonder if Bellevue considers existing residents' quality of life at all. As I understand it, both projects do not include green spaces. No public parks, no dog walking parks, barely any open space, and almost zero trees. We live in Bellevue not Shanghai, LA, or NYC. Why does the planning department believe that such an appalling development is suitable for that location in Bellevue? Very disappointed in your planning department. Again, quality of life issues involve a balance of green spaces, preserved natural spaces, and a measured amount of growth. Where are all these new residents going to go for outdoor enjoyment? We only have one large public park in downtown Bellevue. It is shameful, that the planning department has pushed these projects through. Please do better job for existing Bellevue residents. We deserve to be considered along with all the new residents.</p>
35	Grace Carnes	n/a	snoqualami	WA <p>Firstly, I commend the thoroughness of the DEIS in considering the natural, human, and built environment, including the campus. The comprehensive evaluation of these factors is crucial for informed decision-making and responsible planning for the future. I appreciate the efforts made to assess the potential impacts and identify mitigation measures to address environmental concerns. Additionally, I would like to emphasize the importance of considering social equity throughout the planning process. As Bellevue experiences growth and development, it is crucial to ensure that the benefits and burdens of this growth are distributed equitably among all residents. The DEIS should include a detailed analysis of potential social and economic impacts, particularly on disadvantaged communities, to guide policies that promote inclusivity, affordability, and accessibility. In conclusion, I commend the City of Bellevue for undertaking the Comprehensive Plan process and the preparation of the Draft Environmental Impact Statement. I appreciate the opportunity to provide my comments and suggestions. I trust that the city will carefully consider these inputs as it moves forward in finalizing the plan and implementing the proposed land use policy shift.</p>

36	Rachel Hauser		WA	<p>For my comment I would like to focus on a section of Chapter 2: Alternatives, in which I think there could be slightly more clarification on one subject. This chapter starts by briefly describing each alternative, and then later on going more in detail on them. When I first started reading the brief explanation of Alternative 0 (No Action), I was a bit confused about what this alternative meant. It started by listing the positive outcomes of this alternative but no explanation on how we would get there. When I eventually scrolled down to page 11 of chapter 2, I found the more detailed description of Alternative 0 and began reading. Here it explains that this alternative would continue the current Comprehensive Plan last updated in 2015. In this section there are many tables, figures, and data explaining the trajectory of Alternative 0, but it still leaves me with one question. What does Alternative 0 have that the other alternatives don't? And therefore why include this information if it is already accessible in the current Comprehensive Plan from 2015? Scanning through the information it seems there is certainly benefits but not equal to or more than the other alternatives, therefore I am wondering if I am missing something here. This section could use some more clarification.</p>
37	Dan Choi	none	Bellevue WA	<p>For the concern about affordable housing, I share the sentiment that the supply of some housing should be designed with lower income populations in mind, but rather than simply basing eligibility on such housing strictly on low income levels, there should be strong preference for housing to those that are essential workers (healthcare, grocery, restaurant, teachers, police, fire, govt services). One of the things that I find problematic about Bellevue as a community is that all the critical jobs are done by people that travel from far to serve in those capacities. We should do a better job of taking care of those that help keep our city and critical services running, and there is no better way to show that support than through housing support. Thank you for considering.</p>

38	Emma Carlblom	Transforming Age	Mercer Isl	WA	<p>Hello - I'm advocating on behalf of CIRC, formerly called DASH, an affiliate of Transforming Age. I'm advocating for alternative 2 overlay on two of our locations in the Wilburton Vision Implementation. Our agencies are committed to increasing access to affordable housing at its locations Evergreen Court Retirement, 900 124th AVE NE, and Glendale Apartments, 12640 NE 10th PL, through a future redevelopment. Additionally, Transforming Age made a significant commitment to this redevelopment under a contract acquisition of a third contiguous lot located at, 12520 NE 10th PL, which I'm advocating to include in the Wilburton study area with alternative 2 overlay. While a redevelopment is several years away, the City has a unique opportunity to achieve great gains in reaching its affordable housing targets and responding to Wilburton's neighborhood preference to develop more housing, by supporting a height variance of 16 stories for these locations. I appreciate the City's work, and consideration in overlaying alternative 2 height variance on these three properties. See PDF <a href="https://s3-us-west-2.amazonaws.com/comment-tracker-upload/29/86b1fff0-03cf-11ee-b7cf-e94e6c7d9091.jpg">https://s3-us-west-2.amazonaws.com/comment-tracker-upload/29/86b1fff0-03cf-11ee-b7cf-e94e6c7d9091.jpg</a></p>
39	Alicia Hoppers	DASH dba CIRC	Bellevue	WA	<p>Hello - thank you for the opportunity to provide feedback on the DEIS for Wilburton neighborhood. Downtown Action to Save Housing, DASH, has been rebranded as CIRC, an affiliate of Transforming Age. We are in conceptual planning for two of our Bellevue projects; Evergreen Court Retirement, 900 124th Avenue NE, and Glendale Apartments, 12640 NE 10th Place. These properties are promising locations to add more badly needed affordable housing for seniors and families in Bellevue. They have provided this critical resource since our ownership over the last 20+ years. Given the age of the buildings, the Wilburton Vision, and the ever increasing demand for more housing, these are ideal for a redevelopment. We advocate for alternative 2 overlay on these locations to allow up to 16 stories. Additionally, Transforming Age made a significant commitment to this redevelopment by entering into a contract to acquire a third contiguous lot located at 12520 NE 10th Place, which greatly enhances the ability to redevelop our existing two properties, and significantly increase the affordable housing we can develop on these three parcels. We advocate for a boundary modification to include this third parcel in the Wilburton study area with the alternative 2 overlay, as it is the most logical way to bring these three sites together. Lastly, in our planning, we recognize an opportunity to optimize this redevelopment with a future Right of Way modification to vacate NE 10th PL.</p>

40 Court Olson

People for Climate  
Action

Bellevue WA

Hello Bellevue Staff. I'm submitting this comment on behalf of the People for Climate Action Bellevue Chapter's leadership team. In general, we feel the that the Bellevue Comp Plan DEIS is quite light in addressing the city's commitment to cut greenhouse gas emissions 50% by 2030 and 80% by 2050. A 20-year comprehensive plan needs to be pretty detailed and aggressive for the city to hit those commitments. Consequently, PCA Bellevue looks forward to discussions with city staff in the months ahead in developing such climate related details. Through the summer and fall, we suggest that the city staff be watching for further climate related guidance recommendations that will be coming from the WA Dept. of Commerce later this year. FYI, we're informed by Commerce staff that, due to the passage of HB1181 in the recent legislative session, detailed guidelines, including a long checklist of approximately 300 climate related topics for possible inclusion in a city comp plan, is somewhat delayed, but will be issued by the end of this year. In the meantime, with the understanding that we see the need for a great deal more expansion of the comp plan relating to climate change mitigation and resilience, we offer the following comments on the DEIS. 1. ALTERNATIVES: a. Alternative 3 appears to be the most climate friendly option because: i. It more broadly distributes high density growth, rather than concentrating such growth primarily downtown. ii. It allows greater Mixed-Use Areas with residential and commercial density around major transit stops to make it easier for more people to reduce their car trips. iii. It allows greater focus on distributed locations for small convenience commercial developments with a goal of more walkable neighborhoods and the reduced use of cars. iv. It allows more types of lower cost housing options distributed broadly across the city, with a goal of enabling more people who work in Bellevue to live in Bellevue, and thereby reduce long distance commuting. b. Growth must be done wisely and in parallel with other equally important goals - reducing greenhouse gas emissions by 50% by 2030; increasing our tree canopy to 40% city wide; maintaining our excellent quality of life in Bellevue. A summary needs to be provided stating that Alternative 3 can meet these other goals. At adoption, measures and accountabilities should be in place to monitor progress. c. The buildout of Alternative 3 should be done in in a monitored and managed fashion. Growth data should be updated every 2-3 years. Building growth rates could be managed through new building size caps, and density caps, in concert with incentivization of near zero carbon footprint

41 Jennifer Hammond	Bellevue	WA	<p>Hello, I can speak only generally as document navigation is unwieldy. I want to speak in favor of all procedures that keep greenhouse gases and improve public transportation and bike path accessibility. In the Netherlands, the bike paths are also used by citizens in motorized wheelchairs, and that's something I would like to see here. It's a two-for-one benefit. Lastly, I am in favor of accessible housing for those who struggle with finding shelter and believe that there should be an on-site mental health triage to help keep those buildings and surrounding areas safe. It must be feasible for property managers to remove residents who pose a physical threat to themselves or anyone else, and for those residents to get the treatment they need.</p>
42 Rituja Kapoor			<p>Hello, Thank you for all your work and thought for the future of Bellevue. I would like to vote for Option O- Do Nothing. Bellevue has recently experienced significant growth in housing options, not necessarily for all. While several units have recently appeared, most are very high-priced. New developments are likely to be similar. Also, this much development is impacting the natural environmental aspects of our region. Please count my vote for 1)Do nothing as an avenue to stop destruction of the beauty of current region. PLEASE ALLOW THE CURRENT NATURAL BEAUTY OF OUR REGION TO THRIVE.</p>
43 Brooke Mosby	Kirkland	WA	<p>Hi! After reviewing the environmental impact statement I had a main I hope you address moving on. First, the need for affordable housing within Bellevue. In the focus to increase housing units, it is important to acknowledge how cost of living has made affording houses in this area so difficult. Because of this, I hope you also include affordable housing options in this growth. Other than that I really appreciated the mention of eco-friendly alternatives being used.</p>
44 Jeannie Muckle: Jeannie P. Mucklestone PS Inc.	Medina	WA	<p>I am a property owner at 9 Lake Bellevue, and I feel strongly that to benefit the citizens of Bellevue, the City needs to include Lake Bellevue in ALL the alternatives, not just the third one. Our property is unique in that it is closest to the transit station. The citizens of Bellevue would benefit from Transit Oriented Development in the Lake Bellevue area. A rezone of the lake Bellevue area which is closest to the transit station should be considered separately and included in all options to allow people to live and work close to the Transit.</p>
45 michael kenny	medina	WA	<p>I am a property owner in Bellevue. I would like to see more development at Lake Bellevue on Alternatives 1 and 2 to better take advantage of the Wilburton light rail transit station that has been built there. Transit oriented development is efficient and just and therefore should be prominent on all alternatives. Increased density near the Wilburton station will increase the walkability to and from that station. Please consider changing the zoning near Lake Bellevue on all alternatives. Thank You.</p>



46	Nima Foroutan	Nima Foroutan DDS PLLC	Bellevue	WA	I am a small business owner at 9 Lake Bellevue Dr and our parking lot is right next to the new light rail station. I do not see a reason why the properties closest to the new Wilburton Light Rail Station are excluded from two of the three alternatives for TOD in the new Comp Plan? Why is 'high rise' the only option? Having only one option does not make sense. A mix of all kinds of TOD will create a modern and vibrant environment in Wilburton in the long run. Thank you
47	Lisa Peterson	DM Brown Investments/Data Enterprises	Bellevue	WA	I am an Owner's Representative for a condo in the 9 Lake Bellevue building, which is next to the new Wilburton Light Rail Station. The opportunity to comment on Bellevue's Wilburton Vision Plan is much appreciated. Lake Bellevue is a greenery and wildlife oasis in the middle of high-density development and the I-405 freeway. In the 15 years our company has been in the building, we have seen several bird species, fish, ducks and geese, squirrels, and once even otter pups! By contrast, to the north there is the dense Spring District; West is I-405 and downtown Bellevue; East culminates in the Overlake and Crossroads areas, and south are Bellevue's 'Auto Row' and ongoing retail/office infill. We believe that the City of Bellevue's Wilburton Vision Plan options have rightfully left the immediate Lake Bellevue area unchanged, and that it should remain that way. The Lake has much in common with the beautiful Bellevue Downtown Park; while the lake is privately owned, it is a green, peaceful respite from the high-rises, highways and hurry in Bellevue. It provides a restful and quiet space, and we believe it is an essential part of what makes the city so desirable a place to live and work. There are ample opportunities for high-rise and other development areas in Bellevue without changing Lake Bellevue. Thank you again for the opportunity to comment!
48	Vicki Rauscher	9 Lake office Condominium	Shoreline	WA	I am one of the owners of 9 Lake., an office condominium located at lake Bellevue. We are located adjacent to the Wilburton Station. We own a very large parking lot which would be ideal for a Transit Oriented Development due to its close proximity to the station. We have had a preliminary soils test conducted and the report looks very promising for construction. A TOD at this location would be an outstanding model for the City and the Light Rail. Therefore , I encourage you to look at the upzoning for this area because I feel that it has been accidentally overlooked in the past. Sincerely, Vicki Rauscher

49	Debbie Lacy	Eastside For All			<p>I am the Founder and Executive Director of Eastside For All, a local nonprofit organization that advances racial and social equity in East King County. One of the top priorities in all the communities we work with is housing. I'm submitting comments to urge Bellevue to make decisions that are aligned with the first recommendation listed in Bellevue's recently released report on air quality and land use planning: "Apply an equity lens during all planning processes for land use adjacent to high-volume roadways." (p. 44) An equity lens requires that priority is given to people and groups who experience the greatest inequities, the least amount of resources, and the least representation in decision-making. In decisions and policies related to housing, this would generally include renters (as opposed to home owners) and within the group of renters, it would include those who are most at risk for displacement (Black, Indigenous and other people of color), and within that group, it would include those who are the most cost burdened. One key decision under consideration is about land use in close proximity to freeways. With the established health risks well documented in Bellevue's report, I ask for Bellevue to take into account those risks and the disproportionate impact on the populations mentioned above. Avoid increasing capacity for sensitive uses (schools, daycares, and housing) within 500 feet of high volume roadways. You have the opportunity to make a decision which could prevent unnecessary negative health impacts for children, adults, and elders in Bellevue. Please center the needs of people who have the most to lose. Thank you, Debbie Lacy</p>
50	Yuhua Ding		bellevue	WA	<p>I am very concerned about the impact of a denser residential population on environment and on neighborhood security. I urge a more careful technical social reviews of such drastic changes in policy. I also think it is necessary to have more public hearings and a final voting by all residents.</p>
51	Ziad Kalthoum	Bellevue College	bellevue	WA	<p>I am writing to provide my perspective on Bellevue Draft environmental impact statement. I appreciate the opportunity to participate in the and use planning and share my thoughts about the future growth and development of our city. I commend the comprehensive analysis conducted by DEIS, which takes into account all the various factors that in the end influence growth. The evaluation of natural, and built environments demonstrates the commitment the citizen's help will help us shape our future. However, some concerns have risen. To ensure proper use make sure the use of land use shift policy aligns with the principles of social equity. Also, I like to encourage the company to mitigate the potential environmental impacts that could occur if not taken care of, as well as incorporate sustainable practices. I appreciate the opportunity to contribute my thoughts and concerns regarding Bellevue's Draft Environmental Impact Statement. I trust that this comment will be taken care of and under consideration just as every other</p>

52	Mayank Saxena	Bellevue Dentists	Bellevue	WA	I appreciate the opportunity to provide feedback on the DEIS for the Comprehensive Plan, specifically regarding the Wilburton Vision. It is crucial that we prioritize maximizing Transit-Oriented Development (TOD) around the new Light Rail Station as an intelligent approach to the city's growth. As one of the owners at the Nine Lake Bellevue Condominium, I strongly believe that the parking lot adjacent to the new Light Rail Station should be planned with a focus on vibrant TOD. I recommend including mid-rise and high-rise office and residential options in all planning alternatives for the properties surrounding Lake Bellevue, particularly those in close proximity to the station.
53	Ken Stoner		Bellevue	WA	I believe Bellevue has the residents and businesses best interests in mind when planning the next phase for the city with adherence towards the warm, safe city I have come to know over the 52 years I have lived here. I understand the importance of affordable and safe housing for those that need to get a foothold on life, career and family. I believe the large multi- use areas are needed, but there should be limits on the density for allowing this development. Green space is vital, the downtown park is a great example of this. I am confident that the leadership guiding this plan has our safety and the youth of our community in mind when zoning such changes. The older established neighborhoods only serve to create an attractive and %u201Chome town feel of this growing, vibrant, and proud community. Please keep in mind the reason Bellevue has become and is such a great community. Thank you, Ken

54 Heidi Behrens-B Home owner	Bellevue WA	<p>I bought my home in 1972. The last 50 years have been nothing but change ~ some good, some bad. I live at 1844 140th Ave SE in College Hill. It's a small group of houses built over the last 75+ years. A couple of years ago, the Cook property sold to a developer. The city allowed 6 houses with 5' setbacks and removal of nearly all the old trees. The most hideous loss was a glorious old pine with lovely 6" needles whose branches had been shaped by hundreds of delivery trucks passing under it for over 75 years. When I heard the city was not allowing the removal of "specimen trees", I thought this wonderful old tree was safe. I was wrong. The removal of that true "specimen" tree confirmed my suspicion that the City of Bellevue just doesn't care. They don't care about trees. They don't care of about the destruction of neighborhoods. They don't care about us. They only care about developers. All six of those \$3M+ houses are ugly which is not the beef I have with them. Where was the city in the design development phase? Where was the city in allowing these 3000+sf homes to fully fill the property? It is astonishing to me that a person buys a \$3M+ home without the classic backyard for children to play in. Their backyard is a 5' setback does not qualifies as a "yard". Yesterday, I was running an errand. In passing the group of homes, I noticed one of the home owners had put a pair of folding "Slow! Children at Play" signs in the street. My first thought was "mmmm, you spent \$3M on this house and your children need to play in the street? And, in addition to your mortgage, you need to shell out an additional \$50 for a pair of double faced signs." What I wish we had in City Hall is a group of people who put residents first. It is clear, City Hall is supporting these builders to the detriment of our quality of life and the health of our neighborhoods. Taking a spin through Lake Hills and seeing home after home being demolished to make way for builder burgers is discouraging. The scale of these houses is ruining Lake Hills. As homes get demolished and old trees are felled, we lose a lot of the feeling we used to have living in Bellevue. Seeing the "native trees area" set aside on the Kamber Road side of the Cook development is a complete joke. As a woman who actually has trees worth saving, seeing these pathetic "native tree" examples is beyond discouraging. And, to drag in Climate Change into the discussion: we are experiencing hotter and hotter summers here. The thing I've really appreciated about my property is how cool the trees have kept my home. Yes, I don't qualify for solar panels (which I would do in an instant) because of the old trees shading my home and land,</p>
55 Glenn Kalmus	Bellevue WA	<p>I can see where an incremental increase in density may be warranted but this drastic of a change is inviting a significant impact to our community and environment. Having gone thru the arduous process of a short plat ourselves along Kelsey Creek, I just don't see how it is responsible to have this kind of crazy density without an unbiased EIS conducted as to the real negative impact to the water and tree canopies that cannot be mitigated and will forever change the environment that you are suppose to be good stewards of. Please reconsider!</p>

56 Teresa Doyle		Bellevue	WA	<p>I continue to see affordable housing for low &amp; middle income to be a problem. I want to see Bellevue grow in diversity in multiple ways. Luxury condos we truly have enough of. Building by light rail stations will improve traffic congestion and develop personal habits/ life styles that are healthier for the total community. Bellevue needs to promote walking and pedestrian safety. More colorful signs could be seen as reminders for drivers. Tree growth and the protection of old growth in the community needs attention. Too many trees have been cut down without law protection/enforcement. Making Bellevue a 21 century model for transit options should be emphasized. I look forward to our future transit completions. Cleanliness of litter is something which I am concerned with as I walk all over, since I do not have a car. This problem has improved, but is definitely ongoing. The litter by bus stops can be bad at different sites. Psychologically, a clean city indicates a caring &amp; functioning community! Thanks for this opportunity to give my views.</p>
57 Mark Leingang		Bellevue	WA	<p>I grew up in Bellevue and my wife and I make a decent income. More than the typical family on your planning guide and we still can not afford even a tear down home in the most modestly priced neighborhood of Bellevue. It is out of control. I am in full support for approach 3. Any strategy that does not maximize the production of homes is just going to perpetuate the affordability problem. I know there are a lot of long time property owners who want to maintain the status quo but most of those same property owners could not afford to buy their home today if they were looking from the outside in. I understand that change is hard but it is ridiculous to expand the capacity of commercial real estate in downtown Bellevue without any real plan on how to house all these new people and their families. There also needs to be a common sense approach to tree policy or those trees become the weapons that the status quo will use to stop housing. Lets face it. The state is never going to expand the urban growth boundary so the only option we have is to get denser to add more housing. It's simple supply and demand.</p>
58 Miriam Matson	Home owner in Bellevue for 46 years	Bellevue	WA	<p>I have loved living in Bellevue in a couple different homes for many years. We purchase our first home here because of location, larger lot size option, convenience to schools and shopping and the neighborhood. Bellevue may need more housing and a wider variety of options but I would feel betrayed by the insertion of small multi family apartment or duplex units in my 1.8 zoning. My neighbors and I chose the location (and have paid the corresponding taxes and utilities because of that choice). The city, school district, county, state, and appropriately zoned private properties are a better place to start looking for future options for Bellevue's housing needs. Please maintain the single family nature of our neighborhoods!</p>



59 Tim Powell	Bellevue	WA	I have two comments area's: Bicycles and housing density. 1) The city needs to either make a commitment to bicycles as an alternative or stop trying. The existing system is more dangerous than having nothing. Depending on the route, you have to move in and out of bicycle lanes a half a dozen times. each time having to merge with traffic. If you cannot do it right, don't do it at all. Look at Amsterdam, they made a commitment to bicycles and are doing the planning, changing rules, and building the infrastructure to accomplish the transition to no cars in the CBD. 2) One simple change to our building code would ease our housing problem: allow a small housing unit to be built on a lot with an existing house: an 'Ohana'. In addition to helping the housing problems, it would have some very positive social benefits.
60 Susan Scanlan	Bellevue	WA	I heard in the past it was a goal of the city of Bellevue, to have more people who work in the city live in the city. What about those of us who already live in the downtown core? I live in Bellevue Towers and have been there for four years. During that time especially since the return to work of downtown workers the traffic on the surface streets is building rapidly. It may not seem like there are that many cars moving on the streets, but what about those of us who are trying to get onto the streets out of our buildings? At rush-hour it can be near impossible. There is construction all around us. What is being planned to increase street capacity? Thank you.
61 Svetlana Verthein	BELLEVUE	WA	I just wanted to submit a brief comment. I have participated in multiple interviews regarding this, and I am very glad to see that my suggestions have been all incorporated. I have read parts of this huge document, focusing on Alternatives 2 and 3. Alternative 0 is absolutely not acceptable to me and my family for the lack of affordable housing and a lopsided focus on just a handful of small parts of our wonderful city. Alternative 3 is also not acceptable as it seems to me to be too much too fast of a change. I don't think any city of our size can manage such a huge influx of new housing and new jobs well. Alternative 2 is my TOP CHOICE due to a larger number of housing units compared to Alternative 1 , but Alternative 1 is also attractive. My top concerns were increasing housing, which must include affordable housing, and both of these Alternatives address this. I think because our city is so vibrant and quite wealthy and industrious, letting it grow by providing more housing and more jobs would make Bellevue an even better place to live. Thank you Svetlana Verthein
62 James Richardsc none	Bellevue	WA	I like option 0, because it's growth with the ability to create infrastructure, utilities etc. without taxing the capacity for controlled growth. As an example, it seems that the roadare behind the curve in maintenance now. I can only imagine what greater growth would do.

63 madeleine wiley	redmond	WA	I own 5 rental homes in Bellevue. I am grateful to have access to these plans. My concerns are: 1) if the freeway is expanded into Factoria and impacts Concord Hill HOA. 2) Trees. Thank you for working on the tree canopy. I am horrified with all the trees that continue to come down. I don't know what you can do to monitor if people are taking down more than the allotment annually. I also think this is a very bad measurement to use; over a few years one's lot can be emptied of trees. Look at SpiritRidge -- all the trees down also due to the big homes being built after the tear down. 3) water cost. People don't want to pay for water to keep bushes and trees alive. Our water costs are terrible. I have a friend who moved to Pasco; she pays \$99.00 to water during the growing season. She has a green lawn and all kinds of wet side of the mountain plants. I am horrified that these old dam laws are still in place. We need to change these laws at the state level and keep water available to people to keep our trees and shrubs alive
64 Chris Bendix			I prefer alternative 3. It is the highest and best use of the land and will make the Wilberton area a dynamic, urban place that facilitates more economic activity and encourages transit and non-vehicle transportation.
65 Stanley Xu	Bellevue	WA	I support Alternative #3 since it provides most affordable housing in Bellevue. The zoning of BR-RC-H-1 should be extended into the box of Northup Way, 140th Ave NE, 148th Ave NE and NE Bel-Red Rd, since this area is closed to public transportation, such as light rail, bus and highway. It would provide much more affordable housing units.
66 CRISTINA Dugor Davis Investors & Management LLC	Kirkland	WA	I think Alternative #3 is important so we can plan accordingly for the future and long-term, provides access for more residents at a time when property values are so high that young people can't afford to live here. In addition, #3 basically has the same mitigation measures as #2 in almost all categories. I encourage you to look into all areas of Bellevue, not just Wilburton Hill. 140th along Bridle Trails has room for lots of expansion and it right next to Microsoft.
67 Emelia Hartford	Renton	WA	I think that the implementation and planning of new safe bike lanes and accessibility for nearby amenities could have its own larger section because it could be more clear.
68 Nathan Campbell			I think that this is a very help plan to help build a livable city in. this plan seems to be in the best interest of making the future year representative for everyone in the community.
69 Lucy. C	Bellevue		I want to keep Bellevue as a "city in a park." I'm opposed to promoting higher density concepts like high rises, mixed housing like duplex, multiplex, etc. I also don't want any more shelters here. Regarding transportation, more side walks on 108th AVE NE would be nice and more pedestrian friendly crosswalks. I don't believe we need more transportation options. This adds to more congestion.

70 Deven Tokuno	Bellevuw	WA	I would like to ask the city to include plans to improve our infrastructure while they prepare to more than double the residents and commercial facilities. Traffic is already a nightmare and not everyone will utilize public transportation (and if they did, there would not be enough space). Please also do more to offset the environmental impact the capacity increase will create to ensure our air and water remain clean and healthy. Lastly, the document was 1,000+ pages and way too long for most residents to read. Moving forward, please include a one-page summary at the start of the document with facts about the proposed options. This will increase civil engagement and awareness and mitigate unhappy residents of the future. Thanks for your consideration and for putting the interests of Bellevue residents first.
71 Elham Morshed Neil LLC	Bellevue	WA	I would like to comment about the Wilburton Vision. I believe we need to maximize TOD opportunities around the new Light Rail Station. I am one of the owners at the Nine Lake Bellevue Condominium. Our parking lot is right next to the new Light Rail Station. It should be planned for intense TOD. I fact I am surprised that development around Lake Bellevue is excluded in 2 of the three proposed alternatives. All the planning alternatives for the properties around Lake Bellevue, especially those right at the Station, should include mid rise and high rise office and residential options. Thank you for the opportunity to comment.
72 Ruth Lipscomb	Bellevue	WA	I would like to see Bellevue adopt Alternative 3 so that housing and small commercial sites can be spread throughout the city's (currently) low-density residential areas. When there are more places to walk or bike close to where people live, this gets cars off the roads, reducing greenhouse gas emissions and lessening the need for expanding the auto transportation infrastructure. It is more financially sustainable for affordable housing if residents don't need to own cars. I'd like to see ACU's (Accessory Commercial Units) allowed for small shops, cafes, offices, etc., throughout neighborhoods. The most desirable cities have medium density, not all the housing bunched in one area. Think Paris, London, Montreal. With good policies that require green space, trees, and multi-modal transportation routes, the density can be increased in a way that results in vibrant neighborhoods that are able to support local businesses. Please make sure that the alternatives require a robust network of pedestrian and bicycle routes to get everywhere in the city.
73 William Baker	Bellevue	WA	I would like to see the term "climate change" be replaced with "stop pollution". Green house gases are pollution. So is city/road trash, graffiti, noise pollution and in general garbage in our city including carbon dioxide from cars. "Stop pollution " I believe is a more effective because everyone dislikes pollution while "climate change" is to political.

74	Hope Barker		Bellevue	WA	I would like to submit my support for Alternative 0 regarding the proposed development of the Wilberton neighborhood. I have lived in Bellevue for thirty years and I enjoy living in a city in a park. We are facing the threat of severe climate change, and destroying the trees and over-urbanizing our city is not in the best interests of our population. It is the duty of elected officials to protect our city from overly ambitious development which will ultimately ruin the character of our city. In 2022 voters passed an \$85 million levy to protect open spaces, preserve wildlife corridors and to acquire new open spaces. Let's honor the voters' wishes and stop unnecessary destruction of the environment. Also let's save the meadow at Airfield park in the Eastgate neighborhood of Bellevue. Thanks for your consideration.
75	Dale Roberts	Homeowner	Carnation	WA	I'm always disappointed when a new building in Bellevue, especially a highrise, is the same old square, glass structure that isolates a block. There are so many exciting architectural inventions happening in cities, mostly outside the US. Why shouldn't Bellevue be the US version of Barcelona, a city known internationally for its beauty and innovative architecture? Open courtyards that encourage social mixing, solar panels windows, low-carbon cement, and concrete that contains optic fibers are just a few of the many creations developers could take advantage of if we nudge them in the proper direction. Buildings should be viewed as works of art that will color downtown for decades. Be the city that stops profit from being the deciding design factor. Help Bellevue be bold.
76	Benjamin Bird		Bellevue	WA	I'm thrilled to live in Bellevue and love that unlike many cities we continue to enjoy a boom in growth. With that being said I would ask that considerations be made as to how the construction of buildings is being treated in consideration to other major cities (New York). I would like to see a better job in mitigating street closures, sidewalk closures and overall accessibility if there are better ways to do that. In addition, I'd like to see an effort to enforce some form of affordability for small businesses to be a requirement in any retail space plans. There should be a certain set of spaces required or encouraged (via tax break etc.) to allow for small businesses to rent and thrive in Bellevue. Last but not least I believe there needs to be an exploration on a permanent closure of Old Bellevue Main Street for through traffic to encourage more walkability and year round patio space.
77	Gaurav Bansal				IMHO, sending 1000 pages document to get public opinion is not a good idea. Along with the comprehensive plan it would be better to send high level summary. Lots of folks would not have time to go over the big document.

78	Laura Millikan	Bellevue School District	Issaquah	WA	In 2008, I had been living, working, shopping, receiving healthcare, and attending church in Bellevue for several years. I finally had the emotional ability to escape an abusive relationship and found NO HELP with trying to keep the structure of my life and support network together for myself and my 1-year-old child. I have spent the past 15 years bouncing around living in various parts of the rest of the county as I have never been able to return to living in Bellevue. Being forced out of Bellevue, my child and I lost the structure of our life and support network and had to change every facet of our life multiple times because Bellevue was no longer accessible to me. To me, it is irrelevant what style of housing is built (mixed use, low-rise, mid-rise, high-rise, 2/3/4-plex, etc.). What IS RELEVANT to me is that whatever housing is built for the future, significant percentages of new or existing housing needs to be made available to low-income residents (households with <30% , <50%, and <80% AMI).
79	Alexander Tran		Bellevue	WA	Increasing housing units within Bellevue is a great step towards creating more growth within Bellevue. However, isn't accessibility an occurring issue? Housing in Bellevue is becoming increasingly expensive and the values of different properties are rising. How do you plan to increase housing units while making them accessible for someone in the average financial situation?
80	Sander Valstar		Bellevue	WA	It seems figure 11-4 'Bicycle Network LTS Vision' is incorrect. It appears figure 11-2 'Performance Management Areas' was incorrectly included again at that location. I would like to see the bike LTS vision picture, thank you.
81	Fengling Cheng Skyline Properties Inc		Bellevue	WA	Make Bellevue a beautiful and safe place to live and we support the plans !
82	Evan Lee				Micro-apartments are a great start toward affordability. To go a step further and help affordability for families, consider amending building codes so that point access blocks are easier to build.
83	Cindy Meinecke	None	Bellevue	WA	More bike lanes. Speed up light rail. Increase speed limit to 30mph on 156th and 164th through Lake Hills. Keep the Meadow and other green spaces green and pristine. There is enough mega housing already. Apartment housing is needed more that more giant homes. My adult kids live with us b/c they cannot afford to rent an apartment near here. Balance the housing cost spectrum to include middle class folks.



84	James Adcock	self -- Bellevue Resident	Bellevue WA	My first comment was that I was very disappointed to see how hard it was to even find the Draft EIS statement -- I don't see how Residents can meaningfully comment on the DEIS if they can't even find it! I don't understand why you don't even tell Residents how to find this document? And then the document itself is given a very strange filename, and when I open it in my default Microsoft Edge browser it is in some kind of strange "booklet" format or something that was pretty much impossible to read in Microsoft Edge. So then I had to download the DEIS and re-open it in Adobe Acrobat -- which then displayed the document without the strange formatting problems -- and I could actually read it. My impression is that City of Bellevue never actually intended to allow Residents to actually read this document. Is that correct?
85	Leonardo Barros Barreto			On one hand I truly appreciate the effort to gather feedback from all of us. On the other hand, I feel very frustrated because many of us have been giving the same feedback for many years and all we see is the conditions worsening: - Police and Fire Department underfunded for the enormity of the task they have with the growth we've been experiencing - No real affordable housing for key people in our community like teachers, health professionals, police, fire-fighters, etc. - No clear plan to support the increasing amount of people and car traffic in Bellevue - Meanwhile, no real accountability for some of the large companies driving all that growth To be clear, it's great to live in a town that has been growing like Bellevue but, the lack of real planning and focus on the people (not the corporations) creates the possibility for a very difficult future.
86	kate sayers		BELLEVUE WA	One of the articles in the Seattle Times noted the problem with delivery trucks. Please include in the zoning and planning methods for delivery that 1) don't block street parking 2) don't impinge on handicap spaces. I can't tell you how many times I go to park in a handicap spot and it is blocked by a truck making a delivery. Fewer than 11% of the buildings in Seattle have a loading dock . Perhaps they can be shared. Drivers are in a hurry. On my residential street, they just park in the middle of the street, blocking driveways and drivers. Please plan for these.
87	Aicha Lahmoudi		Mercer Isl; WA	One of the first things I noticed while Bellevue's Draft Environmental Impact Statement was that several copies of the document were in different languages. I find this very important because not all people can read English. After reading the whole statement, I feel and believe that this plan is one that takes into account all social and economic factors to support and grow a stance of equity.

88 Steven Demonnin

Option 3 works best for me because the various kinds of housing and jobs are close together. Residential should be on top of commercial, not a long drive away. Option 43 has a very bad component because of the high rise units. This is very bad. This again forces people to drive long distances. Sidewalks should be wide, there should be retail on the bottom floors and residential on the top floors but no more than 5 stories. People should have the option of walking or biking, and should not be compelled to drive. The other two options oblige people to drive. Which would be bad for the environment, and worse for the comfort of the people. There should be single family houses, of course. But no single family house should be more than 25 minutes away from commercial or other forms of employment. There are cases like near my apartment where the road is plugged up every night with the traffic tails back for more than a mile from the 205 freeway. This is bad for the environment. It is like this for as long as 3 hours a night.

89 Scott Fisher

Bellevue WA

Our original concern about the Wilburton plan was that there would be a radical height difference between our property and the property immediately to the west of our apartment buildings. However, after attending the recent EIS meeting at City Hall, we learned that there are potential plans to rezone our street as well. The new designations are R-medium and R-High, which are yet to be defined. Without a full definition of those changes, it is difficult to comment at this time. But we can say that we favor the incentive-based programs where implementation of lower-cost housing is concerned.

90 Allen Barhudarian

WA

Overall, the Bellevue Comprehensive Plan is a very ambitious framework intended to direct the city's expansion over the next 20 years. The plan is trying to cultivate a dynamic, inviting, and habitable community while at the same time, preserving an excellent quality of life for its residents. The plan puts forth several different approaches to accommodate growth, with each trying to strike a balance between housing and job growth, housing variety, and infrastructure investments throughout the city and the Wilburton study area. The Draft Environmental Impact Statement (EIS) takes a closer look at the impact of the different approaches, which I describe below: These options include (I have relabelled Alternative 0 to 3 as Option 1 to 4): 1. Not taking any action - This approach maintains the current growth structure, concentrating expansion within Downtown and BelRed without any modifications. Per the EIS, "this will likely have a significant adverse impact on housing affordability", which isn't good for diversity and inclusion in Bellevue. There will also be "significant and unavoidable adverse impacts" when it comes to traffic. This is difficult to imagine, given how bad traffic can be in Bellevue during rush hour. This seems to be the worst of the options compared to others. 2. Catering to diverse families - This approach focuses growth in Mixed Use Centers and incorporates subtle density citywide, providing a range of housing options for families of all kinds. One of the main problems with this approach is the "potentially significant unavoidable adverse impacts on air quality", in addition to contributing to worsening traffic corridors, similar to Option 1. 3. Expanding opportunities for more residents - This approach focuses on growth in both Mixed Use Centers and Neighborhood Centers, as well as areas with convenient access to transit and employment, thus creating more residential possibilities. This approach also has "potentially significant unavoidable adverse impacts on air quality", similar to Option 2. Traffic issues also apply here, per the EIS as well. 4. Offering choices across the city - This approach recommends growth in high-opportunity areas, including Mixed Use Centers and near Neighborhood Centers, ensuring housing options are available throughout the city. This approach also has "potentially significant unavoidable adverse impacts on air quality", similar to Option 2 and 3, as well as traffic issues becoming worse, like the other three options. As one can see, each of these different options present different ways to provide more housing units, employment, and commercial development. For example, Option 4 allows for the greatest

91 John Taylor

Part of what makes Bellevue nice is the high bar to entry. We have a safe and secure city. Densification is good. It increases property tax income which allows the city to do more with the budget. Densification with the intent of making Bellevue more affordable may not have the same results. Low income housing does not generate income for the city. I don't think the families that currently live in Bellevue and enjoy the public parks and walks are really excited about having drug addicts and homeless people in their neighborhood.

92 Tom Schwartz		Bellevue	WA	Plant or replant more large shade trees along the down town sidewalks. Continue installing mid block pedestrian crosswalks to make downtown walkable. Inner circulating downtown trolleys (Transit Center on 110th AVE NE to 4th to Bellevue Way to NE 10 to 110 back to Transit Center). This puts all downtown pedestrians within two blocks walking distant from all downtown buildings. Senior center in downtown Bellevue
93 David Woosley		Seattle	WA	Please keep the most flexibility, highest and best use zoning, and let the market dictate what can and should be built. Option 3 provides the greatest flexibility and should be implemented.
94 Simon Zhang	Personal	Bellevue	WA	Please lower the home prices for Bellevue area.
95 Randolph Haagens		Bellevue		Please preserve Bellevue as a 'city in the park' by preserving open space and limiting dense development to areas near arterials and public transportation. A good example of what not to do is the parcel that is the subject of the Save Coal Creek movement. This undeveloped parcel is far from transportation and should be preserved as parkland. The idea of building 36 homes there is outrageous. The jobs/housing balance should be aligned to minimize the need for folks to commute into Bellevue for work. But this can be done by limiting jobs in Bellevue and not (only) by increasing housing density. Growth is not imperative. And yes, by all means increase pedestrian and bicycle transportation.
96 Julie Tzucker		BELLEVUE	WA	Please protect our environment. Remember that trees should become old growth, and old growth protects us from fires and provides our fresh air. Wildlife need homes, too. We hurt ourselves when we don't have balance. I saw some trees that seemed to be chopped down for no reason on the side of 405 at Coal Creek. Why would be kill 30-40 year old trees when we could have preserved them? We should be doing everything we can to save trees. I support planned urban developments with fewer single family homes and more shared spaces. Lawns should be a thing of the past or people should be taxed to have them. We can't afford to live like it's the 1950s. What is personal freedom when there is nothing left to protect? Please put the environment first when planning. Thank you for your time and consideration.
97 LeeAnn Stivers		Bellevue	WA	Please, please complete the modernization of the key transportation route along Bellevue's eastside: West Lake Sammamish Parkway. This route along Lake Sammamish is heavily used by residents and yet only LIMITED sections of the parkway have been modernized from the decades old, pitted concrete surface that still exists with dangerous bicycle and pedestrian passage (no sidewalks) alongside the concrete road. This sad situation exists in Bellevue, while Redmond completely updated their section of West Lake Sammamish Parkway to accommodate cars, bicycles and pedestrians many years ago. Thank you. Sincerely, LeeAnn Stivers

98	Virginia Skordal	Bellevue	WA	Protect R-1 zoning. We have paid taxes for that for years with the understanding that that's zoning would be protected.
99	Richard Gelb Public Health Seattle and King County	Seattle	WA	Public Health Seattle & King County appreciates the transit-focused growth approaches of the City of Bellevue's Comprehensive Plan alternatives and the importance of the focus areas: equity, displacement, and economics. By inducing physical activity, transit-focused growth has significant health benefits over more car dependent land uses, however from a Public Health perspective, it is important to achieve this growth pattern without placing income-restricted housing units directly adjacent to very high-volume roadways. In general, residential uses are where building-scale air and noise mitigation measures are proving least effective. Diesel exhaust is the main source of potential cancer risk from air pollution sources in King County. <sup>1</sup> Noise pollution from vehicle traffic contributes to high blood pressure, heart disease, sleep disturbances, and reduced school performance. <sup>2, 3</sup> After an extensive assessment, the California Air Resources Board recommends avoiding sensitive uses within 500 feet of roadways carrying over 100k average vehicles per day. <sup>4</sup> Given the health consequences of high-volume (> 100k AADT) roadway-adjacent residential uses, it would be helpful to include an alternative in the final EIS that: 1) puts non-residential uses and/or market-rate housing in the zone closer to high volume roadways, and 2) sets back (>500') uses that include income-restricted housing units. This approach might be considered an 'Affordable Housing Highway Setback Alternative'. Thank you for considering including in the City of Bellevue Comprehensive Plan EIS scope (including for the Wilburton Commercial Area study) a growth alternative that avoids placing more-vulnerable building occupants (income-restricted housing) in geographies with outsized exposure to noise and air pollution from high volume traffic corridors.
100	Eduardo Rodriguez	Bellevue	WA	Pues los cambios que están haciendo están bien los de el plan segundo póque generar trabajos y viviendas esta bien pero no ha una forma muy rápida. Mucha gente como yo quiere un lugar seguro para vivir no para trabajar más y gastar más al ritmo que no sientes como pasa tu día. Ese es mi opinión yo he vivido en bellevue por 24 años y es una de las ciudades más seguras.



101	Jean Chauhan	None	Bellevue	WA	<p>Re Bicycling in Bellevue: Along the south side going up Bel-Red road, the remaining parts of the very old &amp; very narrow sidewalk badly need replacement by a wider ones to match the lower areas so much newer and wider. Reason: for much greater SAFETY in such close proximity to cars speeding by! Drivers frequently stop in the middle of crosswalks, even blocking them entirely sometimes, furthermore even rudely refusing to back up even when there is space behind them to do so. So asap boldly stripe &amp; install more cameras everywhere still lacking these SAFETY steps! Somebody pleeeze install means to LOWER BIKE RACKS ON METRO BUSSES, like the steps lowered for pedestrians. Then I could ride uphill to Crossroads or to Redmond or over to Factoria (because I cannot lift up my bicycle after 2 back surgeries plus now in my 80's. I need to have my bike with me to get to the Transit Ctr plus to ride for various errands at my destination, because I must walk with a cane &amp; can do so only up to about 6 blocks. PLEASE SOLVE THIS MAJOR PROBLEM!!!</p>
102	Stephanie Parsons		Bellevue	WA	<p>Re Mitigation measures under the No Action Alternative Aesthetics category, the word 'could' is used to describe potential building restrictions, while Alternative 1 uses the word 'would' when explaining 'gentle density increases.' Why not say explicitly that there will be building restrictions? Is there or is there not an intent to enact some restrictions? The items listed under the mitigation measures should all be enacted, but also please add lighting restrictions.</p>
103	STARLA SCHWA	All Star Massage & Spa	BELLEVUE	WA	<p>Re: DEIS for the Comprehensive Plan and Wilburton Vision</p> <p>Please consider developing (%u201CTOD%u201D) opportunities around the new Light Rail Station. I am an owner at the Nine Lake Bellevue Condominium and our parking lot is right next to the new Light Rail Station. The property is underutilized and it should be planned for intense TOD to use it most effectively for the community. All three of the City%u2019s planned growth alternatives for the properties around Lake Bellevue, especially those right at the Station, should include mid-rise and high rise residential and office options. We would like the third plan which includes this. Consider the Lake Bellevue area for more dense zoning in each of the alternatives. Thanks for your consideration.</p>

104 Karen Mauden	Bellevue WA	<p>Regarding plans for multi-unit housing on the east side of 120th NE, just south of NE 8th Street and up to Main Street:</p> <p>DO NOT allow any building height to exceed a height that would impair current views of buildings at the top of the hill. This means NO VISUAL IMPAIRMENT from the ground floor or higher of current buildings at the top of the hill. Anything exceeding this proposed height would impair the panoramic views these people have of the city.</p> <p>You would not let anyone block someone else's view of Lake Washington or Lake Sammamish....then why would you propose something that would take the panoramic view away from these residents of the Wilburton community?</p> <p>The proposal for 'up to 16 stories' in height in the EIS is unacceptable and shows disregard &amp; disrespect for the Wilburton community who live at the top of the hill.</p> <p>We do not need or want the eastside of 405 to reflect the downtown core. Many of us live in the Wilburton neighborhood because we enjoy the quiet, and the sense of community, not the sterile core of downtown.</p> <p>This area is an 'entry' into the residential Wilburton community and should reflect a scaled down version of the current EIS proposals.</p>
105 cheryl wang	Bellevue WA	<p>Regarding: DEIS If you believe in GLOBAL WARMING, you will NOT allow a more populated Bellevue Washington! By building more housing, apartments, condominiums in single family neighborhoods, you will take out many, many trees which will affect the streams &amp; wildlife that exists in Kelsey Creek &amp; Bridal Trails and many other areas here. The environmental impact in the future will be detrimental to our city &amp; the world. Why do you want to push GLOBAL WARMING????????? Do you want the destruction of the earth to come sooner by pushing this through? Please do not do this!</p>

106 Ching-Chao Wang	Bellevue	WA	<p>Thank you for allowing local public input on EIS. In my humble opinion, I am against increasing the density of housing in our area. We need to protect our dwindling natural open resources (parks, greenbelts, wetlands, rivers and streams). Currently with all the construction of new commercial high raisers there seems to be ample future housing. If there is truly a push for 'Global Warming and Sustainability', increasing housing density in our area needs to be very carefully examined. Keep Bellevue Green!!! Sincerely, Ching-Chao</p>
107 Natalie De Maar Belle advocat llc / de Maar Law	Bellevue	WA	<p>Thank you for providing me a chance to comment on the proposed up-zone in the Wilburton neighborhood. As a long term small business owner, I cannot extend enough of my appreciation for the City's willingness to engage the property owners on the positives and negatives of the three proposed up-zones. I would encourage the city strongly to up zone and develop local housing and additional commercial space in this neighborhood. With the addition of light rail right in front of our parking lot at 9 Lake Bellevue the city and us have a chance to find a great development partner to convert a largely vacant lot that is generally half filled during the work week with new development that would benefit the community by lowering commutes and allowing people to work and live in this neighborhood. I look forward to partnering with the city further on developing Lake Bellevue in to a much better use for the community than a largely empty parking lot which will benefit the cities residents and increase our local tax base.</p>

108 Todd Woosley Brierwood Center Bellevue WA  
LLC

Thank you for the opportunity to comment on the Bellevue/Wilburton DEIS. First, we are excited about the future prospects for the area, as well as the entire City. Our family built, and continues to own, four buildings in the Wilburton study area. These properties are just south of The Spring District, equidistant between the Wilburton and Spring District light rail stations. This is the western part of the BelRed Corridor. We look forward to the time when these buildings, built about fifty years ago, can be redeveloped into a much more urban form. We support the City's overall goal of accommodating growth in Bellevue's growth corridors. Overall, we support Alternative 3, which would grant the highest likelihood redevelopment would be economically viable. Alt. 3 would also create the best opportunity to provide the supply of housing our growing community needs. We also request the greatest flexibility in the types of Permitted Uses possible. With the rapidly changing dynamics of real estate demand, there is unprecedented uncertainty in the future needs of a growing City. If the City desires housing over non-residential development, we recommend creating incentives to make housing even more economically attractive than alternative uses. Regarding transportation, we believe it is imperative for the future success of the City, and the study area in particular, to abide by the letter and intent of Comprehensive Plan Transportation Policy TR-2. Furthermore, the City should allocate capacity based on its forecasted demand (rather than grant preferential treatment to any particularly mode). The goal should be to maximize the overall throughput of all people traveling on Bellevue's transportation network. Specific to the Wilburton area, we strongly encourage the City to complete the last, best complete street project available... the N.E. 6th Street Extension to 120th Avenue N. E. Please do not make the same mistake made decades ago in Downtown, when Bellevue failed to build out a better grid system. Downtown's super blocks have been bad for pedestrians and motor vehicles. Wilburton should have a robust complete street grid system, especially with an arterial that connects Wilburton and BelRed to I-405 at the upcoming N.E. 6th Street . A great example to emulate is Spring Boulevard through The Spring District. It has outstanding facilities for all modes of travel. N.E. 6th Street's extension to 120th Avenue. N.E. Is part of the BelRed Transformation's transportation investment program. This extension was also part of Bellevue's TIFIA loan funded transportation grid. Without it, congestion at many system intersections would be even worse.

109 William Marks Long time Bellevue resident Bellevue WA

Thank you for the opportunity to comment. My comments below are based on your distributed written materials, public meetings and some discussion with members of the committee and city counsel. Categorically, they should not be interpreted as expressing support for or against whether the proposed new housing units in the draft plans should be occupied by owners or renters. I write to express 3 concerns about the draft plan. 1. Lacks analyses of potential differences in impact that renter versus owner-occupied units may have on the city's resources, near term development or long term planning. The analyses provided focus success on affordability and projected job growth with the latter assuming a steady state job market. I didn't find models or plans or mention that the committee considered fluctuations in the job market and how services, development and planning might be affected based on percent owner versus renter-occupied housing. 2. No analysis of renter or owner-occupant new housing units with regard to reserves requirements. Adequate reserves being necessary to long term maintenance the new structures. Reserves spending is one of the most contentious issues that affecting multi-unit housing communities. Maintaining structural integrity is critical to good building environmental stewardship. Therefore, the growth plan should consider strategies that assure long term maintenance of new multi-family buildings that are consistent with climate targets as adopted by the city. By way of example, requirements for developers and owners (Businesses owned or HOA/COA) to maintain adequate reserves as part of the permitting process or articles of incorporation. 3. The environmental impact section is focused solely on mitigating the short term environmental issues that are anticipated during construction. I understand that this is a development plan and not focused on climate issues such as the production of GHG. However, it is short sighted at best and disingenuous at worst, to not include analyses of how the city's proposals for growth stand to influence city's stated climate goals. Influences that may be significantly different based on the relative percentage of owner versus renter occupied housing. While the draft focuses on growth and development this should not be an excuse to avoid consideration of the plan's potential impact on the city's climate targets. Government should not conduct its business in silos. Climate, like Equity is a significant concern of Bellevue residents and should be considered in all city planning. Thank you again for the opportunity to address these concerns to the committee. Sincerely, William H. Marks, M.D., Ph.D.



110 Jennifer Keller	Bellevue WA	<p>Thank you for the work on the Comprehensive Plan and the DEIS, and thank you for the opportunity to comment. In general, I would like the DEIS to look at climate considerations as deeply and carefully as possible. The more we reduce our emissions, the more we will reduce the likelihood of climate impacts such as droughts, wildfire smoke, and extreme weather events. Because we cannot completely escape these impacts, we must also be prepared for them, and put a special emphasis on equity so that the impacts do not land most heavily on those least able to deal with them. Alternative 3 appears to be the most climate friendly option because: * It does a better job of building in the basic concepts of Transit-Oriented Development. It places high density growth not just downtown, but also around "Mixed-Use Areas," placing residential and commercial density around major transit stops. This makes it easier for more people to reduce their car trips. * It also points to distributed locations for small convenience commercial developments, aiming for more walkable neighborhoods and the reduced use of cars. * It allows for more types of lower cost housing options distributed broadly across the city. This means that more people who work in Bellevue could live in Bellevue, which would reduce long distance commuting. However, Alternative 3 does not include an explanation of how essential city goals can be met in parallel with each other, specifically, reducing greenhouse gas emissions by 50% by 2030, increasing our tree canopy to 40%, and maintaining our excellent quality of life. A summary explanation needs to be included. Along with describing how new growth will be shaped, the Comprehensive Plan should describe steps for improving existing infrastructure, specifically, incentivizing energy retrofits to deeply reduce the carbon footprint of existing buildings, and developing zero emissions transportation alternatives. Growth must not come at the expense of missing our target of a 50% reduction in GHG emissions by 2030. We must move as quickly as possible to standards where all growth (new buildings, redevelopment, transportation, and other infrastructure, plus operations) meets ultra-low GHG emissions standards. Some of those standards include: * All-electric buildings * Performance standards such as LEED Platinum certification or better * Well-placed and well-distributed EV charging stations * High standards for safe biking and walking options in every part of the city (interconnected networks of trails) * Any steps the city can take to press for our utility company to modulate peak electricity loads, for</p>
111 B Henderson		<p>The car-centric lifestyle Bellevue encourages is incompatible with livability. Reduce vehicle travel lanes and free parking. Encourage car-free and car-light lifestyles.</p>

112 Kathleen McKenna	Bellevue	WA	The city is planning to allow a developer to build 15 towers to replace Bellevue Village (QFC and Bartells) and property north of the shopping area (currently Le Chateau). - Although the images show rooftop "green areas" on some of the buildings, there is no evidence of sufficient ground level outdoor green space set aside to support the number of residents (and dogs) who need get outside near to their apartments/condo's. - The closest park (the Downtown Park) is too far from most of the towers in the plan for it to be used by dog walkers.
113 David Goodwin	Bellevue	WA	The city needs to do more regarding affordable housing. There should be a fee on all new construction with no wavier, to go towards low and middle income housing. All new construction of multi-dwellings, 4% must be for low and moderate income residents. Again, no exceptions. And finally, the city should look at Canada's example and ban residential ownership of homes for at least 2 years for foreigners.
114 Barbara Hughes	Bellevue	WA	The DEIS needs to be amended to consider the full impact of HB1110. The impact of the change in work patterns (fully remote work/part week work from home/people moving out of Bellevue to Eastern WA and other states) following the pandemic is not yet fully understood. More time is needed to research and understand this. E.G. will future businesses be located in Bellevue if their staff are all/mostly remote, will staff ever fully return to the office, will Bellevue see a decreased need for office space along with less need for housing, will people choose to live in dense cities if their jobs are no longer there, how does this affect transportation needs (will we see an increased need for parking from office staff who now commute into the office part time from far away rural homes, who previously lived nearby and didn't need a car). Have you fully studied the impact of the DEIS on Bridle Trails which is a historic, unique, rural and equestrian neighborhood adjacent to the Bridle Trails State Park? The DEIS should consider the impact on our landmarks, views, historical sites, our visual resource.
115 Zhenhai Zhang	Bellevue	WA	The house prices are too high.
116 Garth Olsen	Bellevue	WA	The larger plots of land along 140th near the Bellevue Golf Course are ready for apartments! This makes so much sense for Bellevue and all the types of people that live there.
117 John Whitney	Bellevue	WA	The plan for the downtown Bellevue QFC needs to have green space and parking
118 Sean Mobley	Bellevue	WA	The zoning update near Wilburton is exciting. However, if all that will be built are 'luxury apartments,' then it's fundamentally a waste of time. Bellevue doesn't need more 'luxury apartments,' it needs purchasable housing that people who don't work at Microsoft and Amazon can afford. So many businesses exist in the city to support the tech industry, from cleaning services to restaurants to office supply stores and more, not to mention teachers and educators, none of which make enough to live close to where they work.

119 CHIRAG KHATRI	Bellevue WA	<p>This draft is 1000 pages, that's insane and I'm not reading all that. Based on a skim though, it seems like the study and plans seem to show the best thing for housing, the environment, the economy is Alternative 3. The one that targets the most amount of housing, increasing density, and has more transit oriented development. The document repeatedly talks about the positive impacts of Alternative 3. I also liked seeing the considerations for improving zoning regulations to make building better/easier. I'd also recommend investing in simplifying zoning and other regulations and investing so that permits and the beaucratic process can go even more quickly, allowing builders to start faster and in turn save in costs. I'm glad that alternative 3 is shown to have the best impact for our region, both in housing, economy, and the environment and strongly urge that this proposal is the one that get's focused on and delivered.</p>
120 Caroline Smith		<p>Though the City of Bellevue's Environmental Impact Statement draft appears to stem from the motivation improve human lifestyle and maintenance, it seems to lack an important factor: affordable housing. The statement is clearly focused on creating the best possible living conditions for its residents, and even hoping to gain more by supplying additional housing units and jobs within its city limits. But, the vision for growth seems unable to reach its full potential considering the city's reputation of expensive living conditions in most of its areas. Many people already struggle to afford housing in urban areas around Washington, and simply adding additional spaces doesn't live up to the Comprehensive Plan's motto: "Building A Livable City for All."</p>
121 Claire Sumadiwi Bellden Cafe	Bellevue WA	<p>To ensure accessibility and equality for the general public, it is essential to prioritize the study and inclusion of the Grand Connection 405 bike or pedestrian over crossing in the Transportation section of the DEIS. This is crucial for cultural, economic, and social development, fostering tourism, promoting placemaking, and bridging the divide caused by I-405. There are key areas that require clarification. Firstly, in Section 11.5.1, it is important to specify if the Grand Connection I-405 non-motorized crossing between City Hall and Easttrail is assumed to be implemented in at least one of the Action Alternatives. Additionally, it should be clarified whether the Wilburton study area will be included in the system performance modeling.</p>

122 F J Pane

To whom it may concern. I'm advocating on behalf of CIRC, formerly called DASH, an affiliate of Transforming Age. I'm advocating for alternative 2 overlay on two of our locations in the Wilburton Vision Implementation. Our agencies are committed to increasing access to affordable housing at its locations Evergreen Court Retirement, 900 124th AVE NE, and Glendale Apartments, 12640 NE 10th PL, through a future redevelopment. Additionally, Transforming Age made a significant commitment to this redevelopment under a contract acquisition of a third contiguous lot located at, 12520 NE 10th PL, which I'm advocating to include in the Wilburton study area with alternative 2 overlay. While a redevelopment is several years away, the City has a unique opportunity to achieve great gains in reaching its affordable housing targets and responding to Wilburton's neighborhood preference to develop more housing, by supporting a height variance of 16 stories for these locations. I appreciate the City's work, and consideration in overlaying alternative 2 height variance on these three properties. I feel this could be a once-in-a-generation opportunity for Bellevue and its residents, and I hope you can give these requests serious thought. Gratefully, F J Pane

123	Camille Walton	Hopelink	Bellevue	WA	<p>To whom it may concern: Hopelink is a nonprofit organization working to end poverty in North and East King County. To support our vision of a community free of poverty, we identify and support the implementation of policies that seek to address the root causes of poverty. Accessing affordable housing and reliable transportation options are both key to maintaining stability and exiting poverty. We are writing to express support for Alternative 3 for the comprehensive plan update. We commend your work towards creating a vibrant and inclusive community in Bellevue and we appreciate the opportunity to share our feedback as an organization serving Bellevue and the surrounding area. As our region continues to grow, it is crucial that we prioritize the development of affordable housing options, especially for families earning less than 80% of the Area Median Income. Access to stable housing is a necessity, and the foundation on which a thriving, equitable city is built. Low-income people are most vulnerable to displacement and homelessness, and ensuring housing is available to those at the lowest income levels should be prioritized. Low-income families also face disproportionate transportation burdens, spending a significant portion of their income commuting. Access to reliable and affordable transportation is vital for individuals to access employment, education, healthcare, and other essential services. Hopelink supports policies intended to ensure that mobility and mobility infrastructure are accessible, affordable, convenient, coordinated, reliable, and safe for all. This means supporting all modes of transportation, including public transit, biking, pedestrian, and rolling options. We believe jurisdictions should partner with other stakeholders including transportation providers, residents, businesses, city officials, human services organizations, and community advocates to improve transportation and mobility options. We want to see a Bellevue where everyone can thrive, regardless of their income. This comprehensive plan update is an opportunity to make a lasting impact and progress toward that goal. Thank you again for this opportunity to participate in the comprehensive plan update process.</p>
124	Xintong Bi				<p>Traffic jam in Factoria area is pretty bad. Side walks in the nearby neighborhood is also very limited. The city might need to slow down on bringing more people or businesses into the area.</p>
125	Ann Jackson	Citizen/resident	Bellevue	WA	<p>Unable to comment without documents/information to review.</p>
126	Farrah Harold				<p>Very interesting read! Hopefully within these few years, this plan can successfully ensure that something can be done about the housing and in some cases, employment crisis so that our schools and neighborhoods will no longer experience significant decrease in children and families in general who can enjoy the resources our city offers!</p>



127	Alicia Hoppers	CIRC	Bellevue	WA	<p>We deeply appreciate the City's work, and consideration in creating the alternatives 1-3 in the Wilburton study area. We are excited to see up to 16 stories for our two sites in the alternative 2; Evergreen Court located at 900 124th AVE Ne and Glendale Apartments at 12640 NE 10th PL . We recognize that alternative 3 yields the most job and housing growth in the City but it doesn't reach the height limit that we see in alternative 2 for Evergreen and Glendale locations. These communities are a unique opportunity for the City of Bellevue to make significant gains in reaching its affordable housing targets, reaching people at all stages of life, and responding to the Wilburton 63% neighborhood preference to develop more housing. CIRC and Transforming Age are committed to a larger scale of affordability on those two sites than what is there now. We seek to optimize the development potential that may come from the height limits discussed in alternative 2 and respond to community needs. We're advocating for the height limits on those two sites in alternative 2 to be overlaid in alternative 3. This affordability commitment is promised for decades after a redevelopment (which is still some years away). We anticipate a minimum of 50-99 years of affordability maximizing the greatest density envisioned in the alternative 2. Additionally, the scale of redevelopment projects along 124th seems to be consistent with the overlay we seek from alternative 2.</p>
128	Nelly Schaffner		Bellevue	WA	<p>We desperately need a senior center in downtown Bellevue, one that would provide activities like dancing games exercise groups outings etc</p>
129	Larry Hubacka	Crime	Bellevue,	WA	<p>We have a wonderful police department. Keep it so. Tough on crime, gangs, drugs, etc. Absolutely no catch &amp; release. Do not make us another slum ridden. Crime filled Seattle. Thank you.</p>
130	Steve Kunkel		Bellevue	WA	<p>We have lived in Newport Hills for 38 years (since 1984). In 1984 the shopping center had (2) banks, (2) gas stations, (2) grocery stores, a liquor store, a drugstore, a Dairy Queen, a barbershop, a hair salon and a few other businesses. Then Factoria added a QFC and Newcastle added a Safeway and a QFC. Now we have just one gas station, no banks, no drugstore, and no barbershop. I think it's time to re-zone this property to accept apartments above retail spaces like we see in Juanita and other places. In my opinion it's a myth that there will be so much extra traffic that it will be gridlock. Many apartment dwellers will use the bus and shopping trips will be reduced because the stores will be within walking distance. Steve Kunkel</p>

131	LISA Olsen		Seattle	WA	We hope you will allow high density construction on the several large open space plots located along 140th near the Bellevue Golf Course. This is a perfect place to have high density housing along a busy corridor. The area is close enough into the city and yet, surrounded by plenty of beautiful public open space. This area should not be exclusively for those that can afford the traditional mansions in that area/Bridle Trails. There are some larger pieces in this area ripe for development. Please do not miss this incredible opportunity to change the trajectory of that area allowing it to be more accessible with more affordable, higher density housing types and allowing people of wider economic backgrounds to also enjoy its public natural spaces directly from their homes. It can be done - Thank you
132	Troy Schmeil		Bellevue	WA	We need more housing of all types in all areas of Bellevue AADU's, Dadu's, Duplexes, Townhomes. We need more and smaller housing so that existing people can stay in Bellevue and downsize we also need it for Kids growing up that want to stay here and for working class people who currently cannot afford to live where they work. it will be gradual and if done well will fit into existing neighborhoods. Thanks Troy Schmeil
133	john cooper	retired	Bellevue	WA	we need sidewalks from 52nd to 60th on 123th S E. Children walk to school,, many adults take long walks. We must walk in the street now.

134	Lara Gardner	Eastside Urbanism	Bellevue	WA	<p>We support Alternative 3 - it is the only option presented that comes close to providing enough housing for our growth targets. We don't love the increased jobs, we think we need closer to a 1:1 ratio of jobs and housing, but we'll take it because it is the option that provides the most housing. We especially like the inclusion of housing on Lake Bellevue - nearly all of the waterfront in this region is privately owned and it's such a shame more people don't get to even approach or see it. The city should not be considering any roadway expansions including extending NE 6th. Roadway expansions only induce more people to drive and the expensive, new infrastructure will quickly be full of traffic. We must make it easy for people to get places without personal vehicles - it is the ONLY way to improve the mobility in this region. The city should consider repurposing existing travel lanes for buses and bikes, and we need to be doing this quickly and flexibly. The city absolutely should consider eliminating parking minimums. We believe the most significant thing Bellevue could do to improve mobility would be to allow some types of commercial businesses in residential areas. Corner store groceries in every neighborhood would allow people to get their most essential and frequent errands taken care of without a vehicle. Accessory Commercial Units could be an option to consider - allowing residents to have small shops, cafes, bars, salons, clinics, etc on their residential property instead of needing to commute to a job and allowing other neighbors to get some needs met without driving to a commercial center. Overall, we are dismayed by the entire comp plan process because of how rigid and inflexible it is. "Smoke season" only started in the last 5 years - what other unanticipated climate impacts will we see in the next 10 years? Charles Darwin said "It is not the strongest of the species that survives, not the most intelligent that survives. It is the one that is the most adaptable to change." We need to learn to be more flexible and able to roll out changes incrementally and quickly, and iterate from what we learn.</p>
135	LeeAnn Guidotti	Wilburton Community Association	Bellevue	WA	<p>We would like to be considered a party of record. On the Wilburton Vision Implementation specifically, we would like to see a balance of additional building height that is allowed, especially on the east edge towards existing single family residential areas.</p>
136	Cassidy Isaacson		Duvall	WA	<p>While I believe this statement is well written, makes sense for the rapid growth of our state and cities, I do not think it wise. Bellevue has already brown at a rapid capacity in just the past twenty years and each condo, corporate building, and park built cause an irreversible amount of damage. Yes, there may be an DEIS statement included in the potential growth of Bellevue which would make life "better" for citizens but no for the surrounding ecosystems despite that being what it's for. I don't even believe it's better for citizens. There's a list of issues and complications it would cause for people who are already members of Bellevue so I personally believe the growth is not needed.</p>

137	Karen Morris		Bellevue	WA	Will have to send in tomorrow, just got home from a appt with husband that went way long.
138	Lisa Tsang	Private citizen	Bellevue	WA	We wanted to remind the city of your promise to line 4 city tennis courts for pickleball and provide rollable nets this summer. When was this project scheduled to take place? I hope we can have more places to play since the Airfield park project hasn't started. We have more than 100 people coming out to play at International school every evening and need more courts urgently. Thank you!
139	Francis Tsang		Bellevue	WA	With an average plastic recycling rate of 9-10% ( <a href="https://time.com/6178386/plastic-recycling-rates-overestimated/">https://time.com/6178386/plastic-recycling-rates-overestimated/</a> ), I'd like to suggest funding for a material recovery facility (MRF - <a href="https://en.wikipedia.org/wiki/Materials_recovery_facility">https://en.wikipedia.org/wiki/Materials_recovery_facility</a> ) or a plastic recycling recovery (PRF, specialized MRF) - perhaps in conjunction with neighboring cities. This will make feedstock available for plastic recycling facilities using both mechanical and advanced technologies. With the announced recycling facility in Arlington, WA ( <a href="https://muratechnology.com/news/mura-opens-us-office-and-announces-first-site-in-washington-state/">https://muratechnology.com/news/mura-opens-us-office-and-announces-first-site-in-washington-state/</a> ) it will be important to collect plastic in an efficient manner to make it available for recycling.
140	Karen Yellman	Resident of Newport Hills	Bellevue	WA	You have the difficult job planning for a growing city - Bellevue. In so doing, I urge you to protect the natural environment as much as you can - a nearly impossible task. Karen Yellman
141	Steven DeMonnin		Bellevue	WA	Zoning in the past has put commercial too far from residential. Commercial zoning should require that all commercial (except gas stations) should have second floors which should have one bedroom and studio and even dormitory style apartments on the second and third stories. No residential zoning should be more than 20 minutes from commercial and /or light industrial zoning. All commercial zoning should have wide sidewalks. Commercial zoning has too narrow sidewalks in many places, like 156 . Restaurants should be encouraged to have seating on the sidewalks. Also sidewalks should be wider anyway. Again sidewalks around crossroads is an example of too narrow sidewalks. All commercial roads should have bike paths. Bike paths and wide sidewalks need commercial zoning would encourage people to walk or bike. This would allow people to leave their cars at home. This would allow for less parking which means less asphalt and less gasoline fumes.
142	Larry Hubacka	Bellevue resident	Bellevue,	WA	Please save our wonderful & beautiful neighborhoods. No condos, apartments or high-rises.

143 Ying Wang	Wilburton neighborhood association	Bellevue WA	<p>Ying Wang 120 130th Ave NE Bellevue, WA 98005 June 11, 2023 Dear Ms. Stead: Please include me as a party of record. Thank you for the opportunity to comment on the DEIS for the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS. The Wilburton subarea and its residents are dedicated to protecting, restoring, and enhancing the character and livability of Wilburton, including the Kelsey Creek Watershed system. Natural elements play a vital role in enhancing the quality of life for Wilburton residents, and the Kelsey Creek Watershed Basin system, and all of its other basin streams such as Goff stream, sub-tributaries, and wetlands flowing throughout Wilburton. King County's DRNP Water Quality Index rated Kelsey Creek at NE 8th with a "Moderate" score, and its Oxygen levels, a "Poor" rating score. As a resident of Wilburton, I support the inception of the Wilburton/NE 8th Subarea Plan Goals: "Wilburton/NE 8th Subarea Plan Goals · To separate residential, recreational, and open space areas from commercial areas and to protect space. · To improve pedestrian accessibility and attractiveness of commercial areas for residents of Bellevue. · To support the provision of commercial services in Wilburton that complement Downtown..." and: "...Protecting residential neighborhoods from increased commercial development and traffic, enhancing existing retail areas, and establishing clear boundaries between differing land uses are the Subarea's major issues." I also support the following Land Use Policies and aligning with the Wilburton/NE 8th Subarea Plan: "...POLICYS-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas. and are committed to supporting policies protecting and preserving Wilburton's Natural Determinants Policies. The natural environment in our Wilburton neighborhood plays a crucial role in providing a sense of well-being. Natural Determinants Policies: "Policies POLICYS-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin. POLICYS-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek. POLICYS-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan." Wilburton is home to many animals that fall into Washington Fish and Wildlife's priority and endangered habitat and species. They include the Great Blue Heron, the Bald Eagle, Chinook Salmon, Coho Salmon, Sockeye Salmon, Steelhead, bats, owls, hawks, and a variety of</p>
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144 April Atwood

Bellevue WA

1) It looks like the east side of Bellevue is treated as the unimportant 'stepchild' of the city---why are the travel goals left unmet by all the alternatives when considering travel between Eastgate, Crossroads, and the Overlake area? Residents on the east and south sides of the city deserve safe and effective transportation just as much as the rest of the city does. 2) The lack of further development of safe bicycle lanes is disappointing. If you have traveled by bike around the city (NOT just on designated 'bicycle corridors' but from residential areas to commercial areas) you find that bikes are combined with car traffic in many areas, which is not safe from the biker's perspective. I urge you to reconsider and to do more to make biking safe/safer in this city---if it feels safe to bike, many could be encouraged to use a bike instead of a car to make commuting and shopping trips.....but as it is, risking one's life by being forced in with speeding traffic is a barrier. 3) SE 150th does NOT have sidewalks on both sides of the street, as your diagrams indicate. Many parts of that road have NO sidewalks at all; providing sidewalks would be a great way to encourage walking without forcing pedestrians to face the risk of walking next to vehicle traffic.

145 Patsy Neher	<p>Hello, I attended the May 8 city council meeting regarding a rezone of the Bellevue Village shopping area and the entire perimeter of Downtown Bellevue. Because I was not afforded the opportunity to speak (only 3 speakers per topic) here are my comments: I believe the planning department has not considered the impacts for existing neighbors. The "Building a Livable City for Everyone" slogan does not seem to include current residents. Why is that? From my vantage point, the planning department seems to be more interested in pleasing developers. Developer representation at the May 8 meeting far surpassed the representation of existing neighborhoods that will be severely impacted. I wondered, were the neighbors notified? Vuecrest was notified just before the meeting, and we are a very active association. So, I wonder, were other, less organized neighbors notified. It seems unlikely. Because if they knew that the city council was planning an upzone that would create a lot of negative impacts for them, they would certainly want to have the opportunity to voice their concerns. Wouldn't you? Sadly, the rezones and upzones will likely be shocking for them. How will existing neighbors be negatively impacted: 1) Our environment (no new parks, barely any green at all, mostly just concrete and steel), 2) Street crowding (Planning Department: No worries regarding parking requirements because the builders will be building affordable housing. Apparently, people living in affordable housing do not use cars. I haven't seen any data regarding that fact). 3) Existing neighbors will be living in the shadow of these buildings. You say that's not important? Well, if you bought your house 5, 10, 15, or 20 years ago, your viewpoint should be considered. Why is an existing neighbor's viewpoint less important than a builder? Or a new neighbor? Vuecrest has spent many hours attending North and South Pinnacle projects' planning meetings (for approx. 6 years), and yet the planning department disregards previously agreed upon "Wedding Cake Design (WCD)." The WCD would have gradually stepped up new building heights to ensure that current neighbor's privacy and sunlight would not be lost. Instead, it seems that the planning department gave developers what they want and turned its back on Vuecrest and other neighbors. What has happened to Bellevue? Again, you say, "Building a Livable City for All" but that doesn't seem to be true. Does it? Will Bellevue be livable for existing neighbors? The South and North Pinnacle projects are extremely oversized - 15 towers! And that does not include the up zone of "overlay A-1, A-2, B-1, B-2." If the existing citizens of</p>
146 David Plummer	<p>1. The City web site states that the final EIS (on the 2024 Comp. Plan update) will be issued in August: is this August 2023? 2. Is the current DEIS (dated April 2023) a draft EIS of the proposed 2024 Comp. Plan; if so, how can I get a copy of the proposed 2024 Comp. Plan?</p>
147 Steve Kunkel	<p>I send this letter to the City in 2016 but never got a response. See docx <a href="https://s3-us-west-2.amazonaws.com/comment-tracker-upload/29/b5af9dc0-06fa-11ee-8d9f-21e87903da63.docx">https://s3-us-west-2.amazonaws.com/comment-tracker-upload/29/b5af9dc0-06fa-11ee-8d9f-21e87903da63.docx</a></p>

148 Sue Harms	A halt on building until the infrastructure can be built to support it! The quality of life continues to deteriorate due to traffic in this city!
149 Paula Fuld	With the rise of homelessness it is important for this city to manage this vulnerable population. I wish for all people to be treated with respect, but I also believe people should respect the environment around them. I see more trash and filth along certain corridors of our otherwise beautiful city. If the city of Bellevue has a plan to house these people along streets, parks and large parking spaces it must do much more to address the cleanliness of the areas around them. Seattle looks like a garbage can! My Grandmother grew up on the south side of Chicago and never had a lot of money, but one thing she stressed is that you don't need a lot of money to stay neat and clean. Spend a little more on these services if more people are allowed to live in homeless conditions. If people are too stoned to clean up them make them leave or house them inside somewhere. Crack down on hard drug pushers. Allow all books to be read , no banning books. Thank you for this open dialogue.

150 April Stevens

To: City of Bellevue Planning Commission From: April Stevens, Bellevue resident First, let me thank you for all your time and efforts that you are giving to consider how Bellevue will grow in the next 20 years. It is a huge task and takes considerable evaluation to ensure that we meet all of our growth goals. In particular, I am writing to you to ensure that our environmental goals of 80% reduction in greenhouse gases by 2050 and increasing our tree canopy to 40% citywide. It is essential that growth be done in parallel with these goals and that the city is able to provide a summary stating this intention on whatever alternative you advise. Currently, this is not the case. Neither of these goals are sufficiently analyzed in the current EIS. Additionally, measures and accountabilities should be in place to monitor progress. Another important factor that is not addressed in the DEIS, is the importance of tree canopy. Tree canopy has several positive climate effects beyond that of capturing carbon. According to the US Department of Energy, sufficient tree canopy can reduce energy consumption. A US Forest Service study, trees can lower air temperature by up to 7 degrees Fahrenheit in urban areas. This will help achieve the City of Bellevue's environmental stewardship plan. As long as these stated goals are addressed, I am in favor of alternative 3 as being the most environmentally friendly. This alternative broadly distributes density growth and allows for greater mixed use areas with both commercial and residential development particularly around transit areas making it easier to reduce car trips. It makes neighborhoods more walkable and allows for more types of lower cost housing options. I encourage you to revert to what the founders of Bellevue had as their vision: a city within a park. Keeping this vision in mind as our city grew is what has made Bellevue a desirable place to live and work. Please don't lose this focus! Thank you again for your work and for allowing me to share my views. Sincerely, April Stevens

151 Leslie Geller

The DEIS is voluminous! I could not digest even a large portion of it. Especially because I waited until the final comment day. I recognize that Bellevue is growing and will continue to grow, in residents and businesses of many sizes. This growth necessitates certainly more housing of many varieties, to accommodate residents who rent and those who already own or desire to own a home. New housing must enable people of ALL incomes to be able to afford to live in Bellevue. I urge the city to do everything you can to increase workforce housing (I guess this is the so-called "missing middle") and lower- to low-income housing. Bellevue should not be a city only for the wealthy, as it is rapidly becoming. I would not want to afford my 1954-era rambler at today's market price valuation, even if I could! I don't want to be house rich, income poor. That's no way to live for anyone. What impact on the DEIS and 2044 planning does HB 1110 have? Seems that this new law does a lot of what Alternative 1 purports to do. It is paramount to me that Bellevue meet, even better, exceed greenhouse gas emission reduction targets!!! I favor ALL of the many and varied instruments and methods that further this goal. It is paramount to me that Bellevue retain the vast, vast majority of our existing trees. The tree code revisions are happening outside of the 2044 planning process. How is Bellevue going to enforce retention of not only existing significant and landmark trees, but also even existing smaller trees that TODAY contribute to GHG absorption, help prevent heat islands and other ill effects of global warming. It is paramount to me that Bellevue NOT develop existing parkland, forest, and greenspace. This includes e.g. Airfield Park and the Coal Creek parcel that's now in limbo of becoming expensive condos instead of wildland enjoyed by hundreds of walkers. Do not forsake nature and natural areas for the \$\$ of development.