

ATTACHMENT 1. DETERMINATION OF SIGNIFICANCE

NOTICE OF DETERMINATION OF SIGNIFICANCE (DS),

NOTICE OF ENVIRONMENTAL IMPACT STATEMENT (EIS), PUBLIC SCOPING COMMENT PERIOD AND PUBLIC SCOPING MEETINGS

Project Name: City of Bellevue 2024-2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation EIS

Proponent: City of Bellevue Community Development Department

File Number: 22-116423-LE

Location of Proposal: City of Bellevue – citywide

Lead Agency: The City of Bellevue

Description of the Proposal: The City of Bellevue is updating its Comprehensive Plan in accordance with the requirements of the state Growth Management Act (GMA). The prior periodic update in 2015 established the City's overall growth strategy with a focus on a majority of new growth in both Bellevue's Downtown, which is a designated Regional Growth Center, and BelRed with less growth planned for other mixed-use areas such as Eastgate and Factoria. This growth strategy has resulted in investments in transportation with planning around six new light rail stations as well as other infrastructure and capital facilities.

The proposed update to the City's Comprehensive Plan will plan for growth of at least an additional 35,000 housing units and 70,000 jobs by the year 2044. The EIS will consider a range of approaches to distributing the growth that aligns with regional requirements for equity, climate change, and housing as well as recently adopted City Council vision and priorities. Amendments to the Comprehensive Plan could include changes, such as those defined in the City Council directed [scope](#).

The programmatic EIS will include development of plan alternatives, environmental analysis of those alternatives, and identification of impacts and mitigation measures. The EIS will include subarea-specific analysis for future land use and associated environmental impacts for the Wilburton study area (consists of portions of the Wilburton/NE 8th St and BelRed Subareas).

A Draft Environmental Impact Statement (DEIS) was prepared for the Wilburton study area (referred to as the "Wilburton Commercial Area") in February 2018, followed by the Wilburton Commercial Area Study in July 2018. The study identified a "preferred alternative" for the future state of Wilburton. Due to changed circumstances and the City's desire to incorporate the Wilburton-specific environmental analysis within the City-wide Comprehensive Plan analysis to ensure a cumulative evaluation of potential environmental impacts, the EIS for the Comprehensive Plan Periodic Update will complete the environmental review for the Wilburton study area.

The City is also soliciting feedback from the public relating to amendment requests associated with specific properties which may include desired changes to the plans, policies, or land use map for specific properties. Formal Community Initiated Amendment Requests for changes to the City's Comprehensive Plan land use map, plans or policies related to a particular property will be

considered as part of the plan update, but changes to the land use designations that apply to individual properties will be considered in the context of the community's vision for the plan.

Determination of Significance (DS) and EIS Required: The lead agency has determined this proposal is likely to have a significant adverse impact on the environment. An environmental impact statement (EIS) is required under RCW 43.21C.030(2)(c) and will be prepared. The lead agency has identified the following areas for possible discussion in the programmatic EIS:

- Earth and water quality
- Air quality and greenhouse gas emissions
- Plants and animals
- Energy and natural resources
- Noise
- Land use patterns and urban form
- Historic Resources
- Relationship to plans, policies, and regulations
- Population, employment, and housing
- Transportation (Traffic)
- Public services
- Utilities
- Displacement analysis
- Equitable impacts analysis
- Economic analysis

Alternatives: The EIS will analyze several alternatives. The Alternatives include a No Action Alternative and three Action Alternatives. The alternatives being proposed below include ideas to be analyzed which will lead to development of specific alternatives. The City anticipates having all the alternatives analyzed and brought forward for future discussion.

For purposes of the No Action Alternative, it is assumed that development would occur within the City of Bellevue based on the existing Comprehensive Plan land use, zoning and development standards. It is anticipated that the action alternatives will be based on variations of elements such as the amount and distribution of growth, and the implementation of new policies and infrastructure.

The action alternatives are described in more detail on the project webpage found at <https://bellevuewa.gov/2044-environmental-review>.

EIS Scoping: Agencies, affected tribes and members of the public are invited to comment on the scope of this proposed EIS. You may comment on the alternatives, probable significant adverse impacts, proposed mitigation measures, and licenses or other approvals that may be required. Methods for presenting your comments are described below. The expanded scoping process is being provided pursuant to the Washington Administrative Code (WAC) 197-11-410 and will include two public scoping meetings. Due to continued precautions for COVID-19, one of the meetings will be held virtually and one will be held in-person.

The City of Bellevue assures that no person shall on the grounds of race, color, national origin, or sex as provided by Title VI of the Civil Rights Act of 1964, and related statutes, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any

City of Bellevue program or activity. Any person who believes his/her Title VI protection has been violated may file a complaint with the ADA/Title VI Administrator. For Title VI complaint forms and advice, please contact the ADA/Title VI Administrator at 425-452-6168.

Members of the public, agencies, Tribes, businesses, and organizations are invited to comment on the scope of the EIS. Comments will be accepted on:

- EIS Growth alternatives
- EIS elements of the environment
- Probable significant adverse impacts
- Mitigation measures

Comment Deadline: The 30-day EIS public scoping comment period begins 8:00 AM on Thursday, September 29, 2022 and ends at 4:30 PM on Monday, October 31, 2022 Pacific Standard Time (PST). All comments related to project scoping must be submitted by this date. Comments may be submitted in writing or orally at the scoping meetings. A valid physical mailing address is required to establish status as an official party of record.

EIS Comments may be submitted in writing by:

Online at <https://comment-tracker.esassoc.com/bellevue/index.html>.

By email: CompPlan2044EIS@bellevuewa.gov

By mail to:

City of Bellevue Development Services Department

Attn: Reilly Pittman

450 110th Avenue NE

Bellevue, WA 98004

Virtual EIS Public Scoping Meeting: An EIS Scoping meeting is scheduled from 6:00-8:00 pm PST, Thursday, October 13, 2022. The purpose of the meeting is to present information about the proposed Comprehensive Plan Periodic Update, the SEPA process, and to provide a verbal comment opportunity on the scope of the proposed EIS. To participate in the scoping meeting attendees are requested to register in advance and may sign up to provide an official scoping comment using the following meeting link: bit.ly/bellevuecomp. Attendees who do not sign up to provide a scoping comment in advance may still make a verbal scoping comment at the meeting. A court reporter will be in attendance to transcribe comments.

In-Person EIS Public Scoping Meeting: An in-person EIS Scoping meeting is scheduled at the City of Bellevue City Hall, Council Chambers (1E-126) at 450 110th Avenue NE, Bellevue, WA 98004 from 6:00-8:00 pm PST, Tuesday, October 18, 2022. There will be an opportunity to provide public comment and a court reporter will be in attendance to transcribe comments.

Project-related information can be reviewed on the project website at:

[Bellevue 2044 Environmental Review](#). For more information on this process, and to submit comments directly to the Comprehensive Plan Update team, please consider attending upcoming public meetings listed in this notice.

If an individual is planning on attending one of these meetings and needs alternate formats, interpreters, language assistance, or reasonable accommodation requests, please phone at least 48 hours in advance 425-452-6930 (voice) or email bbrod@bellevuewa.gov. For complaints regarding accommodations, contact City of Bellevue ADA/Title VI Administrator at 425-452-6168 (voice). If you are deaf or hard of hearing dial 711. All meetings are wheelchair accessible.

If you have any questions regarding the ADA statement above or need help please reach out to ADA Coordinator Blayne Amson, bamson@bellevuewa.gov or 425-452-6168.

Contact Information:

Project Manager

Thara Johnson, Comprehensive Planning Manager, tmjohnson@bellevuewa.gov

SEPA Lead Agency Contact

Elizabeth Stead, Land Use Director and SEPA Responsible Official, estead@bellevuewa.gov

ATTACHMENT 2. SCOPING COMMENTS

SECTION 1. COMMENTS SUBMITTED VIA ONLINE PORTAL

Count	ID #	First	Last	Comment
1	2729	Dylan	Roeter	To whom it may concern, I support to implementation on alternative 3. I've lived in this neighborhood all my life and have seen the incredible growth over the decades. The cost of housing here is way too high. The demand far out stretches the supply. My friends and I would love to live/own in the area where we grew up but currently its out of reach. We need to do everything we can to increase the supply in a responsible way. Thanks
2	2728	AJ	Lachini	I am writing in about the upcoming comp plan for Bellevue. I am supporting Alternative # 3 so land is set up for development for the highest and best use and higher density.
3	2727	Heidi	Dean	1. The CoB acknowledges that things have changed in the city since the original Wilburton study was done, thereby requiring a fresh look. The city has also acknowledged that a large # of the 70K+ jobs that are targeted for growth will have their home base here but will be worked elsewhere due to the advent of remote work. That means the jobs and housing targets should be decreased as they are not an accurate reflection of what's coming. 2. Spread density & affordability equitably across all neighborhoods in the city to avoid socio-economic redlining
4	2726	Doug	Rigoni	See PDF
5	2725	Todd	Woosley	Thanks for the opportunity to comment on the Wilburton EIS. Please find attached a memo with my comments. Sincerely, Todd Todd R. Woosley (425) 454-7150 See PDF
6	2724	Phyllis	White	October 31, 2022 I submit the following on the Bellevue Comprehensive Plan Periodic Update, and the Wilburton Growth Alternatives. Please include these comments in the comment record for both proposals: Thank you for the opportunity for public comment during this Scoping Comment Period. I support the goal to increase affordable housing in Bellevue; however, I have deep concerns about the unnecessary 2:1 housing to jobs rate of growth given the unstable economy, over the top Federal deficit resulting in increasing interest rates and lessening of Federal funds, and the higher costs of goods and services. The goal of the Wilburton/N.E. 8th Street Subarea is to support the residential and non-residential uses in the subarea by protecting residential, recreation, and open space areas from the encroachment of commercial and other non-residential uses (except those normally permitted in residential areas). Non-residential development, such as retail activity, medical uses, and auto sales, should be concentrated in existing non-residential areas. This vision seeks to protect residential areas from commercial encroachment except in some cases. This vision also ensures the protection of our wildlife from encroachment and overdevelopment of commercial and residential uses in our existing single-family neighborhoods. Our neighborhood supports the following Wilburton/N.E. 8th Street Subarea Plan to meet the Wilburton/N.E. 8th Street Subarea goal: •To separate residential, recreational, and open space areas from commercial areas and to protect open 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, such as large retail and auto sales, that provide mixed-use opportunities and add convenient shopping for the adjacent neighborhoods. Wilburton residents enjoy the qualities of our neighborhood listed below: •A sense of community to the residential character of Wilburton. •Protection of tree canopies and the beauty, quality, and trees bring to the Wilburton neighborhood. •Ensure the planning and zoning for the safety and well-being of the neighborhood. •Protect the neighborhood from overdevelopment, loss of tree canopies, and clean water in and open land spaces to preserve remaining wildlife and their resources for clean water running through the Kelsey Creek Basin through our Wilburton neighborhood.I support the land use policies below to retain and support the Wilburton/N.E. 8th Street Subarea Plan Goals: Land Use Policies: •POLICY S-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas. Natural Determinants: •POLICY S-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin. •POLICY S-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek. •POLICY S-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan. Residential Development: •POLICY S-WI-19. Enhance the cohesiveness of established single-family and multifamily residential areas. •POLICY S-WI-21. The impacts of traffic and the building scale of non-residential uses (such as churches and schools) located in residential areas should be considered during development review. •POLICY S-WI-22. Seek affordable and "work force" housing in new mixed-use developments through regulatory and incentive approaches. Parks, Recreation, and Open Space: •POLICY S-WI-32. Retain the parks in the subarea and ensure they remain park facilities (including Wilburton Hill and Kelsey Creek Parks). •POLICY S-WI-33. Retain and develop open spaces for a variety of purposes. •POLICY S-WI-34. The City strongly encourages the continuation of the golf course use at the Glendale Golf Course. •POLICY S-WI-35. Prepare designs for proposed parks with the participation of the community affected and served. •POLICY S-WI-36. Support the continuation of the Lake-to-Lake Trail through Wilburton.

6 2725 contd.	Phyllis	White	<p>•POLICY S-WI-37. The City should consider acquisition of surplus school district sites which might be appropriate for park and recreation uses. •POLICY S-WI-38. Encourage development of the Highland-Glendale site, located on the northeast corner of N.E. 8th Street and 134th Avenue N.E., as a park facility. Please refer to the history of this property, Parcel 0672100095. A family donated the parcel to the City of Bellevue with the condition it is used as a park. Bellevue is referred to as "A City in a Park". Our sub-neighborhoods of Bellevue are as diverse as the residents that live here. Each differs in character, landscape, and density. Many of our differing neighborhood areas have older trees, some over 100 years old, growing on the properties. Trees are critical infrastructures, and neighborhood-by-neighborhood tree protections should be required. It takes years for them to grow. Trees provide a filter from air pollution, absorb stormwater runoff protect the water from contaminants, and provide shade and cooler air in residential properties. Trees offer tremendous wildlife habitats and provide animals shade, shelter, moisture, and food. Areas with fewer trees can become as hot as 10 degrees higher. Animals use trees for resting, nesting, and places to hunt and capturing prey. In my neighborhood area for example, between NE 8th and BelRed Road, trees provide the habitat for many types of animals, such as hawks, bald eagles, cardinals, robins, hummingbirds, crows, blue herons, owls, frogs, raccoons, deer, rabbits, beavers, squirrels, bats, coyotes, and many others. Cutting down the trees for housing density will destroy the essential habitat of these animals and will have a lasting impact on the residential environment we love and enjoy.</p> <p>Replacing single residential homes with apartments, townhouses, middle housing, and DADUs will affect the quality and character of the neighborhood if not done with careful consideration. Moreover, rentals should be required with established rental periods, owner residency requirements, and monitoring. Every neighborhood should have the ability to opt in or inopt out of the inclusion of DADUs.</p> <p>Off-street parking needs to be considered when planning for increasing density. Wilburton streets are narrow, with limited street parking. Also, the light rail, housing, office, and retail developments will contribute to worsening noise and air quality. There are about 22 new parcels in the Spring District and BelRed for development, adding 1,995 housing units and 6,000 parking spaces, with more on the way. Wilburton's traffic will increase with the Spring District, BelRed, The Wilburton Vision Implementation, and the light rail. Our air and noise quality will be significantly impacted. Bellevue Comprehensive Plan Periodic Update:</p> <p>Support "Alternative 0" promoting affordable housing given the reasons mentioned in this letter. The City should allow neighborhood-by-neighborhood tree protections focusing on growth where there is already density and not make the unnecessary sacrifice of forestry and tree canopies for more affordable housing without a definite matching anticipated job market.</p> <p>Support the housing density to meet the "minimum requirements" of the Growth Management Act and promote growth primarily in the downtown and commercial core areas, mixed-use centers (Downtown, East Main, BelRed, Wilburton, Crossroads, Factoria, Eastgate), and consideration of other Bellevue neighborhoods, such as southeast of Enatai, and areas in the commercial Bridal Trails.</p> <p>I also strongly encourage other options including employment with incentives for affordability and equity, partnerships with universities and colleges for employment, and not only by increasing our property taxes for additional housing affordability. Residents are facing financial hardships with our property taxes up 40% from last year. Increasing property taxes will cause less affordability for housing for all.</p>
6 2726 contd.	Phyllis	White	<p>1. Bellevue Comprehensive Plan Periodic Update and Wilburton Vision Implementation</p> <p>1.1. Revise Alternatives 1, 2, and 3 to include only those changes needed to bring Alternative 0 into compliance with the housing unit growth target specified in 2021 King County Countywide Planning Policies. The current descriptions of these alternatives shows that each of them would provide excessive amounts of housing and job growth. 2. Wilburton Vision Implementation 2.1. Revise Alternatives 1, 2, and 3 to eliminate the NE 6th street extension. 2.2. Revise Alternatives 1, 2, and 3 to eliminate any provision for residential towers in any areas in the Wilburton subarea near neighborhood parks and single-family residential.</p> <p>Thank you for your time and attention.</p> <p>Sincerely, Phyllis White</p>
7 2723	Phyllis	White	Error- no comment submitted.
8 2722	Kit	Singh	1) We would like to have the ability to sub divide out property in Bridle Trails. This would create more housing for the city of Bellevue. 2) We need a better sound barrier wall to reduce the excessive traffic noise that pollutes our neighborhood.
9 2721	Andrew	Coates	See PDFs
13 2717	Randy	Bannecker	<p>The Seattle King County Realtors thank you for the opportunity to comment on the DEIS scoping. • Overall, we believe it is important to use the EIS scoping process to broaden thinking about accommodating demand for housing in a manner that will moderate pricing and lead to greater housing choices for Bellevue residents and would-be Bellevue residents throughout the income spectrum. In particular, we believe it is important to get creative about deploying missing middle housing strategies in zones that currently are strictly single family detached housing. We encourage the city to explore the allowance of small lot/small structure housing that is fee simple rather than rental or condominium. This could be a valuable tool in offering entry-level homeownership opportunities in Bellevue. Good design and maintaining neighborhood quality must be key components when contemplating any new housing typologies. • We encourage the city to double the housing growth assumption, given what we expect to be robust job growth well into the future. The median priced single-family home in Bellevue is \$2.4 million; a condominium is \$919,000. These prices lock many prospective buyers out of the Bellevue market and are a function of an inadequate supply of housing relative to demand. A significant increase in zoned density to increase housing supply well beyond GMA housing targets is warranted. • We believe the city should fully develop Bellevue 2044 Alternative 3 to more comprehensively identify options and opportunities to increase residential density in mixed-use centers, areas of high opportunity (good access to transit/jobs) as well as in and near Neighborhood Centers. • In the interest of constraining housing costs increases (single family detached and multifamily), we ask that the scoping process conduct foundational work to address the myriad regulatory requirements and processes (structural, energy, climate, environmental) that add tremendous costs to housing construction. We believe it is time to take a fresh look at housing regulation to reduce duplicative processes and seek to restructure regulations that add cost with negligible benefit (to the structure or larger community).</p> <p>• We encourage the city to tread cautiously with housing policies that promotes affordability with fees or performance requirements. Often these programs are too rigid to respond to market fluctuations and risk chilling projects that would bring critically needed housing units to the city.</p>

14	2716 Mike	Niemann	Hello. My family and many of our neighbors (Bridle Trails off the 116th AVE corridor) have two main issues: Zoning and Road Noise. Zoning: Realizing there is a focus to increase housing availability and accommodate growth in Bellevue, the Bridle Trails area is a clear choice to help achieve your goals. If the zoning changed to R4 instead of the current R1 for example, the number of possible houses would increase 4x and the lots would still be ~10k sq ft on average. On our street alone, the number of possible homes would increase from 16 to 64 which would increase population capacity by ~200 or more people just on one street. We are one of the closest neighborhoods and within walking distance to the new Spring District/120th Station. Is rezoning likely for us? Road Noise: With the focus on environmental factors impacting quality of life, we need to raise the issue of Road Noise from 405. It's bad all along 116th and unacceptable by Bellevue's own standards where we live. I can't imagine any residential area in Bellevue where the noise is worse. The noise wall is woefully short and is not effective. It's also crumbling down in places. The Bellevue City Municipal Code indicates the maximum environmental noise level is 55 decibels. It is consistently over 70 decibels at our house with spikes in excess of 100 decibels. The noise spikes come from Jake Brakes and cars racing. Can you prohibit the use of Jake Brakes on 405 right here as I've seen signs to indicate in other areas? Attached is a screenshot from the Sound Meter app I took the other day from my yard. The app is available on the App Store and shows a normal middle of the day (around 2:00 p.m.) average of 72 decibels. This is every day and negatively impacts sleep and just general enjoyment of life. It's honestly not enjoyable to be in the back yard due to the noise and at night it constantly keeps us up. The wall is so short, you can actually see the tops of vehicles on 405 from our yard. This is really a problem for my 7-year-old son despite our attempts to mitigate with white noise. I invite someone from the city to please come to our house and measure and experience the noise personally. We have seen some newer, impressive walls going up in other parts of the city and request a modernized wall to help get the noise to acceptable levels based on the city code (link below). I am attaching a short video demonstrating the noise from just in front of our house. It's not more quite from our yard but here you can see the wall and a truck going by clearly. There are portions lower than that where you can see regular vehicles but it's obscured by trees. Here is the code. Bellevue is not close to meeting its own standard here. https://bellevue.municipal.codes/BCC/9.18.030 Thank you for your consideration. Please let me know if you would like to visit or have a conversation. We welcome any opportunity to participate. Thanks, Mike Niemann
15	2715 Maria	Hui	Thank you for the opportunity to comment on the EIS. I would suggest there be consideration for prioritizing arts policy in the BelRed area. There are quite a number of current arts organizations in the BelRed area, and their services to the community and residents are invaluable. It is important that they do not get displaced moving forward. Affordable, equitable housing for our arts community and partners is essential. Our arts community should live close to where they work and create. Thank you.
16	2714 Chris	Buchanan	CIRC is a nonprofit organization, founded in 1991 as DASH, with the mission to provide affordable workforce housing in Downtown Bellevue. Of our 800 units, one-third are located in the City of Bellevue's Downtown and Wilburton neighborhoods, housing nearly 500 people. Our focus is providing permanent affordable workforce, family, and senior housing close-in to the City's downtown core, where there is easy access to transit, services, and the jobs that drive Bellevue's economy. Both the Human Services Needs update in 2019 and the 2020 Economic Development Plan identify the high cost of housing as a significant barrier for Bellevue's workers at all income levels. We know there is a shortage of affordable housing in Bellevue and with this Comprehensive Plan Update, there is an opportunity to make meaningful change on that front. Of the four Alternates presented in the EIS Scoping handout, we strongly urge the City to proceed with the option that provides the greatest amount of opportunity for new housing for Bellevue residents: Alternative 3. However, we note that there is one glaring omission: only one option presented (Alternative 0, the "no action" option) includes Mandatory Inclusionary Zoning in the scope. Other cities have seen success in generating affordable housing through MIZ where Bellevue has lagged behind. We Strongly Urge You to include Mandatory Inclusionary Zoning in the scope of study Alongside incentive zoning in ALL options. Only then will the city have sufficient data to compare the efficacy of either Mandatory or Incentive zoning for the purposes of generating affordable housing. It is clear, in hindsight, that the previous Comprehensive Plan Update did not provide the City of Bellevue with the flexibility nor capacity to respond to market forces, resulting in the critical absence of affording housing for Bellevue's workforce. We urge you to take bold steps to correct that in this Comprehensive Plan update.
17	2713 Mark	Foltz	See PDF
18	2712 David	Wright	See PDF
19	2711 Matt	Wickens	Our firm, Pine Forest Properties, is the owner of the Belle View office park in the Wilburton area. We are in full support of the Wilburton Vision, and specifically zoning that would support maximum housing density. Within the draft EIS, we would support Alternative 3, bringing more desperately needed family housing to Bellevue, with favorable incentives (not mandates) for developers to produce affordable housing similar to the Bel Red Area Plan. Matt Wickens President Pine Forest Properties
20	2710 Jenny	Duntz	I want to see more arts incentives in the Arts District. More incentives for business that are art related and for public works as well.
21	2709 Doug	M	The scoping notice identifies transportation as an element of the environment to be included in the EIS analysis, further including traffic in parenthesis. The Scoping Handout did not provide further definition around what would be included in the transportation portion of the analysis, so the implication is that beyond new transportation infrastructure needed for growth (and its environmental impacts) the only other element to be studied is traffic. Since transportation is a varied and highly technical topic area, I am hoping that transportation safety will also be included in this analysis, as it is critical for decisionmakers to understand how the planned growth will impact safety for pedestrians, bicyclists, transit users, etc. If safety for these modes is not considered, we may not be able to understand how these planning actions will impact our mode-shift goals. It is possible that we will be less likely to achieve a fully multimodal system if the system is not safe, which will hinder our ability to move away from SOVs. Additionally, given Bellevue's purported focus on Vision Zero, this would seem to be a perfect opportunity to elevate that program, even though pedestrian deaths have risen in Bellevue in recent years. Please ensure that safety is a major component of the transportation analysis of the EIS. If it is not, it will be a major shortcoming of the EIS. Thank you.
22	2708 Eric	Hansen	We Support Option 3 for Wilburton EIS with 15,000 housing units. We feel it is important to allow flexibility for use types within this zone. Greater density will allow more to take advantage of the light rail and proximity to downtown.

23	2707 Jane	Rasmussen	<p>Hello. During your planning please consider retaining affordable single family housing in Bellevue. Over the years I have seen too many good old single family homes torn down for million dollar homes. Now these homes are being torn down for multi-million dollar homes and I am disturbed that now there is a new \$5.3 million dollar home in my neighborhood. My property taxes are going up incrementing high fast. This past year the assessed value of my home went up \$700,000.00 in one year! (That increase is almost what we paid for it twelve years ago!.) I hate to think about what our property taxes are going to be.</p> <p>While it is good that our property value has increased, if we were to sell our home, where could we afford to live and continue to support the businesses in Bellevue?</p> <p>The tear down of affordable housing to build expensive housing has been going on for decades and now we have a big affordable housing problem. Please include the retention of existing affordable housing in Bellevue's plans and consider steps to do so now. Perhaps zoning and building laws could be established so that when a homes is torn down and a new home(s) is built on the lot or sublots, the value of the new home(s) are no more than a affordable percentage of the value of the homes in the neighborhood.</p>
24	2706 Cody	Klansnic	Writing in to support Map #3!
25	2705 Cathy	Roeter	We support option 3 and increased density in North Bellevue.
26	2704 GLORIA	OLSEN	<p>Thank you, City of Bellevue Planners, for helping insure that people like me could find a place to live in Bellevue. Alternative #3 of the maps for the Wilburton Vision makes the most sense to me! I am a current senior at the University of Washington. I am majoring in fine arts with a minor in Law Society and Justice. I'm not sure what my future holds, but I know one thing is for sure, I will need a place to live! It is possible that my future career involves photography or working with children as these are things I enjoy. However, I am aware that the things I enjoy do not hold potential for lucrative careers but I sincerely hope that this doesn't mean I won't be welcome in Bellevue. To feel welcome, people like me need to have housing options that are acceptable in quality and affordable. I love nature and trees, like most people, and I think the Bridle Trails area would be a peaceful place to live, but currently even the smallest apartment in that area is unaffordable for me. I think the nature of the area can be preserved with the existing limits on development already in place. There are also wonderful parks and trails in Bridle Trails that I know will be preserved, but are currently rarely accessible to me since my ability to use them requires a lengthy commute. Once I graduate, I would like to walk out my front door and be able to go for a jog on the trails or possibly a walking commute to work along a wooded path. My generation does not require large living spaces and many of us do not own cars. We are happiest when we can live in a nice, small living space, but have access to beautiful, natural public areas like Bridle Trails State Park, Bridle Crest Trail or the Bellevue Golf Course. I know this area because my mom and dad were married directly across the street from the Bellevue Golf Course 25 years ago. We all love this area, but we want to be able to have the option to afford to live there. Please help give us the option to live in Bridle Trails, specifically along 140th, by allowing reasonably priced apartments in the area directly across the street from the golf course. Thank you for listening to my voice, Gloria Olsen</p>
27	2703 Amador	Olsen	<p>Hello City of Bellevue Planners, I am appreciative for my generation, generation Z, that you are planning for our massive influx to the City of Bellevue. Our generation plans to come to Bellevue, but we need affordable places to live. And from what I learned at the Foster School of Business with a focus in finance and the College of Built Environments with a focus in real estate, where I graduated Cum Laude two years ago: the best way to increase affordable housing is to increase the supply. For me the best option to increase housing supply in Bellevue is Alternative #3 in appendix A of the Wilburton Plan for expansion to be documented in the overall Bellevue Comp Plan that should be adopted by June 2024. In Alternative #3, specifically the raw, undeveloped, unused, obsolete horse pastures along the 140th corridor should be zoned to accommodate garden style multifamily development. The garden style is generally four stories tall with an additional 10 ft to accommodate the roof. This would allow density in the somewhat constrained developable area due to already significantly protected wetlands, steep slopes and trees. This can not come soon enough! Please keep us posted (as you are doing) so that we can write in when appropriate. Thank you for taking the time to read my comments, Army Olsen 206-595-5749</p>
28	2702 Garth	Olsen	<p>I am writing in to comment on the Wilburton Bellevue 2044 Comprehensive Plan Periodic Update and EIS statement, Fall 2022 Scoping Handout Appendix A. Alternative #3 is the only alternative that comes close to providing the best options for the desperately needed growth in the City of Bellevue. Specifically, the currently undeveloped, unutilized properties along 140th in Bridle Trails should be allowed to develop into mid-scale/Multi-family Medium Density development. Future significant increased density would allow residents to support the return of the King County Metro bus line, which, unfortunately was taken out a few years ago. Reinstalling the bus stop adjacent to the Bellevue Golf Course would allow future residents to easily travel the 140th corridor to the existing and growing commercial hubs within two miles of that bus stop. Alternatively, future high density or medium density residents would have immediate access for leisure and commute to the Bridle Crest trail footpath that leads directly to Microsoft within a 10 minute walk headed east or a 10 minute walk headed west to the Bridle Trails commercial area or Bridle Trails state park for recreation. Higher density along the 140th corridor also goes hand in hand with the future opening of the light rail station within a mile or two of this area. Alternative #3 is the only alternative presented that will help increase the total amount of housing available in Bellevue and therefore relieve pressure on the overall cost of housing. Thank you for working to improve housing supply in Bellevue, Garth Olsen 206-947-3920</p>
29	2701 Virginia	Miller	<p>In the Bellevue 2044 EIS Scoping Handout, Alternatives 2 and 3 are the only ones that make sense, and Alternative 3 is really the only one that will have a chance of providing a spectrum of affordable housing and a variety of housing types. In order to create that type of density, the entire City must be considered. While concentrated housing in Downtown and the Spring District will occur this is expensive housing to build due to land values, primarily; does not create sufficient affordable housing units, and only apartments/condominiums will be provided. Townhomes and cottages make little economic sense in these areas where the cost of land is so high. The eastern 40 acres of the Overlake Farm is a prime location for higher density housing, especially the missing middle. It is across the street from the Bellevue Municipal Golf Course with excellent access to jobs in the Overlake neighborhood, the Spring District, and Downtown Bellevue, as well as the nearby Microsoft West campus. There is also excellent access to transit with the Overlake Village and Redmond Technology light rail stations nearby. Additionally, a wide, paved pedestrian/bicycle path already connects the property to commercial areas nearby. The property can accommodate multi-story multifamily development as well as townhomes and cottages, which would also be in keeping with the adjacent neighborhoods. This 40-acre parcel should be designated for multifamily development and a density of 10-15 dwelling units per acre and a height limit of 60 feet in order to optimize the provision of housing and the preservation of open space. Such a designation would reduce carbon footprint and environmental impact of the expected new residents projected for the City of Bellevue.</p>

30	2700 GLORIA	SFERRA	I am writing in to comment on the current maps proposing zoning changes throughout Bellevue. My mother used to take the ferry boat to Bellevue to ride her horse in Bridle Trails. I then used to drive my daughter and her horse weekly to riding lessons at the old Central Park Stables in the 1980s. Now I am a woman in my 80s and even I understand the changes that need to take place in Bridle Trails. I still ride my pony, but when I haul into Bridle Trails and ride I see many more joggers than I see horse back riders. The time has come for Bridle Trails to shoulder their responsibility in housing the masses of people coming to Bellevue. I see the empty and abandoned horse pastures of Bridle Trails. Why not incentivize these horse pasture owners to allow their lots to be developed to anything but more McMansions! The time has come for Bridle Trails, especially along the already busy 140th corridor to build into meaningful housing alternatives that will make a dent in the lack of housing supply in Bellevue. Please let the large, unused horse pastures along 140th be developed into townhomes and/or clustered apartment buildings. A long time ago, the neighborhood already approved the alternative for senior living to go on the 40 acre parcel across the street from the Bellevue Golf Course. As I am now in my 80s, this sounds even more appealing than it once did. I recently visited Covenant Shores on Mercer Island. The campus is 12 acres and there are 300 residents. It has a wonderful clustered development of a campus with buildings. Please allow the 9 acre piece directly across from the golf course entrance to have the option of developing in this way. It has been a long time coming and the time is now! Allowing the parcel to build taller will allow them to work around the natural wetlands and preserve the regulated buffers, while still offering meaningful change to the City of Bellevue and its desperate need for varied housing alternatives. I support Option #3 with your highest density housing options. But, I also support the future ability for the 9 acre piece to become senior housing. Thank you for taking the first steps by changing the zoning in Bridle Trails. Sincerely, Gloria Sferra 84 year old very active member of Lake Washington Saddle Club since it was founded 1950s
31	2699 LISA	Olsen	Thank you for your work on updating the City of Bellevue Comp plan. The City of Bellevue is desperate for increased housing, so the update cannot come soon enough! The options proposed are a big improvement on the existing models, but I think even more must be done to increase growth. All the options for the Wilburton proposed growth plans show sweeping changes to the southern suburban areas in Bellevue, but what about the northern suburban areas?? Overall, these areas seem to be left out of the growth. It seems as though the city may be protecting its most affluent inhabitants so they can enjoy their large lots and mature trees. Meanwhile, I see areas like Sammamish ripping down our collective virgin forests so that acres upon acres of homogenized, housing can go in. This damage to habitat is irreparable and creates long commutes for people who might otherwise like to live closer to urban areas. Not only does Bellevue need to include the northern suburban areas of the city in its sweeping higher density growth plans, but they need to rework the entire policy for the Bridle Trails area that will allow for increased housing opportunity to middle income families. The large public spaces of Bridle Trails State Park, the Bellevue Golf Course and the Bridle Crest Trail should be accessible on foot to more surrounding people. Please allow common people to enjoy these protected areas on the daily. Specifically the 140th corridor has multiple undeveloped large parcels of land. This is where the increased growth should go. These areas are already located on a major thoroughfare with a wonderful pedestrian or bike access to nearby future light rail stations and major commercial areas. I understand much growth comes from tearing down existing structures and building newer, higher density housing. BUT, the more environmental way to accommodate growth is development of large horse pastures that are obsolete in this day and age. Times have changed and thank goodness Bellevue appears to be embracing development. Do not let Sammamish take all the housing demand and don't allow the ripping down of our beautiful, pristine cascade mountains by pushing growth eastward. We want growth within all the City limits of Bellevue, Kirkland and Redmond. Where growth should be. It is basic supply and demand, if you make development feasible inside your city, then people will live closer to these urban centers and your city will thrive and grow as it should. I know there is much talk about the environmental impact of such growth inside the city. I would focus on the irreparable damage that occurs when other cities take up the slack and allow development in areas of large animal habitat. This is how bears are showing up in peoples backyards around Sammamish.
31	2699 LISA contd.	Olsen	Bellevue, please do your part and please incentivize people with large, undeveloped, underutilized parcels to the north of your city – specifically Bridle Trails – to develop their parcels into higher density housing that can benefit the entire region. I hope Option 1 is not chosen because it sounds like the City is going not put in the sweeping rezones that would increase supply of housing, but rather help affordability through increased government policies to incentivize affordability. Options 2 and 3 increase the potential supply of housing by increasing the land area allowed to develop to higher density. This is more effective and less cumbersome than trying to have the government regulate more housing affordability. Please allow age old concepts of supply and demand do the heavy lifting on housing accessibility – it just makes more sense. And please INCREASE the areas of higher density to include the area north of the downtown core. Thank you!!! Lisa Olsen
32	2698 Ruth	Lipscomb	This comment is related to the Comprehensive Plan housing alternatives. We are all aware that Bellevue is already in a housing crisis due to increasing demand and an inadequate and inelastic supply. In order to bring down housing costs while also providing equitable access to the city's highest opportunity neighborhoods (which are those that currently have the highest housing costs), we must increase housing availability in every neighborhood of the city for all income levels of residents. The EIS scoping should ONLY include alternatives that have, at a minimum, the number of housing units modeled in Alternative 3, and the potential units should only go up from that level. It will take a drastic increase in the total number of housing units available citywide to provide the necessary mitigation of traffic congestion, greenhouse gas emissions, gentrifying displacement, and inequality that we are currently experiencing. As a regional employment hub, our city has a responsibility to provide housing opportunities for more than just the wealthy. I also suggest that Bellevue study at least one alternative that includes the adoption of “form based codes” for all single-family-zoned areas of the city. (That term is defined at https://formbasedcodes.org/definition/ .) This would, in effect, allow the same sizes of “houses” that are allowed now, but remove restrictions on the number of dwelling units within those structures. Many of the most expensive residential parcels in Bellevue could easily support duplexes, triplexes, and even modest-sized quads; there is no shortage of willing renters and buyers. These could be designed within the same building envelopes as are already being permitted for single-family units all over the city when smaller, older houses are torn down. By providing a wide range of typologies everywhere in the city, there would be expanded options for older residents to downsize while staying in their established neighborhoods, and more opportunities for families with children to move into neighborhoods with the best schools. Finally, I encourage the city to study mandatory inclusionary affordability citywide in all of the alternatives. When half of the workers in Bellevue make less than \$50,000 per year, we should be targeting our housing goals not by AMI, which is the median income of those who already live in the city, but by the incomes of our city's workers, a large percentage of whom cannot afford to live here and commute long distances. Providing them with housing options is the best thing we can do to fight climate change. Thank you for your consideration.
33	2697 cheryl	wang	This comment is in regards to the increased housing that the city is planning. I am asking that you put a hold on that. Wilburton should stay as is - the park and single family homes is the right balance. Economy is not well. We don't know how the job market will be. Thank you.
34	2694 Whit	Hamlin	See PDF
35	2693 EDWARD	BOLLES	REGARDING OUR COMMERCIAL OFFICE ZONED PROPERTY AT 15611 BEL RED ROAD. I WOULD LIKE TO SEE ONE OR MORE OF THE FOLLOWING OPTIONS. UPGRADE THE FAR TO .75, ALLOW ONE MORE STORY ON A BUILDING, ALLOW R30 FOR CONDOS, OR TOWN HOMES ETC. ALLOW FOR EXTENDED STAY HOTEL, CONSIDER REZONING THE RESIDENTIAL AREA FROM OUR PROPERTY TO 159TH ST AND FROM NE 24TH TO NE 26TH ST TO OFFICE ZONE OR R 30 ZONE. THIS WOULD LEAVE A NICE BUFFER TO THE HOMES ACROSS THE STREET. ALSO CONSIDER TAKING OUT THE IRON TRIANGLE, BLDG.'S AND MAKE A GIANT ROUND ABOUT THERE. 425-442-5769 ED BOLLES
36	2692 Tim	Trohimovich	See PDF
37	2691 Pat	Wiley	See PDF

38	2688 David	Burg	Who is going to be our future landlords? Affordability is better served when mom-and-pop can invest in small rental units, with direct person-to-person interaction with the tenants. Out-of-state big real estate investment firms will only care about profit and their stakeholders. The plan needs to include individual buy-to-rent units, not the giant towers of downtown Bellevue and Microsoft campus area.
39	2687 David	Burg	The northeast Bellevue neighborhood is overdue for renewal of its water (and other utilities) infrastructure. We need a renewal plan that catch up on the obsolete water system and accommodate the next 50 years. The single-family home zoning leads to inefficient use of space, excessive use of natural resources including water but also leading to higher air pollution relative to the population these homes may accommodate. (Emphasis) *Moderately* higher density housing would correct this situation through an efficient use of the resources at our disposal. A progressive transition to higher density housing requires the water system to be renewed on the basis of new needs and a higher density zoning expectation. I am against a brutal transition to skyscrapers as we've seen downtown Bellevue, and the displacement of low, moderate and stable incoming residents. We need a progressive transition to duplex, triplex, supported by a capable infrastructure. The current overly restrictive zoning and obsolete infrastructure prevents that. The re-zoning and infrastructure investments to the benefit of very large real estate developers, as seen both downtown and now also coming south from the Microsoft campus is a failure of the city hall to address the need of the people who already live in Bellevue. Any redevelopment given to the hands of large developers needs to include a mandate to provide both transition and long-term new housing at same cost for existing residents. It is very unfair that developers get to make money hand over fist from destroying our neighborhood, while we get priced out of our homes. The city plan and regulations granting the construction permits to these developers need to be made in a fair exchange returning to the current residents value and continued housing they can afford. The economic incentives of builders are currently to either make luxury very high density towers with top floor suite for multi-millionaires, or land-wasting Mac Mansion SFHs again for multi-millionaires. How does that address any of the needs of our city's medium household income? It just doesn't. The city needs to use its infrastructure plan, zoning regulations, building code and permit process to correct the market forces for a sustainable and fair redevelopment of Bellevue's northeast neighborhood to the benefit of both current and future residents.
40	2686 T.J.	Woosley	The Wilburton area is going to play a very large part in Bellevue's ability to accommodate the upcoming employment, residential and commercial growth into the future. For the Scoping of the EIS I would strongly encourage that the largest growth alternative (#3) be assumed and that the proposed residential population # be increased from 12,000 to 15,000. Transportation/Mobility infrastructure (for all modes, including cars) needs to be adequately planned and built concurrent with the needed commercial and residential development. Thank you, T.J. Woosley
41	2683 Douglas	Mathews	Mandatory inclusion of low-income housing (around 10%) should be required for development of multi-family housing projects.
42	2673 Linda	Ulrich	Dear Committee Members, As a long time Bellevue resident (64 years) I have a deep vested interest in and concern with the plans being discussed for the Wilburton Vision Implementation plan. During the years of residency along the Bel-Red Corridor, on 134th Ave NE, we have seen a devastating loss of, and displacement of, our wild life, old growth trees and native vegetation. Driving west on 520 or 8Th Ave I have counted a minimum of 8 cranes. I was shocked therefore to read of the plans for even greater density than that which is currently under construction. Sadly, Bellevue no longer seems to reflect it's name - Beautiful View - one can only "view" block after block of 3-4 story apartment buildings and minimal landscaping. The sun is even blocked in many areas due to the density of the apartments. This alone creates a problem of run-off from the roofs, parking areas, and sidewalks all running into the diminished streams we give lip service to protecting. I agree with affordable housing but please reevaluate what that means. Many if not most of these high density projects result in monthly rents that are as much as a mortgage payment. I understand that provides greater revenue for the City via taxes but at what cost to the City itself? I understand there are other areas that have not been "tagged" such as Bridle Trails, areas north of Bel-Red, east of 156th to suggest a few. I strongly hope you will consider leaving the Wilburton area the wild life sanctuary that it is and look to other areas to accommodate your need for more affordable housing plans. Thank you for your consideration.
43	2672 Linda	Ulrich	Error- no comment submitted.
44	2670 Dennis	Curran	I am the VP of Administrative Services at Bellevue College and I oversee all facility and land issues at the college. The BC campus is zoned for residential and we would like to rezone the campus to something more suited to higher education facilities. Something that allows us to build at least three stories for future structures.
45	2669 John	Wu	I'm afraid this "crazy" plan will turn our beautiful Wilburton neighborhood into an overcrowded, traffic-jammed, uninhabitable, crime-ridden inner-city dungeon. Then there will be various homeless shelters. Ironically, outsiders make decisions for our community. If our city can't handle this much housing, we don't need our city to handle it alone. There are other cities that could help build more housing. The study option also has the following problems: 1. Are based on a pre-Covid commuting situation where people daily went to their workplace. Just drive through the Spring District or downtown and you'll see numerous empty offices. Space-available signs are everywhere. Take a spin through the South Bellevue Park & Ride lot midday on a weekday and the once-crammed facility has just a couple dozen cars. 2. Encourage large increases in the number of teeny apartments. Today, if you drive past those cramped quarters, you'll see many are empty – people who are no longer chained to a physical workplace have fled. 3. Do not address the effect of traffic on 128th – the north-south street on the east side of Wilburton Hill Park. That road – and intersection with the Lake Hills Connector at SE 8th – already backs up southbound when 116th/8th traffic mires. Nor does the study address volume increases on 124th/Main and the effect on park visitors and our neighborhood elementary school. 4. Do not describe how our views of our landscape will change. The city touts being committed to green space, but the study allows for visitors to the Botanical Garden to be greeted with a western wall of high-rise towers vs. its current beautiful vista. (In expectation of zoning changes, an adjacent office park was recently sold.) See https://www.bizjournals.com/seattle/news/2022/10/20/pine-forest-acquires-bellevue-office-buildings.html 5. Do not address King County's expectations that the opening of the Wilburton Trestle as a trail will attract a lot of visitors. (At an open house, fewer than 5 parking spots were allotted by Bellevue for the north access and not one for the south access.) See https://kingcounty.gov/elected/executive/constantine/news/release/2021/September/20-eastrail-amazon.aspx
46	2664 Charlie	Bauman	See PDF
47	2652 KEVIN	PAULICH	Single Family zoning should be changed so as to allow unrelated people to reside together in one house. For example, owners of a large house, say a couple whose children have grown up and moved out, should be allowed to rent out rooms in their house to unrelated people. This kind of collective living should be encouraged.
48	2649 Hanna	Floss	I would like to advocate for Alternative 3, increasing density throughout the city. However, I am unclear why only Alternative 1 has this statement "Mandatory inclusionary affordability alongside additional capacity in growth corridor (Downtown, East Main, Wilburton, and BelRed);" Can we have mandatory inclusionary affordability in alternative 3? For the Wilburton study area, I favor Alternative 2. I feel strongly that the Eastrail should be backing up to apartments so residents can take advantage of this accessway to light rail, downtown and beyond.
49	2648 BARBARA BRAUN		2030 decarbonization goals should be added to the EIS standards. Given the vision for this area, the question should be how much is it IMPROVING things against the EIS standards and our decarbonization goals. If EIS is negative vs positive to any extent, the plan should be revised. This is the opportunity, and the stated goal, to go from a blighted area to a model of environmental redemption and sustainability. This project should break free of the coal/gas and highway/car shackles of the past. It's time to move on. The development so far in Wilburton (PCC, REI, etc.) and the Spring District don't reflect the vision although PCC is a green building.

50	2647 Renay	A Bennett	You guys have got to stop this unchecked growth. There is no way our infrastructure can support it. We do not have the water, power, roads, schools, fire, police, parks and green space, or sewer to support it. These are all part of infrastructure! And if you think Sound Transit will somehow support the 'transportation needs', you are very much mistaken. They will take forever to figure out how to cross a floating bridge (yeah, we warned you about this) and when they do, it will be a quick fix that will require more engineering for a better fix, still not a long term solution. Case in point for your unchecked and unsupported growth in the downtown; police have had to direct traffic out of buildings, stopping the street flow because coerced staffers approved buildings that produce so much traffic, they can't even get out of their parking garages. There is no need for welfare housing and there is no reason to subject people to pay for this scheme. I know there will be lies on this EIS. I have read too many government docs that are filled with lies. I implore you to reject this corruption and honestly assess the situation.
51	2623 Tauna	Wahl	I would like to know what the plans are for noise reduction from the 520 and specifically the 1405. We live along 116th and the noise from the freeway is well above the maximum permissible environmental noise levels for our location. There are high walls located in other locations but nothing built near us or the one down the freeway is old and very short. We would also like to know if there are any plans within the Bridle Trails community to allow for rezoning for higher density housing?
52	2622 Chris	Munson	We have lived over 12 years now in NE Bellevue and have seen a lot of changes with the expansion of living, jobs and shopping areas. I'm not against the expansion; what I would like to see is a greater emphasis in adding to the vegetation canopy around Bellevue when buildings are finished. Whether in the Bel-Red area, One Esterra Park or along 156th, in and around and even on top of these buildings, vegetation has not returned in lieu of more concrete. I know this can be accomplished because I see this in other cities around the world where the emphasis is on keeping what is unique about their area. The NW is unique given its gorgeous greenery that blends in with the cities and neighborhoods; in the last few years, I've seen a greater emphasis on Build-First; Foliage-as-Needed that reminds me of several communities in Southern California where the foliage has all but disappeared. There needs to be greater emphasis that any new buildings are both 'green' in emissions, but also bring more greenery back to the footprint they took over. There should be more dense foliage areas in each new building location too; right now, the emphasis seems to be tons more parking with black tarmac, which just creates more heat maximizing for cars and traffic. I know the Bellevue Tech Center continues to be a hotly desired location for greater community expansion and jobs; please know that the forest and walking areas are still some of the finest and most soothing areas of NE Bellevue because of the high canopy, tree foliage and walking. During the hot summer weeks, it's measurably cooler under those trees; and that has a direct environmental impact. It's a park...without being a park. It's why we love Bellevue too. Please don't keep expanding around it while having it the only last remaining, sizeable green-area. thank you
53	2619 Mark	Nash	It is great to see plans for the future that make Bellevue a more desirable place to live and work. My opinion is that the Wilburton alternatives 2 and 3 are the only alternatives that come close to sufficiently utilizing the great transit access being built around the area. the other alternatives are honestly a misuse of real estate potential both socially, equitably and economically. I do see problems with housing costs increasing near the study area so it would be great for many of the new housing to be mandated to be affordable. Also it would be great to have more "lids" over 405 into the downtown area. Without this people may be discouraged from visiting the "other side" due to a perception that it is difficult to use anything but the grand connection. Also it would be nice to get rid of the clover leaf since it increases congestion for people merging into/off of the on/off ramps onto the highway and also has great development potential economically. Hopefully this could coincide with the 8th street bridge being re-surfaced with bike lanes somehow integrated into it
54	2618 Phyllis	White	1. No micro-units. Living in a tiny space takes a psychological toll, especially for those with mental health disorders. Space is necessary for mental health. The micro-units are temporary housing and are a waste for other types of housing units. 2. Middle housing should be limited to already dense areas. They are similar to mega mansions in taking up tree canopies and spaces where there are trees and wildlife. We have deer, coyotes, bald eagles, hawks, blue herons, beavers, opossums, and other wildlife living in our Wilburton neighborhood between Bel-Red and NE 8th. There are numerous trees over 100 years of age and the Kelsey Creek stream runs through the neighborhood. 3. With the Bel-Red and Wilburton West Edge commercial development, and the Spring District, traffic will be increased. Limit the density and growth areas to Bel-Red and commercial Wilburton. 4. Slow the growth. Currently, Bellevue has approximately 61,128 household units. Planning for 35,000 additional units is more than half of our current housing units. This pace of housing density without knowing the anticipated physical job growth is jumping ahead of itself. Employers are allowing a majority of employees to work remotely and are cutting back on office development. 5. Decrease taxes for residents and small businesses. King County spends over 1 billion a year of our tax dollars on the homeless, and over \$800,000 in the Best Starts for Kids funding. No one knows how the funds are being used or if they are effective. There is no valid auditing of both according to the Seattle Times https://www.seattletimes.com/seattle-news/times-watchdog/upbeat-image-of-massive-best-starts-for-kids-levy-doesnt-tell-voters-full-story/ . We should tax non-profits so that they can keep a budget. Waste increases rental costs. 6. Save single-family residential land with tree canopies and other plants that enable wildlife to survive. Adding an overabundance of housing and density in single residential will displace the animals and will change the character of our residential neighborhoods.
55	2617 Robert	Wallace	I am not in favor of allowing multifamily or commercial uses in existing single-family neighborhoods. I favor maintaining modest height and density adjacent to single family neighborhoods. I favor significantly increasing height and density in proximity to transit stations and freeways. I would encourage the City of Bellevue to lobby King County and the State Legislature to modify the State Environmental Policy Act and county zoning to allow more development in rural areas with close proximity to major highways and freeways.
56	2607 Dean	Dubofsky	Commenting on the Bellevue 2044 plan. I believe that Bellevue is experiencing a housing crisis. The best solution is to encourage the building of more housing everywhere. For that reason I support Alternative 3.
57	2600 David	Goodwin	You need to get more serious about addressing housing affordability for teachers, public service workers, and retired people. The city is not doing enough to address these issues. In fact, it is getting worse. The city needs to get more aggressive in raising revenue for low and moderate housing. Taxes on all new construction with no exceptions, all multiple housing projects must set aside a percent for low and moderate housing, again, with no exceptions. These are just 2 examples. Thanks. David
58	2598 John	Van Duzor	I am more concern with rent for small business There is little space left for auto repair, specially shops. These small business are also important to a community such as there is no longer a place in Bellevue to repair shoes.
59	2597 Timothy	Siegel	In the Housing Goals I was surprised and disappointed to see no mention of avoiding making choices that might endanger health and safety by permitting an increase in crime. Crime is the most direct threat to the health and safety of city residents. I lived in Detroit, MI for many years and am directly familiar with the devastating effect that crime can have on a city. Crime leads to population loss, and a resultant shrinking tax base, resulting in fewer police officers being funded. This, in turn, leads to more crime. Eventually, the only people living in the city are those who have no choice. So, in all of our goals, preventing and avoiding an increase in crime should be at the top of the list, not missing entirely.

60	2592	Michael	Mostov	<p>City has already made a gross mistake permitting development of office high-rises in downtown, instead of badly residential housing. These high-rises if ever occupied, will provide jobs to people who are not currently Bellevue residents - workers will migrate to Bellevue exacerbating housing shortage, creating traffic jams, driving up lines and prices in neighboring retail establishments. Permitting these high-rises was a great disservice to the current and future Bellevue residents. In fact, the best thing that can happen to the city is that these new office buildings will remain empty, unable to find tenants, standing like tall monuments to poor foresight of the past city planners.</p> <p>Therefore, I find it very concerning that city plans on adding another 70,000 workplaces for only 35,000 units of housing, without specifying that these have to be workplaces which will be suitable specifically to Bellevue current residents or improve the quality of life for current residents, rather than degrading it. Not every job meets this definition. The proposed goals seem biased toward attracting new residents to fill new jobs, while driving current residents out due to worsening shortage of housing, raising cost of living and worsening traffic.</p>
61	2591	Stephen	Cobert	<p>I reviewed the plan options and was really surprised at the amount of growth that is planned. The City of Bellevue is already feeling over crowded now. Traffic is terrible during rush hour. Even with transportation improvements, I believe that the traffic in Bellevue will be nearly impossible to navigate. I am also doubtful that building more housing units will actually lower the cost of housing. Sure there will be some mandatory affordable housing but these will get snapped up immediately and remaining units will still be very expensive. I am for less growth and more transportation improvements.</p>
62	2589	Barbara	CAREY	<p>We have just moved out of downtown Bellevue from the Borgata building, whites faces the city park. As the tall buildings to the east have gone up, the temperature in the buildings to the west has increased significantly. In the summer afternoons, the sun reflects off the buildings and back onto the properties to the west. Each new building makes the problem worse. I wonder if the city planners have taken into consideration the heat buildup by allowing so many large buildings. in such a concentrated space.</p>
63	2584	Ingrid	Ensing	<p>I am so sad to see the lose of trees throughout the Bellevue area. The Pacific Northwest is a wooded, natural environment, and development and weather are stripping that feel from our Bellevue community. Major sections of trees have come down along the 405, Spring District, and downtown Bellevue. Trees have been taken out along streets like 148th where old growth was replaced with weak, samplings; surely more trees are coming out along Northup and Bel-Red. The area is losing so many trees due to heat. The city should survey this lose and plan for replacement. Given increasing temperatures, it is even more important to maintain the trees to keep the heat down. Bellevue should be a city in a forest. Instead, it is looking like the high rises of Vancouver or Los Angeles.</p>
64	2583	Heidi	Ressler	<p>2022 most of my Bellevue driving is between Crossroads and Eastgate P&R. I decided to get tires rotated at Discount tire and was amazed to see living units right across the street off Bel-Red and 132nd - in the heart of Bellevue's oh-so-convenient auto repair and service section. Later I went to BurgerMaster along 20th and was appalled to see a new residential mix-use building going up near 130th also in the heart of small business, kitchen & bath, music, paint stores. I guess this still might be part of the Spring District project - what appalled me was how it will negate the WONDERFUL, FREE view of Olympics and downtown Bellevue enjoyed by passing public. Please don't make VIEW a bidding war, especially since COVID restrictions it is important to have VARIETY close to home. One of the cheapest public resources are scenic views from various point in the community to destinations outside the community - lakes, mountains, urban scapes (downtown Bellevue, Seattle and even Issaquah plateau). As you take down tall trees don't also remove the sky with increasingly close and tall buildings. This will be no place to enjoy in retirement (10 years still) at the current pace of development.</p>

SECTION 2. WRITTEN COMMENTS

SUBMITTED AT PUBLIC SCOPING MEETING

Comprehensive Plan Periodic Update: Environmental
Impact Statement (EIS)

Virtual Scoping Public Meeting: File number (22-116423-LE)

October 18, 2022, 6 PM



Written Q&A Form

Name (optional): Heidi Dean

Contact information (optional): technogeekswife@yahoo.com

Question Section:

① If you are looking at neighborhood centers (zoned "mixed use") will the CoB institute a minimum requirement for commercial/retail in order to be considered "mixed use"?

→ Note: overbuilding residential/underbuilding retail = ↑ cars on road seeking services

② If you are looking at densifying the residential portion of a neighborhood with a neighborhood center will CoB look at focusing on increasing retail/commercial in that center instead of forcing residential there?

Note:)

③ Will the transportation policies be adequate to meet the GMA's transportation infrastructure concurrency requirements?

Note: CoB can't meet GMA concurrency requirements right now

Comprehensive Plan Periodic Update: Environmental
Impact Statement (EIS)

Virtual Scoping Public Meeting: File number (22-116423-LE)

October 18, 2022, 6 PM



Written Q&A Form

Name (optional): HAL FERRIS

Contact information (optional): hal.ferris@outlook.com

Question Section:

- ① Housing affordability needs to be considered in scoping for example, if all capacity is concentrated in high rise dense housing which is the most expensive to produce it will be require much higher subsidies to provide even modest levels of affordability?
- ② Existing mixed use capacity has been predominantly used for commercial development. Assumed ratios of commercial & residential development need to recognize current development usage?
- ③ Consider desirable land use and development. Do not limit potential solutions because the EIS scope did not consider a potential solution?

Comprehensive Plan Periodic Update: Environmental
Impact Statement (EIS)

Virtual Scoping Public Meeting: File number (22-116423-LE)

October 18, 2022, 6 PM



Written Q&A Form

Name (optional): Ryan Grans

Contact information (optional): GIS Companies

Question Section: What is the process for increasing
the residential/housing density above and beyond
Alternative 3 ?

I'm on the BDA LUCA Committee. Many of us
feel strongly about increasing residential density over
adding commercial square footage.

Comprehensive Plan Periodic Update: Environmental
Impact Statement (EIS)

Virtual Scoping Public Meeting: File number (22-116423-LE)

October 18, 2022, 6 PM



Written Q&A Form

Name (optional): *Kate Sayers*

Contact information (optional): *425 641 9312*

Question Section:

① Work has changed & people are not using transit - yet
your plan has not considered this
(I sent articles) -

② When is the increased park?

3 Have you met with other parties to innovate
- State officials - housing on bridge trails
- housing on school
- Close the golf course & build housing

④ Why do Somerset & Bridle
Hills get NODENSITY

I want economic Equity
— us poor folks
Don't want
All the Density

Lake hills, Jackson St

⑤ Why don't you show
us pictures of "the plans"
by neighborhood?

Comprehensive Plan Periodic Update: Environmental
Impact Statement (EIS)

Virtual Scoping Public Meeting: File number (22-116423-LE)

October 18, 2022, 6 PM



Written Q&A Form

Name (optional):

Contact information (optional):

Question Section:

(6) What is the impact on schools
If you had 70K people
have you asked?

(7) Why not add housing at
Bussener? - Bellevue Square
- in T-Mobile?

8 Why can't we see an
alternative that
JUST meets

the 35K?

⑨ Who decide on these "Options"

Comprehensive Plan Periodic Update: Environmental
Impact Statement (EIS)

Virtual Scoping Public Meeting: File number (22-116423-LE)

October 18, 2022, 6 PM



Written Q&A Form

Name (optional): Betsy Hummer

Contact information (optional): 9255914784

Question Section: Water is Sacred. All existing bodies of water
need to be maintained and enhanced. Daylight Rivers +
Streams, provide access to Riparian Areas. Incorporate
Existing waterways into all development. Soundproof
all buildings to the highest degree to accommodate
all tenants and inhabitants so people are not traumatized
by living in close proximity with one another.

Accommodate vehicle traffic.

Require all developments to have open space

Require planting of fast growing Shrubs and Trees
to Replenish the loss of Tree Canopy

What's going to happen to Lake Hills?

Where is all the affordable housing going to go?

How can Townhomes be required?

How can the History of Wilburton and Mudlakes
be preserved and made known?

How can anybody be expected to ride bikes on
NE 8th?

Comprehensive Plan Periodic Update: Environmental
Impact Statement (EIS)

Virtual Scoping Public Meeting: File number (22-116423-LE)

October 18, 2022, 6 PM



Written Public Comment Form

Name: Benjamin Hansen

Email: ben.hansen09@gmail.com

Organization:

Address: 3518 109 PL NE #104

City/State/zip code: Bellevue, WA, 98004

Comment Section:

Please include ~~the~~ the total future tax revenue vs the total future service cost at the parcel (or slightly ~~bigger~~ bigger) level, to help us see the long run cost ~~of various~~ of single family vs other ~~or~~ more productive alternatives.

Please include how the zones would change over time, ~~so~~

SECTION 3.1 MEETING TRANSCRIPT

VIRTUAL PUBLIC SCOPING MEETING

1 unmute you, and then your time begins when you start
2 speaking.

3 MR. CAWTHON: Yes. Hello. My name is
4 Cliff Cawthon. I'm the advocacy and policy manager
5 for Habitat for Humanity, Seattle, King, Kittitas
6 Counties. First of all, I want to thank you for
7 giving me the opportunity to speak tonight, and I
8 wanted to urge the -- I wanted to encourage folks
9 through this process to really consider doing growth
10 in an equitable manner and one in which it's friendly
11 towards affordable homeownership opportunities and,
12 particularly, you know, considering the number of
13 issues or number of factors in the scoping process.

14 You know, the alternatives that allow for
15 denser neighborhoods where we can have more first-time
16 home buying opportunities for folks or we can have
17 more and build more affordably. That, I feel, will
18 contribute more to the overall health and well-being
19 of the community, especially as it grows and
20 especially as we're seeing more remote work -- more
21 remote work take root in the area as a region, as a
22 whole. So I just wanted to share those thoughts, and
23 thank you for giving us this opportunity to comment
24 tonight.

25 MS. TOOMEY: Thank you, Cliff.

1 Okay. We're going to restart the clock. So
2 the next person I am looking for is Court Olson, and
3 then after Court will be Christopher Randels. Court
4 Olson, I believe you are here because we got a
5 question from you, so a member of our team will unmute
6 you. Please state your name for the record, and your
7 time will begin when you start speaking.

8 MR. OLSON: Thank you. Court Olson
9 here. I live in the Lake Hills area, Bellevue, and I
10 am most concerned about growth that is not sustainably
11 focused and particularly concerned about greenhouse
12 gas emissions. So I would like to encourage the City
13 to take up stronger regulations on new construction
14 relating to greenhouse gas emissions.

15 I know we've got a goal of reducing emissions
16 50 percent by 2030 as a citywide goal, but I think we
17 need to, particularly when we're talking about growth,
18 focus on getting our buildings, residential,
19 commercial, and other buildings, to be very close to
20 net zero carbon emissions based in their design.

21 So I'd like to see our code updated,
22 strengthened to the point where we're supposed to be
23 statewide by 2031. Bellevue could step up and
24 increase our greenhouse gas emissions attack on new
25 buildings by requiring greater energy efficiency and

1 low carbon or no carbon impacts from new buildings.

2 So thank you for your time.

3 MS. TOOMEY: Thank you, Court.

4 Okay. I'm going to give our host a chance to
5 restart the clock. It kind of ran away from us for a
6 minute. And once you're finished speaking, if you
7 have your hand raised with the Zoom function, we just
8 ask that you lower it so we can keep track of our
9 current speakers.

10 Okay. So our next speaker is Christopher
11 Randels, and then after Christopher will be Diana
12 Thompson. So, Christopher Randels, a member of our --
13 if you're here, a member of our team is going to
14 unmute you, and then you unmute yourself, state your
15 name for the record, and then your time begins when
16 you start speaking.

17 MR. RANDELS: I think I unmuted. Can
18 you hear me?

19 MS. TOOMEY: Yes.

20 MR. RANDELS: Awesome. Perfect. I'll
21 go ahead and start then.

22 So Chris Randels, a Lake Hills resident just
23 speaking on behalf of myself this evening. Just a few
24 notes while you were -- while staff were presenting.
25 Thank you for the presentation. Really extensive.

1 Really comprehensive.

2 As I look through materials, one of the things
3 that stood out to me was I've seen when studying --
4 when setting the scope for transportation, I've seen
5 that mentioned as transportation, parentheses, traffic
6 and so just want to ensure that as we examine
7 transportation impacts that the City is also taking
8 into account how the growth alternatives can use
9 things like bus lanes, bike lanes, sidewalks, really
10 following the framework that's been set by the
11 mobility implementation plan and making sure that
12 we're looking at kind of multimodal -- that we're
13 looking at transportation impacts through a multimodal
14 lens.

15 I would also ask that the -- so the boldest
16 alternative for the City, alternative 3, just kind of
17 echoing what other commenters have said about making
18 sure that there's opportunities all throughout the
19 city. I think it would be helpful if it could look at
20 a baseline of small garden apartments or other
21 housing -- other types of those housing typologies
22 throughout the city that provide -- that can provide
23 affordable rental and homeownership in every
24 neighborhood. I think that having that geographic
25 distribution is important.

1 I'd also encourage that -- I know the City
2 said in alternative 3 that you all will be looking at
3 more development around smaller neighborhood centers.
4 I would also ask that the City consider allowing or
5 looking at what it would be if that alternative were
6 to also allow small businesses operated out of
7 people's homes, for example, a small coffee shop
8 operated out of people's garages or people being able
9 to run small doctors' practices out of their homes,
10 for example.

11 I think that that would help facilitate one
12 more multimodal travel to a vision that several city
13 council members have expressed around the 15-minute
14 city paradigm which would be enabling more people to
15 walk, bike, take transit.

16 I would also ask, if possible, although it's
17 not an official City policy, that each alternative be
18 looked at through that 15-minute city lens of kind of
19 acknowledging and assessing what percentage of the
20 geography the city fits in the 15-minute city
21 paradigm, what percent of the population fits within
22 the 15-minute city paradigm under each alternative.
23 And that can take into account the access to local
24 businesses.

25 Finally, in my last 20 seconds, I would be

1 interested -- with Wilburton specifically, I've heard
2 with the Spring District that there is a great need
3 for existing retail to have a lot of housing around it
4 in order to support those retail uses, so I would want
5 to make sure that to support the small scale level
6 mom-and-pop shops that we need in Wilburton that we
7 right size the housing appropriately, i.e. go for more
8 housing where needed. Thank you.

9 MS. TOOMEY: Thank you, Christopher.

10 Okay. We are looking for Diana Thompson.
11 Diana, we're not sure if you are the call-in number.
12 We're going to try to unmute the phone if it is you.
13 But in the interim, if anyone else has not -- we'll
14 come back to Diana if we can. If anyone has not given
15 comment but would like to, please use the raise hand
16 function right now, and we'll call on you as your name
17 pops up.

18 Okay. So we are just going to try to let the
19 one -- okay. So we have -- so the phone number called
20 in is not Diana. Someone has called in two accounts.
21 So thank you so much for letting us know.

22 So it doesn't look like we have Diana Thompson
23 here tonight for comment. This has been the last call
24 for anyone who would like to raise their hand and
25 provide verbal comment tonight.

1 Okay. We have a hand raised, Walter Scott.
2 Walter, our team is going to unmute you, and then you
3 unmute yourself. Please state your name for the
4 record, and your time begins when you start speaking.

5 MR. SCOTT: Walter Scott and it's about
6 7:14. I just wanted to say that the City is being
7 very careful and they're professionals, and I have
8 full faith in their ability to allow an increase in
9 density and at the same time minimize the negative
10 results that can occur from density in the area.

11 I think that the more flexibility the City has
12 in enforcing the laws, the better it is for everybody
13 involved, because there's situations that will arise
14 that we can't envision at this time. And they need to
15 be able to react to that and create some diversity in
16 the development.

17 For example, if every site has the same height
18 and density parameters, all the buildings will look
19 pretty similar because the developers will develop, if
20 they can, to the maximum of their ability to make that
21 site economic.

22 And, for example, if you had a larger site,
23 like 3 or 5 acres, 3 to 5 acres minimum, you could
24 build some lower buildings, maybe even one-story or
25 two-story buildings for retail to create like a --

1 what would you say, like a reef where fish -- small
2 fish can go. You have a place where all the people
3 come together, and they can shop at retail at leisure
4 and have quality retail there. And then on the same
5 site, they could increase the density and height of
6 that other building they were going to develop to make
7 allowance for the low reef that they built there.

8 So I don't know if that analogy makes any
9 sense to everybody, but that's how I'm viewing it. I
10 wanted to say that the LID or the bridge across the
11 freeway is a pretty important point, and it has to be
12 gotten right because it's going to affect how many
13 people use bikes and go pedestrian to even go to the
14 train stations, which we want to encourage the use of
15 those and make it as direct and easy as possible.

16 That's what I have to say. I have a great
17 amount of excitement for what the City could guide in
18 this -- and the result could be incredible. It could
19 be really a thing of beauty, and that's all I have to
20 say. Thank you.

21 MS. TOOMEY: Thank you so much, Walter.

22 Okay. Well, thanks to all of you for being
23 here tonight, for asking such thoughtful questions,
24 and providing your comments. We really appreciate
25 your engagement.

SECTION 3.2 MEETING TRANSCRIPT

IN-PERSON PUBLIC SCOPING MEETING

1 capture it for everyone else. Please state your name
2 for the record, and then your three minutes will begin
3 when you start speaking.

4 Okay. So the first person on my list I think
5 is Hal Ferris. If you'll state your name for the
6 record.

7 MR. FERRIS: Hal, H-A-L, Ferris,
8 F-E-R-R-I-S. So my comment is that this year for this
9 round of our comprehensive plan the state legislature
10 requires that we identify our affordable housing
11 targets, how we're going to fund them, along with our
12 land use policy. But our scoping document did not
13 include how we're going to fund it as a part of our
14 scoping document in the list of scoping.

15 And affordability -- subsidized housing
16 requires a significant amount of funding, and the
17 taller buildings we build are the most expensive type
18 of housing in our community or any community. If we
19 concentrate more of our housing in those tall
20 buildings, we are going to require a greater level of
21 public subsidy to achieve our requirements for
22 affordable housing.

23 So our scoping needs to -- instead of just
24 having colored diagrams up there for the different
25 neighborhoods, we need to consider that it needs to be

1 spread out because it costs less to build lower
2 density housing than it does higher and, therefore,
3 lower public funding burden to achieve our
4 affordability goals. So I think housing affordability
5 needs to be included in the scoping, not just housing
6 capacity, but the affordability and how we fund that
7 needs to be included in the scoping. Thanks.

8 MS. TOOMEY: Thank you.

9 Okay. Next person is Ben Halsen. And then
10 just to kind of get people queued up, Cliff Cawthon
11 will be after Ben.

12 MR. HANSEN: So it's Benjamin Hansen,
13 B-E-N-J-A-M-I-N, and then Hansen, H-A-N-S-E-N.

14 So I'm a Bellevue resident and also have the
15 luxury of also working here, so thank you guys for
16 organizing this.

17 One piece that I would like considered is
18 looking at the total tax benefit to the city depending
19 upon the type of residents in terms of property tax,
20 not just at a yearly basis, but over the lifetime of
21 the property versus the services provided, including,
22 like, roads, sewer, water, and then the difference
23 between those so we can see what areas of the city are
24 providing a drag on the overall city budget. Thank
25 you.

1 MS. TOOMEY: Thank you, Ben.

2 Okay. We have Cliff and then the next person
3 will be Roger Pearce after Cliff.

4 MR. CAWTHON: Thank you. Yeah. So my
5 name IS Cliff Cawthon. I'm the advocacy and policy
6 manager with Habitat for Humanity, Seattle, King and
7 Kittitas Counties. I'm going to be honest, I don't
8 really feel that well tonight, so I'm going to try to
9 be brief.

10 So, first of all, thanks for putting on this
11 presentation and giving us the space to talk. And
12 throughout this entire process one thing has just kind
13 of jumped out to me that the minimum that, you know,
14 is set by the state, I think that in order to plan
15 smart that we need to plan beyond that, because
16 realistically this region is going to add more than a
17 million people in the next, like, five to ten years.
18 And Bellevue is going to be a big part of that.

19 Bellevue is an area hub for jobs, transit.
20 Actually, my second job is working as an adjunct
21 professor over at Bellevue College, so a number of my
22 colleagues work outside of the city of Bellevue. A
23 number of my colleagues live on the east side, and a
24 number of my colleagues would like to live closer.
25 But there's, obviously, an affordability issue, right.

1 So I think in order to do this, we need to be
2 ambitious. And with that, this -- I hope that this
3 process would look not just at potential partnerships
4 with different organizations -- in fact, you know,
5 we've talked throughout this process about
6 partnerships with churches and nonprofits but also
7 using tools like inclusionary zoning and incentives,
8 which have been outlined in some of the alternatives.

9 But I would hope that we would actually lean
10 into that and think about how to use those along with
11 opening up more areas for, you know, housing, and I
12 should just say that we should also consider that
13 there's not a dichotomy when it comes to density
14 between, like, mega sky rises and single-family homes.

15 In fact, most of the housing that we built
16 around the region are, you know, everything from
17 duplexes, triplexes, cottages, and plexes that you
18 wouldn't even notice, you know, above the skyline.
19 Right. So that is housing that you can mix in, in the
20 current neighborhood and really not change the
21 structural character of -- or at least the appearance
22 of the structural character of the homes around it,
23 which looking at the time and my previous statement
24 about brevity is kind of ironic there. All right.
25 Thank you.

1 MS. TOOMEY: Thank you. Cliff. Okay.
2 Roger Pearce and then --

3 MR. PEARCE: I don't have an oral
4 comment. Thank you for the presentation, though. It
5 was really great. I'll send a letter.

6 MS. TOOMEY: Kate Sayers.

7 MS. SAYERS: I'll wait until the end.
8 I'll wait until the end.

9 MS. TOOMEY: Okay. Do you want -- you
10 want to give the last verbal comment?

11 MS. SAYERS: Yes.

12 MS. TOOMEY: Okay. We're just doing
13 three minutes for everybody.

14 Okay. Great. Ryan Grams.

15 MR. GRAMS: I'm the same as Roger.

16 MS. TOOMEY: Okay. Thank you. Okay.

17 Betsi, we will turn it over to you for three
18 minutes.

19 MS. HUMMER: I'm Betsi Hummer,
20 B-E-T-S-I, H-U-M-M-E-R. And I'm not a pro like those
21 other speakers. I just live here in Bellevue, and
22 when I heard about the EIS and I already -- you
23 already heard me talk about that word, scoping. And
24 so I really don't understand what this is all about.

25 However, when I thought -- when I saw that it

1 had to do with the environment and I looked at
2 Wilburton and I read Lucile McDonald's "Bellevue:
3 It's First 100 years," all I can think of is Lake
4 Sturtevant that they now call Lake Bellevue. And
5 Sturtevant Creek and the daylighting of all creeks as
6 you go over all of our roads, we have an incredible
7 number of great streams and rivers and ponds.

8 And I think that they are sacred, and I think
9 they need to be enhanced and improved and worked into
10 the development. I believe the area needs to be
11 developed, and I also believe that, especially in
12 Wilburton looking at Lake Sturtevant -- I was on a
13 little walk -- and nobody knew that there was a lake
14 beyond those car dealerships. And nobody knew that it
15 had initially been farms, and nobody knew that it had
16 been a co-op by the Japanese farmers that brought
17 industry to Bellevue. Nobody knew that the Cardon
18 family had established the first commercial area there
19 in Midlakes.

20 And that's why I'm going to The Pumphouse
21 afterwards to celebrate Midlakes. And that same
22 intensity on the environment and respecting the
23 neighborhoods, respecting what we're all working to do
24 here in Bellevue is live a beautiful life in a
25 beautiful area needs to be implemented throughout the

1 EIS. And, see, not a pro.

2 MS. TOOMEY: Thank you. Okay. Just --
3 you're Kate? Kate, you are last on the list and then
4 if anyone -- so can I get a hand raise if anyone else
5 is giving comment? Okay. Why don't you come up
6 toward the front if you're giving comment. We just
7 want to respect people's time, get everyone three
8 minutes thoughtfully. If you'll just state your name
9 for the record, and the time starts when the clock
10 starts or when you start speaking.

11 MS. DUGONI: I'm Cristina Dugoni, and I
12 live in North Bellevue. My only quick comment is just
13 in order -- first of all, I do resonate with the woman
14 in terms of keeping streams and the beauty of our
15 area, and I think we all do.

16 It seems to me we have a lot of very low
17 density in Bellevue, and, certainly, we all appreciate
18 it. But doing minor things like increasing height
19 restrictions, we can take some of those areas and
20 potentially add in density without, you know, having
21 mid-rise or high-rises in our neighborhoods
22 potentially just by increasing some of the height
23 restrictions in the lower density areas. That's all I
24 have to say.

25 THE REPORTER: Can you spell your name,

1 please.

2 MS. DUGONI: C-R-I-S-T-I-N-A,
3 D-U-G-O-N-I.

4 MS. TOOMEY: Okay. Next speaker and
5 then we'll have one more, and if you'll state your
6 name and spell your name for the record for our court
7 reporter.

8 MS. DEAN: My name is Heidi, H-E-I-D-I,
9 Dean, D-E-A-N. And I live in Newport Hills.

10 And so, obviously, Newport Hills has a
11 neighborhood center that has been the topic of several
12 rezoning attempts. So what I'm looking at is in a
13 neighborhood like mine, if we're looking at focusing
14 density possibly in a neighborhood center and also
15 into the residential area, I have concern about that.

16 Because in Bellevue's mixed-use zoning, there
17 is no minimum square footage requirement for retail
18 and commercial space for it to be mixed use. So what
19 we find often is in these mixed-use developments they
20 way overbuild residential and way underbuild the
21 retail and commercial services to serve those.

22 So in a neighborhood like mine that's set way
23 kind of away from everybody, you know, we're up the
24 hill from Factoria and off away from New Castle a bit,
25 if you radically increase the density in my

1 neighborhood in the residential area but also then add
2 residential at my center and really don't increase the
3 commercial space, you're going to put us in our cars
4 driving off the hill to seek services. I would really
5 actually like maybe that those neighborhood centers
6 focus more on the services and the retail.

7 And that kind of brings me to my concerns
8 about transportation concurrency. Because for those
9 of you who aren't familiar with the Growth Management
10 Act, there are mandates in the Growth Management Act
11 that transportation concurrency is it is supposed to
12 be built concurrently or within six years of projects.
13 And COB does not meet those requirements. So I kind
14 of want to make sure that our policies are going to --
15 are going to address that.

16 And then also, too, I have concerns about the
17 park space and stuff for like Factoria and Eastgate as
18 you -- I know that the COB is looking at buying space
19 there, but I don't know where they're going to put it.
20 They're looking at tearing down a house in Eastgate to
21 put a .25-acre park in there. So I just have some
22 concerns about things like that. Thank you.

23 MS. TOOMEY: Thank you, Heidi.

24 Okay. Anyone else looking to give comment
25 verbally tonight?

1 Okay. Kate, please state and spell your name
2 for the record.

3 MS. SAYERS: K-A-T-E, last name Sayer,
4 S, as in Susan, -A-Y-E-R-S.

5 All right. So I believe in density and I
6 believe in low income housing. My sister died because
7 she could not afford her housing in the city she lived
8 in, the small town she lived in. So I'm for it, but I
9 want it spread out equally. I want density in
10 Somerset and in Bridle Trails, even if they need to
11 buy houses and build fourplexes. I don't want all the
12 density just in northeast Bellevue.

13 When I looked at that map, they're jamming it
14 into one place. It's based on the transit model.
15 However, if you read the recent Seattle Times article,
16 which I did send to the City of Bellevue, it said that
17 transit has changed radically. People are no longer
18 going into office centers. They're working from home.
19 So has the office planning and has the strategy around
20 this process changed to really look at people working
21 from home and staying home? We can always add bus
22 lines to Somerset and Bridle Trails, Enatai,
23 et cetera. And I don't think anybody has thought of
24 that.

25 I also don't think that the rich should get

1 lovely open spaces and the rest of us get just jammed
2 with our houses and our neighborhoods being turned
3 into triplexes with ADUs in every backyard. I want
4 the City to come up with affordability strategies
5 where they buy some of the small 900-square-foot
6 houses and sell them to residents, and then they can
7 buy them back if they move and split the equity.

8 That's what happened in Wisconsin with my
9 sister. The City of Langley has been trying a cottage
10 strategy where they've been putting six houses around
11 a courtyard. We haven't done any innovative
12 creativity around our housing, and when I'm offered an
13 alternative -- alternatives 1, 2, and 3 that doesn't
14 even consider what the state requires and makes
15 assumptions for Bellevue residents without asking us
16 if we want 2 or 3, it infuriates me.

17 I believe the density. I believe in planning,
18 but I want it fair. I want it equity. I want the
19 rich to get some of it and not just those of us who
20 make low or moderate and live in 900-square-foot
21 houses in Lake Hills. I think that's good.

22 Let me see if I have anything else. Oh,
23 trees. I do. We're losing trees. The trees have not
24 been addressed. I hope it's part of the EIS
25 discussion because it's -- Bridle Trails gets all the

1 trees they want. They have a special permitting
2 process to protect their trees that the rest of in
3 Northeast Bellevue don't have and can't get. I want
4 fourplexes. I want density on every corner of the
5 street in Enatai, Bellevue, and Bridle Trails. I want
6 some of the state parkland to be set and coordinated
7 with them to build housing. I want some housing on
8 the public school land, and I want housing, dense
9 housing, built around the golf course with underground
10 parking so it's not inconvenient for anybody.

11 We can do a much better job than any of the
12 options we've been offered, and I'd like you to think
13 radically about how we can serve the needs of our
14 citizens, the fire and the teachers and not do what
15 these plans have us doing. Thank you.

16 MS. TOOMEY: Okay. Thank you,
17 everyone, for your participation. Again, just
18 reiterating, because we really want people to
19 participate in scoping, submit comments if you
20 haven't. We have lots of copies of the handout. We
21 also have materials in seven other languages, so if
22 you have friends, neighbors, families who would like
23 to see materials in another language, we can help get
24 that information to you tonight as well and just to
25 encourage you to give comment if you haven't and

1 certainly let others know in your community to give
2 comment before October 31.

3 Okay. I think that concludes our evening.
4 Thank you so much, everyone, for being here.

5 (The proceedings concluded at
6 7:31 p.m.)

7
8 * * * * *

SECTION 4. ONLINE PORTAL ATTACHMENTS



October 31, 2022

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 writing to provide comments in response to the Scoping Notice for the Environmental Impact Statement (EIS) being prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, Sterling Realty Organization owns about 13 acres of land on eight parcels immediately southeast of the I-90 / I-405 intersection, in the Factoria neighborhood. Our properties are the closest to the future Sound Transit Link Richard's Road light rail station, and currently contain a mix of vibrant uses. 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.

Many concepts in Bellevue's Land Use Code for areas outside Downtown date back to the late 1970's and early 1980's. This was an era in which Bellevue was primarily a suburban bedroom community, with the first high-rise buildings appearing in Downtown. Outside of Downtown, most development was low-density and suburban in character and elements of the Land Use Code continue to reflect this history. In the last 15 years, new zoning has been adopted for Bel-Red, Eastgate and East Main, but in each case the new zoning included relics of the City's suburban past.

Bellevue is now a major regional center in the Puget Sound and the upcoming zoning for its mixed-use areas, TOD areas, growth centers and their surrounds, as well as other areas well-served by transit, should reflect this reality. New zoning for these areas should be based on the urban design principles that underlie the City's Downtown zoning.

We recognize that the Comprehensive Plan is a planning document, not a set of development regulations. But major changes to the way the City approaches its Land Use Code will be

required in the future implementation of this Comprehensive Plan update. Therefore, our comments below focus on the changes that are needed in the Land Use Code to ensure that Bellevue can meet its destiny as a regional urban center. The upcoming EIS should anticipate the need for these changes and its alternatives should assume a level of development that is achievable with the implementation of these Code changes.

As a general matter, we support Alternative 3 described in the EIS scoping notice, with the notation that this alternative should also be informed by the Code changes suggested below.

For these reasons, we suggest that the EIS should include analysis based on the following assumptions.

- Uses

- 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.
- 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.
- Allow electric vertical take-off and landing (eVTOL) uses adjacent to transit stations, in order to maximize mass transit ridership and general mobility.

- Height & Density

- 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.

- 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 240 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 200 feet. Below 200 feet, high-rise development is difficult to underwrite in these urban centers.
- Floorplates & Tower Standards
 - Maintain appropriately-sized residential floorplates above 85 feet, while permitting residential floorplates larger than 28,000 square feet below 85 feet. The objective should be to maximize housing development opportunities, which means larger floorplates below 85 feet and smaller ones in towers above.
 - Allow larger floorplates for nonresidential uses, particularly tech, research & development and lab uses, above 40 feet. Such larger floorplates are especially attractive to this group of tenants, so the plan should accommodate these requirements.
 - Tower spacing should be limited to 40 feet, as in Downtown.
 - Structure setbacks should be eliminated, instead establishing a “build-to line” for new development.
- Parking
 - Minimum parking requirements should be significantly reduced in TOD areas, to 0.5 stalls/unit for multifamily and 1 stall/1,000 square feet for nonresidential.
 - Further parking reductions should be allowed based on project-specific parking studies, as in Downtown.
 - 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.
 - On-site loading standards should be 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.

- Affordable Housing
 - Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options.
 - Extend MFTE authorization throughout all growth areas in the City.
 - Incentivize the creation of affordable housing by allowing private developers to create affordable housing “banks” in new or rehabilitated income-restricted projects. Those projects could be built in advance of new market-rate development in the City, and then in-lieu funds from the new projects could be used to acquire affordable housing credits from the income-restricted projects.
 - Avoid mandatory inclusionary requirements.
 - Bellevue should create and staff a new Housing Division within the Department of Community Development, to coordinate the City’s affordable housing initiatives and the use of fee-in-lieu collections.

- Critical Areas
 - 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 fails to protect critical areas – it only reduces the long-term opportunity for TOD development. Critical areas can be well-protected without meaningless 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.

- Tree Regulations
 - Urban center and TOD areas should be exempted tree preservation regulations, similar to Downtown.

- Impervious Surfaces
 - Urban center and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on hard surface coverage regulations, similar to Downtown.

- Process
 - Allow broad use of development standard departures in all urban center and TOD areas. Encourage the use of such departures where they would result in superior design and use.
 - Allow broad use of development agreements in all urban centers and TOD areas for any land use regulation.

- In urban centers and TOD areas, allow a two-year extension of ADR approvals, to preserve development opportunities across market cycles.

We appreciate the opportunity to provide these comments and we look forward to participating in the EIS and Comprehensive Plan update process ahead.

Sincerely,

Sterling Realty Organization Co.



Whit Hamlin

Vice President / Chief Investment Officer

To: The City of Bellevue – Development Services Department
Attn. Reilly Pittman

From: Todd R. Woosley

Re: Wilburton Study Area EIS Scoping Comments

Date: October 31, 2022

Dear City of Bellevue,

Thank you for the opportunity to comment on the Scoping of the Wilburton Study Area's Environmental Impact Statement. Overall, I support the alternatives under consideration. I also recommend the City of Bellevue contemplate an alternative that increases the number of housing units to be evaluated to 15,000. This recommendation assumes there would be no reduction in the non-residential/commercial capacity also under study.

Furthermore, please include an Alternative that effectively leads to the Land Use Code revisions anticipated in the long-overdue BelRed Lookback. While Alternative 3 comes the closest to what would likely have resulted from the Lookback (scheduled for 2014, never done), it fails to fully consider many properties between the Spring District and Wilburton light rail stations for Transit Oriented Development. FYI, the City recommended the land area within close proximity to either the Spring District or Wilburton light rail stations be considered for Transit Oriented Development (TOD) once the exact location of these stations was determined. Now that these stations are nearly operational, the Wilburton EIS is the appropriate process for evaluating these TOD properties being redeveloped at urban densities.

Overall, I believe accommodating the City's future growth in Bellevue's designated Growth Corridors is the best approach to the challenge of maintaining our high quality of life while developing into an increasingly urban city.

In addition to evaluating an alternative that recognizes the western portion of the BelRed Corridor (located in the Wilburton Study Area) potentially being designated TOD, please find specific areas of land use and transportation impacts and/or mitigation measures the City should include in the Wilburton Study Area Environmental Impact Statement:

LAND USE:

It would be helpful for the analysis to evaluate how greater capacity for housing in Wilburton (and other non-single family neighborhoods) would protect the integrity of Bellevue's single family neighborhoods, in addition to the benefits of increasing our housing supply and improving housing affordability.

1. Consider increasing the amount of housing that would be allowed in Wilburton to 15,000 units.
 - a. There is a clear need for the region to accommodate more housing. Specifically, Bellevue should provide the zoned capacity to meet our obligations under the Countywide Planning Policies. I strongly recommend the City use a “market factor” of 8x zoned capacity (rather than the lower CPP rate) to improve the odds enough housing will be supplied, and that it will meet our affordability targets.
2. Complete the long-delayed BelRed Corridor Plan lookback commitment to rezone properties located within the proximity of the two light rail stations accessible BelRed Corridor properties in the Wilburton Study Area for Transit Oriented Development.
3. Adjust the impact analysis to reflect the lost housing capacity of the approximately 25 acres of land envisioned for multi-family housing in the NW portion of the BelRed Corridor that was taken off the market due to the construction of Sound Transit’s maintenance facility.
4. Non-residential/Commercial Land Uses
 - a. Please retain the square footage of these types of uses in every alternative in the EIS analysis.
5. Evaluate the impacts on the City’s tree canopy coverage if single family neighborhoods were required to accommodate more housing as compared to having this housing accommodated in the Wilburtpn Study Area.

TRANSPORTATION:

I encourage the City to evaluate the most robust multi-modal transportation infrastructure network possible. It is important the City base its analysis on the increased trip generation, and forecasted mode splits, used in its BKR traffic modeling, for an objective evaluation of the environmental impacts from the various growth alternatives. Overall, the unprecedented investments in Wilburton’s road capacity, bike lanes, sidewalks, EasTrail and light rail should receive credit for their multi-modal ability to accommodate the increased trips from all the alternatives being evaluated.

Yet, some of the planned infrastructure might not be built. Therefore, please include the following in the traffic impact analysis to help inform the public about the impacts of not completing planned infrastructure:

1. Evaluate the effects of an at-grade N.E. 6th Street Extension between 116th Avenue NE and 120th Avenue NE. Both three and five lane options, along with bike and pedestrian facilities, should be analyzed.
 - a. The State of Washington has funded their portion of the long-planned NE 6th Street Extension, which will construct a ramp connecting 116th Avenue NE to the I-405 Express Toll Lanes (ETL).
 - b. The City’s TIFIA loan (from the federal government) includes Bellevue’s segment of the NE 6th Street Extension as one of the projects to be funded by this loan.

- c. The previous DEIS for the CAC failed to include the at-grade design alternative. Analyzing it in this process will make up for the shortcoming of the previous EIS analysis.
 - d. The CAC and Council's vision for Wilburton calls for the development of a transportation grid system. The NE 6th Street Extension appears to be the most critical component of such a grid system.
 - e. The City's transportation capital plans include the City's portion of the NE 6th Street Extension.
 - f. The CAC DEIS identified significant Level Of Service (LOS) problems at the NE 8th Street and NE 4th Street interchanges along 116th Avenue NE if the extension terminated at 116th (rather than continuing to 120th).
- 2. Evaluate the completion of Phase 4 of the 120th Avenue NE Expansion.
 - a. Bellevue has successfully completed 3 of the 4 phases of the 120th Avenue NE Expansion. This major arterial, a complete street, now has 5 motorized vehicle lanes, 2 bike lanes and sidewalks on both sides. However, it chokes down to a 2 lane road with dirt shoulders north of Spring Boulevard. Removing this constriction will help mitigate the trips generated by the growth envisioned in Wilburton and the surrounding areas.
 - 3. Add the Southbound Lake Hills Connector Ramp to I-405 as part of the planned infrastructure to serve the study area.
 - 4. Designate properties within ½ mile of the nearly completed Sound Transit LINK light rail stations as Transit Oriented Development (TOD).
 - 5. Evaluate the future capacity provided by the potential NE 2nd Street Overpass between 112th and 116th Avenues NE. This project has the potential to help knit together Downtown and Wilburton by expanding the desired grid system. It could also provide a direct connection from EasTrail to the Downtown Park and Meydenbauer Bay Park.
 - 6. Evaluate the impacts of the completion of the "1/2 Diamond" interchange at 124th Avenue NE at SR 520.

Thank you for your consideration of the above. I look forward to continuing working with the City as it crafts the best plan for the future of the Wilburton Study Area, and Bellevue as a whole.



816 Second Ave, Suite 200, Seattle, WA 98104
p. (206) 343-0681
futurewise.org



October 28, 2022

Attn: Thara Johnson
City of Bellevue, Community Development Department
450 110th Avenue NE
Bellevue WA 98004

Re: Futurewise Comment on the Bellevue 2024 Environmental Review Scoping

Dear Community Development Department:

Thank you for the opportunity to comment on the scope of the environmental impact statement (“EIS”) for the City of Bellevue’s 2024 Periodic Comprehensive Plan Update. We agree with the Determination of Significance on September 29, 2022. We will share additional comment on the proposed EIS scope 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.

Executive Summary

Decision to Prepare an EIS. Futurewise agrees with the City of Bellevue’s Determination of Significance for the Bellevue 2044 Periodic Comprehensive Plan Update.

Elements of the EIS & Mitigation. In the comments below, we share our general agreement with the study areas that have been identified for the EIS including the displacement, equitable impacts, and economic analyses. We urge the city to complete these analyses in direct consultation with impacted communities. Due to a number of factors that outlined below, we support having the EIS analyze higher levels of housing growth than the minimums included in the Countywide Planning Policies and VISION 2050. For the “Transportation (traffic)” area of analysis, we recommend that the City of Bellevue use a multimodal framework and include multimodal mitigation measures to meet vehicle miles traveled (“VMT”) and greenhouse gas emissions (“GHG”) reduction requirements. We also encourage the City to consider compact and mixed-use development patterns and infill as complementary strategies to meet these VMT and GHG reduction requirements. We agree with the study of housing in the EIS. As part of this analysis, the EIS must consider sufficient land at appropriate housing densities and housing





types that can achieve the State of Washington Department of Commerce’s forthcoming projections of housing need for moderate, low, very low, and extremely low-income households. To study displacement, Futurewise supports metrics for both residential and commercial displacement and for residential displacement to include direct economic displacement, indirect economic displacement, cultural displacement, and physical displacement.

Growth alternatives. Futurewise supports the study of a fifth growth alternative (“Alternative 4”) that considers the impact of allowing “missing middle” housing typologies in all low and moderate density residential zones in all of Bellevue’s neighborhoods. We also ask that the City of Bellevue: study the impacts of a full range of affordability tools and incentives within each of the growth alternative (except the “No Action” alternative), study the impacts of replacing dwelling-units-per-acre development regulations with FAR maximums in all multifamily zones, maximize Alternative 3 to consider ways to maximize opportunities for economical mid-rise construction, and use a “gap filling” approach when refining growth strategies to ensure citywide access to frequent transit and essential daily needs services.

I. DECISION TO PREPARE AN EIS

The City’s [Determination of Significance](#) (“DS”) document states the following:

The lead agency has determined this proposal is likely to have a significant adverse impact on the environment. An environmental impact statement (EIS) is required under RCW 43.21C.030(2)(c) and will be prepared.

We agree with this determination and support the City’s decision to prepare an EIS.

The purpose of an EIS is to identify and disclose the potential impacts of the proposed alternatives and to identify mitigating measures.¹ The EIS should provide the City with the information needed to comply with the requirements of SEPA, while also preparing it to meet the requirements of the GMA and the multi-county planning policies included in Puget Sound Regional Council’s (PSRC) VISION 2050 plan.²

By complying with the state and regional requirements, Bellevue will both improve the quality of its comprehensive plan and strengthen its ability to defend against legal appeals concerning either the EIS or the contents of the comprehensive plan itself.

II. ELEMENTS OF THE EIS & MITIGATION

We are generally supportive of the proposed elements of study in the EIS, as proposed in the [Scoping Handout](#) and [Determination of Significance](#). We also have comments about the areas of study.

¹ *Heritage Baptist Church v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 2 Wn. App. 2d 737, 752, 413 P.3d 590, 598 (2018).

² *Puget Sound Regional Council, VISION 2050 Multicounty Planning Policies* (Oct 2020), last accessed on August 8, 2022, at: <https://www.psrc.org/sites/default/files/2022-02/vision-2050-mpps.pdf>.



In the [Scoping Handout](#), the City of Bellevue already identifies the following areas for study in the programmatic EIS:

- Earth and water quality
- Air quality and greenhouse gas emissions
- Plants and animals
- Energy and natural resources
- Noise
- Land use patterns and urban form
- Historic Resources
- Relationship to plans, policies, and regulations
- Population, employment, and housing
- Transportation (Traffic)
- Public services
- Utilities
- Displacement analysis
- Equitable impacts analysis
- Economic analysis

We generally agree with the areas that have been identified including the displacement, equitable impacts, and economic analyses. We have additional comments related to the areas intended for analysis, including mitigation measures.

Direct Consultation with Impacted Communities


- 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.”³ Futurewise strongly recommends the City consult directly with members of the impacted communities for each type of environmental impact assessed in the EIS.

Relationship to plans, policies, and regulations

- We agree that the EIS must analyze the effects of the alternatives on plans, policies, and regulations. VISION 2050 in 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.”⁴ So the City has the flexibility and requirement to analyze housing targets beyond those adopted by the Countywide Planning Policies and

³ *Puget Sound Regional Council, Vision 2050: A Plan for the Central Puget Sound Region*, p. 76 (Oct.2020) last accessed on August 8, 2022, at: <https://www.psrc.org/sites/default/files/2022-02/vision-2050-plan%20%281%29.pdf>.

⁴ *Puget Sound Regional Council, VISION 2050: A Plan for the Central Puget Sound Region* p. 44 MPP-CC-7 (Oct.2020) last accessed on Oct. 19, 2022, at: <https://www.psrc.org/planning-2050/vision-2050>.



VISION 2050. Given the high rate of growth likely in Bellevue, the existing public facilities and services, the continuing regional investments in light rail, and the environmental and climate benefits of accommodating this growth in Bellevue, we support having the EIS analyze high levels of housing growth than those included in the Countywide Planning Policies and VISION 2050.

The EIS must also analyze whether the alternative will comply VISION 2050 and multicounty planning policies.⁵ The EIS must also analyze whether the alternatives will comply with the King County Countywide Planning Policies.⁶

Transportation (Traffic)

- We request that the study of transportation include a true multimodal analysis by replacing a focus on car throughputs, with an assessment of moving people and goods that includes biking, walking, and public transportation infrastructure and recognizes the mitigation benefits of dense, mixed-use development. In December 2021, the City of Bellevue amended their Comprehensive Plan with the Multimodal Concurrency Code ([BCC 14.10](#)), allowing the city to consider multiple modes of transportation to measure concurrency levels, instead of vehicle capacity at intersections alone. We strongly support the application of a multimodal transportation framework to understand transportation impacts in the Comp Plan EIS as well. This can include the study of multimodal mitigation strategies, such as bus lanes, additional pedestrian and bike infrastructure, etc. to comply with vehicle miles traveled and greenhouse gas emissions reduction requirements from the Growth Management Act (“GMA”). The transportation impacts of new development in dense, mixed-use, walkable neighborhoods near transit should reflect the unique trip characteristics of this development type and not be based on conventional, car-oriented trip production models.

Air and Greenhouse Gas Emissions and Climate

- We agree that the EIS must analyze the effects of the alternatives on air quality and greenhouse gas emissions. Climate is an element of the environment.⁷ There are two broad types of climate impacts.


There are the impacts of development in generating greenhouse gas pollution. SEPA EISs are required to analyze greenhouse gas pollution.⁸ Washington State enacted limits on greenhouse gas emissions and a statewide goal to reduce annual

⁵ *Stickney v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 11 Wn. App. 2d 228, 244 – 45, 453 P.3d 25, 34 (2019) (comprehensive plans must comply with VISION and the multi-county planning policies).

⁶ *King Cnty. v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 138 Wn.2d 161, 175 – 76, 979 P.2d 374, 380 (1999), as amended on denial of reconsideration (Sept. 22, 1999) (comprehensive plans must comply with countywide planning policies.)

⁷ WAC 197-11-444(1)(b)(iii).

⁸ *Columbia Riverkeeper, Sierra Club, and Center For Biological Diversity v. Cowlitz County, Port of Kalama, Northwest Innovation Works-Kalama, LLC, and State of Washington*, Department of Ecology, Shorelines Hearings Board (SHB) No. 17-010c, Order on Motions for Partial Summary Judgment (Sept. 15, 2017), at 18, 2017 WL 10573749, at *9.



per capita vehicle miles traveled for light-duty vehicles.⁹ The EIS must analyze whether each alternative will meet the greenhouse gas pollution limits and vehicle miles traveled benchmarks.

Comprehensive planning is one way to address both the reduction of greenhouse gasses and vehicle miles traveled. Almost half of all greenhouse gas emissions in our state result from the transportation sector. Land use and transportation strategies that promote compact and mixed-use development and infill reduce the need to drive, reducing the amount of greenhouse gas emissions.¹⁰ In an article published in a peer-reviewed scientific journal, Goldstein *et al.* analyzed greenhouse emissions from housing and concluded that:

If the electrical grid is decarbonized, then the residential housing sector can meet the 28% emission reduction target for 2025 under the Paris Agreement. However, grid decarbonization will be insufficient to meet the 80% emissions reduction target for 2050 due to a growing housing stock and continued use of fossil fuels (natural gas, propane, and fuel oil) in homes. Meeting this target will also require deep energy retrofits and transitioning to distributed low-carbon energy sources, as well as reducing per capita floor space and zoning denser settlement patterns.¹¹

The denser settlement patterns were fairly modest and could be met by building a mix of small apartment buildings and modest single-family homes at eight to ten housing units per acre.¹² Since Washington's greenhouse gas limits are modeled after the Paris Agreement, Goldstein *et al.* shows that a growing community can meet these limits with wise land use policies and regulations.

Another important method of reducing greenhouse gas emissions is to include complementary land uses not already present in local zoning districts, such as supermarkets, parks, schools, and services in residential neighborhoods.¹³ These measures are often referred to as the **15-minute city**. The EIS should assess the potential for complete neighborhoods to reduce greenhouse gas emissions by shifting from car trips to carbon-neutral modes like walking, rolling, and bicycling.


⁹ RCW 70A.45.020(1)(a) (greenhouse gas pollution limits) and RCW 47.01.440(1) (vehicle miles traveled benchmarks).

¹⁰ Matt Bucchin and Aaron Tuley, *Planning for Climate Mitigation and Adaption* pp. 140 – 41 (American Planning Association, Planning Advisory Service (PAS) Report 601: July 2022).

¹¹ Goldstein *et al.*, *The carbon footprint of household energy use in the United States*, 117 PNAS 19122, 19122 (July 20, 2020) last accessed on Oct. 19, 2022, at: <https://www.pnas.org/cgi/doi/10.1073/pnas.1922205117>

¹² *Id.* at 19128.

¹³ Matt Bucchin and Aaron Tuley, *Planning for Climate Mitigation and Adaption* p. 141 (American Planning Association, Planning Advisory Service (PAS) Report 601: July 2022).



The second type of broad climate impacts are the impacts of climate change on the built and natural environment such as increased storm intensities, increased heat events, and sea level rise.¹⁴ The EIS should also analyze the impacts of climate change on the built and natural environments.

The EIS must identify mitigating measures for both types of impacts. *Planning for Climate Mitigation and Adaption* includes mitigating measures for both mitigation and adaptation.

Housing and Affordable Housing

- We agree that the EIS must analyze the effects of the alternatives on housing. As part of this analysis the EIS must analyze whether each alternative plans for sufficient land at housing densities and for housing types to that can achieve the State of Washington Department of Commerce's projections of housing need for moderate, low, very low, and extremely low-income households. For moderate, low, very low, and extreme low-income households this will typically require low-rise and mid-rise multi-family wood frame construction housing at densities of 80 to 200 housing units per acre. Based on the two needs allocation models currently under consideration for King County, between 78% and 85% of the zoning capacity to meet the Bellevue's 35,000 home growth target will need to be met by these construction types and densities. Each alternative should be assessed for the extent to which it complies with these new state housing element requirements. The draft projections by county and two methodologies for allocating those projections by city, town, and the unincorporated county can be found at:

<https://deptofcommerce.app.box.com/s/a3z9g09nztfkqmitysasg4if3nkd7v5e> and

<https://tableaupub.kingcounty.gov/t/Public/views/AllocationMethodComparison-s-HIJTVersion/AllocationsStory>

Displacement Analysis – Residential, Commercial, and Recreational

- Futurewise supports the City's proposal to assess displacement impacts and the inclusion of these impacts in the contents of the EIS. The scoping documents provided by the City on September 29, 2022, however, do not specify additional details.

SEPA requires analysis of residential, commercial, and recreational displacement. In *Barrie v. Kitsap County*, the Washington State Supreme Court held that State Environmental Policy Act environmental impact statements are required to consider socio-economic impacts.¹⁵ This is because "SEPA declares that the state's policy is to 'fulfill the social, economic, and other requirements' of citizens. RCW

¹⁴ The University of Washington Climate Impacts Group has identified many of these impacts in reports and data products. Last accessed on Oct. 19, 2022, at: <https://cig.uw.edu/>.

¹⁵ *Barrie v. Kitsap Cnty.*, 93 Wn.2d 843, 858–59, 613 P.2d 1148, 1157 (1980).

43.21C.020(1)(c).¹⁶ The SEPA rules that formerly did not expressly require a discussion of economic and social effects were invalid.¹⁷

These socio-economic impacts include residential and commercial displacement. This is why the SEPA checklist in WAC 197-11-960B.8.i., j., and k. ask “[a]pproximately how many people would reside or work in the completed project[,]” “[a]proximately how many people would the completed project displace[,]” and “[p]roposed measures to avoid or reduce displacement impacts, if any ...” Similarly, the SEPA checklist in WAC 197-11-960B.12.b. asks “[w]ould the proposed project displace any existing recreational uses” Note that these questions are not limited to residential displacement and impacts on businesses are socio-economic impacts.¹⁸ For these reasons the EIS needs to analyze the impacts of residential and commercial displacement. Otherwise, the City’s EIS may be found inadequate like the county EIS in Barrie that did not analyze impacts of a rezone outside of downtown on downtown businesses.¹⁹

Futurewise supports the proposed metrics for both residential and commercial displacement. For residential displacement, we recommend that the impact analysis include metrics capable of measuring the four types of displacement described in the Seattle Planning Commission’s ‘Anti-Displacement Issue Brief’: direct economic displacement, indirect economic displacement, cultural displacement, and physical displacement.²⁰ We support the use of both quantitative and qualitative methods in this analysis. For commercial displacement, we suggest the City follow the guidance of VISION 2050 MPP-Ec-12, which provides that cities should “[i]dentify potential physical, economic, and cultural displacement of existing businesses that may result from redevelopment and market pressure” and “[u]se a range of strategies to mitigate displacement impacts to the extent feasible.”²¹ We recommend that this analysis be included in the EIS to, in part, help assess growth strategy alternatives’ impacts on Minority Business Enterprises and Minority/Women Business Enterprises which have been disproportionately impacted by racially discriminatory public policies, adverse impacts from public infrastructure projects, and both public and private divestment.

III. GROWTH ALTERNATIVES

¹⁶ *Barrie v. Kitsap Cnty.*, 93 Wn.2d 843, 858, 613 P.2d 1148, 1157 (1980).

¹⁷ *Barrie v. Kitsap Cnty.*, 93 Wn.2d 843, 858, 613 P.2d 1148, 1157 (1980).

¹⁸ *Barrie v. Kitsap Cnty.*, 93 Wn.2d 843, 858–61, 613 P.2d 1148, 1157–58 (1980).

¹⁹ *Barrie v. Kitsap Cnty.*, 93 Wn.2d 843, 858, 613 P.2d 1148, 1158 (1980).

²⁰ Seattle Planning Commission, “Issue-specific thoughts on the major update to the Comprehensive Plan Addressing Displacement in Seattle’s Comprehensive Plan”, p.4 (March 2022), last accessed on August 8, 2022, at:

https://www.seattle.gov/documents/Departments/SeattlePlanningCommission/ComprehensivePlan/SPC_Anti-displacement_Issue_Brief_March2022_Web.pdf.


²¹ *Puget Sound Regional Council, Vision 2050: A Plan for the Central Puget Sound Region*, MPP-Ec-12, p.96 (Oct.2020) last accessed on Oct. 28, 2022, at: <https://www.psrc.org/planning-2050/vision-2050>.



We recommend the study of a fifth growth alternative (“Alternative 4”) that considers the impact of allowing “missing middle” housing typologies in all Bellevue neighborhoods with low and moderate density residential zones. We also recommend that the City of Bellevue: a.) study the impacts of a full range of affordability tools and incentives within each of the growth alternative (except the “No Action” alternative), b.) study the impacts of replacing dwelling-units-per-acre development regulations with FAR maximums in all multifamily zones, c.) maximize Alternative 3 to consider ways to maximize opportunities for mid-rise construction, and d.) use a “gap filling” approach when refining growth strategies to ensure citywide access to frequent transit and essential daily needs services.

In [Appendix A](#) of the Bellevue 2044 Scoping Handout, the Community Development Department proposes four alternatives for future growth in Bellevue. This includes a “No Action” alternative (“Alternative 0”) and three growth alternatives (“Alternatives 1-3”) that will study different sets of housing capacity, affordability tools, and growth distribution patterns. We applaud Bellevue for considering a bold range of additional residential capacity well above the minimum Countywide Planning Policies growth target of 35,000 new housing units. Considering bold alternatives for housing growth can help correct the housing-jobs imbalance we currently observe in Bellevue. We also 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.

- **In addition to the current Alternatives (0-3), we recommend the study of a fifth growth alternative (“Alternative 4”) that considers the impact of allowing “missing middle housing” typologies including townhomes, duplexes, triplexes, fourplexes, and cottage apartments in all neighborhoods with low and moderate density residential zones.** Even after [Freddie Mac](#) identified a +3.87 point year-over-year rise in 30-year fixed-rate mortgages, [Redfin](#) still observed a +12.2% rise in home prices of all types in Bellevue from September 2021 to September 2022. This property appreciation in the face of market-cooling forces suggests massive pent-up demand for homeownership options in Bellevue. Since Bellevue’s Periodic Comprehensive Plan Update cannot consider growth patterns that are not studied in the EIS without the preparation of an additional SEPA analysis, it will be important to fully understand the impact of “missing middle” housing typologies outside of mixed-use areas, transit-accessible nodes, and neighborhood centers as currently conceived in the scoping document.
- **Study multiple affordability tools (and incentives) within each alternative, except the No Action Alternative.** Currently, Alternative 1 studies a mandatory inclusionary affordability tool and increased incentives. Alternatives 2 and 3 differ in that they study tiered voluntary inclusionary affordability tools alongside increased incentives elsewhere. Each alternative considers a different residential



capacity level, with Alternative 1 being the lowest (15-20k housing units above No Action Alternative levels) and Alternative 3 being the highest (25-30k housing units above No Action Alternative levels).

While it's possible that different residential capacity levels could influence the effectiveness of certain affordability tools, it is a false choice to separate the tools into specific growth alternatives at this stage in the process. For the City of Bellevue to make a truly informed decision about growth and equity, it will be important to study the expected production that each affordability tool is expected to yield (voluntary and mandatory inclusion + incentives) within each Alternative. This will not be possible under the EIS alternative scoping as currently proposed.

- **Study the impacts of replacing dwelling-units-per-acre regulations with FAR maximums in all multifamily zones.** The Bellevue 2024 Periodic Comprehensive Plan Update is an opportunity to consider new ways of doing things. Studying this uniform approach for calculating density in MF zones can introduce additional consistency in the code. In some cases, it may also allow flexibility for additional housing units to be built within similar dimensional requirements and design standards.
- **In Alternative 3, consider ways to maximize opportunities for mid-rise construction near transit, jobs, and existing Neighborhood Centers.** As noted earlier, this can help meet the State of Washington Department of Commerce's projections of housing need for moderate, low, very low, and extremely low-income households. For moderate, low, very low, and extreme low-income households this will typically require midrise multi-family wood frame housing at densities of 80 to 200 housing units per acre.

This alternative should also study the impact of creating new Neighborhood Centers by rezoning existing commercial nodes and other types of nodes that are conducive to mixed-use, transit-oriented development. This can align with the "gap filling" approach as explained in more detail below.

- **Use a "gap filling" approach when refining growth strategies to ensure citywide access to frequent transit and essential daily needs services.** VISION 2050 in RGS-Action-7 directs cities to "support the implementation of a full range of strategies, including zoning and development standards, incentives, infrastructure investments, housing tools, and economic development, to achieve a development pattern that aligns with VISION 2050 and to reduce rural growth rates over time and focus growth in cities."²²

²² Puget Sound Regional Council, *Vision 2050: A Plan for the Central Puget Sound Region* p.44 (Oct.2020) last accessed on Oct. 28, 2022, at: <https://www.psrc.org/planning-2050/vision-2050>.

Futurewise suggests that the City follow this guidance by using a “gap filling” approach—i.e., identifying areas of Bellevue that do not align with the development pattern described in VISION 2050, and using tools like land use policy change and transportation infrastructure investment to bring those areas into alignment. As the City refines its conceptual growth strategies into neighborhood-specific land use plans, it should avoid circular logic traps (sometimes referred to as “chicken or the egg” questioning) around the question of whether residential density should lead or follow beneficial existing conditions like transit service, public infrastructure, commercial density, etc.

The City is required to plan for housing and jobs density patterns that align with the regional growth plan (i.e., concentration in cities and near frequent transit) and plan to achieve those patterns through policy and public investment. To meet this requirement, Futurewise strongly recommends that the City refine its proposed growth strategy alternatives to add density both to places that currently have beneficial existing conditions and to places that lack those conditions. *In the case of the latter, the goal should be to encourage residential density levels that can support the citywide expansion of services like frequent transit²³ and small businesses²⁴ that provide essential daily needs.* After all, the GMA provides that all elements, including the transportation and capital facility plan elements, “shall be consistent with the future land use map.”

Thank you for considering our comments. If you require additional information, please contact me at telephone 206 343-0681 Ex 102 or email tim@futurewise.org.

Sincerely,



Tim Trohimovich, AICP
Director of Planning & Law
Futurewise

END OF DOCUMENT

²³ Puget Sound Regional Council, *Vision 2050: A Plan for the Central Puget Sound Region*, MPP-RC-7, p. 20 (Oct.2020) last accessed on Oct. 28, 2022, at: <https://www.psrc.org/planning-2050/vision-2050>.

²⁴ Puget Sound Regional Council, *Vision 2050: A Plan for the Central Puget Sound Region*, MPP-DP-12, p. 77 (Oct.2020) last accessed on August 8, 2022, at: <https://www.psrc.org/planning-2050/vision-2050>.

October 31, 2022

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 writing to provide comments in response to the Scoping Notice for the Environmental Impact Statement (EIS) being prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, N124 Holdings owns the properties located at 1940 124th Ave NE 98005, 2000 124th Ave NE 98005, 2020 124th Ave NE 98005 and 2100 124th Ave NE 98005. 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.

As a general matter, we support Alternative 3 described in the EIS scoping notice, with the notation that this alternative should also be informed by the Code changes suggested below. We suggest that the EIS should include analysis based on the following assumptions.

- Uses
 - 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. In particular, the zones in Bel-Red outside the Spring District should allow greater density for both residential and non-residential uses to promote more daytime activity and a mixed-use neighborhood. Current zoning tends to segregate residential and non-residential uses into different portions of Bel-Red, which makes it impossible to achieve a vibrant, mixed-use neighborhood across the subarea.
 - 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.
- Allow electric vertical take-off and landing (eVTOL) uses adjacent to transit stations, in order to maximize mass transit ridership and general mobility.
- Height & Density
 - 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.
 - 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 200 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 200 feet. Below 200 feet, high-rise development is difficult to underwrite in these urban centers.
- Floorplates & Tower Standards
 - Maintain appropriately-sized residential floorplates above 85 feet, while permitting residential floorplates larger than 28,000 s.f. below 85 feet. The objective should be to maximize housing development opportunities, which means larger floorplates below 85 feet and smaller ones in towers above.
 - Allow larger floorplates for nonresidential uses, particularly tech, research & development and lab uses, up to 85 feet. Such larger floorplates are especially attractive to this group of tenants, so the plan should accommodate these requirements.
 - 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.
- Structure setbacks should be eliminated, instead establishing a “build-to line” for new development.

- Parking

- Minimum parking requirements should be significantly reduced in TOD areas, to 0.5 stalls/unit for multifamily and 1 stall/1000 s.f. for nonresidential.
- Further parking reductions should be allowed based on project-specific parking studies, as in the Downtown.
- 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.
- 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.

- Affordable Housing

- Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options
- Extend MFTE authorization throughout all growth areas in the City.
- Incentivize the creation of affordable housing by allowing private developers to create affordable housing “banks” in new or rehabilitated income-restricted projects. Those projects could be built in advance of new market-rate development in the City, and then in-lieu funds from the new projects could be used to acquire affordable housing credits from the income-restricted projects.
- Avoid mandatory inclusionary requirements
- Bellevue should create and staff a new Housing Division within the Department of Community Development, to coordinate the City’s affordable housing initiatives and the use of fee-in-lieu collections

- Critical Areas

- Exempt Wilburton and 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 development. Critical areas can be well-protected without meaningless 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.

- Tree Regulations
 - Urban center and TOD areas should be exempted tree preservation regulations, similar to Downtown.
- Impervious Surfaces
 - Urban center and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on LID/hard surface coverage regulations, similar to Downtown.
- Process
 - Allow broad use of development standard departures in all urban center and TOD areas. Encourage the use of such departures where they would result in superior design and use.
 - Allow broad use of development agreements in all urban centers and TOD areas for any land use regulation.
 - In urban centers and TOD areas, allow a two-year extension of ADR approvals, to preserve development opportunities across market cycles.

We appreciate the opportunity to provide these comments and we look forward to participating in the EIS and Comprehensive Plan update process ahead.

Sincerely,



Pat Wiley
N124 Holdings, LLC

Bellevue 2044 Comprehensive Plan EIS Scoping Comment

Mark A. Foltz

spuddybuddy@ubertuber.org

October 31, 2022

The Bellevue 2044 Comprehensive Plan EIS should make the following amendments to **Alternative 3** as follows and study the improved Alternative 3 for impacts.

- Amend Alternative 3 to implement mandatory inclusionary zoning in all areas receiving new housing capacity, either through on-site development of homes affordable to < 80% AMI, or in lieu payments for the development of permanently affordable housing off-site.
- Amend Alternative 3 to legalizes detached accessory dwelling units (“backyard cottages”) and attached accessory dwelling units (“in-law apartments”) on existing and new detached single-family homes.
- Amend Alternative 3 to add incentives for deep green (“passivhaus”) construction for all new development through zoning incentives (height and/or FAR bonuses).
- Amend Alternative 3 to eliminate parking minimums for all new development (commercial, residential, and mixed-use).

For all alternatives included in the EIS the following analyses should be conducted. The SEPA impact area(s) are noted in brackets for each item.

1. **[IMPACT AREAS: Air quality and greenhouse gas emissions, Transportation]** An analysis of the impact of the five alternatives on overall GHG emissions. The analysis should consider not only the GHG emissions from Bellevue’s current and future residents, but also the **additional transportation emissions caused by the displacement of current and potential residents** who commute to jobs in Bellevue and want to live in Bellevue, but are forced to find housing outside of Bellevue because of a lack of homes affordable to their income level.

2. **[IMPACT AREAS: Plants and animals, Air quality and greenhouse gas emissions]** An analysis of the impact of the five alternatives on **reduction in tree canopy outside of Bellevue**, including the number of trees that must be removed in the greater Puget Sound region to accommodate new housing that Bellevue is not providing through each growth alternative. The analysis should consider the impact of the reduced tree canopy on net GHG emissions through lost opportunity for future carbon sequestration.

3. **[IMPACT AREA: Equitable impacts analysis]** An analysis of the impact of the five alternatives on the **equitable impacts of those with jobs in Bellevue being forced to live outside of Bellevue for lack of affordable housing**. This includes the impact of additional transportation costs on these households and time spent commuting on health, educational opportunities, quality of life, and economic mobility, broken down by demographic data to understand if there are disparate impacts by income level, gender, race, age, and immigration status.

4. **[IMPACT AREA: Displacement analysis]** An analysis of the resulting **displacement of current residents by increasing housing costs** under the five alternatives (and potential for mitigation of displacement by development of affordable housing). The analysis of which residents who will be displaced for lack of affordable housing should be broken down by demographic data including income level, gender, race, age and immigration status. This analysis should be done neighborhood by neighborhood to guide policy decisions where affordable housing should be developed as an anti-displacement measure.

Thank you for considering my scoping comment.

October 31, 2022

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 writing to provide comments in response to the Scoping Notice for the Environmental Impact Statement (EIS) being prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, Coast Hospitality LLC is the parent company of the ground lessee of Hotel 116, located on the east side of 116th Avenue NE, just south of NE 8th Street (the “Property”). The Property is in the heart of the Wilburton subarea. 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.

We recognize that the Comprehensive Plan is a planning document, not a set of development regulations. But major changes to the way the city approaches its Land Use Code will be required in the future implementation of this Comprehensive Plan update. Therefore, our comments below focus on the changes that are needed in the Land Use Code to ensure that Bellevue can meet its destiny as a regional urban center. The upcoming EIS should anticipate the need for these changes and its alternatives should assume a level of development that is achievable with the implementation of these Code changes.

As a general matter, we support Alternative 3 described in the EIS scoping notice, with the notation that this alternative should also be informed by the Code changes suggested below.

For these reasons, we suggest that the EIS should include analysis based on the following assumptions.

Comments Specific to Wilburton

- The area on both sides of 116th Avenue NE between I-405 and Eastrail line and NE 4th Street and NE 8th Street should be the location of the most intense development in Wilburton.
- NE 6th Street should terminate at 116th Avenue NE after crossing I-405. To extend NE 6th Street east to 120th Avenue NE would create little benefit to vehicle transportation and would destroy the opportunity to provide an iconic, regional connection between The

Grand Connection and Eastrail at that location. In addition to losing this critical multi-modal connection, an eastern extension of NE 6th Street would necessitate yet another at-grade crossing of Eastrail by a major arterial within only about a quarter mile.

General Comments

- Uses
 - 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.
 - 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.
 - Allow electric vertical take-off and landing (eVTOL) uses adjacent to transit stations, in order to maximize mass transit ridership and general mobility.
- Height & Density
 - 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.
 - 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 200 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 200 feet. Below 200 feet, high-rise development is difficult to underwrite in these urban centers.

- Floorplates & Tower Standards
 - Maintain appropriately sized residential floorplates above 85 feet, while permitting residential floorplates larger than 28,000 s.f. below 85 feet. The objective should be to maximize housing development opportunities, which means larger floorplates below 85 feet and smaller ones in towers above.
 - Allow larger floorplates for nonresidential uses, particularly tech, research & development and lab uses, above 40 feet and 85 feet. Such larger floorplates are especially attractive to this group of tenants, so the plan should accommodate these requirements.
 - 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 kinds of connections.
 - Tower spacing should be limited to 40 feet, as in the Downtown.
 - Structure setbacks should be eliminated, instead establishing a “build-to line” for new development.
- Parking
 - Minimum parking requirements should be significantly reduced in TOD areas, to 0.5 stalls/unit for multifamily and 1 stall/1000 s.f. for nonresidential.
 - Further parking reductions should be allowed based on project-specific parking studies, as in the Downtown.
 - Consider mass transit, grand Connection and Eastrail adjacency in setting low or zero parking stall/unit requirements.
 - Exempt below grade parking from FAR.
 - 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.
 - 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.
- Affordable Housing
 - Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options
 - Avoid mandatory inclusionary requirements
 - Extend MFTE authorization throughout all growth areas in the city.
 - Incentivize the creation of affordable housing by allowing private developers to create affordable housing “banks” in new or rehabilitated income-restricted projects. Those projects could be built in advance of new market-rate development in the City, and then in-lieu funds from the new projects could be used to acquire affordable housing credits from the income-restricted projects.
 - Bellevue should create and staff a new Housing Division within the Department of Community Development, to coordinate the City’s affordable housing initiatives and the use of fee-in-lieu collections

- Critical Areas
 - Exempt Wilburton and 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 development. Critical areas can be well-protected without meaningless 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.
- Tree Regulations
 - Urban center and TOD areas should be exempted tree preservation regulations, similar to Downtown.
- Impervious Surfaces
 - Urban center and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on LID/hard surface coverage regulations, similar to Downtown.
- Process
 - Allow broad use of development standard departures in all urban center and TOD areas. Encourage the use of such departures where they would result in superior design and use.
 - Allow broad use of development agreements in all urban centers and TOD areas for any land use regulation.
 - In urban centers and TOD areas, allow a three-year extension of ADR approvals, to preserve development opportunities across market cycles.

We appreciate the opportunity to provide these comments and we look forward to participating in the EIS and Comprehensive Plan update process ahead.

Sincerely,



Douglas Rigoni
President/CEO

Coast Hospitality LLC

600 Stewart Street, Suite 1920, Seattle, Wa, 98101
206 849 8664

www.coasthospitality.com

WTM PROPERTY OWNER, LLC
511 Boren Avenue North, Suite 300
Seattle, WA 98109

October 28, 2022

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 writing to provide comments in response to the Scoping Notice for the Environmental Impact Statement (EIS) being prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, WTM Property Owner, LLC owns the Bellevue Tennis Academy at 13201 NE Spring Boulevard. 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.

Many concepts in Bellevue's Land Use Code for areas outside of Downtown date back to the late 1970's and early 1980's. Outside of Downtown, most development was low-density and suburban in character and elements of the Land Use Code continue to reflect this history. In the last 15 years, new zoning has been adopted for Bel-Red, Eastgate and East Main, but in each case the new zoning included relics of the City's suburban past.

Bellevue is now a major regional center in the Puget Sound and the upcoming zoning for its mixed-use areas, transportation-oriented development (TOD) areas, growth centers and other areas well-served by transit, should reflect this reality. New zoning for these areas should be based on the urban design principles that reflect the growth goals in the Comprehensive Plan update.

We recognize that the Comprehensive Plan is a planning document, not a set of development regulations. But major changes to the way the City approaches its Land Use Code will be required in the future implementation of this Comprehensive Plan update. Therefore, our comments below focus on the changes that are needed in the Land Use Code to ensure that Bellevue can meet its destiny as a regional urban center. The upcoming EIS should anticipate the need for these changes and its alternatives should assume a level of development that is achievable with the implementation of these Code changes.

As a general matter, we support Alternative 3 described in the EIS scoping notice, with the notation that this alternative should also be informed by the Code changes suggested below.

For these reasons, we suggest that the EIS should include analysis based on the following assumptions.

- Uses

- 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.
- Modernize and generalize uses in the Bel-Red district, thereby encouraging and incorporating types of uses desired by the BelRed Arts District (i.e. performance, venue, and flex space). This can be accomplished by including BelRed Arts District uses in the FAR Amenity System.
- Avoid being prescriptive about timing, sequencing and scale of different uses; allow the market to dictate development over time.
- 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.

- Height & Density

- Maximize heights and densities within ½ mile of light rail stations.
- The high-density zones around the 130th Street EastLink station should allow greater density for non-residential uses to promote more daytime activity and a mixed-use TOD station. Current zoning effectively limits this large area to residential development.
- 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, which will maximize positive urban development above-grade.
- Allow FAR to be freely allocated within a master-planned site, including across zoning lines and public right-of-ways.
- Maximum residential heights in TOD areas should not be less than 200 feet, in order to support viable high-rise development as well as mid-rise (5-8 story) development.

- Floorplates & Tower Standards

- Maintain appropriately-sized residential floorplates above 85 feet, while permitting residential floorplates larger than 28,000 square feet below 85 feet. The objective should be to maximize housing development opportunities.
- Allow larger floorplates for nonresidential uses, particularly tech, research & development and lab uses, above 40 feet and 85 feet. Larger floorplates are especially attractive to this group of tenants, so the Comprehensive Plan should accommodate these requirements.
- 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.
- Tower spacing should be limited to 40 feet, similar to Downtown.

- Structure setbacks should be eliminated, instead establishing a “build-to line” for new development.
- Parking
 - Minimum parking requirements should be significantly reduced in TOD areas, to 0.5 stalls/unit for multifamily and 1 stall/1,000 square feet for nonresidential.
 - Further parking reductions should be allowed based on project-specific parking studies, as in the Downtown.
 - Eliminate parking requirements for street-level active uses and active uses along pedestrian connections and open spaces. Code requirements for such uses are so excessive that they are an obstacle to the development of such uses.
 - 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.
- Affordable Housing
 - Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options.
 - Extend MFTE authorization throughout all growth areas in the City. The MFTE program is a proven tool that results in measurable additions to affordable housing and must continue to be supported.
 - Incentivize the creation of affordable housing by allowing private developers to create affordable housing “banks” in new or rehabilitated income-restricted projects.
 - Avoid mandatory inclusionary requirements in favor of programs that have been proven to produce affordable housing, such as MFTE.
 - Bellevue should create and staff a new Housing Division within the Department of Community Development, to coordinate the City’s affordable housing initiatives and the use of fee-in-lieu collections
- Critical Areas
 - Exempt Wilburton and Bel-Red from the Critical Areas Ordinance, similar to Downtown
 - Incentivize and encourage restoration of creeks and streams throughout Bel-Red. This will be most effectively accomplished through flexibility and innovation, honoring the connection between creeks and streams and the urban environment.
 - Encourage participation in programs that promote protection of water quality and aquatic habitat such as Salmon Safe.
 - Incentivize creative methods of stormwater infiltration systems and practices.
 - To accommodate restoration in the urban environment, consider reductions in critical area buffers similar to the “Urban Stream” defined by the City of Woodinville Municipal Code.
 - 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 development. Critical areas can be well-protected without meaningless 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. Preservation of isolated slope areas in a dense urban environment only creates orphaned, unusable land that could be put to better urban uses.
- Tree Regulations
 - Urban center and TOD areas, including Bel-Red, should be exempted from tree preservation regulations, similar to Downtown.
- Impervious Surfaces
 - Urban center and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on LID/hard surface coverage regulations, similar to Downtown.
 - Areas which fall within critical area buffers, as required by Code, should be counted in pervious surface calculations. Excluding critical area buffers is unnecessarily punitive and results in less density in the long term.
- Process
 - Allow broad use of development standard departures in all urban center and TOD areas. Encourage the use of such departures where they would result in superior design and use.
 - Allow broad use of development agreements in all urban centers and TOD areas for any land use regulation.
 - In urban centers and TOD areas, allow a two-year extension of ADR approvals, to preserve development opportunities across market cycles.
 - Transportation impact fee credits should be used in conjunction with other benefits and incentives to ensure that property owners are properly compensated for the construction of new infrastructure in Bel-Red.

We appreciate the opportunity to provide these comments and we look forward to participating in the EIS and Comprehensive Plan update process ahead.

Sincerely,

WTM PROPERTY OWNER, LLC



By:

Its:

Charlie Bauman

From: Charlie Bauman
Sent: Monday, October 24, 2022 11:14 AM
To: Nesse, Katherine; Johnson, Thara
Cc: CompPlan2044EIS@bellevuewa.gov
Subject: RE: Comprehensive Plan comment
Attachments: RE: Bel-Red Policies and Evergreen Center Check-In; RE: Bel-Red Policies and Evergreen Center Check-In; RE: Comp Plan Periodic Update; Bel-Red Subarea Plan - proposed changes - June 2022.docx

Kate, Thara – thank you for sending this reminder. I am replying to this note with my comments on the Comp Plan EIS scoping. Please let me know any questions related to this. Thank you!

Comprehensive Plan EIS Comments

General: I strongly encourage this EIS to study alternatives that maximize density, both for housing and commercial uses, throughout the city, with an emphasis on Bel-Red.

Bel-Red: My comments focus on Bel-Red because I am working with the owners of the Evergreen Center property located just north of the 130th St light rail station. This is a 6-acre piece of land that is one of the biggest opportunities in Bel-Red to maximize mixed-use density (housing, office, and retail) directly adjacent to the forthcoming light rail station. I have had multiple conversations with the City previously about this property (see attached emails) and the many obstacles to its successful redevelopment. In short, the current street grid plans, allowed density, floorplate size limitations, and critical areas on the site, make any redevelopment completely infeasible. I have previously shared multiple recommendations, including Comp Plan Policy changes (also attached), that attempt to alleviate these major constraints and provide a path to redevelopment. **It is necessary that the Comp Plan EIS scoping include alternatives that study ALL of these recommendations, so that we can then move into Comp Plan policy drafting.**

Specific Comments on EIS Scoping:

- The main issue I see is that in all alternatives, Bel-Red does not seem to be a focus. The alternatives briefly reference Bel-Red as an area for “moderate housing increases” but it does not include it as a center for job growth.
 - RECOMMENDATION: All EIS alternatives should study Bel-Red for significant housing and jobs increases

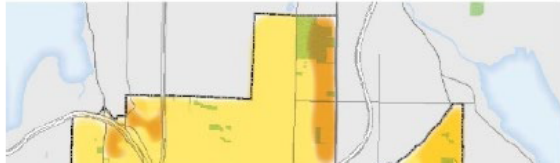
Common to All Action Alternatives (1-3)

The alternatives utilize the existing city capacity for both housing and jobs and add capacity to meet 2044 population and employment targets approved in the King County Countywide Planning Policies as listed on previous page.

- Development in the city's Mixed-use Centers continues to be the focus for growth. Downtown remains the growth center, with significant jobs and housing increases in Wilburton and moderate housing increase: BelRed. Remaining Mixed-use Centers (Crossroads, Eastgate, Factoria) have additional focus.
- In Alternative 1 it focuses on Wilburton, Crossroads, Eastgate and Factoria, but not Bel-Red.
 - RECOMMENDATION: Bel-Red is the most blank slate of all these areas and should be a top priority focus for density.

Alternative 1: Providing Options for Families of All Kinds

Capacity for 45,000 – 50,000 additional housing units beyond ~65,000 existing units in 2022

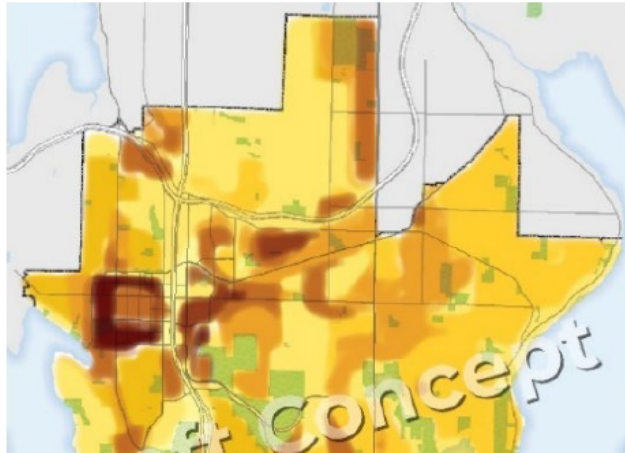


Focus additional residential density including mixed-use growth on **Mixed-use Centers**, including the areas of existing capacity in Downtown, East Main, BelRed and with a renewed focus on Wilburton, Crossroads, Eastgate, and Factoria.

- Alternative 3 studies the most density for Bel-Red but is still vague. It calls for studying added housing near transit and on larger sites.
 - RECOMMENDATION: This Alternative should be more specific and study both jobs and housing. Language should be included that Alternative 3 will study “maximizing mixed-use density (jobs and housing) within ½ mile around all light rail stations.” The 130th street station area should also be specifically mentioned as having considerable potential for mixed-use density, given its vast amounts of underutilized land and central proximity to the light rail stations.

Alternative 3: Providing Options Throughout the city

Capacity for 65,000-70,000 additional housing units beyond ~65,000 existing units in 2022



In addition to the growth concepts in alternative 2 adding housing in Transit Use Centers, in areas with good access to transit or jobs, and on large lots across the city, expand housing capacity in and near **Neighborhood Centers** (commercial areas within predominantly residential areas of City). This alternative also encourages the **creation of new Neighborhood Centers** in areas that currently lack access to essential services within short distance. This density could extend further along and near the transit rich arterials running through these areas as well. Similar to alternative 2, this alternative would also include more extensive multimodal transportation investments in these areas of higher proposed density.

Final Thoughts:

- The EIS should be as broad as possible and study maximum density throughout the city. This Comp Plan update is guiding the city's growth for the next 30 years. The goal of the EIS should be to study all possible growth outcomes, rather than trying to predict where the growth should occur today.
- Regarding the Evergreen Center site, my fear is that the EIS scoping and ultimate Comp Plan update will be too narrow in scope and not provide enough clear guidance for the zoning and code changes to be enacted that are needed to make redevelopment feasible. If we can't implement changes that work for a 6-acre site next to light rail, then there is a high likelihood that many sites will not redevelop as intended, leaving the city with a shortage of housing and job options.

Thank you for your time. Please reach out with any questions. Best.

Charlie Bauman

425-802-3352

From: Nesse, Katherine <KNesse@bellevuewa.gov>

Sent: Friday, October 21, 2022 2:42 PM

To: Charlie Bauman <charlie@guntowercapital.com>

Cc: Johnson, Thara <TMJohnson@bellevuewa.gov>

Subject: Comprehensive Plan comment



October 31, 2022

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 writing to provide comments in response to the Scoping Notice for the Environmental Impact Statement (EIS) being prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, Principal Real Estate owns the properties in Wilburton commonly known as Wilburton Village (North and South) and Best Buy located at 400 116th Ave NE, 272 116th Ave NE, and 457 120th Ave NE (The Properties”). The Comprehensive Plan update will be important to the future use and development of our properties and the role it will play in Bellevue’s growth as a regional center.

Many concepts in Bellevue’s Land Use Code for areas outside Downtown date back to the late 1970’s and early 1980’s. This was an era in which Bellevue was primarily a suburban bedroom community, with the first high-rise buildings appearing in Downtown. Outside of Downtown, most development was low-density and suburban in character and elements of the Land Use Code continue to reflect this history. In the last 15 years, new zoning has been adopted for Bel-Red, Eastgate and East Main, but in each case the new zoning included relics of the City’s suburban past.

Bellevue is now a major regional center in the Puget Sound and the upcoming zoning for its mixed use areas, TOD areas, growth centers and their surrounds, as well as other areas well-served by transit, should reflect this reality. New zoning for these areas should be based on the urban design principles that underlie the City’s Downtown zoning.



We recognize that the Comprehensive Plan is a planning document, not a set of development regulations. But major changes to the way the City approaches its Land Use Code will be required in the future implementation of this Comprehensive Plan update. Therefore, our comments below focus on the changes that are needed in the Land Use Code to ensure that Bellevue can meet its destiny as a regional urban center. The upcoming EIS should anticipate the need for these changes and its alternatives should assume a level of development that is achievable with the implementation of these Code changes.

As a general matter, we support Alternative 3 described in the EIS scoping notice, with the notation that this alternative should also be informed by the Code changes suggested below.

For these reasons, we suggest that the EIS should include analysis based on the following assumptions.

Comments Specific to Wilburton

- Overall, the area between 116th Avenue NE and Eastrail and NE 4th Street and NE 8th Street should be the location of the most intense development in Wilburton.
- NE 6th Street should terminate at 116th Avenue NE after crossing I-405. To extend NE 6th Street east to 120th Avenue NE would create little benefit to vehicle transportation and would destroy the opportunity to provide an iconic, regional connection between The Grand Connection and Eastrail at that location. In addition to losing this critical multi-modal connection, an eastern extension of NE 6th Street would be extraordinarily expensive (in terms of both property acquisition and construction costs) and would necessitate yet another at-grade crossing of Eastrail by a major arterial within only about a quarter mile. As a result, such a NE 6th extension would destroy the key hub for Eastrail and undermine the hundreds of millions of dollars of investment in this regional multi-modal facility.
- No requirement of a “street grid” should be imposed on the properties. 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 properties impair the use and activation of any such grid streets and those streets would not connect to any larger network. Any future development of the properties can and should accommodate east-west pedestrian connections.
- The properties along both sides of the Eastrail between NE 4th and NE 8th should receive increased heights and densities for trail-oriented development.

- Uses
 - 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.
 - 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.
 - Allow electric vertical take-off and landing (eVTOL) uses adjacent to transit stations, in order to maximize mass transit ridership and general mobility.
- Height & Density
 - 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.
 - 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 and commercial heights in Wilburton should be equivalent and should be consistent with the CAC's recommendations of up to 6 FAR and 450 feet in height. In other areas of Wilburton in which high-rise residential development is targeted, those heights should not be less than 200 feet, in order to



support viable high-rise development and incentivize the needed production of housing. Historical experience has shown that the extraordinary costs imposed in high-rise development are best amortized at heights above 200 feet. Below 200 feet, high-rise development is difficult to underwrite in these urban centers.

- Floorplates & Tower Standards

- Maintain appropriately-sized residential floorplates above 85 feet, while permitting residential floorplates larger than 28,000 s.f. below 85 feet. The objective should be to maximize housing development opportunities, which means larger floorplates below 85 feet and floorplates in towers sized appropriately to promote the development of housing inventory.
- Allow larger floorplates for nonresidential uses, particularly tech, research & development and lab uses, above 40 feet and 85 feet. Such larger floorplates are especially attractive to this group of tenants, so the plan should accommodate these requirements.
- 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.
- Structure setbacks should be eliminated, instead establishing a “build-to line” for new development.

- Parking

- Minimum parking requirements should be significantly reduced in TOD areas, to 0.5 stalls/unit for multifamily and 1 stall/1000 s.f. for nonresidential.
- Further parking reductions should be allowed based on project-specific parking studies, as in the Downtown.
- Eliminate parking requirements for street-level active uses and for active uses along Eastrail. Code requirements for such uses are so excessive that they are an obstacle to the development of such uses.
- 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.

- Affordable Housing

- Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options
- Avoid mandatory inclusionary requirements



- Extend MFTE authorization throughout all growth areas in the City.
 - Incentivize the creation of affordable housing by allowing private developers to create affordable housing “banks” in new or rehabilitated income-restricted projects. Those projects could be built in advance of new market-rate development in the City, and then in-lieu funds from the new projects could be used to acquire affordable housing credits from the income-restricted projects.
 - Bellevue should create and staff a new Housing Division within the Department of Community Development, to coordinate the City’s affordable housing initiatives and the use of fee-in-lieu collections
- Critical Areas
 - Exempt Wilburton and 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 development. Critical areas can be well-protected without meaningless 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.
- Tree Regulations
 - Urban center and TOD areas, including Wilburton, should be exempted from tree preservation regulations, similar to Downtown.
- Impervious Surfaces
 - Urban center and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on LID/hard surface coverage regulations, similar to Downtown.
- Process
 - Allow broad use of development standard departures in all urban center and TOD areas. Encourage the use of such departures where they would result in superior design and use.
 - Allow broad use of development agreements in all urban centers and TOD areas for any land use regulation.



- In urban centers and TOD areas, allow a two-year extension of ADR approvals, to preserve development opportunities across market cycles.
 - Transportation impact fee credits should be used in conjunction with other benefits and incentives to ensure that property owners are properly compensated for the construction of new infrastructure in Wilburton.
- Emergency Access
 - Allow for coordination with King County to provide for emergency access from Eastrail in order to support trail-oriented development.

We appreciate the opportunity to provide these comments and we look forward to participating in the EIS and Comprehensive Plan update process ahead.

Sincerely,

A handwritten signature in black ink that reads "Steve Kramer".

Steve Kramer
Principal
KG Investment Properties

A handwritten signature in black ink that reads "Andrew Coates".

Andrew Coates
Managing Director
KG Investment Properties



October 31, 2022

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 writing to provide comments in response to the Scoping Notice for the Environmental Impact Statement (EIS) being prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, KG Investment Properties and Clarion Partners own the current Burger King property located on NE 8th Street east of I-405 at 11723 NE 8th Street (the “Property”). 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.

Many concepts in Bellevue’s Land Use Code for areas outside Downtown date back to the late 1970’s and early 1980’s. This was an era in which Bellevue was primarily a suburban bedroom community, with the first high-rise buildings appearing in Downtown. Outside of Downtown, most development was low-density and suburban in character and elements of the Land Use Code continue to reflect this history. In the last 15 years, new zoning has been adopted for Bel-Red, Eastgate and East Main, but in each case the new zoning included relics of the City’s suburban past.

Bellevue is now a major regional center in the Puget Sound and the upcoming zoning for its mixed use areas, TOD areas, growth centers and their surrounds, as well as other areas well-served by transit, should reflect this reality. New zoning for these areas should be based on the urban design principles that underlie the City’s Downtown zoning.



We recognize that the Comprehensive Plan is a planning document, not a set of development regulations. But major changes to the way the City approaches its Land Use Code will be required in the future implementation of this Comprehensive Plan update. Therefore, our comments below focus on the changes that are needed in the Land Use Code to ensure that Bellevue can meet its destiny as a regional urban center. The upcoming EIS should anticipate the need for these changes and its alternatives should assume a level of development that is achievable with the implementation of these Code changes.

As a general matter, we support Alternative 3 described in the EIS scoping notice, with the notation that this alternative should also be informed by the Code changes suggested below.

For these reasons, we suggest that the EIS should include analysis based on the following assumptions.

Comments Specific to Wilburton

- The area between 116th Avenue NE and Eastrail and NE 4th Street and NE 8th Street should be the location of the most intense development in Wilburton.
- NE 6th Street should terminate at 116th Avenue NE after crossing I-405. To extend NE 6th Street east to 120th Avenue NE would create little benefit to vehicle transportation and would destroy the opportunity to provide an iconic, regional connection between The Grand Connection and Eastrail at that location. In addition to losing this critical multi-modal connection, an eastern extension of NE 6th Street would be extraordinarily expensive (in terms of both property acquisition and construction costs) and would necessitate yet another at-grade crossing of Eastrail by a major arterial within only about a quarter mile. As a result, such a NE 6th extension would destroy the key hub for Eastrail and undermine the hundreds of millions of dollars of investment in this regional multi-modal facility.
- No requirement of a “street grid” should be imposed on the properties. 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 properties impair the use and activation of any such grid streets and those streets would not connect to any larger network. Any future development of the properties can and should accommodate east-west pedestrian connections.
- The properties along both sides of the Eastrail between NE 4th and NE 8th should receive increased heights and densities for trail-oriented development.

- Uses
 - 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.
 - 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.
 - Allow electric vertical take-off and landing (eVTOL) uses adjacent to transit stations, in order to maximize mass transit ridership and general mobility.
- Height & Density
 - 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.
 - 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 and commercial heights in Wilburton should be equivalent and should be consistent with the CAC's recommendations of up to 6 FAR and 450 feet in height. In other areas of Wilburton in which high-rise residential development is targeted, those heights should not be less than 200 feet, in order to



support viable high-rise development and incentivize the needed production of housing. Historical experience has shown that the extraordinary costs imposed in high-rise development are best amortized at heights above 200 feet. Below 200 feet, high-rise development is difficult to underwrite in these urban centers.

- Floorplates & Tower Standards

- Maintain appropriately-sized residential floorplates above 85 feet, while permitting residential floorplates larger than 28,000 s.f. below 85 feet. The objective should be to maximize housing development opportunities, which means larger floorplates below 85 feet and floorplates in towers sized appropriately to promote the development of housing inventory. Allow larger floorplates for nonresidential uses, particularly tech, research & development and lab uses, above 40 feet and 85 feet. Such larger floorplates are especially attractive to this group of tenants, so the plan should accommodate these requirements.
- 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.
- Structure setbacks should be eliminated, instead establishing a “build-to line” for new development.

- Parking

- Minimum parking requirements should be significantly reduced in TOD areas, to 0.5 stalls/unit for multifamily and 1 stall/1000 s.f. for nonresidential.
- Further parking reductions should be allowed based on project-specific parking studies, as in the Downtown.
- Eliminate parking requirements for street-level active uses and for active uses along Eastrail. Code requirements for such uses are so excessive that they are an obstacle to the development of such uses.
- 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.

- Affordable Housing

- Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options
- Avoid mandatory inclusionary requirements



- Extend MFTE authorization throughout all growth areas in the City.
 - Incentivize the creation of affordable housing by allowing private developers to create affordable housing “banks” in new or rehabilitated income-restricted projects. Those projects could be built in advance of new market-rate development in the City, and then in-lieu funds from the new projects could be used to acquire affordable housing credits from the income-restricted projects.
 - Bellevue should create and staff a new Housing Division within the Department of Community Development, to coordinate the City’s affordable housing initiatives and the use of fee-in-lieu collections
- Critical Areas
 - Exempt Wilburton and 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 development. Critical areas can be well-protected without meaningless 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.
- Tree Regulations
 - Urban center and TOD areas, including Wilburton, should be exempted from tree preservation regulations, similar to Downtown.
- Impervious Surfaces
 - Urban center and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on LID/hard surface coverage regulations, similar to Downtown.
- Process
 - Allow broad use of development standard departures in all urban center and TOD areas. Encourage the use of such departures where they would result in superior design and use.
 - Allow broad use of development agreements in all urban centers and TOD areas for any land use regulation.



- In urban centers and TOD areas, allow a two-year extension of ADR approvals, to preserve development opportunities across market cycles.
 - Transportation impact fee credits should be used in conjunction with other benefits and incentives to ensure that property owners are properly compensated for the construction of new infrastructure in Wilburton.
- Emergency Access
 - Allow for coordination with King County to provide for emergency access from Eastrail in order to support trail-oriented development.

We appreciate the opportunity to provide these comments and we look forward to participating in the EIS and Comprehensive Plan update process ahead.

Sincerely,

A handwritten signature in black ink that reads "Steve Kramer".

Steve Kramer
Principal
KG Investment Properties

A handwritten signature in black ink that reads "Andrew Coates".

Andrew Coates
Managing Director
KG Investment Properties



October 31, 2022

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 writing to provide comments in response to the Scoping Notice for the Environmental Impact Statement (EIS) being prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, KG Investment Properties and Rockwood Capital own 11661-11671 SE 1st 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.

Many concepts in Bellevue’s Land Use Code for areas outside Downtown date back to the late 1970’s and early 1980’s. This was an era in which Bellevue was primarily a suburban bedroom community, with the first high-rise buildings appearing in Downtown. Outside of Downtown, most development was low-density and suburban in character and elements of the Land Use Code continue to reflect this history. In the last 15 years, new zoning has been adopted for Bel-Red, Eastgate and East Main, but in each case the new zoning included relics of the City’s suburban past.

Bellevue is now a major regional center in the Puget Sound and the upcoming zoning for its mixed use areas, TOD areas, growth centers and their surrounds, as well as other areas well-served by transit, should reflect this reality. New zoning for these areas should be based on the urban design principles that underlie the City’s Downtown zoning.



We recognize that the Comprehensive Plan is a planning document, not a set of development regulations. But major changes to the way the City approaches its Land Use Code will be required in the future implementation of this Comprehensive Plan update. Therefore, our comments below focus on the changes that are needed in the Land Use Code to ensure that Bellevue can meet its destiny as a regional urban center. The upcoming EIS should anticipate the need for these changes and its alternatives should assume a level of development that is achievable with the implementation of these Code changes.

As a general matter, we support Alternative 3 described in the EIS scoping notice, with the notation that this alternative should also be informed by the Code changes suggested below. We also note that Alternatives 1 and 2 reflect a lower density for the core area of Wilburton, which may be useful for comparison purposes, but the fundamental concept that should be reflected in all alternatives is that the maximum height and density within Wilburton should occur at the Property, since the Property is the epicenter of urban activity in the subarea.

For these reasons, we suggest that the EIS should include analysis based on the following assumptions.

Comments Specific to Wilburton

- NE 6th Street should terminate at 116th Avenue NE after crossing I-405. To extend NE 6th Street east to 120th Avenue NE would create little benefit to vehicle transportation and would destroy the opportunity to provide an iconic, regional connection between The Grand Connection and Eastrail at that location. In addition to losing this critical multi-modal connection, an eastern extension of NE 6th Street would be extraordinarily expensive (in terms of both property acquisition and construction costs) and would necessitate yet another at-grade crossing of Eastrail by a major arterial within only about a quarter mile. As a result, such a NE 6th extension would destroy the key hub for Eastrail and undermine the hundreds of millions of dollars of investment in this regional multi-modal facility.
- The properties along both sides of the Eastrail should receive increased heights and densities for trail-oriented development. The properties south of SE 1st, including the Property, should be focused on dense residential development that supports cost-effective podium construction with floorplates in excess of 28,000 square feet.



General Comments

- Uses
 - 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.
 - 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.
 - Allow electric vertical take-off and landing (eVTOL) uses adjacent to transit stations, in order to maximize mass transit ridership and general mobility.
- Height & Density
 - 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.
 - Height measurement for the Property should be based on a grade plane at the elevation of Eastrail.
 - 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 and commercial heights in Wilburton should be equivalent and should be consistent with the CAC's recommendations of up to 6 FAR and 450 feet in height. In other areas of Wilburton in which high-rise residential development is targeted, those heights should not be less than 200 feet, in order to support viable high-rise development and incentivize the needed production of housing. Historical experience has shown that the extraordinary costs imposed in high-rise development are best amortized at heights above 200 feet. Below 200 feet, high-rise development is difficult to underwrite in these urban centers.
- Floorplates & Tower Standards
 - Maintain appropriately-sized residential floorplates above 85 feet, while permitting residential floorplates larger than 28,000 s.f. below 85 feet. The objective should be to maximize housing development opportunities, which means larger floorplates below 85 feet and floorplates in towers sized appropriately to promote the development of housing inventory.
 - Allow larger floorplates for nonresidential uses, particularly tech, research & development and lab uses, above 40 feet and 85 feet. Such larger floorplates are especially attractive to this group of tenants, so the plan should accommodate these requirements.
 - 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.
 - Structure setbacks should be eliminated, instead establishing a "build-to line" for new development.
- Parking
 - Minimum parking requirements should be significantly reduced in TOD areas, to 0.5 stalls/unit for multifamily and 1 stall/1000 s.f. for nonresidential.
 - Further parking reductions should be allowed based on project-specific parking studies, as in the Downtown.
 - Eliminate parking requirements for street-level active uses and for active uses along Eastrail. Code requirements for such uses are so excessive that they are an obstacle to the development of such uses.
 - 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.



- Affordable Housing
 - Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options
 - Avoid mandatory inclusionary requirements
 - Extend MFTE authorization throughout all growth areas in the City.
 - Incentivize the creation of affordable housing by allowing private developers to create affordable housing “banks” in new or rehabilitated income-restricted projects. Those projects could be built in advance of new market-rate development in the City, and then in-lieu funds from the new projects could be used to acquire affordable housing credits from the income-restricted projects.
 - Bellevue should create and staff a new Housing Division within the Department of Community Development, to coordinate the City’s affordable housing initiatives and the use of fee-in-lieu collections
- Critical Areas
 - Exempt Wilburton and 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 development. Critical areas can be well-protected without meaningless 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.
- Tree Regulations
 - Urban center and TOD areas, including Wilburton, should be exempted from tree preservation regulations, similar to Downtown.
- Impervious Surfaces
 - Urban center and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on LID/hard surface coverage regulations, similar to Downtown.



- Process
 - Allow broad use of development standard departures in all urban center and TOD areas. Encourage the use of such departures where they would result in superior design and use.
 - Allow broad use of development agreements in all urban centers and TOD areas for any land use regulation.
 - In urban centers and TOD areas, allow a two-year extension of ADR approvals, to preserve development opportunities across market cycles.
 - Transportation impact fee credits should be used in conjunction with other benefits and incentives to ensure that property owners are properly compensated for the construction of new infrastructure in Wilburton.
- Emergency Access
 - Allow for coordination with King County to provide for emergency access from Eastrail in order to support trail-oriented development.

We appreciate the opportunity to provide these comments and we look forward to participating in the EIS and Comprehensive Plan update process ahead.

Sincerely,

A handwritten signature in black ink that reads "Steve Kramer".

Steve Kramer
Principal
KG Investment Properties

A handwritten signature in black ink that reads "Andrew Coates".

Andrew Coates
Managing Director
KG Investment Properties



October 31, 2022

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 writing to provide comments in response to the Scoping Notice for the Environmental Impact Statement (EIS) being prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, Clarion Partners owns the property located at 1422-1424 130th Ave NE in Bel-Red. 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.

As a general matter, we support Alternative 3 described in the EIS scoping notice, with the notation that this alternative should also be informed by the Code changes suggested below. We suggest that the EIS should include analysis based on the following assumptions.

- Uses
 - 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. In particular, the zones in Bel-Red outside the Spring District should allow greater density for both residential and non-residential uses to promote more daytime activity and a mixed-use neighborhood. Current zoning tends to segregate residential and non-residential uses into different portions of Bel-Red, which makes it impossible to achieve a vibrant, mixed-use neighborhood across the subarea. For example, the area surrounding the 130th EastLink station is effectively limited to residential uses.



- 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.
- Allow electric vertical take-off and landing (eVTOL) uses adjacent to transit stations, in order to maximize mass transit ridership and general mobility.
- Height & Density
 - 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.
 - 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 and commercial heights in Wilburton should be equivalent and should be consistent with the CAC's recommendations of up to 6 FAR and 450 feet in height. In other areas of Wilburton and Bel-Red in which high-rise residential development is targeted, those heights should not be less than 200 feet, in order to support viable high-rise development and incentivize the needed production of housing. Historical experience has shown that the extraordinary costs imposed in high-rise development are best amortized at heights above 200 feet. Below 200 feet, high-rise development is difficult to underwrite in these urban centers.



- Floorplates & Tower Standards
 - Maintain appropriately-sized residential floorplates above 85 feet, while permitting residential floorplates larger than 28,000 s.f. below 85 feet. The objective should be to maximize housing development opportunities, which means larger floorplates below 85 feet and floorplates in towers sized appropriately to promote the development of housing inventory.
 - Allow larger floorplates for nonresidential uses, particularly tech, research & development and lab uses, above 40 feet and 85 feet. Such larger floorplates are especially attractive to this group of tenants, so the plan should accommodate these requirements.
 - 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.
 - Structure setbacks should be eliminated, instead establishing a “build-to line” for new development.
- Parking
 - Minimum parking requirements should be significantly reduced in TOD areas, to 0.5 stalls/unit for multifamily and 1 stall/1000 s.f. for nonresidential.
 - Further parking reductions should be allowed based on project-specific parking studies, as in the Downtown.
 - Eliminate parking requirements for street-level active uses and for active uses along Eastrail. Code requirements for such uses are so excessive that they are an obstacle to the development of such uses.
 - 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.
- Affordable Housing
 - Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options
 - Extend MFTE authorization throughout all growth areas in the City.
 - Incentivize the creation of affordable housing by allowing private developers to create affordable housing “banks” in new or rehabilitated income-restricted projects. Those projects could be built in advance of new market-rate development in the City, and then in-lieu funds from the new projects could be used to acquire affordable housing credits from the income-restricted projects.



- Avoid mandatory inclusionary requirements
- Bellevue should create and staff a new Housing Division within the Department of Community Development, to coordinate the City's affordable housing initiatives and the use of fee-in-lieu collections
- Critical Areas
 - Exempt Wilburton and 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 development. Critical areas can be well-protected without meaningless 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.
- Tree Regulations
 - Urban center and TOD areas, including Wilburton, should be exempted from tree preservation regulations, similar to Downtown.
- Impervious Surfaces
 - Urban center and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on LID/hard surface coverage regulations, similar to Downtown.
- Process
 - Allow broad use of development standard departures in all urban center and TOD areas. Encourage the use of such departures where they would result in superior design and use.
 - Allow broad use of development agreements in all urban centers and TOD areas for any land use regulation.
 - In urban centers and TOD areas, allow a two-year extension of ADR approvals, to preserve development opportunities across market cycles.
 - Transportation impact fee credits should be used in conjunction with other benefits and incentives to ensure that property owners are properly compensated for the construction of new infrastructure in Wilburton.



We appreciate the opportunity to provide these comments and we look forward to participating in the EIS and Comprehensive Plan update process ahead.

Sincerely,

A handwritten signature in black ink that reads "Steve Kramer".

Steve Kramer
Principal
KG Investment Properties

A handwritten signature in black ink that reads "Andrew Coates".

Andrew Coates
Managing Director
KG Investment Properties



October 31, 2022

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 writing to provide comments in response to the Scoping Notice for the Environmental Impact Statement (EIS) being prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, KG Investment Properties and Rockwood Capital own 7 acres on the east side of 116th Avenue NE, between NE 4th Street and NE 6th 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.

Many concepts in Bellevue’s Land Use Code for areas outside Downtown date back to the late 1970’s and early 1980’s. This was an era in which Bellevue was primarily a suburban bedroom community, with the first high-rise buildings appearing in Downtown. Outside of Downtown, most development was low-density and suburban in character and elements of the Land Use Code continue to reflect this history. In the last 15 years, new zoning has been adopted for Bel-Red, Eastgate and East Main, but in each case the new zoning included relics of the City’s suburban past.

Bellevue is now a major regional center in the Puget Sound and the upcoming zoning for its mixed use areas, TOD areas, growth centers and their surrounds, as well as other areas well-



served by transit, should reflect this reality. New zoning for these areas should be based on the urban design principles that underlie the City's Downtown zoning.

We recognize that the Comprehensive Plan is a planning document, not a set of development regulations. But major changes to the way the City approaches its Land Use Code will be required in the future implementation of this Comprehensive Plan update. Therefore, our comments below focus on the changes that are needed in the Land Use Code to ensure that Bellevue can meet its destiny as a regional urban center. The upcoming EIS should anticipate the need for these changes and its alternatives should assume a level of development that is achievable with the implementation of these Code changes.

As a general matter, we support Alternative 3 described in the EIS scoping notice, with the notation that this alternative should also be informed by the Code changes suggested below. We also note that Alternatives 1 and 2 reflect a lower density for the core area of Wilburton, which may be useful for comparison purposes, but the fundamental concept that should be reflected in all alternatives is that the maximum height and density within Wilburton should occur at the Property, since the Property is the epicenter of urban activity in the subarea.

For these reasons, we suggest that the EIS should include analysis based on the following assumptions.

Comments Specific to Wilburton

- The future connection between The Grand Connection and Eastrail is the centerpoint of the Wilburton subarea, and this location should be afforded the greatest heights and densities. Overall, the area between 116th Avenue NE and Eastrail and NE 4th Street and NE 8th Street should be the location of the most intense development in Wilburton. As noted above, all alternatives in the EIS should focus the maximum height and density within Wilburton should occur at the Property, which is the catalyst hub for Wilburton.
- NE 6th Street should terminate at 116th Avenue NE after crossing I-405. To extend NE 6th Street east to 120th Avenue NE would create little benefit to vehicle transportation and would destroy the opportunity to provide an iconic, regional connection between The Grand Connection and Eastrail at that location. In addition to losing this critical multi-modal connection, an eastern extension of NE 6th Street would be extraordinarily expensive (in terms of both property acquisition and construction costs) and would necessitate yet another at-grade crossing of Eastrail by a major arterial within only about a quarter mile. As a result, such a NE 6th extension would destroy the key hub for Eastrail and undermine the hundreds of millions of dollars of investment in this regional multi-modal facility.



- No requirement of a “street grid” should be imposed on the Property. 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.
- Assuming that the Property receives the appropriate scale and type of height, density and development entitlements and obtains compensation in the form of extraordinary FAR bonuses, development of the Property should then include the extension of The Grand Connection from 116th Avenue NE to Eastrail and the build-out of Eastrail along the eastern frontage of the Property. This approach should be based on the successful model used Downtown for the Pedestrian Corridor, where an FAR super-bonus was afforded those properties building out the Pedestrian Corridor. The model worked well in the Downtown over many decades and should be replicated here.

General Comments

- Uses
 - 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.
 - 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.



- Allow electric vertical take-off and landing (eVTOL) uses adjacent to transit stations, in order to maximize mass transit ridership and general mobility.
- Height & Density
 - 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.
 - Height measurement for the Property should be based on a grade plane at the elevation of Eastrail.
 - 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 and commercial heights for the Property should be equivalent and should be consistent with the CAC's recommendations of up to 6 FAR and 450 feet in height. In other areas of Wilburton in which high-rise residential development is targeted, those heights should not be less than 200 feet, in order to support viable high-rise development and incentivize the needed production of housing. Historical experience has shown that the extraordinary costs imposed in high-rise development are best amortized at heights above 200 feet. Below 200 feet, high-rise development is difficult to underwrite in these urban centers.
- Floorplates & Tower Standards
 - Maintain appropriately-sized residential floorplates above 85 feet, while permitting residential floorplates larger than 28,000 s.f. below 85 feet. The objective should be to maximize housing development opportunities, which means larger floorplates below 85 feet and floorplates in towers sized appropriately to promote the development of housing inventory.
 - Allow larger floorplates for nonresidential uses, particularly tech, research & development and lab uses, above 40 feet and 85 feet. Such larger floorplates are especially attractive to this group of tenants, so the plan should accommodate these requirements.



- 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.
- Structure setbacks should be eliminated, instead establishing a “build-to line” for new development.
- Parking
 - Minimum parking requirements should be significantly reduced in TOD areas, to 0.5 stalls/unit for multifamily and 1 stall/1000 s.f. for nonresidential.
 - Further parking reductions should be allowed based on project-specific parking studies, as in the Downtown.
 - Eliminate parking requirements for street-level active uses and for active uses along Eastrail. Code requirements for such uses are so excessive that they are an obstacle to the development of such uses.
 - 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.
- Affordable Housing
 - Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options
 - Avoid mandatory inclusionary requirements
 - Extend MFTE authorization throughout all growth areas in the City.
 - Incentivize the creation of affordable housing by allowing private developers to create affordable housing “banks” in new or rehabilitated income-restricted projects. Those projects could be built in advance of new market-rate development in the City, and then in-lieu funds from the new projects could be used to acquire affordable housing credits from the income-restricted projects.
 - Bellevue should create and staff a new Housing Division within the Department of Community Development, to coordinate the City’s affordable housing initiatives and the use of fee-in-lieu collections
- Critical Areas
 - Exempt Wilburton and 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 development. Critical areas can be well-protected without meaningless 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.
- Tree Regulations
 - Urban center and TOD areas, including Wilburton, should be exempted from tree preservation regulations, similar to Downtown.
- Impervious Surfaces
 - Urban center and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on LID/hard surface coverage regulations, similar to Downtown.
- Process
 - Allow broad use of development standard departures in all urban center and TOD areas. Encourage the use of such departures where they would result in superior design and use.
 - Allow broad use of development agreements in all urban centers and TOD areas for any land use regulation.
 - In urban centers and TOD areas, allow a two-year extension of ADR approvals, to preserve development opportunities across market cycles.
 - Transportation impact fee credits should be used in conjunction with other benefits and incentives to ensure that property owners are properly compensated for the construction of new infrastructure in Wilburton.
- Emergency Access
 - Allow for coordination with King County to provide for emergency access from Eastrail in order to support trail-oriented development.



Finally, please note that we submitted a comment letter to the Draft Environmental Impact Statement prepared in 2018 by the City. Many of these comments remain relevant to the current EIS. A copy of our 2018 letter is attached.

We appreciate the opportunity to provide these comments and we look forward to participating in the EIS and Comprehensive Plan update process ahead.

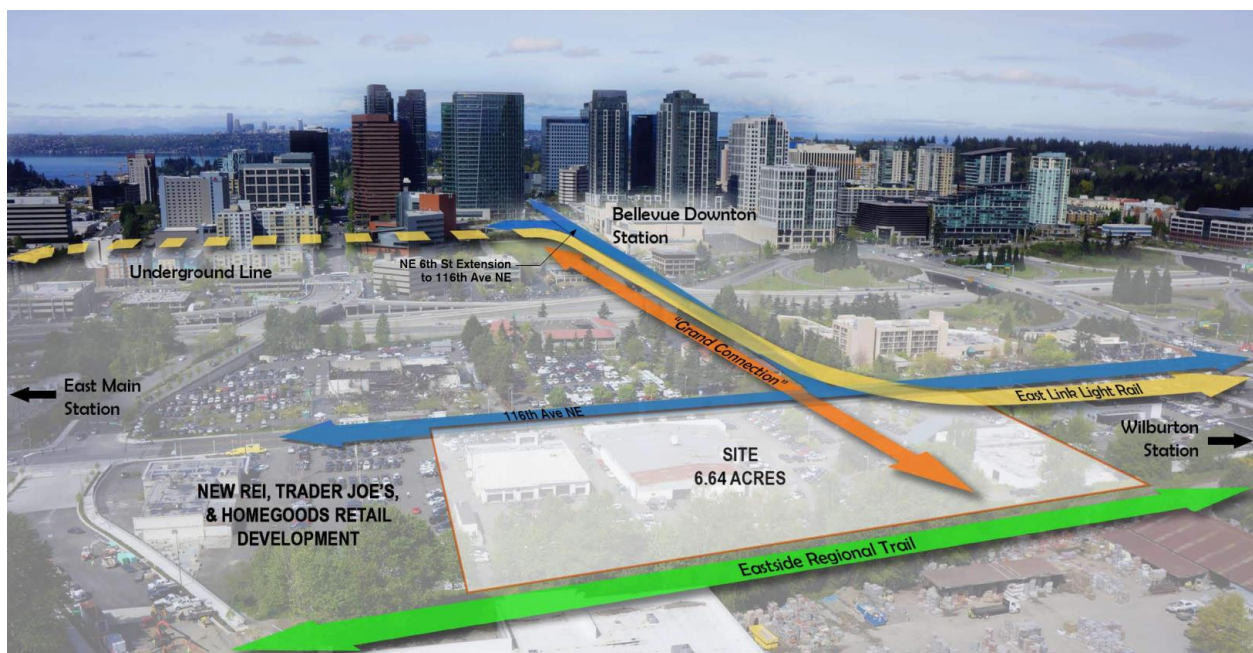
Sincerely,

A handwritten signature in black ink that reads "Steve Kramer".

Steve Kramer
Principal
KG Investment Properties

A handwritten signature in black ink that reads "Andrew Coates".

Andrew Coates
Managing Director
KG Investment Properties



SECTION 5. EMAILED COMMENTS

McCULLOUGH HILL LEARY, PS

March 19, 2018

VIA ELECTRONIC MAIL

Bradley Calvert, AICP
Department of Planning & Community Development
City of Bellevue
450 110th Avenue NE
Bellevue, WA 98004

Re: Comments on Wilburton/Grand Connection Draft EIS

Dear Mr. Calvert:

We are writing on behalf of KG Investment Properties (“KGIP”) to provide comments on the Draft Environmental Impact Statement (DEIS) for the Wilburton-Grand Connection Plan (the “Plan”). KGIP has worked with the City of Bellevue (“City”) on planning for future development of the 6.6-acre site bordered by the ERC to the east, 116th Avenue to the west, with the Grand Connection running through our property on the northern edge (the “KGIP Property”).

The City’s 2008 Wilburton Subarea Update identified the properties between NE 8th Street and NE 4th Street on either side of 116th Avenue NE as a “Special Opportunity Area,” recognizing the unique opportunity this area represents for a combination of density, mobility and recreation. This current planning effort has added three important elements to this “Special Opportunity Area”: EastLink light rail, the Grand Connection and the Eastside Rail Corridor trail (ERC).

The colocation of these many regional elements in one place now provides a new and enhanced opportunity to turn the Special Opportunity Area of a decade ago into a regional destination of which the City can be proud.

But the promise of this area can only be realized with the density necessary to activate it. The ERC is a 16.7-mile long connector, joining Bellevue, Kirkland, Redmond, Woodinville and Renton into the area’s regional trail network. Nowhere on this stretch is there a location more suitable to urban density and activation than this one. Here is where the Grand Connection meets the ERC, and where, together with EastLink, Bellevue can celebrate its connections to the region and its key role at the center of this eastside hub. More than Downtown, Bel-Red or Eastgate, this location in Wilburton is where Bellevue connects to the Puget Sound region.

This also means that this location is the center of the Wilburton planning area. In order to activate the Grand Connection and the ERC, and to bring urban vitality to the entire planning area, the KGIP Property between NE 8th Street and NE 4th Street on both sides of 116th Avenue NE must be targeted for sufficient height and density to make it a true urban center. In addition, the coming Wilburton Light Rail station will be 650 feet to the north and the Bellevue Downtown Light Rail station will also be a short walk away using the Grand Connection. Lastly, the possible extension of NE 6th to 116th will add even more accessibility to this site, and another connection between Wilburton and Downtown. Given the unparalleled infrastructure and accessibility serving the KGIP Property, it has the potential to be a centerpiece of the Wilburton urban village and should receive the highest densities and building heights prescribed in the updated Wilburton zoning plan.

This area, once designated as a Special Opportunity Area, has the potential to develop into many different and exciting places for all people to enjoy. The opportunity for jobs, great places to live, recreational areas, restaurants, shops, and more can all be realized in this area. The Grand Connection, Light Rail, ERC and Civic Space concept will bring a confluence of users into the area and it is important to allow for the ability to develop a wide variety of uses (including mixed-use opportunities). But the DEIS alternatives imply that certain uses would be emphasized – and others restricted – in different portions of this area. The restriction of certain uses to specific sites or areas (as contemplated in the DEIS alternatives) would diminish the ability for the area to redevelop in an organic and complementary fashion. The five uses listed in the DEIS Alternatives (Retail, Office, Residential, Hotel, and Institutional) should all be equally allowed in this area, in order to provide the greatest opportunity for development that fulfills the vision for the area, in a timeframe that would complement the substantial public infrastructure investment in the area. To better depict a more flexible, mixed-use approach to development under the alternatives, we have attached revised maps of the DEIS alternatives for your review and consideration.

We applaud the City's Department of Planning & Community Development for their work on the Plan. In concert with the Citizen's Advisory Committee (CAC), the City has outlined a range of alternatives in the DEIS that address the unique transit-oriented development opportunities in Wilburton. The western area of Wilburton remains largely underdeveloped but will, upon completion of EastLink and the Grand Connection, enjoy unparalleled transit, pedestrian and recreational access in Bellevue's center city. To realize this opportunity, the City and the CAC have focused on creating an urban environment in Wilburton with the height, density and pedestrian environment that it deserves. Through the City's good work, the DEIS helps to frame the exciting opportunities that will be the future of Wilburton.

Our comments on the DEIS are set forth below:

1. Transportation.

Our specific comments on the Transportation Section of the DEIS are set forth below. In addition, we have attached the March 14, 2018 memorandum from The Transpo Group setting forth their additional comments on the DEIS.

a. The DEIS dramatically overstate the trip generation of future development. The transportation analysis in the DEIS assumes various residential, office and retail land uses in the future development scenario and then assesses the impacts of that projected development by assuming potential trip generation from those uses. But the DEIS grossly overstates those potential trip rates between now and 2035 (the horizon year in the DEIS). Although the DEIS does not disclose the specific trip rates assigned to future uses in the planning area, it is clear that – at least as to office uses – the assumed rates well exceed the likely rates that will be associated with future development.

Page 3.9.40 of the DEIS notes that the DEIS transportation team conducted a comparison of the assumed trip rates in the DEIS to actual rates in current office projects in Downtown Bellevue. **The results indicate that the DEIS office trip rates exceed actual current office trip rates in the Downtown by 50%.** Since the condition of future development in Wilburton will resemble that in Downtown today, it is logical that these current Downtown rates should set the minimum benchmark for use in the DEIS.

Yet these significantly lower current Downtown rates have been achieved without light rail, while the DEIS horizon year for study – 2035 – is one in which light rail will have been operational in this area for more than a decade. Therefore, the current downtown trip rates will substantially overstate the future trip rates in Wilburton with light rail and the Grand Connection in place. The mode split in the DEIS should shift a significant proportion of trips to light rail, transit and pedestrian and bicycle use.

For these reasons, the transportation analysis in the DEIS overstates the traffic impacts of future development by 70% to 100%. As noted below, this error transforms what should be a pedestrian-oriented future urban village in Wilburton into an auto-centric one. Revision of the transportation analysis to adopt accurate trip rates is necessary in the Final EIS.

b. Extension of NE 6th Street to 120th Avenue NE is not necessary. The DEIS assumes that NE 6th Street will be extended in 120th Avenue NE in all alternatives. Some modest study of termination of NE 6th Street at 116th Avenue NE is included in Alternative 2 merely for comparison purposes. But with dramatically reduced traffic volumes (as noted above), the analysis of the need for the NE 6th Street extension to 120th Avenue NE must be reevaluated. We believe that this re-analysis will demonstrate that the City's transportation network can operate adequately without this extension.

The extension of NE 6th Street to 120th Avenue NE would require an enormous investment of funding, resources and time. Introduction of yet another ERC crossing with thousands of vehicles each day would destroy the unique urban pedestrian junction where the Grand Connection meets the ERC and dramatically undermine the pedestrian development potential and experience between NE 4th and NE 8th. The intersection of the Grand Connection with the ERC is a special opportunity for trail-oriented development that could become the jewel of the ERC and the gateway to Bellevue from the regional trail system. We believe extending NE 6th Street with a termination at 116th Avenue NE is the best option for Wilburton...

c. Concurrency in Wilburton must be addressed as in Downtown and Bel-Red. The DEIS notes that future traffic volumes in Wilburton will result in exceedance of current MMA standards for the area. We believe that re-evaluation of these results based on appropriate trip rates will substantially reduce any such exceedance; but it nevertheless remains important to treat Wilburton as an urban center in the same manner as the City treats Downtown and Bel-Red. MMA standards for Wilburton should be adjusted to reflect the important future role of this area in providing jobs and housing for the City in a multi-modal transportation zone.

d. Parking requirements should be demand-based. The DEIS suggests that future zoning in Wilburton will adopt minimum and maximum parking ratios for the area. These 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 Downtown and Bel-Red, based on potential technology tenants. The DEIS should address this reality.

e. 116th Avenue NE should provide adequate access to adjoining properties. The Plan proposes to redevelop 116th Avenue NE into a new boulevard street, potentially with bike lanes included. While this level of development can be appropriate in an urban environment, 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.

2. Grand Connection/Open Spaces.

The Civic Space concept for a central open space in Wilburton is to be applauded. But to be an organizing concept for this new TOD area, it must adjoin and be connected to activating ground floor uses and urban density. And for the Civic Space to promote and influence this future urban development, it should be an early-phase component of Wilburton urban infrastructure. Bryant Park in New York and Millennium Park in Chicago are two good examples of urban open spaces whose development spurred massive investment in new residential and office projects in the adjoining area.

The “Lid 405” option for the Civic Space lacks these qualities. Its huge expense and significant engineering challenges will ensure that years or decades will be required to realize it. And it would be an “open space” adjoining the freeway traffic of I-405, an island atop the Interstate isolated from the urban density it is supposed to complement. On the other hand, the Lincoln Square site on 116th Avenue NE is an ideal site for the Civic Space. It enjoys fine solar exposure yet is protected from the impacts of I-405 traffic. It adjoins the urban density it is intended to serve. And it can be implemented quickly, so that it can act as a stimulus to the redevelopment of Wilburton. In addition, its location offers ready access to retail, services, jobs, housing and parking that the “Lid 405” option lacks. The Final EIS should note these land use issues associated with the location of the Civic Space.

a. The DEIS does not adequately assess the feasibility challenges of the "Lid 405" Option. The DEIS adopts a notably favorable stance toward the "Lid 405" option for the Grand Connection. To do so, the DEIS understates or ignores the financial and feasibility challenges inherent in that design. For example:

i. The cost of spanning I-405 with a structural system sound enough to support the dead load of thousands of tons of earth, concrete and other structure is likely to exceed \$100 million. This cost will render the option infeasible within our lifetimes. But the DEIS pays little attention to this outrageous expense or the unlikelihood that it could be raised. In comparison, the cost of Option A, a simpler, more direct and less expansive design, would be only a fraction of the expense of the Lid-405 option. Cost differences of this magnitude will bear directly on the timing and feasibility of the Grand Connection; and since the implementation of the Grand Connection is the centerpiece of the Plan, the Final EIS must undertake a thorough cost comparison analysis of the various options. Failure to construct the Grand Connection across I-405 (or failure to do so in a timely manner) will have significant consequences for the implementation of the remainder of the Plan in the Wilburton area.

ii. The scope and complexity of agency coordination necessary to achieve any crossing of I-405 will be enormous; but for the Lid-405 option, this complexity will be further magnified, leading to implementation challenges independent of cost considerations alone. WSDOT, FHWA and Homeland Security will all be involved in this exercise, and state and federal resource agencies will oversee any impacts to Sturtevant Creek. This difference among options must be considered in the Final EIS.

The overall discussion and analysis of the Grand Connection crossing of I-405 must in general be more thorough and balanced, in order to provide decision-makers with an accurate and complete evaluation of the alternatives.

3. ERC

a. The DEIS does not evaluate the land use/urban design impacts of a grade-separated ERC crossing of NE 4th Street and NE 8th Street. The DEIS only attempts a superficial evaluation of the at-grade vs. grade-separated crossing alternatives for the ERC at NE 4th Street and NE 8th Street. In particular, the DEIS ignores many of the potential impacts of the "preferred" grade-separated alternative, including:

i. Minimum slopes required to allow accessibility and to achieve adequate crossing height over NE 8th Street and 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 ERC between 4th and 8th would be substantially degraded if these imposing ramp structures were to be implemented.

ii. These ramp structures will create a wall down the center of the Plan area and will divorce much of the ERC from adjoining development in precisely the area in which that connection is critical (i.e., the junction of the Grand Connection and the ERC).

iii. The substantial cost of the grade-separated crossing will make its implementation unlikely and, in the best case, significantly delayed.

The at-grade crossing option for NE 4th and NE 8th Streets was supported by the Wilburton CAC and is demonstrated in the DEIS to have no adverse transportation impacts. It also allows a much-improved relationship between the ERC 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.

4. Land Use Issues.

a. *Acquisition of property for the Grand Connection should be treated like the Pedestrian Corridor.*

The Grand Connection overlays the existing Pedestrian Corridor downtown and in many ways represents an extension of this Corridor to the west and east. 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.

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 in Wilburton. As in Downtown, the dedication and development of the Grand Connection 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.

b. *Urban Design.* Bellevue has traditionally used setbacks, building stepbacks and floorplate restrictions to achieve an end result in the built environment. These types of prescriptive regulations create their own repetitive 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.

The marketplace is evolving and larger floorplates are a direct result of technology companies needs to create highly collaborative workplaces and efficient work environments. The Wilburton Subarea may be one of the only areas within the City limits that larger floorplates could be considered that is located within easy access of a high capacity light rail line and freeway.

5. Views/Shadows.

a. 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 the ERC. 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 the ERC 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 ERC system, this is the one location on the entire ERC 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 the ERC.

b. 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.

6. Other Issues.

a. The DEIS should not recommend prescriptive solutions. The EIS is meant to be an evaluation and disclosure document; it should not prescribe Code solutions. However, there are places in the DEIS where prescriptive recommendations are made; these should be eliminated and the Final EIS should limit itself to general recommendations.

b. Affordable Housing. The DEIS includes a highly specific discussion of a specific affordable housing regulatory program. While this may be a good program, the Final EIS should explore a complete suite of approaches to affordable housing.

c. Automobile Sales. The DEIS evaluates possible fiscal impacts from loss of existing automobile sales operations on 116th Avenue NE. The Final EIS should acknowledge that the City has an adopted plan for relocation of automobile sales operations, a plan that has gradually provided for relocation of these uses to other areas in the City over the last decade. The City has planned thoughtfully and well in advance for the future transformation of the Wilburton area, so the implementation of the Plan is not likely to reduce automobile sales in the City.

d. Construction Costs. The DEIS significantly understates construction costs in the current market. For example, typical costs for construction of Class A office buildings runs approximately \$500 per square foot, not the \$250 per square foot assumed in the DEIS. By substantially understating these costs, the DEIS also understates the favorable tax benefits for the City associated with Plan implementation. The Final EIS should provide a more accurate evaluation of these costs and benefits.

e. Light Rail Station Walk Radius. The DEIS uses a ¼-mile walk radius around proposed EastLink stations in its analysis. In 2014, however, the City signed onto the Puget Sound Regional Council's Growing Transit Communities Compact ("Compact"). The Compact strategies identify an emerging consensus that cities should be planning for transit-oriented development densities within ½ mile of light rail stations. The Final EIS should use this larger walkshed. For your review, this ½ mile walkshed is depicted on the attached revised maps of the DEIS alternatives.

f. Low-impact Development. The future urban center at Wilburton will share the higher-density urban quality of Downtown and Bel-Red. In such higher-density environments, stormwater codes must recognize the limitations on available area and means for water quality treatment. The Final EIS should review the adoption of stormwater regulations for Wilburton that are consistent with Downtown and Bel-Red.

On behalf of KG Investment Properties, we would again like to applaud the City's Department of Planning & Community Development, in concert with the Citizen's Advisory Committee, for their work on the Wilburton Plan. We believe the vision for the Wilburton Commercial Area to become Bellevue's next urban mixed-use community can be fulfilled in a way that will set the area apart in a spectacular way and make it a regional treasure. The abundant multi-modal infrastructure investment in this area is unrivaled elsewhere in the City and greater Puget Sound region. The effective leveraging of this investment will be critical in creating the grand vision that all who are taking part in this process have for the area. This vision for Wilburton will be realized over many decades and a forward-thinking plan is necessary to its ultimate realization. The City and the CAC have rightly focused on creating an urban environment in Wilburton with the height, density and pedestrian environment that it deserves. Our comments in this letter are made with the intention of increasing the viability of, and potential for, the ultimate realization of the grand vision for Wilburton and we are excited and committed to being an immediate catalyst in its implementation.

Sincerely,



John C. McCullough

JM:ldc

cc: KG Investment Properties

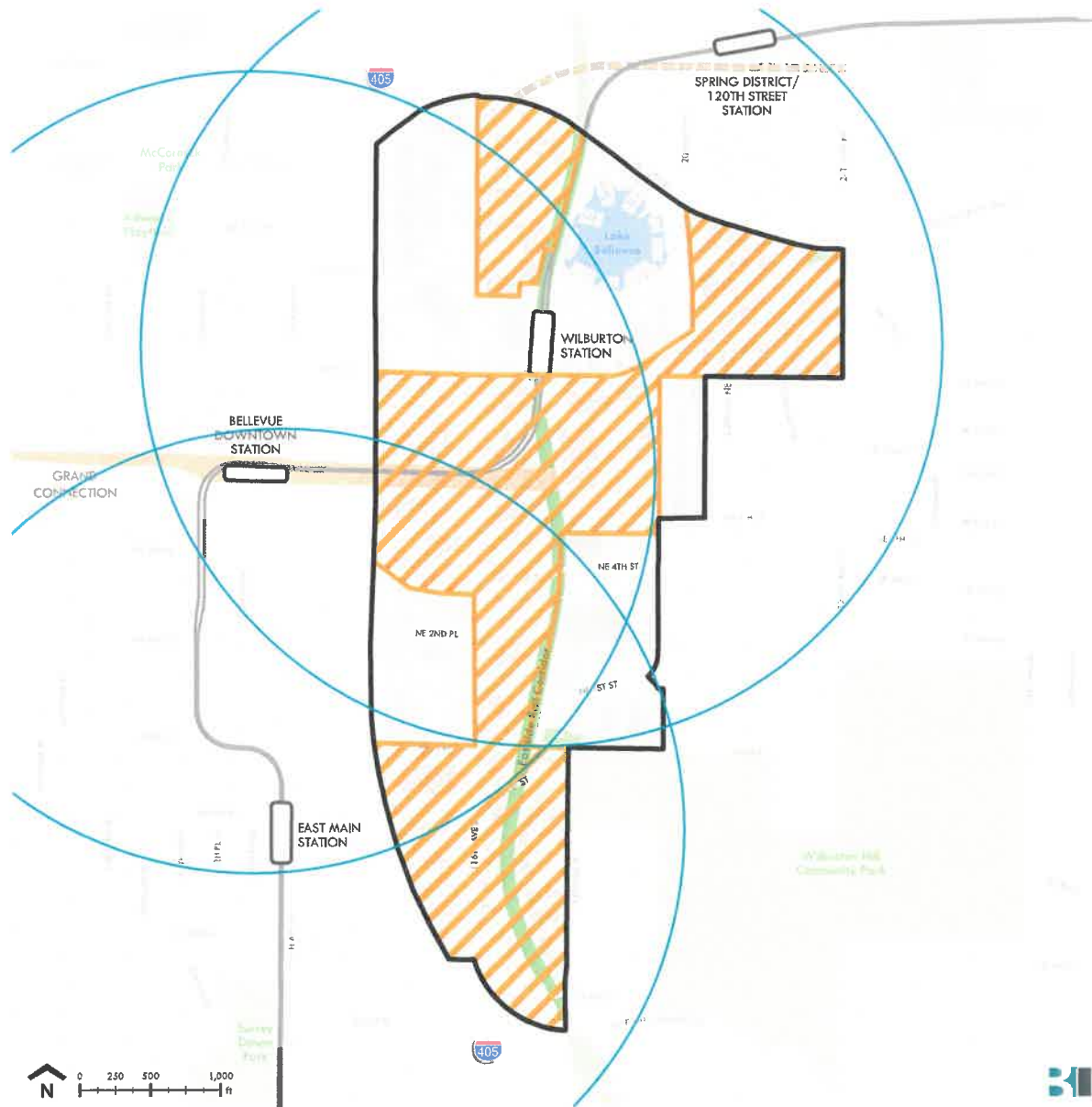
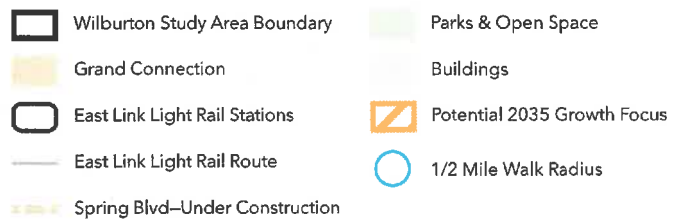


Exhibit 1-5 Potential 2035 Growth Focus Areas

Source: BERK, 2017



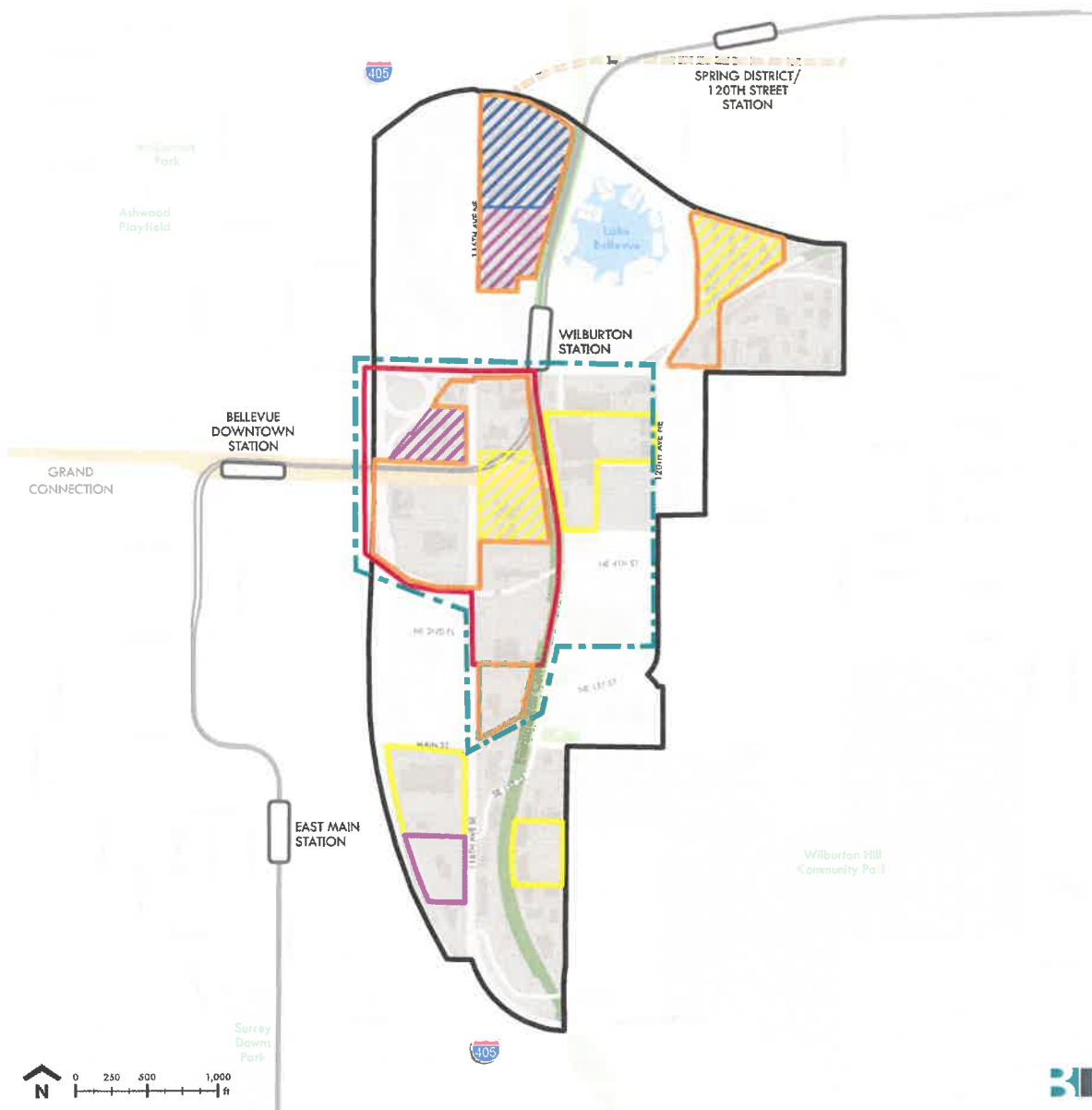
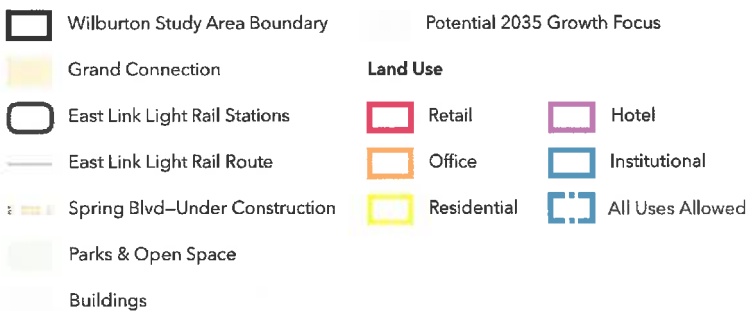


Exhibit 2-15 Alternative 1 Land Use Distribution, 2035

Source: City of Bellevue, BERK, 2017



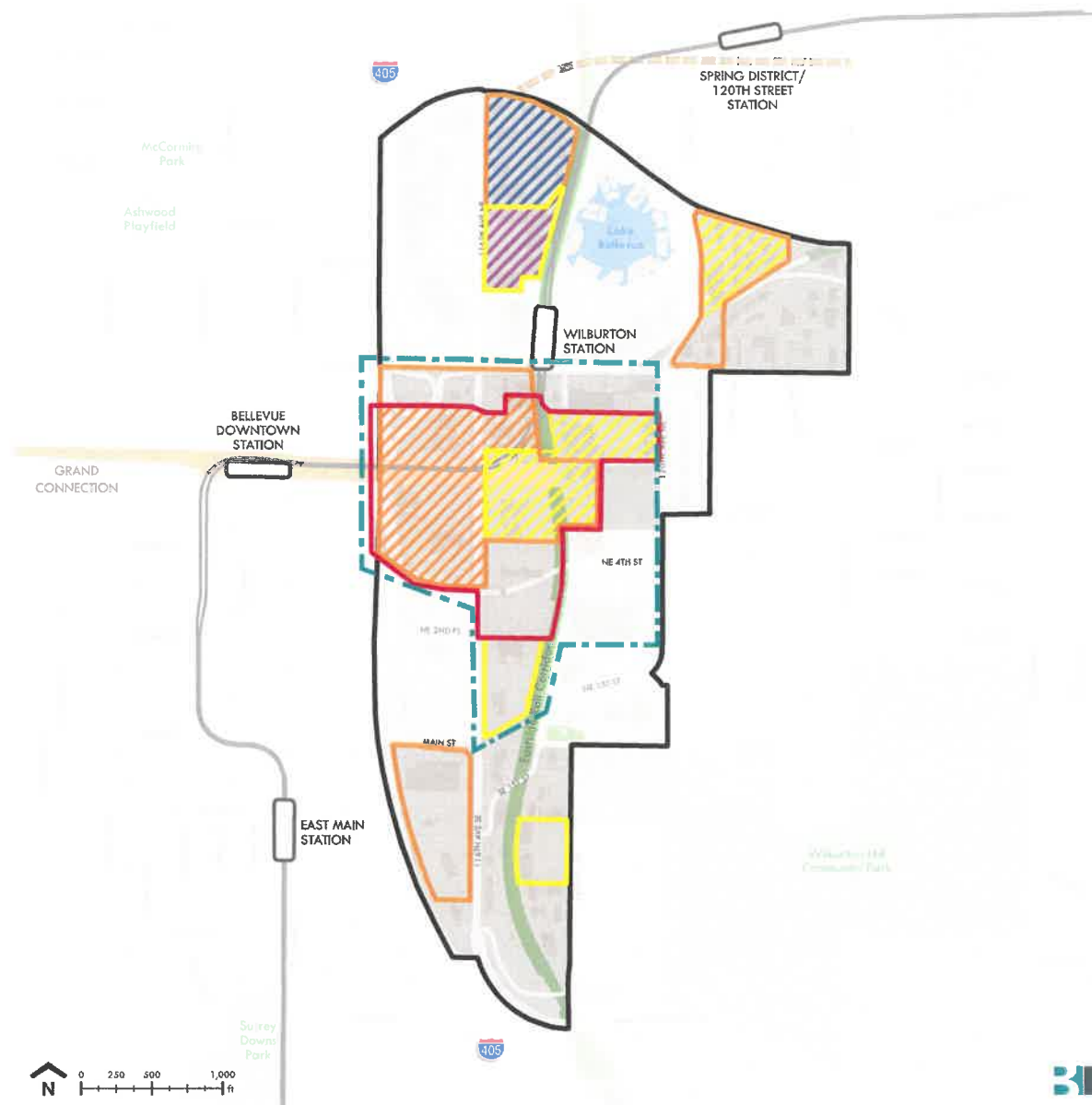
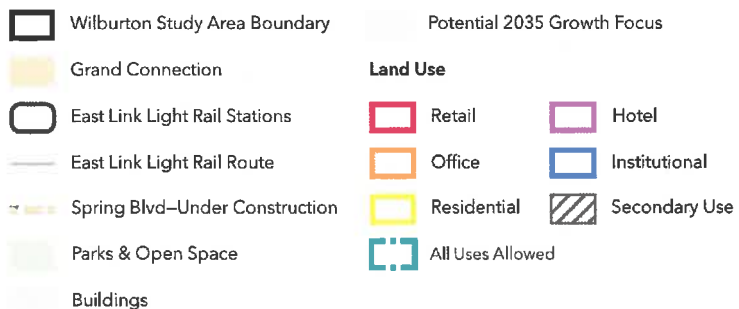
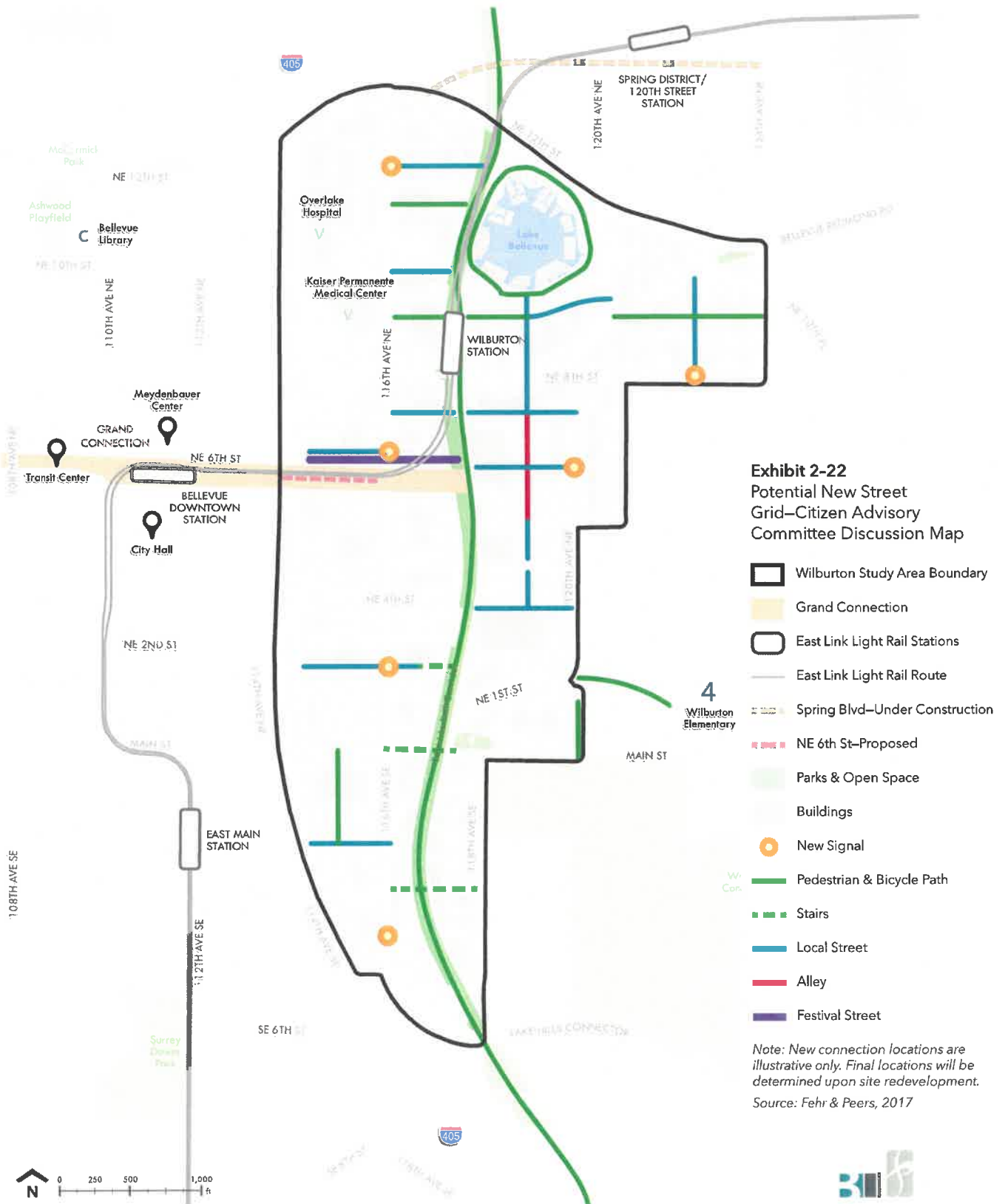


Exhibit 2-18 Alternative 2 Land Use Distribution, 2035

Source: City of Bellevue, BERK, 2017





MEMORANDUM

Date:	March 14, 2018	TG:	1.18077.00
To:	Bradley Calvert, AICP, City of Bellevue		
From:	Michael Swenson, PE, PTOE		
cc:	Andrew Coates & Steve Kramer, KG Investments		
Subject:	Wilburton/Grand Connection DRAFT Environment Impact Statement Comments		

On behalf of our clients, KG Investments, we have reviewed the Wilburton/Grand Connection Draft Environmental Impact Statement and offer the following comments for your consideration in the preparation of the Final EIS. Our comments are summarized in the bullets provided below.

1. **Model limitations/Trip Generation Rates.** The DEIS contains text outlining several limitations of the travel demand model. The text indicates that the trip rates utilized in the analysis are higher than the existing rates observed in the City. This is concerning as it likely overstates future congestion levels and influences conclusions of the EIS. Trip rates should be revised and forecasts updated to better reflect anticipated future conditions with the operations of light rail and on-going advancements in Transportation Demand Management strategies throughout the city.
2. **NE 6th Extension to 116th Avenue NE or 120th Avenue NE.** This analysis relied on the results of the traffic analysis to assess a recommended action. Based on concerns reflected in the previous comments, this analysis should be revised and conclusions revisited based on updating modeling.
3. **Revisions to the MMA standards.** We concur that revisions to the MMA standards for the Wilburton area is an appropriate action to take as part of Alternative 2 planning. Given the density assumed for Alternative 2, and similarities with the Bel-Red and Downtown zones, revisions to the MMA standards is appropriate. However, due to the comments provided previously, we recommend that the specific MMA standards for the Wilburton area be reassessed following any updates to the traffic analysis results.
4. **8th Street At-grade Pedestrian Crossing.** We have reviewed the technical analysis prepared by the City as well as conducted an independent analysis regarding the impacts associated with 8th Street at-grade pedestrian crossing. The results of the Transpo Group analysis was provided to the CAC in the Fall 2017. The results of our analysis are consistent with the City's with respect to the impacts to NE 8th Street traffic under this scenario. Both analyses found that through effective signal coordination, there would be minimal impacts traffic along the corridor, including the intersections at 116th Avenue and 120th Avenue can be min minimal.

We appreciate the opportunity to provide these comments on behalf of our client.

MEMORANDUM

Date:	September 7, 2017	TG:	1.17339.00
To:	Andrew Coates and Steve Kramer, KG Investment Properties Jack McCullough, McCullough Hill Leary		
From:	Michael Swenson, PE, PTOE & Kassi Leingang, PE, Transpo Group		
Subject:	NE 8th Street At-Grade Trail Crossing Analysis		

This memorandum summarizes the results of the initial analysis evaluating the potential impacts of adding an at grade pedestrian crossing along NE 8th Street at the Eastside Rail Corridor between 116th Avenue NE and 120th Avenue NE in Bellevue. The operational impacts of the at grade crossing, including level of service, vehicle queueing and corridor travel times are summarized below. Further analysis and coordination with the City of Bellevue traffic engineering staff will be required to validate the traffic forecasts and operations methodology utilized in this analysis.

As noted in this analysis, queuing along the corridor could be managed through the signal coordination and eastbound/westbound queuing would not impact the traffic signal operations at 116th Avenue NE or 120th Avenue NE.

NE 8th Street Pedestrian Crossing

The NE 8th Street pedestrian crossing would be provided for the Eastside Rail Corridor (see Figure 1). The Eastside Rail Corridor is a previously used rail corridor that is to be converted to a multimodal trail extending from Renton to Redmond and connect to the Centennial Trail in Snohomish County. The crossing at NE 8th Street is currently proposed as an elevated trail crossing. Alternatively, this memorandum evaluates the operations of the NE 8th Street corridor if the trail crossing were to be an at grade controlled via a traffic signal. The at-grade pedestrian crossing is assumed to be signalized and coordinated with the adjacent signals at 116th Avenue NE and 120th Avenue NE.

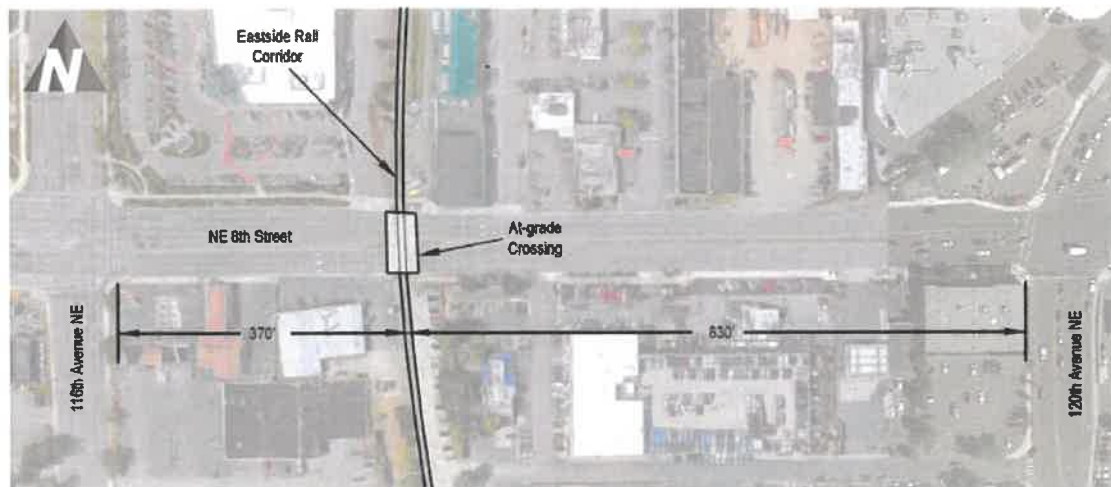


Figure 1 - Site Vicinity

Traffic Volume Forecasts

In order to estimate the operational impacts of the proposed at-grade trail crossing, future 2019 traffic volumes from a past City of Bellevue model run¹ were used for the NE 8th Street corridor. Figure 2 summarizes the volumes used from the previous concurrency model runs.



Figure 2 – 2019 Model Run Weekday PM Peak Hour Traffic Volumes

Vehicle Queuing

Future 2019 vehicle queues both with and without the proposed trail crossing were evaluated using SimTraffic 9, a microsimulation traffic operations tool. A *Synchro* network for the 2019 horizon year with CIP projects included was previously provided by the City of Bellevue and utilized for the analysis for the without trail crossing condition. The future with trail crossing condition included an additional signal at the crossing and was coordinated with the NE 8th Street corridor.

Existing queues along the corridor were observed during the weekday PM peak hour in July 2017 in order to validate the results. A summary of the observations are included in Attachment A. The worst observed queue within each 5-minute period was documented. The observations showed that the existing westbound queues at the 116th Avenue NE / NE 8th Street intersection range between 255 and 575 feet and an average queue of 375 feet. In the eastbound direction at the 120th Avenue NE / NE 8th Street intersection, queues lengths had a greater variation with queues ranging between 105 and 855 feet and an average queue of 345 feet. As noted above, these queues are the worst queues for the observed 5-minute interval. Based on the reporting methodology in SimTraffic, these maximum queue lengths shown in the graphic may not necessarily occur at the same signal phasing interval.

The average of the peak observed queues and future 2019 95th percentile queues, both with and without the trail crossing are shown in Attachment B. Detailed future queueing worksheets are included in Attachment C.

Attachment B shows that future 2019 without the rail crossing would increase by approximately 5 vehicles westbound at the 116th Avenue NE / NE 8th Street intersection and by approximately 2 vehicles eastbound at the 120th Avenue NE / NE 8th Street intersection relative to the existing

¹ The model run was conducted in October 2013 for the target development. The volumes assumed do not include the trips associated with the Target as this proposal has changed since the model run. It is recognized that these traffic volumes are not the most recent; however, there is little noticeable difference in traffic levels along NE 8th Street between 116th Avenue NE and 120th Avenue NE.

observed queues. With the addition of the trail crossing signal and the coordination of the NE 8th Street corridor, although the overall queues along the corridor increase, the anticipated queues eastbound and westbound at the new trail crossing signal would not extend to the adjacent intersections and the queues to from the adjacent intersections would not extend to the trail crossing. Therefore, the 95th percentile queues with the addition of a signalized trail crossing across NE 8th Street are anticipated to be accommodated under future 2019 conditions.

Intersection Level of Service

Level of service (LOS) analyses were performed at the intersections with and without the at-grade crossing to determine the impact of the proposed trail crossing. The LOS analysis was evaluated using the *Highway Capacity Manual* (HCM), Transportation Research Board methodology using the Synchro software version 9.1. The level of service analysis reflects the same traffic network as used for the queueing analysis above.

The operational characteristics of an intersection are determined by calculating the intersection level of service (LOS). Level of service for intersection operations is described alphabetically (A through F). LOS is based on the calculated average control delay per vehicle and is typically reported for the whole intersection for signalized. A more detailed explanation of LOS criteria is provided in Attachment D.

The LOS results for the future 2019 conditions are shown in Table 1. LOS worksheets are included in Attachment C.

Table 1. Future 2019 LOS Summary

Intersection	Future 2019		Future 2019 With Trail Crossing	
	LOS ¹	Delay ²	LOS	Delay
116th Avenue NE / NE 8th Street	D	53	D	46
Trail Crossing / NE 8th Street	No Trail Crossing		A	0.2
120th Avenue NE / NE 8th Street	D	51	D	53

1. Level of service, based on 2010 Highway Capacity Manual methodology.

2. Average delay in seconds per vehicle.

Table 1 shows that both with and without the proposed at-grade signalized trail crossing, the 116th Avenue NE and 120th Avenue NE intersections along NE 8th Street would operate at LOS D. The trail crossing would operate at LOS A.

Arterial Speeds

Arterial travel times and speeds were calculated along NE 8th Street between 116th Avenue NE and 120th Avenue NE both with and without the pedestrian crossing. The arterial analysis was performed using Synchro. The resulting travel times and speeds are summarized in Table 2 below and the arterial worksheets are included in Attachment C.

Table 2. Future 2019 Arterial Travel Times and Speeds Summary¹

Direction	Eastbound		Westbound	
	Travel Time (s)	Speed (mph)	Travel Time (s)	Speed (mph)
Future 2019	63.9	13.8	79.5	11.1
Future 2019 With Trail Crossing	81.4	10.5	92.5	9.2

1. Travel times and speeds assume a segment length of 0.24mi.

As shown in Table 2, with the addition of the pedestrian crossing across NE 8th Street, travel times are anticipated to increase by approximately 13 to 18 seconds in the westbound and eastbound directions, respectively, a less than 1 minute increase in travel time. Similarly, the overall speeds are anticipated to decrease by 2 to 3 mph in the westbound and eastbound directions, respectively.

Summary

The operations along NE 8th Street corridor was analyzed both with and without an at-grade trail crossing under future 2019 weekday PM peak hour conditions. The 95th percentile queues with the addition of a signalized trail crossing across NE 8th Street are anticipated to be accommodated under future 2019 conditions with minimal increases in queues relative to no trail crossing. Along NE 8th Street between 116th Avenue NE and 120th Avenue NE, changes in travel times with the addition of the at grade crossing are anticipated to be minimal with increases of less than 1 minute in either direction. Additionally, the 116th Avenue NE and 120th Avenue NE intersections along NE 8th Street are forecast to operate at LOS D both with and without the proposed at-grade signalized trail crossing and the signalized trail crossing is forecast to operate at LOS A. Overall, the addition of the signalized trail crossing along the NE 8th Street corridor would result in minimal increases in queues and little to no change in level of service operations.

Attachment A: Observed Queues

7-17-17
26

→ = Worst case observed during 5 min period

505-510



120ft
820
Trail
7th
02c
116ft

Ave

520-525



WB Ave: 376.9 Max: 575 Min: 235
EB Ave: 346.3 Max: 555 Min: 105



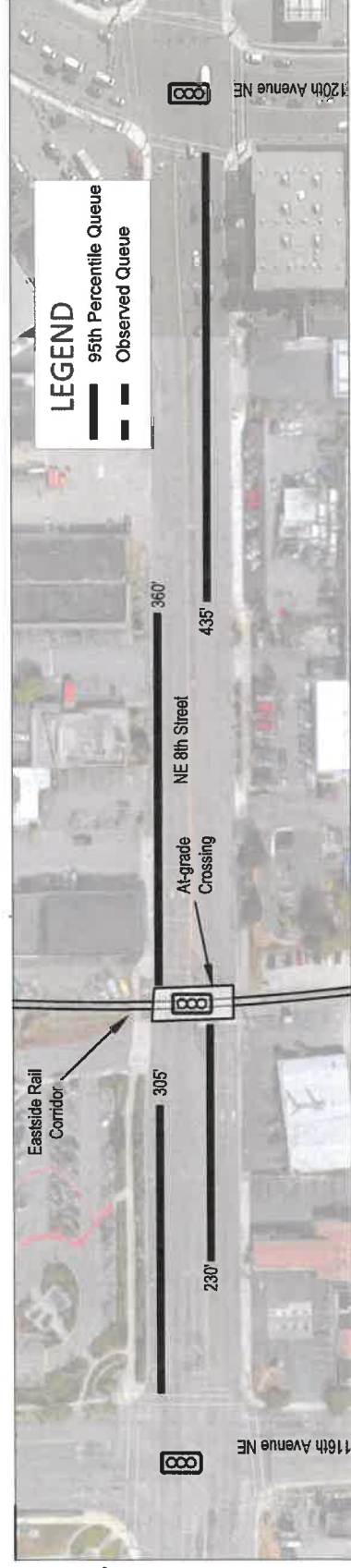
Attachment B: Observed and Future (2019) Queues



Existing (Observed)



2019 Without Crossing



2019 With Crossing

Observed and Future (2019) Queues

NE 8th Street Trail Crossing Analysis

Attachment C: Queue and LOS Worksheets

Queuing and Blocking Report
2019 Weekday PM Peak Hour

8th Street Trail Crossing
2019 Weekday PM Peak Hour

Intersection: 30: 116th Ave & NE 8th

Movement	EB	EB	EB	EB	EB	EB	B8211	B8211	B8211	B8212	WB	WB
Directions Served	L	L	T	T	T	R	T	T	T	T	L	L
Maximum Queue (ft)	169	223	276	318	339	175	27	206	322	10	97	349
Average Queue (ft)	79	104	129	177	271	136	1	25	91	0	35	75
95th Queue (ft)	146	183	255	312	402	233	20	119	257	7	79	208
Link Distance (ft)			251	251	251		669	669	669	881		
Upstream Blk Time (%)		0	1	3	18							
Queuing Penalty (veh)		0	0	0	0							
Storage Bay Dist (ft)	350	350				150					325	325
Storage Blk Time (%)		0	1		27	2						0
Queuing Penalty (veh)		0	1		86	7						0

Intersection: 30: 116th Ave & NE 8th

Movement	WB	WB	WB	B33	NB	NB	NB	NB	SB	SB	SB	SB
Directions Served	T	T	TR	T	L	T	T	R	L	L	T	T
Maximum Queue (ft)	440	484	507	3	392	521	507	51	323	365	406	470
Average Queue (ft)	289	334	351	0	145	340	338	14	156	232	245	234
95th Queue (ft)	444	486	501	3	272	461	461	42	300	340	355	389
Link Distance (ft)	862	862	862	255		1513	1513				623	623
Upstream Blk Time (%)												0
Queuing Penalty (veh)												0
Storage Bay Dist (ft)					450			600	350	350		
Storage Blk Time (%)	6					1	0		0	1	1	3
Queuing Penalty (veh)	5					1	0		0	3	2	16

Intersection: 30: 116th Ave & NE 8th

Movement	SB	SB
Directions Served	R	R
Maximum Queue (ft)	275	262
Average Queue (ft)	225	171
95th Queue (ft)	305	285
Link Distance (ft)		
Upstream Blk Time (%)		
Queuing Penalty (veh)		
Storage Bay Dist (ft)	250	250
Storage Blk Time (%)	5	0
Queuing Penalty (veh)	12	1

Queuing and Blocking Report
2019 Weekday PM Peak Hour

8th Street Trail Crossing
2019 Weekday PM Peak Hour

Intersection: 233: 120th Avenue NE & NE 8th Street

Movement	EB	EB	EB	EB	B33	B33	B33	B33	WB	WB	WB	WB
Directions Served	L	L	T	TR	T	T	T	T	L	L	T	TR
Maximum Queue (ft)	304	318	339	347	16	26	145	177	202	225	786	750
Average Queue (ft)	202	214	243	265	1	2	22	37	96	192	516	476
95th Queue (ft)	286	308	370	389	19	21	95	132	178	282	809	756
Link Distance (ft)	255	255	255	255	862	862	862	862			1247	1247
Upstream Blk Time (%)	4	6	12	16								
Queuing Penalty (veh)	12	20	37	50								
Storage Bay Dist (ft)									200	200		
Storage Blk Time (%)									0	1	45	
Queuing Penalty (veh)									2	6	137	

Intersection: 233: 120th Avenue NE & NE 8th Street

Movement	NB	NB	NB	SB	SB	SB	SB
Directions Served	L	T	TR	L	T	T	R
Maximum Queue (ft)	289	500	583	123	414	358	303
Average Queue (ft)	95	248	369	55	268	224	125
95th Queue (ft)	191	421	559	113	369	325	237
Link Distance (ft)		568	568	536	536	536	536
Upstream Blk Time (%)		0	1				
Queuing Penalty (veh)		0	0				
Storage Bay Dist (ft)	300						
Storage Blk Time (%)		1					
Queuing Penalty (veh)		1					

Intersection: 8211: Bend

Movement	WB	WB
Directions Served	T	T
Maximum Queue (ft)	4	6
Average Queue (ft)	0	0
95th Queue (ft)	4	6
Link Distance (ft)	251	251
Upstream Blk Time (%)		
Queuing Penalty (veh)		
Storage Bay Dist (ft)		
Storage Blk Time (%)		
Queuing Penalty (veh)		

Network Summary

Network wide Queuing Penalty: 400

Intersection: 30: 116th Ave & NE 8th

Movement	EB	EB	EB	EB	EB	EB	B8211	B8211	WB	WB	WB	WB
Directions Served	L	L	T	T	T	R	T	T	L	L	T	T
Maximum Queue (ft)	155	206	288	325	383	175	118	244	100	250	283	291
Average Queue (ft)	77	97	126	187	295	144	7	45	32	66	231	249
95th Queue (ft)	137	162	239	314	424	234	67	183	78	165	299	302
Link Distance (ft)			291	291	291		669	669			258	258
Upstream Blk Time (%)		0	0	1	14					0	10	15
Queuing Penalty (veh)		0	0	0	0					0	49	77
Storage Bay Dist (ft)	350	350				150			325	325		
Storage Blk Time (%)		0	0		29	1				0	10	
Queuing Penalty (veh)		0	0		92	4				0	8	

Intersection: 30: 116th Ave & NE 8th

Movement	WB	NB	NB	NB	NB	SB	SB	SB	SB	SB	SB
Directions Served	TR	L	T	T	R	L	L	T	T	R	R
Maximum Queue (ft)	283	304	437	438	53	332	360	452	436	275	259
Average Queue (ft)	256	124	291	284	12	176	253	229	202	212	164
95th Queue (ft)	298	224	403	395	39	346	369	392	361	287	265
Link Distance (ft)	258		1510	1510				624	624		
Upstream Blk Time (%)	21							0	0		
Queuing Penalty (veh)	105							0	0		
Storage Bay Dist (ft)		450			600	350	350			250	250
Storage Blk Time (%)		0	0			0	5	0	1	3	0
Queuing Penalty (veh)		0	0			0	12	0	3	7	1

Intersection: 33: NE 8th

Movement	EB	EB	EB	EB	WB	WB	WB
Directions Served	T	T	T	T	T	T	T
Maximum Queue (ft)	226	249	279	274	379	404	410
Average Queue (ft)	57	66	96	100	141	177	198
95th Queue (ft)	154	183	225	227	313	344	358
Link Distance (ft)	258	258	258	258	812	812	812
Upstream Blk Time (%)	0	0	0	1			
Queuing Penalty (veh)	0	0	2	2			
Storage Bay Dist (ft)							
Storage Blk Time (%)							
Queuing Penalty (veh)							

Queuing and Blocking Report

2019 Weekday PM Peak Hour - with Crossing

8th Street Trail Crossing

Intersection: 233: 120th Avenue NE & NE 8th Street

Movement	EB	EB	EB	EB	WB	WB	WB	WB	NB	NB	NB	SB
Directions Served	L	L	T	TR	L	L	T	TR	L	T	TR	L
Maximum Queue (ft)	377	374	483	494	199	225	711	694	324	547	600	164
Average Queue (ft)	244	243	235	242	100	196	455	417	106	292	402	71
95th Queue (ft)	358	359	418	431	181	275	675	628	224	474	600	155
Link Distance (ft)	812	812	812	812			1247	1247		572	572	534
Upstream Blk Time (%)										1	3	
Queuing Penalty (veh)										0	0	
Storage Bay Dist (ft)					200	200			300			
Storage Blk Time (%)					0	1	39		0	3		
Queuing Penalty (veh)					2	6	119		0	4		

Intersection: 233: 120th Avenue NE & NE 8th Street

Movement	SB	SB	SB
Directions Served	T	T	R
Maximum Queue (ft)	412	374	292
Average Queue (ft)	280	235	130
95th Queue (ft)	380	339	238
Link Distance (ft)	534	534	534
Upstream Blk Time (%)			
Queuing Penalty (veh)			
Storage Bay Dist (ft)			
Storage Blk Time (%)			
Queuing Penalty (veh)			

Intersection: 8211: Bend
























Movement	WB	WB
Directions Served	T	T
Maximum Queue (ft)	6	13
Average Queue (ft)	0	1
95th Queue (ft)	6	11
Link Distance (ft)	291	291
Upstream Blk Time (%)		
Queuing Penalty (veh)		
Storage Bay Dist (ft)		
Storage Blk Time (%)		
Queuing Penalty (veh)		

Network Summary

Network wide Queuing Penalty: 494






















HCM 2010 Signalized Intersection Summary
30: 116th Ave & NE 8th

2019 Weekday PM Peak Hour
2019 Weekday PM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	205	980	320	85	1385	30	140	790	25	220	495	595
Future Volume (veh/h)	205	980	320	85	1385	30	140	790	25	220	495	595
Number	5	2	12	1	6	16	7	4	14	3	8	18
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1863	1863	1863	1863	1863	1900	1863	1863	1863	1937	1863	1863
Adj Flow Rate, veh/h	216	1032	337	89	1458	32	147	832	26	232	521	626
Adj No. of Lanes	2	3	1	2	3	0	1	2	1	2	2	2
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	292	1978	616	392	2311	51	355	925	626	311	696	763
Arrive On Green	0.08	0.39	0.39	0.15	0.45	0.45	0.20	0.31	0.31	0.09	0.20	0.20
Sat Flow, veh/h	3442	5085	1583	2661	5121	112	1774	2980	1583	3579	3539	2217
Grp Volume(v), veh/h	216	1032	337	89	965	525	147	832	26	232	521	626
Grp Sat Flow(s),veh/h/ln	1721	1695	1583	1331	1695	1843	1774	1490	1583	1790	1770	1108
Q Serve(g_s), s	11.0	28.0	22.8	5.3	39.3	39.3	13.0	48.1	1.8	11.4	25.0	20.0
Cycle Q Clear(g_c), s	11.0	28.0	22.8	5.3	39.3	39.3	13.0	48.1	1.8	11.4	25.0	20.0
Prop In Lane	1.00		1.00	1.00		0.06	1.00		1.00	1.00		1.00
Lane Grp Cap(c), veh/h	292	1978	616	392	1530	832	355	925	626	311	696	763
V/C Ratio(X)	0.74	0.52	0.55	0.23	0.63	0.63	0.41	0.90	0.04	0.75	0.75	0.82
Avail Cap(c_a), veh/h	344	1978	616	392	1530	832	355	1126	733	358	1101	1016
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	80.4	42.2	25.1	67.7	37.9	37.9	62.7	59.4	33.5	80.2	68.1	54.0
Incr Delay (d2), s/veh	5.3	1.0	3.5	0.1	2.0	3.6	0.3	7.7	0.0	5.7	0.6	3.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	5.5	13.3	10.6	2.0	18.8	20.8	6.4	20.8	0.8	5.9	12.3	6.4
LnGrp Delay(d),s/veh	85.7	43.2	28.6	67.8	39.9	41.5	63.0	67.1	33.5	86.0	68.7	57.0
LnGrp LOS	F	D	C	E	D	D	E	E	C	F	E	E
Approach Vol, veh/h	1585			1579			1005			1379		
Approach Delay, s/veh	45.9			42.0			65.7			66.3		
Approach LOS	D			D			E			E		
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	29.5	73.0	18.6	58.9	18.3	84.2	39.1	38.4				
Change Period (Y+Rc), s	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0				
Max Green Setting (Gmax), s	10.0	68.0	16.0	66.0	16.0	62.0	28.0	54.0				
Max Q Clear Time (g_c+l1), s	7.3	30.0	13.4	50.1	13.0	41.3	15.0	27.0				
Green Ext Time (p_c), s	0.2	8.2	0.2	3.8	0.2	8.0	4.0	6.5				
Intersection Summary												
HCM 2010 Ctrl Delay				53.4								
HCM 2010 LOS				D								
























HCM 2010 Signalized Intersection Summary
233: 120th Avenue NE & NE 8th Street

2019 Weekday PM Peak Hour
2019 Weekday PM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	505	910	140	305	935	10	130	420	500	55	650	495
Future Volume (veh/h)	505	910	140	305	935	10	130	420	500	55	650	495
Number	1	6	16	5	2	12	7	4	14	3	8	18
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1863	1863	1900	1863	1863	1900	1863	1863	1900	1863	1863	1863
Adj Flow Rate, veh/h	532	958	147	321	984	11	137	442	526	58	684	521
Adj No. of Lanes	2	2	0	2	2	0	1	2	0	1	2	1
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	579	1279	196	560	1157	13	269	594	532	79	1116	766
Arrive On Green	0.17	0.42	0.42	0.09	0.32	0.31	0.08	0.34	0.35	0.04	0.32	0.32
Sat Flow, veh/h	3442	3077	472	3442	3585	40	1774	1770	1583	1774	3539	1583
Grp Volume(v), veh/h	532	551	554	321	486	509	137	442	526	58	684	521
Grp Sat Flow(s),veh/h/ln	1721	1770	1779	1721	1770	1856	1774	1770	1583	1774	1770	1583
Q Serve(g_s), s	21.3	37.0	37.0	8.5	35.9	35.9	6.8	31.0	46.2	4.5	23.0	35.5
Cycle Q Clear(g_c), s	21.3	37.0	37.0	8.5	35.9	35.9	6.8	31.0	46.2	4.5	23.0	35.5
Prop In Lane	1.00		0.27	1.00		0.02	1.00		1.00	1.00		1.00
Lane Grp Cap(c), veh/h	579	735	740	560	571	599	269	594	532	79	1116	766
V/C Ratio(X)	0.92	0.75	0.75	0.57	0.85	0.85	0.51	0.74	0.99	0.73	0.61	0.68
Avail Cap(c_a), veh/h	615	735	740	572	571	599	432	594	532	89	1116	766
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	57.3	34.7	34.7	29.7	44.3	44.3	28.4	41.2	45.3	66.0	40.7	27.8
Incr Delay (d2), s/veh	17.8	6.9	6.9	0.8	14.7	14.1	0.6	4.5	36.2	19.3	0.7	2.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	11.6	19.5	19.6	4.0	19.9	20.7	3.3	15.8	25.5	2.6	11.3	15.8
LnGrp Delay(d),s/veh	75.1	41.6	41.6	30.5	59.0	58.4	29.0	45.7	81.4	85.3	41.4	29.9
LnGrp LOS	E	D	D	C	E	E	C	D	F	F	D	C
Approach Vol, veh/h	1637				1316				1105			
Approach Delay, s/veh	52.5				51.8				60.6			
Approach LOS	D				D				E			
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	28.6	48.2	11.3	52.0	15.5	61.2	14.1	49.1				
Change Period (Y+Rc), s	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0				
Max Green Setting (Gmax), s	25.0	41.0	7.0	47.0	11.0	55.0	22.0	32.0				
Max Q Clear Time (g_c+1), s	23.3	37.9	6.5	48.2	10.5	39.0	8.8	37.5				
Green Ext Time (p_c), s	0.3	2.5	0.0	0.0	0.1	8.9	0.4	0.0				
Intersection Summary												
HCM 2010 Ctrl Delay	50.7											
HCM 2010 LOS	D											







HCM 2010 Signalized Intersection Summary
30: 116th Ave & NE 8th

2019 Weekday PM Peak Hour - with Crossing
8th Street Trail Crossing

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	205	980	320	85	1385	30	140	790	25	220	495	595
Future Volume (veh/h)	205	980	320	85	1385	30	140	790	25	220	495	595
Number	5	2	12	1	6	16	7	4	14	3	8	18
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1863	1863	1863	1863	1863	1900	1863	1863	1863	1937	1863	1863
Adj Flow Rate, veh/h	216	1032	337	89	1458	32	147	832	26	232	521	626
Adj No. of Lanes	2	3	1	2	3	0	1	2	1	2	2	2
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	304	2000	623	327	2191	48	348	935	637	322	736	733
Arrive On Green	0.09	0.39	0.39	0.12	0.43	0.42	0.20	0.31	0.31	0.09	0.21	0.21
Sat Flow, veh/h	3442	5085	1583	2661	5121	112	1774	2980	1583	3579	3539	2217
Grp Volume(v), veh/h	216	1032	337	89	965	525	147	832	26	232	521	626
Grp Sat Flow(s),veh/h/ln	1721	1695	1583	1331	1695	1843	1774	1490	1583	1790	1770	1108
Q Serve(g_s), s	9.2	23.2	18.2	4.6	34.2	34.2	10.9	39.9	1.5	9.5	20.5	21.1
Cycle Q Clear(g_c), s	9.2	23.2	18.2	4.6	34.2	34.2	10.9	39.9	1.5	9.5	20.5	21.1
Prop In Lane	1.00		1.00	1.00		0.06	1.00		1.00	1.00		1.00
Lane Grp Cap(c), veh/h	304	2000	623	327	1451	789	348	935	637	322	736	733
V/C Ratio(X)	0.71	0.52	0.54	0.27	0.67	0.67	0.42	0.89	0.04	0.72	0.71	0.85
Avail Cap(c_a), veh/h	321	2000	623	327	1451	789	348	1093	720	334	1109	967
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.91	0.91	0.91	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	66.5	34.6	19.3	59.7	34.3	34.3	52.9	49.0	27.3	66.4	55.2	46.8
Incr Delay (d2), s/veh	5.6	1.0	3.4	0.1	2.2	4.0	0.3	7.6	0.0	6.0	0.5	4.7
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.6	11.0	8.5	1.7	16.4	18.2	5.4	17.4	0.7	4.9	10.1	6.9
LnGrp Delay(d),s/veh	72.1	35.6	22.6	59.9	36.5	38.4	53.2	56.5	27.3	72.4	55.6	51.5
LnGrp LOS	E	D	C	E	D	D	D	E	C	E	E	D
Approach Vol, veh/h	1585			1579			1005			1379		
Approach Delay, s/veh	37.8			38.4			55.3			56.6		
Approach LOS	D			D			E			E		
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	21.4	62.0	16.5	50.1	16.2	67.2	32.4	34.2				
Change Period (Y+Rc), s	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0				
Max Green Setting (Gmax), s	8.0	57.0	12.0	53.0	12.0	53.0	20.0	45.0				
Max Q Clear Time (g_c+l1), s	6.6	25.2	11.5	41.9	11.2	36.2	12.9	23.1				
Green Ext Time (p_c), s	0.9	8.0	0.1	3.2	0.1	7.3	2.8	6.1				
Intersection Summary												
HCM 2010 Ctrl Delay	45.8											
HCM 2010 LOS	D											






















HCM 2010 Signalized Intersection Summary 33: NE 8th

2019 Weekday PM Peak Hour - with Crossing
8th Street Trail Crossing

								
Movement	EBL	EBT	WBT	WBR	SBL	SBR		
Lane Configurations		↑↑↑	↑↑↑		↑	↑		
Traffic Volume (veh/h)	0	1390	1530	0	0	0		
Future Volume (veh/h)	0	1390	1530	0	0	0		
Number	5	2	6	16	7	14		
Initial Q (Qb), veh	0	0	0	0	0	0		
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00		
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00		
Adj Sat Flow, veh/h/ln	0	1863	1863	0	1863	1863		
Adj Flow Rate, veh/h	0	1463	1611	0	0	0		
Adj No. of Lanes	0	4	3	0	1	1		
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95		
Percent Heavy Veh, %	0	2	2	0	2	2		
Cap, veh/h	0	6230	4944	0	1	1		
Arrive On Green	0.00	0.97	0.97	0.00	0.00	0.00		
Sat Flow, veh/h	0	6929	5421	0	1774	1583		
Grp Volume(v), veh/h	0	1463	1611	0	0	0		
Grp Sat Flow(s),veh/h/ln	0	1602	1695	0	1774	1583		
Q Serve(g_s), s	0.0	1.5	2.3	0.0	0.0	0.0		
Cycle Q Clear(g_c), s	0.0	1.5	2.3	0.0	0.0	0.0		
Prop In Lane	0.00			0.00	1.00	1.00		
Lane Grp Cap(c), veh/h	0	6230	4944	0	1	1		
V/C Ratio(X)	0.00	0.23	0.33	0.00	0.00	0.00		
Avail Cap(c_a), veh/h	0	6230	4944	0	365	325		
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00		
Upstream Filter(I)	0.00	0.86	0.63	0.00	0.00	0.00		
Uniform Delay (d), s/veh	0.0	0.1	0.1	0.0	0.0	0.0		
Incr Delay (d2), s/veh	0.0	0.1	0.1	0.0	0.0	0.0		
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0		
%ile BackOfQ(50%),veh/ln	0.0	0.6	0.9	0.0	0.0	0.0		
LnGrp Delay(d),s/veh	0.0	0.2	0.2	0.0	0.0	0.0		
LnGrp LOS		A	A					
Approach Vol, veh/h		1463	1611		0			
Approach Delay, s/veh		0.2	0.2		0.0			
Approach LOS		A	A					
Timer	1	2	3	4	5	6	7	8
Assigned Phs		2		4		6		
Phs Duration (G+Y+Rc), s		180.0		0.0		180.0		
Change Period (Y+Rc), s		5.0		5.0		5.0		
Max Green Setting (Gmax), s		133.0		37.0		133.0		
Max Q Clear Time (g_c+I1), s		3.5		0.0		4.3		
Green Ext Time (p_c), s		44.7		0.0		44.6		
Intersection Summary								
HCM 2010 Ctrl Delay			0.2					
HCM 2010 LOS			A					

HCM 2010 Signalized Intersection Summary
233: 120th Avenue NE & NE 8th Street

2019 Weekday PM Peak Hour - with Crossing
8th Street Trail Crossing

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	505	910	140	305	935	10	130	420	500	55	650	495
Future Volume (veh/h)	505	910	140	305	935	10	130	420	500	55	650	495
Number	1	6	16	5	2	12	7	4	14	3	8	18
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1863	1863	1900	1863	1863	1900	1863	1863	1900	1863	1863	1863
Adj Flow Rate, veh/h	532	958	147	321	984	11	137	442	526	58	684	521
Adj No. of Lanes	2	2	0	2	2	0	1	2	0	1	2	1
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	577	1369	210	583	1254	14	254	566	507	75	1051	736
Arrive On Green	0.17	0.44	0.44	0.09	0.35	0.34	0.08	0.32	0.33	0.04	0.30	0.30
Sat Flow, veh/h	3442	3077	472	3442	3585	40	1774	1770	1583	1774	3539	1583
Grp Volume(v), veh/h	532	551	554	321	486	509	137	442	526	58	684	521
Grp Sat Flow(s),veh/h/ln	1721	1770	1779	1721	1770	1856	1774	1770	1583	1774	1770	1583
Q Serve(g_s), s	22.8	37.6	37.7	8.7	36.9	36.9	7.5	34.0	48.0	4.9	25.3	39.4
Cycle Q Clear(g_c), s	22.8	37.6	37.7	8.7	36.9	36.9	7.5	34.0	48.0	4.9	25.3	39.4
Prop In Lane	1.00		0.27	1.00		0.02	1.00		1.00	1.00		1.00
Lane Grp Cap(c), veh/h	577	787	792	583	619	649	254	566	507	75	1051	736
V/C Ratio(X)	0.92	0.70	0.70	0.55	0.78	0.78	0.54	0.78	1.04	0.77	0.65	0.71
Avail Cap(c_a), veh/h	619	787	792	608	619	649	397	566	507	83	1051	736
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.96	0.96	0.96	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	61.5	33.6	33.6	29.0	43.7	43.7	32.5	46.2	50.0	71.1	46.0	32.0
Incr Delay (d2), s/veh	17.5	4.9	4.9	0.5	9.6	9.2	0.7	6.3	50.2	28.1	1.1	2.7
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	12.3	19.4	19.6	4.1	19.7	20.6	3.7	17.6	28.0	3.0	12.5	17.7
LnGrp Delay(d),s/veh	79.0	38.5	38.5	29.5	53.3	52.9	33.2	52.6	100.2	99.2	47.1	34.7
LnGrp LOS	E	D	D	C	D	D	C	D	F	F	D	C
Approach Vol, veh/h	1637			1316			1105			1263		
Approach Delay, s/veh	51.7			47.4			72.8			44.4		
Approach LOS	D			D			E			D		
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	30.1	55.5	11.4	53.0	15.9	69.7	14.8	49.5				
Change Period (Y+Rc), s	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0				
Max Green Setting (Gmax), s	27.0	48.0	7.0	48.0	12.0	63.0	22.0	33.0				
Max Q Clear Time (g_c+I1), s	24.8	38.9	6.9	50.0	10.7	39.7	9.5	41.4				
Green Ext Time (p_c), s	0.3	6.0	0.0	0.0	0.2	10.8	0.3	0.0				
Intersection Summary												
HCM 2010 Ctrl Delay				53.3								
HCM 2010 LOS				D								

Arterial Level of Service: EB NE 8th

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
120th Avenue NE	III	30	31.1	32.8	63.9	0.24	13.8	E
Total	III		31.1	32.8	63.9	0.24	13.8	E

Arterial Level of Service: WB NE 8th

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
116th Ave	III	30	31.1	48.4	79.5	0.24	11.1	E
Total	III		31.1	48.4	79.5	0.24	11.1	E

Arterial Level of Service

2019 Weekday PM Peak Hour - with Crossing

8th Street Trail Crossing

Arterial Level of Service: EB NE 8th

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
	IV	30	15.7	8.2	23.9	0.07	10.4	D
120th Avenue NE	IV	30	25.2	32.3	57.5	0.17	10.5	D
Total	IV		40.9	40.5	81.4	0.24	10.5	D

Arterial Level of Service: WB NE 8th

Cross Street	Arterial Class	Flow Speed	Running Time	Signal Delay	Travel Time (s)	Dist (mi)	Arterial Speed	Arterial LOS
	IV	30	25.2	9.4	34.6	0.17	17.5	C
116th Ave	IV	30	15.7	42.2	57.9	0.07	4.3	F
Total	IV		40.9	51.6	92.5	0.24	9.2	D

Attachment D: LOS Definitions

Highway Capacity Manual 2010

Signalized intersection level of service (LOS) is defined in terms of a weighted average control delay for the entire intersection. Control delay quantifies the increase in travel time that a vehicle experiences due to the traffic signal control as well as provides a surrogate measure for driver discomfort and fuel consumption. Signalized intersection LOS is stated in terms of average control delay per vehicle (in seconds) during a specified time period (e.g., weekday PM peak hour). Control delay is a complex measure based on many variables, including signal phasing and coordination (i.e., progression of movements through the intersection and along the corridor), signal cycle length, and traffic volumes with respect to intersection capacity and resulting queues. Table 1 summarizes the LOS criteria for signalized intersections, as described in the *Highway Capacity Manual 2010* (Transportation Research Board, 2010).

Table 1. Level of Service Criteria for Signalized Intersections

Level of Service	Average Control Delay (seconds/vehicle)	General Description
A	≤10	Free Flow
B	>10 – 20	Stable Flow (slight delays)
C	>20 – 35	Stable flow (acceptable delays)
D	>35 – 55	Approaching unstable flow (tolerable delay, occasionally wait through more than one signal cycle before proceeding)
E	>55 – 80	Unstable flow (intolerable delay)
F ¹	>80	Forced flow (congested and queues fail to clear)

Source: *Highway Capacity Manual 2010*, Transportation Research Board, 2010.

1. If the volume-to-capacity (v/c) ratio for a lane group exceeds 1.0 LOS F is assigned to the individual lane group. LOS for overall approach or intersection is determined solely by the control delay.

Unsignalized intersection LOS criteria can be further reduced into two intersection types: all-way stop and two-way stop control. All-way stop control intersection LOS is expressed in terms of the weighted average control delay of the overall intersection or by approach. Two-way stop-controlled intersection LOS is defined in terms of the average control delay for each minor-street movement (or shared movement) as well as major-street left-turns. This approach is because major-street through vehicles are assumed to experience zero delay, a weighted average of all movements results in very low overall average delay, and this calculated low delay could mask deficiencies of minor movements. Table 2 shows LOS criteria for unsignalized intersections.

Table 2. Level of Service Criteria for Unsignalized Intersections

Level of Service	Average Control Delay (seconds/vehicle)
A	0 – 10
B	>10 – 15
C	>15 – 25
D	>25 – 35
E	>35 – 50
F ¹	>50

Source: *Highway Capacity Manual 2010*, Transportation Research Board, 2010.

1. If the volume-to-capacity (v/c) ratio exceeds 1.0, LOS F is assigned an individual lane group for all unsignalized intersections, or minor street approach at two-way stop-controlled intersections. Overall intersection LOS is determined solely by control delay.

From: Charlie Bauman <charlie@guntowercapital.com>
Sent: Tuesday, October 25, 2022 3:56 PM
To: Nesse, Katherine; Johnson, Thara
Cc: CompPlan2044EIS
Subject: RE: Comprehensive Plan comment

Thara, Kate – I am supplementing this comment with one more. I also submitted this through the online portal. Thank you!

In addition to my comments in the email below, I would like the EIS to specifically study various alternatives for the Evergreen Center property located at 1840 130th Ave NE, Bellevue, WA 98005. This is a large 6-acre site directly North of the 130th St light rail station, well poised to anchor the neighborhood, provide housing and jobs, and become a destination for the City. To make this feasible, please have the EIS specifically study the following for the Evergreen Center property:

- 1) Floor-to-area ratios up to eight (8x)
- 2) Heights up to 240 feet for residential
- 3) Elimination of all floor plate size restrictions for residential uses below 85 feet in height
- 4) Elimination of the structural critical area setbacks from Goff Creek
- 5) Study increased office floor-to-area ratios up two (2x)
- 6) Elimination of the current street grid plan
- 7) Study reduced parking ratio requirements for all uses including zero parking requirement for residential uses

Studying these scenarios will ensure that meaningful Comprehensive Plan changes and subsequent zoning changes have the support they need to be implemented when the time comes.

Thank you!

Charlie Bauman
425-802-3352

From: Charlie Bauman
Sent: Monday, October 24, 2022 11:14 AM
To: Nesse, Katherine <KNesse@bellevuewa.gov>; Johnson, Thara <TMJohnson@bellevuewa.gov>
Cc: CompPlan2044EIS@bellevuewa.gov
Subject: RE: Comprehensive Plan comment

Kate, Thara – thank you for sending this reminder. I am replying to this note with my comments on the Comp Plan EIS scoping. Please let me know any questions related to this. Thank you!

Comprehensive Plan EIS Comments

General: I strongly encourage this EIS to study alternatives that maximize density, both for housing and commercial uses, throughout the city, with an emphasis on Bel-Red.

Bel-Red: My comments focus on Bel-Red because I am working with the owners of the Evergreen Center property located just north of the 130th St light rail station. This is a 6-acre piece of land that is one of the biggest opportunities in Bel-Red to maximize mixed-use density (housing, office, and retail) directly adjacent to the forthcoming light rail station. I have had multiple conversations with the City previously about this property (see attached emails) and the many obstacles to its successful redevelopment. In short, the current street grid plans, allowed density, floorplate size limitations, and critical areas on the site, make any redevelopment completely infeasible. I have previously shared multiple recommendations, including Comp Plan Policy changes (also attached), that attempt to alleviate these major constraints and provide a path to redevelopment. **It is necessary that the Comp Plan EIS scoping include alternatives that study ALL of these recommendations, so that we can then move into Comp Plan policy drafting.**


Specific Comments on EIS Scoping:

- The main issue I see is that in all alternatives, Bel-Red does not seem to be a focus. The alternatives briefly reference Bel-Red as an area for “moderate housing increases” but it does not include it as a center for job growth.
 - RECOMMENDATION: All EIS alternatives should study Bel-Red for significant housing and jobs increases

Common to All Action Alternatives (1-3)

The alternatives utilize the existing city capacity for both housing and jobs and add employment targets approved in the King County Countywide Planning Policies.

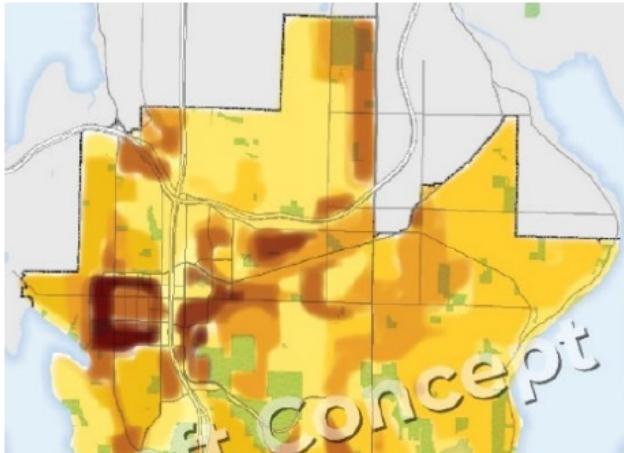
- Development in the city’s Mixed-use Centers continues to be the focus for growth center, with significant jobs and housing increases in Wilburton and BelRed. Remaining Mixed-use Centers (Crossroads, Eastgate, Factoria) have
- In Alternative 1 it focuses on Wilburton, Crossroads, Eastgate and Factoria, but not Bel-Red.
 - RECOMMENDATION: Bel-Red is the most blank slate of all these areas and should be a top priority focus for density.

Alternative 1: Providing Options for Families of All Kinds	
<i>Capacity for 45,000 – 50,000 additional housing units beyond ~65,000 existing units in</i>	
	<p>Focus additional residential density including Mixed-use Centers, including the areas of existing capacity in Wilburton and Factoria, and with a renewed focus on Wilburton and Factoria.</p>

- Alternative 3 studies the most density for Bel-Red but is still vague. It calls for studying added housing near transit and on larger sites.
 - RECOMMENDATION: This Alternative should be more specific and study both jobs and housing. Language should be included that Alternative 3 will study “maximizing mixed-use density (jobs and housing) within ½ mile around all light rail stations.” The 130th street station area should also be specifically mentioned as having considerable potential for mixed-use density, given its vast amounts of underutilized land and central proximity to the light rail stations.

Alternative 3: Providing Options Throughout the city

Capacity for 65,000-70,000 additional housing units beyond ~65,000 existing units in 20



In addition to the growth concepts in alt use Centers, in areas with **good access t** across the city, expand housing capacity **Centers** (commercial areas within predi City). This alternative also encourages th **Centers** in areas that currently lack acci short distance. This density could exten rich arterials running through these are this alternative would also include more transportation investments in these are

Final Thoughts:

- The EIS should be as broad as possible and study maximum density throughout the city. This Comp Plan update is guiding the city's growth for the next 30 years. The goal of the EIS should be to study all possible growth outcomes, rather than trying to predict where the growth should occur today.
- Regarding the Evergreen Center site, my fear is that the EIS scoping and ultimate Comp Plan update will be too narrow in scope and not provide enough clear guidance for the zoning and code changes to be enacted that are needed to make redevelopment feasible. If we can't implement changes that work for a 6-acre site next to light rail, then there is a high likelihood that many sites will not redevelop as intended, leaving the city with a shortage of housing and job options.

Thank you for your time. Please reach out with any questions. Best.

Charlie Bauman

425-802-3352

From: Charlie Bauman <charlie@guntowercapital.com>
Sent: Monday, October 24, 2022 11:14 AM
To: Nesse, Katherine; Johnson, Thara
Cc: CompPlan2044EIS
Subject: RE: Comprehensive Plan comment
Attachments: RE: Bel-Red Policies and Evergreen Center Check-In; RE: Bel-Red Policies and Evergreen Center Check-In; RE: Comp Plan Periodic Update; Bel-Red Subarea Plan - proposed changes - June 2022.docx

Kate, Thara – thank you for sending this reminder. I am replying to this note with my comments on the Comp Plan EIS scoping. Please let me know any questions related to this. Thank you!

Comprehensive Plan EIS Comments

General: I strongly encourage this EIS to study alternatives that maximize density, both for housing and commercial uses, throughout the city, with an emphasis on Bel-Red.

Bel-Red: My comments focus on Bel-Red because I am working with the owners of the Evergreen Center property located just north of the 130th St light rail station. This is a 6-acre piece of land that is one of the biggest opportunities in Bel-Red to maximize mixed-use density (housing, office, and retail) directly adjacent to the forthcoming light rail station. I have had multiple conversations with the City previously about this property (see attached emails) and the many obstacles to its successful redevelopment. In short, the current street grid plans, allowed density, floorplate size limitations, and critical areas on the site, make any redevelopment completely infeasible. I have previously shared multiple recommendations, including Comp Plan Policy changes (also attached), that attempt to alleviate these major constraints and provide a path to redevelopment. **It is necessary that the Comp Plan EIS scoping include alternatives that study ALL of these recommendations, so that we can then move into Comp Plan policy drafting.**

Specific Comments on EIS Scoping:

- The main issue I see is that in all alternatives, Bel-Red does not seem to be a focus. The alternatives briefly reference Bel-Red as an area for “moderate housing increases” but it does not include it as a center for job growth.
 - RECOMMENDATION: All EIS alternatives should study Bel-Red for significant housing and jobs increases

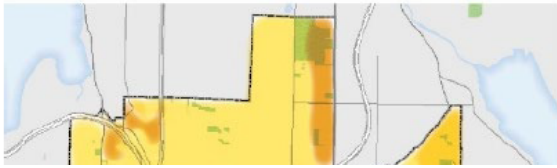
Common to All Action Alternatives (1-3)

The alternatives utilize the existing city capacity for both housing and jobs and add and employment targets approved in the King County Countywide Planning Policies

- Development in the city’s Mixed-use Centers continues to be the focus for growth center, with significant jobs and housing increases in Wilburton and **BelRed**. Remaining Mixed-use Centers (Crossroads, Eastgate, Factoria) have
 - In Alternative 1 it focuses on Wilburton, Crossroads, Eastgate and Factoria, but not Bel-Red.
 - RECOMMENDATION: Bel-Red is the most blank slate of all these areas and should be a top priority focus for density.

Alternative 1: Providing Options for Families of All Kinds

Capacity for 45,000 – 50,000 additional housing units beyond ~65,000 existing units in 2040

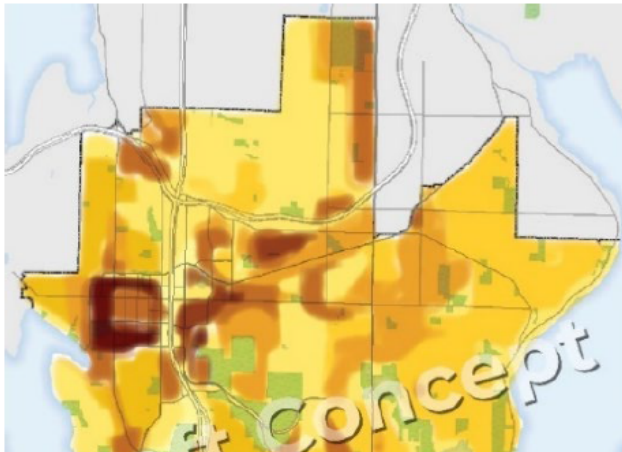


Focus additional residential density including **Centers**, including the areas of existing capacity in Bel-Red and with a renewed focus on Wilbur and Factoria.

- Alternative 3 studies the most density for Bel-Red but is still vague. It calls for studying added housing near transit and on larger sites.
 - RECOMMENDATION: This Alternative should be more specific and study both jobs and housing. Language should be included that Alternative 3 will study “maximizing mixed-use density (jobs and housing) within ½ mile around all light rail stations.” The 130th street station area should also be specifically mentioned as having considerable potential for mixed-use density, given its vast amounts of underutilized land and central proximity to the light rail stations.

Alternative 3: Providing Options Throughout the city

Capacity for 65,000-70,000 additional housing units beyond ~65,000 existing units in 2040



In addition to the growth concepts in alternative 1, this alternative includes use Centers, in areas with good access to transit across the city, expand housing capacity in **Centers** (commercial areas within predicted urban form City). This alternative also encourages the development of **Centers** in areas that currently lack access to transit within short distance. This density could extend along rich arterials running through these areas. This alternative would also include more transportation investments in these areas.

Final Thoughts:

- The EIS should be as broad as possible and study maximum density throughout the city. This Comp Plan update is guiding the city’s growth for the next 30 years. The goal of the EIS should be to study all possible growth outcomes, rather than trying to predict where the growth should occur today.
- Regarding the Evergreen Center site, my fear is that the EIS scoping and ultimate Comp Plan update will be too narrow in scope and not provide enough clear guidance for the zoning and code changes to be enacted that are needed to make redevelopment feasible. If we can’t implement changes that work for a 6-acre site next to light rail, then there is a high likelihood that many sites will not redevelop as intended, leaving the city with a shortage of housing and job options.

Thank you for your time. Please reach out with any questions. Best.

Charlie Bauman
425-802-3352



October 31, 2022

Attn: Thara Johnson
Bellevue Community Development Department
450 110th Avenue NE
Bellevue, WA 98004

RE: Eastside Affordable Housing Coalition Comment on 2024 Environmental Review Scoping

Dear Bellevue Community Development Department,

On behalf of the [Eastside Affordable Housing Coalition \(EAHC\)](#), we thank the City of Bellevue for the opportunity to comment on the scope of the Environmental Impact Statement (EIS) for Bellevue's 2024 Comprehensive Plan Update. The EAHC is a group comprised of 34+ organizations representing housing providers, direct service providers, faith leaders, Bellevue community members, and advocates who provide affordable housing to the City of Bellevue. We are committed to advancing housing affordability through Bellevue's Comprehensive Plan update and appreciate the work Bellevue has done to prepare the EIS scoping. Particularly, we appreciate its focus on analyzing housing production beyond the minimum growth target of 35,000 homes. 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 people.

This Comprehensive Plan update is a once-in-a-decade opportunity for Bellevue to lead by reforming land use, increasing affordability, and allowing for mixed uses in and around neighborhood centers. Bellevue has grown tremendously since the last Comprehensive Plan update, becoming a major tech center on the Eastside. It is essential that Bellevue analyzes a full range of growth alternatives in the EIS.

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. To grow equitably, Bellevue must add more affordable homes, more sustainable homes, and more missing middle homes, mid-rise apartments, and small-scale retail throughout the city.

**Housing Development Consortium
of Seattle-King County**

1326 5th Avenue, Suite 230, Seattle, WA 98101
206.682.9541 | www.housingconsortium.org

Of the alternatives drafted, Alternative 3 goes the furthest to scale up housing production, distribute growth more equitably, and advance housing affordability. However, we recommend the following changes to the scope of the proposed alternatives, to ensure Bellevue leads the region and create a more affordable, equitable, and sustainable city:

- **Analyze the implementation of mandatory inclusionary zoning in all of the growth alternatives, not just Alternative 1.** 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.
- **All the growth alternatives should create as much housing capacity as possible, with at least one alternative analyzing capacity for 80,000 or more homes,** knowing that not all of the potential housing capacity will be developed within the relevant time period. The EIS should be careful to not conflate *housing capacity* with *projected housing growth*. Parcel-by-parcel redevelopment decisions are up to the decision of individual land-owners, not all potential redevelopment sites will be and not all redevelopments will fully maximize capacity.
- **Alternative 3 should be expanded to permit mid-rise, mixed-use apartments within a 15-minute walk of frequent transit service and neighborhood centers.** Bellevue's draft housing need targets demonstrate the need to accommodate many homes affordable to people making less than 80% of Area Median Income (AMI), particularly below 30% AMI. While *any* new housing requires subsidies to be affordable to low-income people, lower cost typologies like mid-rise apartments will reduce the subsidy required and should therefore be maximized throughout the growth strategies. Compared to wood framed mid-rise construction, steel and concrete high-rise construction can be up to \$70,000 more expensive per home.
- **Alternative 3 should locate new nodes of housing and business density in areas with current or potential access to frequent transit service.** Alternative 3 should be designed to fill gaps in access to the businesses and amenities that fulfill daily needs by increasing housing development capacity to levels that can sustain transit service and commercial services.
- **Bellevue should study at least one alternative that allows a broad range of middle housing options, including attached and detached accessory dwelling units, duplexes, triplexes, fourplexes, townhouses, and cottage clusters, throughout the entirety of Bellevue.** Allowing middle housing in high opportunity areas 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 in historically exclusionary neighborhoods while still reflecting a residential character and allowing space for trees.
- **A new alternative, Alternative 4, should expand on Alternative 3 with policies to create abundant, affordable housing throughout the entirety of Bellevue.** Alternative 4 should be

explicitly designed as an anti-displacement alternative, allowing maximal growth of the most affordable housing types in areas of high opportunity. This could look like a connected network of complete neighborhoods, allowing mid-rise apartments in areas with access to frequent transit and around neighborhood centers, with bonuses for affordable homes, and ground floor commercial and community spaces to serve people's daily needs. Beyond neighborhood centers and areas served by frequent transit, Alternative 4 should allow a broad range of middle housing options, including attached and detached accessory dwelling units, duplexes, triplexes, fourplexes, townhouses, and cottage clusters, throughout the entirety of Bellevue.

- **All of the alternatives should analyze transitioning existing multifamily zones from a density-based code to a Floor Area Ratio (FAR)-based code**, to maximize development capacity in existing multifamily zones outside Downtown and BelRed.
- **All of the alternatives should incorporate analysis of all publicly-owned, not for profit-owned, and faith community-owned parcels and maximize allowed density on these parcels**, as part of a comprehensive strategy to scale up affordable housing development. This is aligned with Bellevue's 2017 Affordable Housing Strategy (C-1).

Broadly, all of the alternatives should develop strategies to expand the "15-minute city" concept effectively to ensure complete, walkable communities. Bellevue should integrate a mix of housing types with jobs, commercial spaces, schools, health clinics, and parks, to ensure residents' daily needs are within a 15-minute walk.

Beyond the growth strategy alternatives, we recommend that the EIS incorporate analysis of the following components:

- Bellevue's greenhouse gas analysis of all of the alternatives should consider the regional benefits of preventing sprawl outside the City of Bellevue and adding dense, climate-friendly housing in neighborhoods close to jobs and transit.
- All of the growth alternatives should analyze altering the multimodal transportation network concurrently with the land use strategy, to expand the area of Bellevue covered by frequent transit service.
- All of the alternatives should analyze the economic and revenue benefits to the City of Bellevue of adding denser housing types throughout Bellevue.
- All of the alternatives should 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.
- Each of the alternatives should analyze rates of economic and physical displacement and consider appropriate mitigation strategies.

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.

Sincerely,

Molly Judge, Director of Advancement
Imagine Housing (EAHC co-chair)

Ryan Donohue, Chief Advocacy Officer
Habitat for Humanity Seattle-King and Kittitas Counties (EAHC co-chair)

Hal Ferris
Ferris Advisors (EAHC Bellevue Representative)

Chad Vaculin, Advocacy and Mobilization Manager
Housing Development Consortium (EAHC staff support)

A full list of EAHC members can be found on our [website](#).

From: Catherine Dugoni <catdugoni@gmail.com>
Sent: Saturday, October 29, 2022 3:26 PM
To: CompPlan2044EIS
Subject: Bellevue EIS 2044

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

I believe it is fair to share density throughout the entire city.

The 140th Ave NE Corridor in Northeast Bellevue is a strong location to increase density with the Spring District and Microsoft within blocks of that location. Also the Bellevue golf course is a natural place to put density around.

I believe it is also important so that we can add density up rather than horizontal which takes more land. If we are going to be stewards of the future and next generations, it is very important to maintain open space, trees and build up rather than allow sprawl. Thank you. Catherine

Sent from my iPhone

From: Carson Scott <cscott@lee-associates.com>
Sent: Wednesday, October 26, 2022 3:32 PM
To: CompPlan2044EIS
Subject: Please support option 3 for Wilburton EIS with 15,000 units

Hello,

My name is Carson Scott and I grew up in Bellevue, still live here, and work in the Ridgewood buildings in Wilburton. I would like to encourage the city to choose option 3 in the Wilburton EIS scoping exercise to increase the housing units to 15,000. With the light rail and easy access to the 520 corridor, I think increasing the density is a great idea for Bellevue and the state as a whole.

On 120th ave heading toward the spring district, in my opinion, would be a great place to add density given it has sufficient infrastructure to do so, and would be a great option in helping Bellevue meet its housing goals.

Thank you for all your work,

Carson Scott
Associate
Lee & Associates | Pacific Northwest

D 425.818.1538
C 425.736.3752
O 425.454.4242
cscott@lee-associates.com



170 120th Avenue NE | Suite 203
Bellevue, WA 98005



Confidentiality Notice: The information contained in this electronic e-mail and any accompanying attachment(s) is intended only for the use of the intended recipient and may be confidential. If any reader of this communication is not the intended recipient, unauthorized use, disclosure or copying is strictly prohibited, and may be unlawful. If you have received this communication in error, please immediately notify the sender by return e-mail, and delete the original message and all copies from your system.

DITTY PROPERTIES

Involved in Bellevue since 1928

October 30, 2022

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

Re: Bellevue 2044 Comprehensive Plan EIS Scoping Comments

Dear Liz and Reilly,

This letter is submitted in response to the City of Bellevue's Determination of Significance and scoping notice for its 2044 Comprehensive Plan Environmental Impact Statement ("EIS"). We own the property located at 11635 - 11647 NE 8th Street in Bellevue which abuts Eastrail, is a mere 200 feet south of the future Wilburton light rail station across the new NE 8th Street Eastrail bridge, and is less than 500 feet to the east of the on- and off-ramps to I-405 on NE 8th Street. In other words, our site is in the heart of Wilburton surrounded by multi-modal transportation options and near the Overlake Medical Center and Kaiser Permanente medical facilities that employ thousands of people. This site is part of our family legacy of property ownership and community engagement in Bellevue dating back to the 1920s. We have witnessed Bellevue grow from its agricultural roots into the world-class City it is today, and we are excited to be an active participant in the City's next chapter.

We appreciate the work Bellevue staff have completed to build upon the prior work of the Wilburton Citizen Advisory Committee and draft EIS to formulate updated alternatives for Wilburton that reflect the changed circumstances Bellevue now faces. It's no secret that Bellevue has seen an explosion of growth over the past five years, and the City now has a once-in-a-generation opportunity to upzone Wilburton to appropriately distribute future growth and provide much needed residential density.

We have reviewed the identified Alternatives for the Wilburton Subarea in the Scoping Handout, and offer the following comments for consideration as you move on to the draft EIS stage:

- **The area for 450' residential towers should be expanded.** Under any of the growth Alternatives 1-3, the areas targeted for 450' residential maximum heights appear to be limited to the west side of 116th. In order to achieve multi-modal high-rise residential development and maximize housing opportunities immediately proximate to Eastrail, light rail, and I-405, the area targeted for 450' height should be increased to encompass

the *entire area* between I-405 and Eastrail in at least one of the Alternatives, and perhaps more. This central corridor makes sense for the most growth and 450' heights will be complementary to Downtown zoning to the west.

Our property is 17,443 square feet, which is small by Bellevue block standards, but provides a tremendous opportunity. This size does not lend itself to commercial office development that typically requires at least 20,000 square foot floorplates, however, it is well-suited for high-rise residential development with smaller floorplates. High-rise residential development requires concrete construction, which is the most expensive construction type, and only works at scales well beyond 300'. For the City to truly realize the residential density it is targeting, it should expand the area for 450' residential tower zoning. Lower height limits for residential will not provide the density necessary to justify concrete construction and should be avoided in this central corridor. There is perhaps no better multi-modal, transit-oriented-development site in Wilburton than ours for a tall, skinny, residential tower as it is just steps from Eastrail and light rail with easy access to I-405. Failing to zone the site with a height limit that supports a residential tower is a lost opportunity for the City and future generations.

- **The draft EIS should detail clear assumptions for calculating housing unit capacity.** The City's growth Alternatives for Wilburton assume between 5,000-12,000 additional housing unit capacity. We question whether this is enough density given that this is the only neighborhood in the City with the multi-modal trifecta of I-405 freeway access, light rail *and* Eastrail. The City should consider increasing the additional housing unit capacity to 20,000 or more in this neighborhood to achieve a true mixed-use vision in Alternative 3.

Furthermore, the draft EIS should clearly articulate the development standards it assumes in order for the public to be able to validate the stated housing unit capacity. In other areas of the City, limiting development standards like prescriptive floorplate sizes, tower step-backs and setbacks, multifamily play areas, and lot coverage limits constrain residential development and add cost. The City should consider the trade-offs in housing unit capacity created with these development standards as part of the draft EIS.

It is also not clear in the Scoping Handout whether the City assumes a residential FAR limit will be included as another layer of density regulation in Wilburton. We understand this is an issue the City is also studying as part of its "Next Right Work" on affordable housing. Given that residential development will already be limited by height limits and form-based development standards, we do not believe any FAR limits are necessary for this use. Again, allowing residential high-rise towers to be built up to 450' heights will ensure their feasibility. The City should clarify in the draft EIS that it does not intend to further constrain feasibility with a residential FAR limit that would have a disproportionate impact on promoting the development of smaller sites.

- **Affordable housing is needed, and it should be incentive-based and balanced with any other community amenities required of development projects.** Bellevue, like the rest of our region, is in a housing crisis. More housing is needed at all affordability levels.

However, any zoning-based programs to create affordable housing should be incentive-based and include in-lieu fee options to ensure they are durable in the face of unknown future market forces. This will ensure needed affordable housing is delivered and that the overall housing production pipeline remains strong. In setting up an incentive program, the City should also account for the costs of development standards and other desired community benefits to ensure it is calibrated properly to achieve development and community goals.

- **The transportation analysis should consider alternatives to onsite parking, especially for sites within a few hundred feet of the light rail station.** Solving potential traffic and transportation issues will be key to the long-term success of the Wilburton neighborhood. One way to address this problem is to maximize the number of future residents who will use alternatives to single-occupant vehicles. The draft EIS Alternatives should study eliminating minimum parking requirements especially on sites close to light rail and Eastrail as a traffic and transportation mitigation measure.

Thank you for taking the time to consider these comments and for your work on behalf of the City. We look forward to working with the City and the broader community as this process continues.

Sincerely,



Campbell Mathewson

Authorized Agent for Ditty Properties

cc: Emil King, Planning Director
Janet Shull, Senior Planner
Thara Johnson, Planning Manager
Abigail DeWeese and Josh Friedmann, HCMP



PMF CAPITAL MANAGEMENT

October 27, 2022

City of Bellevue Development Services Department
Attn: Reilly Pittman
450 110th Avenue NE
Bellevue, WA 98004
Email: CompPlan2044EIS@bellevuewa.gov

Re: Comprehensive Plan Periodic Update Environmental Impact Statement Comment

Dear Mr. Pittman:

On behalf of PMF Capital Management LLC and Kelsey Creek Center LLC, thank you for the opportunity to comment on the City of Bellevue's (City's) scoping for the Comprehensive Plan Periodic Update Environmental Impact Statement (EIS). We write in support of the vision set out in Alternative 3: Providing Options Throughout the City (Alternative 3). We believe Alternative 3, with some modifications, best positions the City to grow wisely for the next generation.

We agree with staff's recommendation that adoption of Alternative 3 will most effectively address the City's goals of increasing housing supply for all levels of income. Expanding housing capacity as proposed under Alternative 3 will not only strengthen existing neighborhood centers but also promote housing equity and affordability. By expanding housing choices throughout the City, Alternative 3 best advances the City's vision of a prosperous and equitable future where all citizens of Bellevue have easy access to housing, transit, and jobs.

PMF Capital Management manages the Kelsey Creek Center. Kelsey Creek Center is a mixed-use property, generally located at 14825-15056 Main Street in Bellevue (Property). The Property is subject to a Concomitant Zoning Agreement (CZA) that was required as part of a prior rezone over a decade ago. The CZA contains outdated land use and parking requirements that do not align with the City's current goals for sustainable growth and housing opportunities. The City should ensure repeal of outdated agreements (e.g., concomitant zoning agreements) such as the CZA through the 2022 Comprehensive Plan update. The City followed a similar procedure with the Eastgate Comprehensive Plan updates. This helped ensure that the City's land use vision could be implemented without further Council action.

The Property is located on major transit corridors near frequent transit. In the EIS, we encourage staff to study increased height and densities in commercial areas such as the Property that are near light rail and bus rapid transit, to further transit-oriented development.

15015 Main Street, Suite 203
Bellevue, WA 98007
P: 425-746-6066
F: 425-746-6595



PMF CAPITAL MANAGEMENT

The Property is an ideal location for dense mixed-use development that includes multifamily housing opportunities.

Finally, within the Alternative studied, the City should study incentive-based requirements that support residential and mixed-use projects in the City's commercial zones.

Thank you in advance for your consideration. We look forward to the City's continued work on the Comp Plan Update to support a variety of residential and office growth opportunities throughout the City.

Sincerely,

Brian Franklin

President

PMF Capital Management LLC

From: [Bill Finkbeiner](#)
To: [CompPlan2044EIS](#)
Subject: Support Option 3 for Wilburton EIS scoping with 15,000 housing units
Date: Wednesday, October 26, 2022 10:25:54 AM

I think about Wilburton a lot and have a lot to say about it, but the gist of this email is that this is a neighborhood that has all the infrastructure in place to compliment downtown with significant densities. Given this, and the market demand for housing, Bellevue should absolutely choose the option three in the for EIS scoping and should up the housing numbers to at least 15,000. More detailed thoughts are below.

Over the last 22 years I have probably spent about half of my life in the Wilburton neighborhood. Depending on the traffic and what I have planned for the day I either drive or bike into work. When I drive I sometimes take the 124th exit off 520 or the NE 8th exit off of 405, there are several other onramps and offramps into the neighborhood that facilitate easy access. When I bike I take the Eastrail until it ends near 10th and then it is easy to get into the North end of the Wilburton neighborhood without leaving a bike lane. There is a rapid ride bus that comes every 10 minutes less than a block away and I am looking forward to the two light rail stations opening within a quarter mile of where I work. For lunch I can walk to any of a dozen restaurants but usually end up going to Whole Foods or Uwajimaya which are both within quarter mile walk, amazingly there is also a PCC and Trader Joes within a half mile. Last week I stopped into the drugstore across the street to get my flu shot. Sometimes to clear my head in the afternoons I go for a walk or bike to the Bellevue Botanical Garden, which abuts the Wilburton neighborhood and is less than a mile away, on my way I pass by the new Wilburton Elementary. I am always amazed at how amazing this neighborhood is and how few people live and work here.

At the same time Bellevue is falling so far behind the market's demand for housing that it is unaffordable to most families and individuals. Pretty much all the land available for single family housing in the region has already been built out and to increase supply we would have to expand the growth management area and build further into rural areas, increasing commute times, increasing traffic and increasing environmental and societal costs. Or we could put more people where this incredible infrastructure exists by allowing for significantly more densities. I understand that changes like increased densities also bring some costs, and some people don't like change, but the benefits so far outweigh the costs that this is a no brainer, especially in an area as well served by infrastructure and services as Wilburton. The primary benefit is the increased housing stock which will put downward pressure on housing costs, but there are a ton of secondary benefits. These include the general societal benefits that come from dense neighborhoods like the increase in diverse businesses, especially those that increase the quality of life for all residents like restaurants, gyms, day cares, etc. There is also a benefit to the region by putting densities in a walkable neighborhood so well served by the massive investments we have made into transit alternatives. For all these reasons Bellevue needs to think big when it comes to Wilburton and in your scoping efforts you should maximize the densities reviewed to bring the most long term benefit to the city.

For all these reasons Bellevue should absolutely choose the option three in the for EIS scoping and should up the housing numbers to at least 15,000.

Sincerely,

Bill Finkbeiner

From: Betsi Hummer <betsihammer@yahoo.com>
Sent: Monday, October 31, 2022 3:15 PM
To: Johnson, Thara
Subject: Fw: Bellevue EIS Scoping Comments

Hi Thara

Here my Scoping comments. Please reformulated them so they are compliant with eis process.
Thanks Betsi Hummer Ph425.591.4784 betsihammer@yahoo.com

- Earth and water quality

Water bodies throughout Bellevue should be honored, celebrated, maintained, and enhanced. Care should be taken to restore lakes and streams to their original state or make sure they are improved and not made worse.

- Air quality and greenhouse gas emissions

Increased population will result in increased pollution. Retaining larger trees and vegetation will help get rid of that extra carbon. Make traffic smoother so with less stop and go there is less emissions.

Encourage recycling and yard waste disposal.

Extend and encourage recycling in multifamily housing.

- Plants and animals

Declare rabbits an invasive species

- Energy and natural resources

- Noise

Require all multifamily to have the highest rated soundproofing to

- Land use patterns and urban form

- Historic resources

Bellevue doesn't have the same historic downtown and various industries as surrounding cities such as Renton, Redmond and Kirkland. An extra effort needs to be made throughout Bellevue to honor the Indigenous people as well as the contributions of all settlers and newcomers. The development of suburban neighborhoods in existing fields and forests does not have the same history as those other cities, but the inhabitants, developers, pioneers, settlers, and active citizens should be honored.

Historic institutions, such as neighborhood associations, Sammamish Community Council, and East Bellevue Community Council, and original settlement - such as Lochleven's vacation settlement, should be honored.

A plaque showing the original businesses and uses should be available somewhere in the area. Original roads should be modified. The impact of major developments, such as 148th Ave at Larsen Lake and the development of the Kelsey Creek Soping Center, and the Airfield, and the ensuing dump should be remembered in some fashion so we are all aware of the changes and how a bunch of earth being moved can impact a neighborhood - positive and negative.

- Relationship to plans, policies, and regulations

- Population, employment, and housing

Disperse all housing types throughout the City.

All neighborhoods need to be treated equitably. If density is to be added to Bellevue, all neighborhoods should be densified the same. Housing should be available for all income levels in all neighborhoods. East Bellevue and Crossroads have the smallest single family lot sizes - R5 - in the City of Bellevue, as well as the highest concentration of multifamily housing. The smallest lot size in most other neighborhoods in Bellevue is R3.5; they also have fewer multi-family projects. Additionally, the most subsidized housing developments are located in East Bellevue and Crossroads. Affordable housing needs to be dispersed throughout the City to have a strong community that is integrated economically, culturally, and socially. Zoning needs to be upzoned to be similar throughout the City - R5 and 7.5 needs to replace the R1-R4 in all neighborhoods, so the lots can be more easily subdivided, allowing for cottage .

Permit restrictions on Planned Unit Development need to be eased up throughout the City so higher density can be built, especially on major arterials, such as SE 104th, SE 108th, Bellevue Way, SE 108th. The arterials in East Bellevue already are zoned for multifamily and have Planned Unit Developments; West Bellevue, NW Bellevue, NE Bellevue, Bridle Trails, Somerset, Woodridge, Lakemont and Enatai, for example, need to densify their arterials especially close to schools.

A great example of the various housing typologies can be found on Main Street between 149th and 140th, and west of 140th on Main Street toward the Glendale Country Club - R1.8, R5, condominiums, Townhomes, and 4plexes can all be found in this neighborhood. This example could be replicated throughout Bellevue. This strip of real estate also demonstrates the strong community that is created by the mix of not only housing typologies, but also the proximity of a wide variety of incomes, families, cultures, and ethnicities.

People who work in Bellevue don't necessarily want to live in Bellevue. Other people who do not work in Bellevue could want to live in Bellevue. Housing is driven by the market and supply and demand. The pervasive sentiment is that people want to live near where they work, and that each person should be able to live where they want, regardless of income and housing prices. Housing owners and property developers, however, are the people that determine what is built where. Even if there are incentives, and zoning to try to build certain types of housing in certain neighborhoods, developers will build what works for their business model, not necessarily what is seen as a better solution. West of Lake Hills Elementary School a 1969 duplex on a R10 zoned property was replaced with a 5 bedroom, 4 bathroom, 4,000 square foot home; even though a duplex could have been built, the developer chose to build a single family home and sell for market rate.

- Transportation

Bellevue was developed as a car-centric city. Regardless of increased transit, light rail, bicycle, or pedestrian transportation options, people in Bellevue will travel primarily by independent vehicles. Every redevelopment needs to accommodate automobiles. The streets, alleys, roads and avenues need to take independent vehicle traffic into consideration. Bike and Pedestrian traffic should be taken into consideration when improving roads, but traffic congestion reduction needs to be retained in all developments. Private employer bus service should be incorporated into the transit options, since it seems King County Metro Transit does not have the capacity to provide effective or efficient service for the people travelling to work, play or shop in Bellevue.

The Urban Boulevard program should be brought back and redeveloped for the modern era, taking into careful consideration of multimodal transportation.

NE 8th should be redeveloped to be a beautiful connection between Lake Washington, urban Bellevue, and Lake Sammamish, suburban Bellevue.

- Public services
- Utilities
- Displacement analysis
- Equitable impacts analysis
- Economic analysis

Betsi Hummer 425.591.4784 betsihummer@yahoo.com

From: Betsi Hummer <betsihummer@yahoo.com>
Sent: Monday, October 31, 2022 3:15 PM
To: Johnson, Thara
Subject: Wilburton vision EIS Scoping comments Betsi Hummer

- Earth and water quality

Wilburton/Midlakes Commercial development needs to provide less impervious surfaces for water runoff and improvement of the soil beneath the buildings.

- Air quality and greenhouse gas emissions

Wilburton is bordered by busy impervious surface roads, including Interstate 405, NE 8th, NE 12th, 116th Ave NE. Traffic methods to reduce green house gas emissions from vehicles in this area need to be taken. Making the speed limit slower and more consistent, less stop and go traffic, improved circulation to dissipate emission

- Plants and animals

Wilburton needs more quick growing plants introduced to

- Energy and natural resources
- Noise
- Land use patterns and urban form
- Historic resources
- Relationship to plans, policies, and regulations
- Population, employment, and housing
- Transportation
- Public services
- Utilities

What are the additional areas of study that the city is proposing to be analyzed to support the EIS analysis? The city is providing additional information on:

- Displacement analysis
- Equitable impacts analysis
- Economic analysis

Betsi Hummer 425.591.4784 betsihummer@yahoo.com



October 31, 2022

City of Bellevue Development Services Department
Attn: Reilly Pittman
450 110th Ave NE
Bellevue, WA 98004
Via Email: compplan2044eis@bellevuewa.gov

Re: Comprehensive Plan EIS Scoping Comments

Microsoft is delighted to provide our comments for the future of Bellevue. Our long-term commitment to the quality of life, livability, and equitable access to opportunity remains a high priority. The Comprehensive Plan EIS Scoping is a milestone step in making sure Bellevue can make the most of future growth and investments.

Bellevue, like other Eastside communities, is experiencing unprecedented job growth, which has brought economic diversity and prosperity to the region but also led to scarcity of housing and subsequent affordability and quality of life issues.

We continue to be committed to working with local jurisdictions on meaningful public policy agendas. Housing, transportation, and workforce development are just a few of several key areas of focus that drive quality of life in our community. As the Eastside continues to transition to one of the fastest growing and dynamic communities in the country, our leaders (public, private and nonprofit) must continue taking actions that enhance our local quality of life. The Mayor, City Council, City Manager, and staff of Bellevue are presented with the opportunity and responsibility to fundamentally address all these important matters by setting a bold vision for Bellevue's future.

We support the city's vision, and we continue to support the policies and programs that will advance mixed-use, mixed-income neighborhoods that are well served by frequent and reliable transit including the coming Sound Transit light rail expansion, extensive open spaces, and vibrant pedestrian experiences.

It's been more than three years since we announced our \$500 million commitment toward affordable housing solutions in King County. In January, we deepened our commitment by \$250 million, bringing Microsoft's total pledge to \$750 million. Our initiative launched with nine mayors, including the Mayor of Bellevue, standing with us to sign our affordable housing pledge, promising to help address the local policy barriers affecting middle- and low-income housing supply. The housing shortage in the region is unparalleled and access to housing that is affordable to many households -- from our employees to our teachers, nurses, and first responders, and those in the service and hospitality -- is more out of reach.

We've worked very closely many years with Bellevue city leadership around implementation of its 2017 Affordable Housing Strategy and ways the city can go further. We are proud of the city's deep commitment to advancing these conversations through its 'Next Right Work' on affordable housing and through its 2044



Comprehensive Plan Periodic Update (“Comprehensive Plan Update”) and Wilburton Vision Implementation (“Wilburton Vision”) Environmental Impact Statement, Fall 2022 Scoping Handout.

The current scoping period for this update will set the table for how the city thinks about job and housing growth across its sub-areas for the next several decades and we continue to advocate for the policies and programs that will enable bold moves to address the city’s significant middle-and-low-income housing supply needs. We encourage you to create policy to address Bellevue’s current and future state and think of new ways to meet the once in a generation change happening in our community.

As such, below are our comments on the scope of the Comprehensive Plan 2044 update:

- Bellevue and the Puget Sound region have experienced greater job and resident growth than the State and County forecasts for the last 20 years. We support the recommendation to study an alternative that increases the number of housing units provided to 70,000 and the number of jobs to 140,000.
- The city should continue concentrating density in Growth Centers, which rightly focuses growth at transportation nodes, thereby reducing traffic and greenhouse gas emissions. We see opportunity on the edges of Bel-Red near Redmond’s Overlake neighborhood where Redmond is planning for significant additional density and growth, in Eastgate, in Factoria, and within all of the city’s neighborhood centers.
- We also suggest that all areas within frequent transit areas be considered as opportunities for growth. Land use policy should maximize, or at least reflect, the significant transportation investments our community has already made.
- Wilburton is a low-density area immediately adjacent to downtown. Zoning and housing density here should be utilized (and increased) as the natural extension of the downtown core.
- Bel-Red’s redevelopment should be considered a prime opportunity for growth, and we support the request to place a greater emphasis on this subarea. It was an area slated for significant growth in the last Comprehensive Plan update, but it has not realized its potential because of zoning standards and a street grid that has been a barrier to feasible development. We also suggest maximizing mixed-use residential and commercial development within the half-mile radius surrounding all light rail stations.
- Policies and land use such as parking, FAR and zoning should be updated to fully realize development potential. Eliminating limitations due to development standards in Growth Centers will allow for development to flourish in these areas.



- Alternatives Two and Three include voluntary incentive-based programs that provide flexibility to develop more housing for all incomes widely across Bellevue sub-areas. With housing demand outpacing supply across the nation, we understand the market has become more competitive. Please consider the impacts of regulations on private investment and what happens to housing production if institutional investors don't participate. We support incentive programs that have proven to be a track record to produce housing at all affordability levels.
- Requiring developers to build a minimum amount of parking in urban high-rise multifamily buildings close to frequent and reliable transit have a range of negative consequences, including decreasing financial productivity and shifting finite resources from the creation of residential and commercial units. We understand the state legislature may consider a bill related to this topic in the upcoming legislative session.
- We support recommendations from others that help prepare the City for the growth outlined in the 2044 Comprehensive Plan such as hiring more planners, better online technology for the city's permitting system, allowing departures from the code to increase project flexibility and efficiency, allowing two-year permit and building permit extensions to account for market conditions and COVID delays and increasing SEPA thresholds.

We truly appreciate your diligence in facilitating this feedback process and for navigating a range of highly complex policy issues.

We look forward to our continued collaboration as we work in tandem to build a more viable Bellevue -- one that will house its workers, empower its industries, and ensure its sustainability.

Sincerely,

A handwritten signature in black ink, appearing to read "Jane Broom".

Jane Broom
Senior Director, Microsoft Philanthropies

Barb Wilson
Puget Sound Local Government Affairs at Microsoft

From: Barbara Parker <bkparker5@gmail.com>
Sent: Tuesday, October 25, 2022 9:25 AM
To: CompPlan2044EIS
Subject: Coal creek

Save coal creek wilderness from home construction. It's a beautiful area with much history.

Barbara parker

From: [Anne Rittenhouse](#)
To: [CompPlan2044EIS](#)
Subject: EIS
Date: Thursday, October 6, 2022 9:48:18 AM

[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 was attending a BNOA meeting with Justin and Gwen, and they presented an update on the Wilburton Vision Implementation Initiative, and were asking for our input to it, and the 2044 Comprehensive Plan.

I just wanted to add some comments regarding protecting trees, and making sure that any EIS for development really takes a look at how losing trees is detrimental to our air quality!

"According to the Arbor Day Foundation , in one year a mature tree will absorb more than 48 pounds of carbon dioxide from the atmosphere and release oxygen in exchange. So next time you take a deep breath of air give credit to a tree or hug a tree in thanks for what it gives us – the very air we breathe."

"Many trees at the equator reach maturity in as little as ten to twenty years. In contrast, trees in northern latitudes usually grow a lot more slowly, often less than a meter or two per year. In addition, for a tree to reach maturity in the boreal forests of Canada or parts of Europe, it usually takes 80-120 years!"

I know the COB is changing land use regs to help retain more trees than are currently being allowed to be mowed down, however, I hope the City really is looking at the removal of mature trees as an environmental issue.

It seems that working with groups like 300 Trees, to get residents to plant new trees, is not as worthy an effort as SAVING existing mature trees?

Thank you.

Sincerely, Anne
Anne Rittenhouse
6229 121st Ave. SE
Bellevue, WA 98006-4422
206-714-0826 Ritts@comcast.net



October 28, 2022

Bellevue City Council
450 110th Ave. NE
Bellevue, WA 98004

RE: 2024 Comprehensive Plan Update, Periodic Update

Dear Mayor Robinson and Councilmembers:

The Master Builders Association of King and Snohomish Counties (MBAKS) thanks you for the opportunity to provide comment as you launch the Periodic Update to the Comprehensive Plan. With nearly 2,600 members, MBAKS is the largest local homebuilders' association in the United States with nearly 2600 members, providing a range of housing choice and affordability. We aspire to be the most trusted and respected housing experts in the region.

As the city embarks on its comprehensive planning out to 2044, we view this as an important opportunity to participate in the planning efforts as they move forward. According to the Puget Sound Regional Council (PSRC), 1.8 million more residents and 1.2 million more jobs will come to King, Snohomish, Pierce, and Kitsap Counties by 2050. Given that the Growth Management Act (GMA) directs most growth to existing urban areas, there is a substantial challenge which lies ahead for Bellevue and other growing communities.

Goal 4 of the GMA (RCW 36.70A.020(4)) states "Housing. Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock."

This important goal is implemented through the Housing Element requirements in RCW 36.70A.070(2), which was recently updated with the passage of House Bill 1220. **Now more than ever, there is a focused lens on providing a variety of housing types for all economic segments of the community.**

MBAKS SUPPORTS HOUSING OPTIONS

MBAKS adjoins other stakeholders in urging you to plan for increased density throughout Bellevue to respond to the growing need, and plan for a variety of housing options throughout the city. This must include planning for a variety of housing types at varying levels of density, including our mixed-use centers and our single-family neighborhoods. It's also important Bellevue maximize the region's investment in transit by adding increased housing capacity near frequent transit and job centers.

PAIR AFFORDABLE HOUSING GOALS WITH MEANINGFUL INCENTIVES

Current market conditions create many challenges when implementing an effective inclusionary housing program without a broad suite of incentives to mitigate the impact to development feasibility. For an inclusionary housing policy program to be successful, it must be paired with carefully crafted incentives. Density bonuses are a good tool to support the creation of long-term affordable housing. However, for the program to be most effective, the city must package affordable housing obligations with financial incentives, regulatory incentives, and process improvements. MBAKS



looks forward to being a resource to the city as you develop these policies to achieve your housing affordability goals.

As part of the Periodic Update process, you will be working to accommodate 35,000 more homes and 70,000 jobs out to 2044. We support the city in those efforts and ask you to look carefully at the policy updates and evaluate the potential for unintended consequences. This is especially important as you consider growth alternatives and updates to policies implementing changes in state law, Vision 2050, and countywide planning policies.

As new and revised policies are being developed and considered, we ask that you weigh the implications of each policy change and how they will be implemented. Many times, new and revised policies are implemented through the development of new or modified regulations. **New regulations often have a direct or indirect impact on the cost to provide housing.** This can include:

- Increased permit fees
- New application or submittal requirements which increase the amount of time to prepare and submit permit applications
- Longer internal review timelines associated with new code requirements which increases the amount of time to obtain permits
- New requirements associated with building a project. This could range from increasing requirements to protect existing trees to new construction requirements. These all add costs.

These impacts not only occur from changing housing policies but new or revised policies in other chapters of the comprehensive plan. To avoid new and revised policies negatively impacting the cost of housing in the future, **we ask that the following questions be analyzed at the staff level and discussed by the Bellevue City Council as policies are developed to accommodate our growing City.**

- How will the proposed new or revised policy be implemented?
- Could implementation of the new or revised policy require additional applications, fees, or studies for housing projects?
- Could implementation of the policy require additional internal review processes for permit applications? Could this increase the overall time to review permit applications for housing?
- Could the proposed new or revised policy increase the cost to build and provide housing by increasing requirements related to housing projects?

Understanding the connection between new and revised policies and possible impacts on housing upfront is key to making more informed choices as policies are developed and considered. This work will also help ensure you are meeting GMA Housing Element requirements with the ability to accommodate our future growth.

We understand and appreciate the challenges that come with planning for increased growth in our region. MBACKS is committed to working with you and your staff as your Comprehensive Plan update moves forward. Please consider us a resource and don't hesitate to reach out if you have any questions or would like to discuss this further.

Sincerely,



Jennifer Anderson
Government Affairs Manager
Master Builder Association of King and Snohomish Counties

From: Jenifer Thornton <jen.s.thornton@gmail.com>
Sent: Monday, October 31, 2022 2:31 PM
To: CompPlan2044EIS
Cc: Sydney Jaffe (Sydney.ostrem@gmail.com)
Subject: Re: RCJ Properties - City of Bellevue Comprehensive Plan Periodic Update and Wilburton Vision Implementation Environmental Impact Statement

Re: Please Support at least 15,000 Additional Housing Units, Common Sense Density and Option 3 Under the Bellevue 2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation

Our family, through our family company, RCJ Properties, LLC, has owned the property located at 888 116th Avenue NE in the Wilburton neighborhood of Bellevue for over 50 years. Currently, we ground lease the property to Whole Foods. We have seen the remarkable evolution of Wilburton over the last five decades, most significantly the construction of Sound Transit's rail and station nearly adjacent to our property. We are well aware of the housing shortage and transportation challenges our region and City face. Fortunately, room for redevelopment exists in Wilburton, and the development environment is very favorable: Sound Transit's construction is nearly complete, Wilburton is located directly adjacent to I-405, and the City continues to invest heavily in public parks and trails here. Thus, the twin problems of low housing stock and transporting Bellevue's growing population will be tangibly addressed with a common-sensical up-zone of Wilburton. That up-zone, and in particular, adoption of the at least the values disclosed in Option 3 under the Wilburton EIS, will provide housing for the growing workforce across all income levels, while minimizing increased vehicle trips and the impacts of those trips on the City.

The Wilburton neighborhood has an abundance of transportation options including easy freeway access to I-405 and SR 520 and three light rail stations within the walkshed of the neighborhood. These transportation investments must be leveraged by creating a high-density neighborhood with at least 15,000 new housing units. This is especially true because the Spring District and the light rail maintenance facility were built significantly below their allowed zoning. With appropriate zoning that properly leverages Wilburton's significantly improved infrastructure and its four existing major supermarkets, our neighborhood could become the most walkable neighborhood in Bellevue.

For all these reasons, Option 3 is the lowest of the future growth alternatives that should be evaluated and then adopted by the City. It is the only way for the City and region to get an appropriate return on both the City's and the regional investments in Wilburton and the only way the City can possibly achieve its goals of creating necessary housing stock and a truly walkable City.

Thank you for your consideration.

RCJ PROPERTIES, LLC

Sydney Ostrem
Jenifer Thornton
Manager

October 31, 2022

City of Bellevue Development Services Department
Attn: Reilly Pittman
450 110th Avenue NE
Bellevue, WA 98004
Email: CompPlan2044EIS@bellevuewa.gov

Re: Comprehensive Plan Periodic Update Environmental Impact Statement Comment

Dear Mr. Pittman:

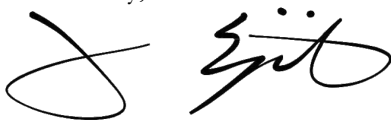
On behalf of KORE Bellevue Technology Center, Inc., thank you for the opportunity to comment on the City of Bellevue's (City's) scoping for the Comprehensive Plan Periodic Update Environmental Impact Statement (EIS). We write in support of the vision set out in Alternative 3: Providing Options Throughout the City (Alternative 3). We believe Alternative 3, with some modifications, best positions the City to grow wisely for the next generation.

We concur with staff's assessment that adoption of Alternative 3 would best promote the City's goals of increasing housing supply for all levels of income. We agree that expanding housing capacity as proposed under Alternative 3 will not only strengthen existing neighborhood centers but also promote housing equity and affordability. By expanding housing choices throughout the City, Alternative 3 best advances the City's vision of a prosperous and equitable future where all citizens of Bellevue have easy access to housing, transit, and jobs. The current Comprehensive Plan process presents an opportunity to further harmonize the City's goals with its plans. As the City charts its future, outdated land use constraints should not be allowed to thwart the benefits of this major Comprehensive Plan update. We encourage the City to include policies that:

- Ensure repeal of outdated agreements (e.g., concomitant zoning agreements) that include land use conditions that are inconsistent with the City's current growth strategies adopted in the new plan.
 - The City followed a similar procedure with the Eastgate Comp Plan updates. This helped ensure that the City's land use vision could be implemented without further Council action.
- Support increased height and densities in commercial areas near light rail and bus rapid transit; and
- Provide incentives that support residential and mixed-use projects in the City's commercial zones.

Thank you in advance for your consideration. We look forward to the City's continued work on the Comp Plan Update to support a variety of residential and office growth opportunities throughout the City.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jason Espiritu', with a stylized flourish at the end.

Jason Espiritu
Vice President
Pacific Oak Capital Advisors

Andrea Masterson

From: Jane Totis <jrtotis@gmail.com>
Sent: Monday, October 24, 2022 11:50 AM
To: CompPlan2044EIS
Subject: Birds & wildlife

I live just inside Bridle Trail for 23 years and we no longer here at 148 & 40 th have birds, a few black birds & few chippies . Saw 2 squirrels 🐿 recently no more Geese or 🦆 ducks. Either they are being killed off or this intense building is ruining habitats for them. Shame progress can't be compatible with nature. It could be if more thoughtful planning was used, yes we've got black bears here it in due time they to will be sacrificed. I guess I'm hoping we can keep this more compatible for all, not get carried away like downtown has gotten.

From: [Jane Rasmussen](#)
To: [CompPlan2044EIS](#)
Subject: Please include retaining affordable housing in your plans
Date: Monday, October 31, 2022 9:18:56 AM

Hello.

My name is Jane Rasmussen and I live at 205 140th Ave NE in Bellevue.

I am very concerned that for decades existing affordable housing in Bellevue has been torn down for new expensive houses to be built on their lots. Now we have a serious affordable housing problem. I think part of Bellevue's affordable housing plans should include plans to retain affordable single family housing in Bellevue.

Also, I think Bellevue should take steps now to retain single family affordable housing. Perhaps zoning and building laws could be established to cap the value of a new home being built on the lot of a torn-down home to be an affordable percentage of the homes in the neighborhood.

Not long ago houses were torn down to build million dollar homes. Now they are being torn down to build multi-million dollar homes and most recently a new home built on the lot of a torn-down home went up for sale for \$5.3 million! And we haven't received our latest home assessment value from that occurring. The last assessed property value of our home went up \$700,000.00 in one year! (That is almost what we paid for our home twelve years ago.) While it is nice that our home is increasing in value - it is increasing too much in value too fast to be affordable and continue to support Bellevue businesses.

Please do something to reduce the number of existing, affordable homes being torn down and expensive homes being built for the benefit of wealthy developers. Please act now so that young and old average Americans can afford housing in Bellevue.

Sincerely,
Jane Rasmussen

From: [Ian McAllister](#)
To: [CompPlan2044EIS](#)
Subject: Bellevue 2044 EIS Scoping Comments
Date: Monday, October 31, 2022 1:00:38 PM
Attachments: [Bellevue EIS scoping comments Major Comp Plan Update.docx](#)

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

Re: Bellevue 2044 EIS Scoping Comments

Dear Reilly:

KTB Properties is a family-owned company that owns several properties on 108th Avenue SE, just north of downtown Bellevue (the "Property"). We write to provide comments in response to the Scoping Notice for the Bellevue 2044 Comprehensive Plan EIS.

We are excited to participate in this important planning exercise. Currently the Property is zoned R-10, but is directly adjacent to R-30 zoning, and just north of that, the DT-MU zone. Our Property is within walking distance to downtown, and therefore we believe it should be studied for significant additional density in the Major Update. At a minimum, our Property should be studied at an R-30 density.

In addition, while we are not sure whether the City will overlay a transition area on our Property, we do not believe a reduction in density that would be required as part of a transition area in an area so accessible to downtown is appropriate.

We appreciate the opportunity to make comments, and we look forward to working with you through the Comprehensive Plan process. Please contact us at the email below should you have additional questions for us.

Sincerely,

Ian McAllister
ianmcall@gmail.com

The properties are 161-187 108th Avenue NE.

October 31, 2022

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

Re: Bellevue 2044 EIS Scoping Comments

Dear Reilly:

KTB Properties is a family-owned company that owns several properties on 108th Avenue SE, just north of downtown Bellevue (the “Property”).¹ We write to provide comments in response to the Scoping Notice for the Bellevue 2044 Comprehensive Plan EIS.

We are excited to participate in this important planning exercise. Currently the Property is zoned R-10, but is directly adjacent to R-30 zoning, and just north of that, the DT-MU zone. Our Property is within walking distance to downtown, and therefore we believe it should be studied for significant additional density in the Major Update. At a minimum, our Property should be studied at an R-30 density.

In addition, while we are not sure whether the City will overlay a transition area on our Property, we do not believe a reduction in density that would be required as part of a transition area in an area so accessible to downtown is appropriate.

We appreciate the opportunity to make comments, and we look forward to working with you through the Comprehensive Plan process. Please contact us at the email below should you have additional questions for us.

Sincerely,

Ian McAllister
ianmcall@gmail.com

¹ The properties are 161-187 108th Avenue NE.

From: Holly Finkbeiner <hlfinkbeiner@gmail.com>
Sent: Wednesday, October 26, 2022 3:01 PM
To: CompPlan2044EIS
Subject: CompPlan2044EIS@bellevuewa.gov

Hello,

My name is Holly Finkbeiner and I am a property owner in Bellevue. I want to encourage the city to choose Option 3 in the Wilburton EIS scoping exercise and to increase the housing units studied from 12,000 to 15,000.

I also want to specifically encourage you to look at increased densities in the NE corner of Wilburton along 120th towards the Spring District. This area has the infrastructure to support the increased densities that Bellevue will need to meet its housing goals.

Thank you for your consideration.

Holly Finkbeiner

October 31, 2022

City of Bellevue Development Services Department
Attn: Reilly Pittman
450 110th Avenue NE
Bellevue, WA 98004
Email: CompPlan2044EIS@bellevuewa.gov

Re: Comprehensive Plan Periodic Update Environmental Impact Statement Scoping Comment

Dear Mr. Pittman:

On behalf of Eastridge Partners LLC, thank you for the opportunity to comment on the City of Bellevue's (City's) scoping for the Comprehensive Plan Periodic Update Environmental Impact Statement (EIS). Eastridge Partners participated extensively in the CAC Committee for Wilburton between 2017-2020; we are happy to see that planning efforts are expanding upon prior work to address the City's unprecedented growth. We write in support of the vision set out in Wilburton Subarea Alternative 3 which pursues multiple strategies to accommodate the most additional housing and jobs in Bellevue. We believe Wilburton Alternative 3 should study higher density, mixed-use development as this neighborhood is our best opportunity to achieve Bellevue's challenging growth needs.

Eastridge Partners owns Eastridge Corporate Center ("ECC") generally located at 11811 - 11911 NE 1st Street in Bellevue (parcels 3325059015 and 3325059183) between NE 1st Street and Main Street. The properties total 5 acres and approximately 86,500 s.f. of office. Each parcel is developed with a 3-story office building constructed in the 1980's. The ECC property is currently zoned Office ("O") and is within the Wilburton/ NE 8th Street Subarea.

We have reviewed the Wilburton Study Area Alternatives provided in the Notice of Scoping. Alternative 3 which seeks to locate the highest number of housing units and jobs in Wilburton is most appropriate given Bellevue's unprecedented growth. However, the City needs to add 70,000 new dwelling units to address housing affordability. We encourage that Alternative 3 should study adding 15,000 units to the Wilburton area. While the Alternatives appear to divide Wilburton into different use categories, we continue to believe that mixed-use designation with flexibility to develop residential and office will best facilitate development to meet Bellevue's planning goals in the area.

Wilburton's is Bellevue's last and best opportunity to accommodate dense growth over the next 20 years that is adjacent to the CBD.. 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 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 incentives-based regulations that facilitate mixed-use development in Wilburton.

The ECC property is currently not developed to its potential and represents an opportunity for additional housing and jobs development. It is within minutes of Downtown, and near Rapid Ride transportation; it is an ideal location for dense mixed-use development that includes multifamily housing. For all these reasons, we encourage the City to study – and adopt – Alternative 3 as the City's preferred alternative as you advance the major Comprehensive Plan update.

Thank you in advance for your consideration. We look forward to the City's continued work on the Comprehensive Plan Update to support a variety of residential and office growth opportunities throughout the City.

Sincerely,



Panfilo Morelli
Managing Partner
11911 NE 1st Street
Suite 101
Bellevue, WA 98005



Gardner Morelli
Vice President
11911 NE 1st Street
Suite 101
Bellevue, WA 98005

From: fmiller707@gmail.com
Sent: Friday, October 28, 2022 3:34 PM
To: CompPlan2044EIS
Subject: Comp Plan 2044, Overlake Farm 40 Acres

Dear City of Bellevue,

The Overlake Farm property, in Northeast Bellevue, contains a parcel of 40 acres on the west side of 140th Avenue NE and immediately south of the Bellevue-Redmond border. We have reviewed the Alternatives proposed in the Scoping Notice for the Draft EIS that will be prepared for the 2044 Comprehensive Plan update.

Our comments are:

Bellevue has grown to be the commercial/business hub for the greater Eastside. Redmond and Kirkland, have some important business areas, but Downtown Bellevue and the Spring District combine to form one of the most significant employment centers. This necessitates more housing in Bellevue to accommodate demand and maintain and/or create more affordable housing, well beyond the directed additional 35,000 housing units and 70,000 jobs by 2044.

In the Bellevue 2044 EIS Scoping Handout, alternative 3 is most likely to provide a spectrum of affordable housing and a variety of housing types. To create that type of density, the entire City must be considered. While concentrated housing in Downtown and the Spring District will continue to expand, this is expensive due to land values, does not create sufficient affordable housing units, and only apartments/condominiums will be provided. Townhomes and cottages make little economic sense in these areas where the cost of land is so high.

The eastern 40 acres of the Overlake Farm is a prime location for higher density housing, especially the missing middle. It is across the street from the Bellevue Municipal Golf Course with excellent access to jobs in the Overlake neighborhood, the Spring District, and Downtown Bellevue, as well as the nearby Microsoft West campus. There is also excellent access to transit with the Overlake Village and Redmond Technology light rail stations nearby. Additionally, an existing paved pedestrian/bicycle path already connects the property to commercial areas nearby. The property can accommodate multi-story multifamily development as well as townhomes and cottages, which would also be in keeping with the adjacent neighborhoods.

This 40-acre parcel should be designated for multifamily development and a density of 10-15 dwelling units per acre and a height limit of 60 feet in order to optimize the provision of housing and the preservation of open space. Such a designation would reduce carbon footprint and environmental impact of the expected new residents projected for the City of Bellevue.

Sincerely,

Forrest Miller

From: Deborah Mahon <debi33@me.com>
Sent: Monday, October 24, 2022 3:09 PM
To: CompPlan2044EIS
Subject: My comments: Final Week of Scoping for Comp Plan Environmental Review

We cannot handle all this additional growth. Our infrastructure – water, sewer, schools, roads, parks and green spaces, police, fire – cannot support it.

Also, we do NOT believe it is right to cram more welfare housing into our neighborhoods.

When we paid a premium price to buy our home in Bellevue, we would not have been for changing the zoning to allow for more infill in our neighborhoods, and we still are not in favor of it, due to lack of infrastructure and parking.

Deborah Mahon

EGBW38R Owner, LLC

October 27, 2022

City of Bellevue Development Services Department
Attn: Liz Stead, Director and SEPA Responsible Official
Reilly Pittman, Environmental Planning Manger
450 110th Avenue NE
Bellevue, WA 98004

Via email CompPlan2044EIS@bellevuewa.gov

Re: *Bellevue 2044 Comprehensive Plan EIS Scoping Comments*

Dear Liz and Reilly,

Thank you for this opportunity to comment on the scope of the City of Bellevue's Environmental Impact Statement for its 2044 Comprehensive Plan update. You are engaged in important work for the City that will shape its trajectory for many years to come.

As you know, EGBW38R Owner, LLC acquired the former Boeing Computer Office Campus in Eastgate last summer. Since then, we have been hard at work repositioning 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. Aside from this, however, we have not solidified our long-term plans for the Campus.

The site presents an incredible opportunity for growth, but it is near its development capacity limit under current zoning. The current "Future Land Use Map" designation for the site is OLB, which can support both OLB and OLB2 zoning. The site is currently zoned OLB, which is the less dense zoning designation. In order to provide future flexibility for redevelopment, we request the City consider a rezone of the site to OLB2 or another higher-density, mixed-use zoning designation in its draft EIS Action Alternatives. We believe additional density on this site is particularly appropriate because it is currently buffered from nearby residential areas by a significant landscape buffer that is protected by covenants and will not be removed, access and circulation is provided to the south through office developments and higher-density zones, and because the site includes significant underutilized land area.

The City's Action Alternatives call for at least 25,000 additional jobs and up to 40,000 additional housing units. We believe our site can be a part of accommodating this growth with the requested zoning changes.

Thank you again for this opportunity to comment. We look forward to continuing to engage with you in the next steps of the City's planning process.

Sincerely,



Diego Rico
Vice President of EGBW38R Owner LLC

From: Plummer David F. <pdf3@comcast.net>
Sent: Monday, October 31, 2022 8:58 AM
To: CompPlan2044EIS
Cc: onebellevue@googlegroups.com; Arredondo, Charmaine; Lee, Conrad
Subject: Comments on Bellevue Comprehensive Plan Periodic Update and Wilburton Growth Alternatives

Hello!

I submit the following comments on the Bellevue Comprehensive Plan Periodic Update, and the Wilburton Growth Alternatives; please include these comments in the comment record for both proposals:

1. Bellevue Comprehensive Plan Periodic Update

- 1.1. Revise Alternatives 1, 2, and 3 to ensure that each alternative will be developed to meet the 35,000 housing unit growth objective in accordance with 2021 King County Countywide Planning Policies. The current descriptions of these alternatives shows that each of them would provide excessive amounts of housing growth.
- 1.2. Revise Alternatives 1, 2, and 3 to ensure that each alternative will be developed to meet the 70,000 job growth objective in accordance with 2021 King County Countywide Planning Policies. The current descriptions of these alternatives shows that each of them would provide excessive amounts of job growth.
- 1.3. Revise Alternatives 1, 2, and 3 to include only those changes needed to bring Alternative 0 into compliance with the housing unit growth target specified in 2021 King County Countywide Planning Policies.

2. Wilburton Vision Implementation

- 2.1. Revise Alternatives 1, 2, and 3 to reduce the maximum building heights in all areas to the dimensional equivalent of 3 stories.
- 2.2. Revise Alternatives 1, 2, and 3 to eliminate the NE 6th street extension.
- 2.3. Revise Alternatives 1, 2, and 3 to eliminate any provision for residential towers in any areas of the Wilburton subarea.

Please acknowledge receipt of my comments.

Sincerely yours,

David F. Plummer

David F. Plummer
14414 NE 14th Place
Bellevue, WA. 9700y

To: City of Bellevue, Development Services Department

RE: City of Bellevue CPA and EIS 2044

From: Davis Investors and Management, LLC, on behalf of Overlake Farm BLK III, LLC

Date: 10/26/2022:

The Overlake Farm property, in Northeast Bellevue, contains a parcel of 40 acres on the west side of 140th Avenue NE and immediately south of the Bellevue-Redmond border. We have reviewed the Alternatives proposed in the Scoping Notice for the Draft EIS that will be prepared for the 2044 Comprehensive Plan update.

Our comments are as follows:

Bellevue has grown to be the commercial/business hub for the greater Eastside. Redmond and Kirkland, have some important business areas, but Downtown Bellevue and the Spring District combine to form one of the most significant employment centers. This creates the need for more housing in Bellevue to accommodate demand and maintain and/or create more affordable housing, well beyond the directed additional 35,000 housing units and 70,000 jobs by 2044.

In the Bellevue 2044 EIS Scoping Handout, Alternatives 2 and 3 are the only ones that make sense, and Alternative 3 is really the only one that will have a chance of providing a spectrum of affordable housing and a variety of housing types. In order to create that type of density, the entire City must be considered. While concentrated housing in Downtown and the Spring District will occur this is expensive housing to build due to land values, primarily; does not create sufficient affordable housing units, and only apartments/condominiums will be provided. Townhomes and cottages make little economic sense in these areas where the cost of land is so high.

The eastern 40 acres of the Overlake Farm is a prime location for higher density housing, especially the missing middle. It is across the street from the Bellevue Municipal Golf Course with excellent access to jobs in the Overlake neighborhood, the Spring District, and Downtown Bellevue, as well as less than a block from Microsoft West campus. There is also excellent access to transit with the Overlake Village and Redmond Technology light rail stations nearby. The property can accommodate multi-story multifamily development as well as townhomes and cottages.

This 40-acre parcel should be designated for multifamily development and a density of 10-15 dwelling units per acre and a height limit of 60 feet in order to optimize the provision of housing and the preservation of open space.

Sincerely,

Cristina Dugoni

October 31, 2022

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

Re: Bellevue 2044 EIS Scoping Comments

Dear Reilly:

Henbart and Gorlick own several properties across the street from the 132nd Light Rail Station, near the intersection of 132nd and Spring Boulevard (the “Property”). Together, the Property totals 202,952 square feet. We write to provide comments in response to the Scoping Notice for the Bellevue 2044 Comprehensive Plan EIS. Please see the attachment for a depiction of the referenced properties (“Property”).

It is important that the scope of the EIS include major land use changes and upzones around Bellevue’s light rail network. The current Bel-Red zoning that exists on the Property does not result in the type of urban density that should, as a policy matter, be permitted across the street from a regional transportation station. We have provided an analysis that depicts the impacts of the current zoning on the Property, as well as an analysis that depicts what might be done with additional density added in this location. We suggest that, at a minimum, the EIS scope include the density we have included in this analysis. We support Alternative 3 described in the EIS scoping notice, with the following additions to the assumption studied within Alternative 3, as well as the issues stated in the attachment:

General Comments

- **Critical Areas**
 - Exempt Bel-Red, and all Growth Centers, from the Critical Areas Ordinance, similar to Downtown;
 - Where the Critical Area Ordinance applies in Growth 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 development. Critical areas can be well-protected without meaningless 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.
 - The attachment depicts the impact to the Property that currently occurs due to the steep slope on the Property, as well as the “critical area reducer” that would apply. The current Land Use Code does not provide the City with the ability to differentiate between a man-made and a naturally-occurring critical area, resulting in an inappropriate reduction of density across the street from a light rail station.
- Height & Density/Zoning Constraints
 - Maximize heights and densities within ½ mile of light rail stations; allow for a 6 FAR within ½ mile of light rail stations;
 - The depiction attached shows development at a 4 FAR with many of the zoning restrictions currently in Bel-Red lifted. We believe additional FAR could easily be utilized on this site and encourage the City to “go big” on FAR within close range of light rail.
 - Exempt residential uses from FAR. We understand the City is already studying this as part of the Next Right Work. This is the single best way to incentivize the much-needed residential development needed to provide housing in Bellevue. The depiction attached on page 4 shows an FAR of 4 with exempt residential. It results in the provision of 1,935 residential units
 - Revise floor plate restrictions to 28,000 below 85’, and 13,500 above 85’. As you can see, this results 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 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. 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.
- Bel-Red should be exempted from tree regulations, as in downtown. Requiring a reasonable tree replacement ratio may lead to an expansion of the urban tree canopy rather than pitting trees against urban development across from light rail.

- Uses

- 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.

- Parking
 - Eliminate 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.
 - 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.
- Affordable Housing
 - Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options
 - Avoid mandatory inclusionary requirements
- Transportation Grid System
 - Flexibility should be allowed for the grid system. Across the street from light rail, are full roads necessary? Or instead, should the City prioritize the moving of people (bikes and peds) through a site rather than cars? Create code flexibility and an expectation that reviewers and planners ensure pedestrian connectivity, rather than only car connectivity.

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

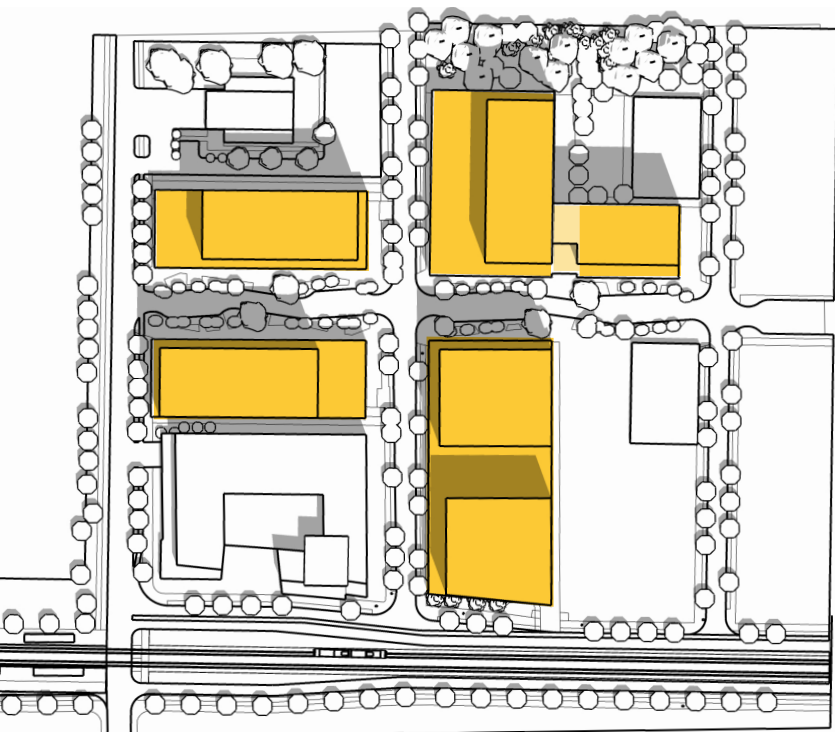
Increase development density throughout the Bel-Red sub area, further progressing toward Bellevue’s Growth Targets.

2. Leverage Proximity of 132nd Link Station

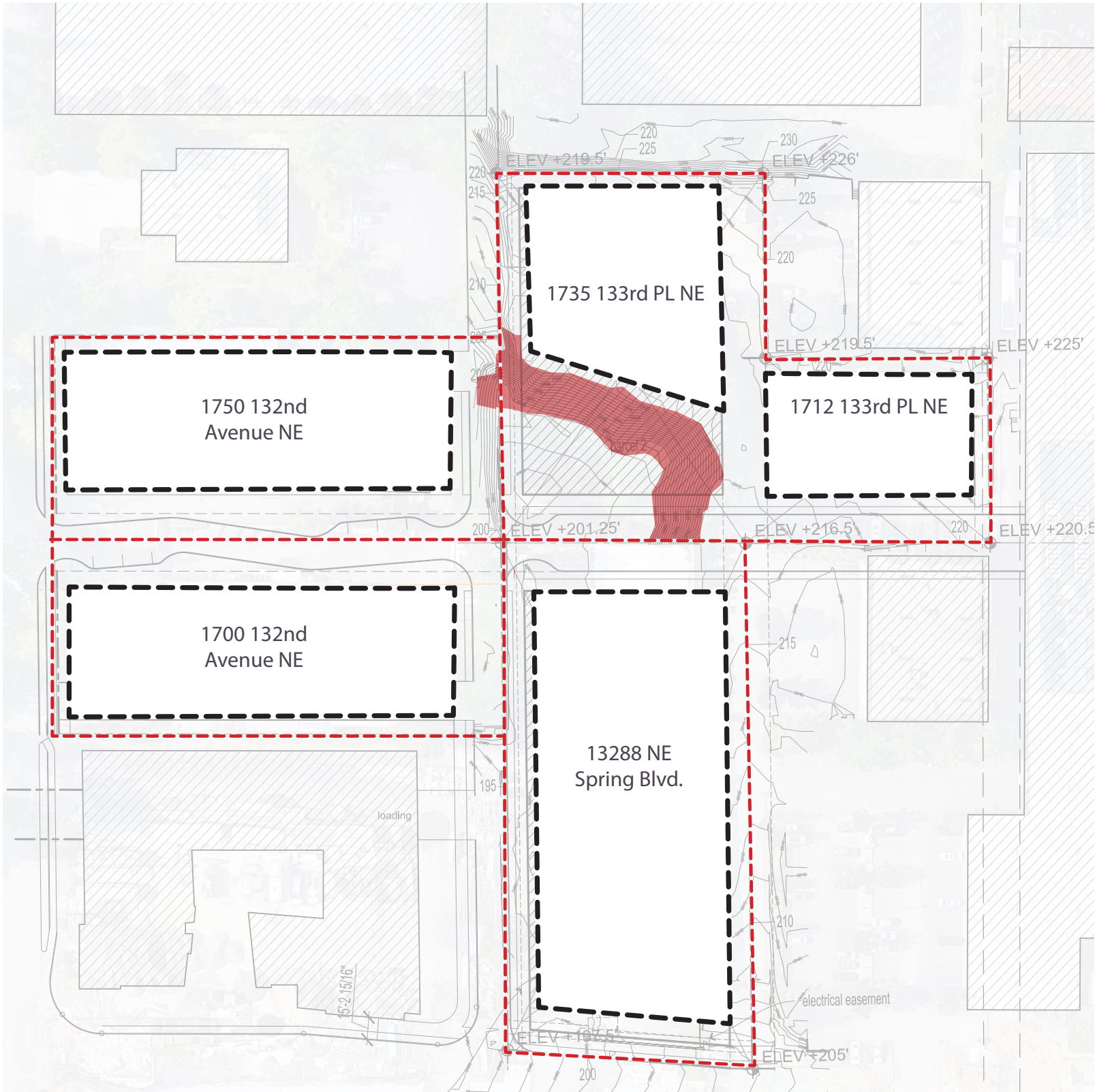
Increase development adjacent to Link Stations, promoting mass transit use and reducing single occupant vehicles.

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)

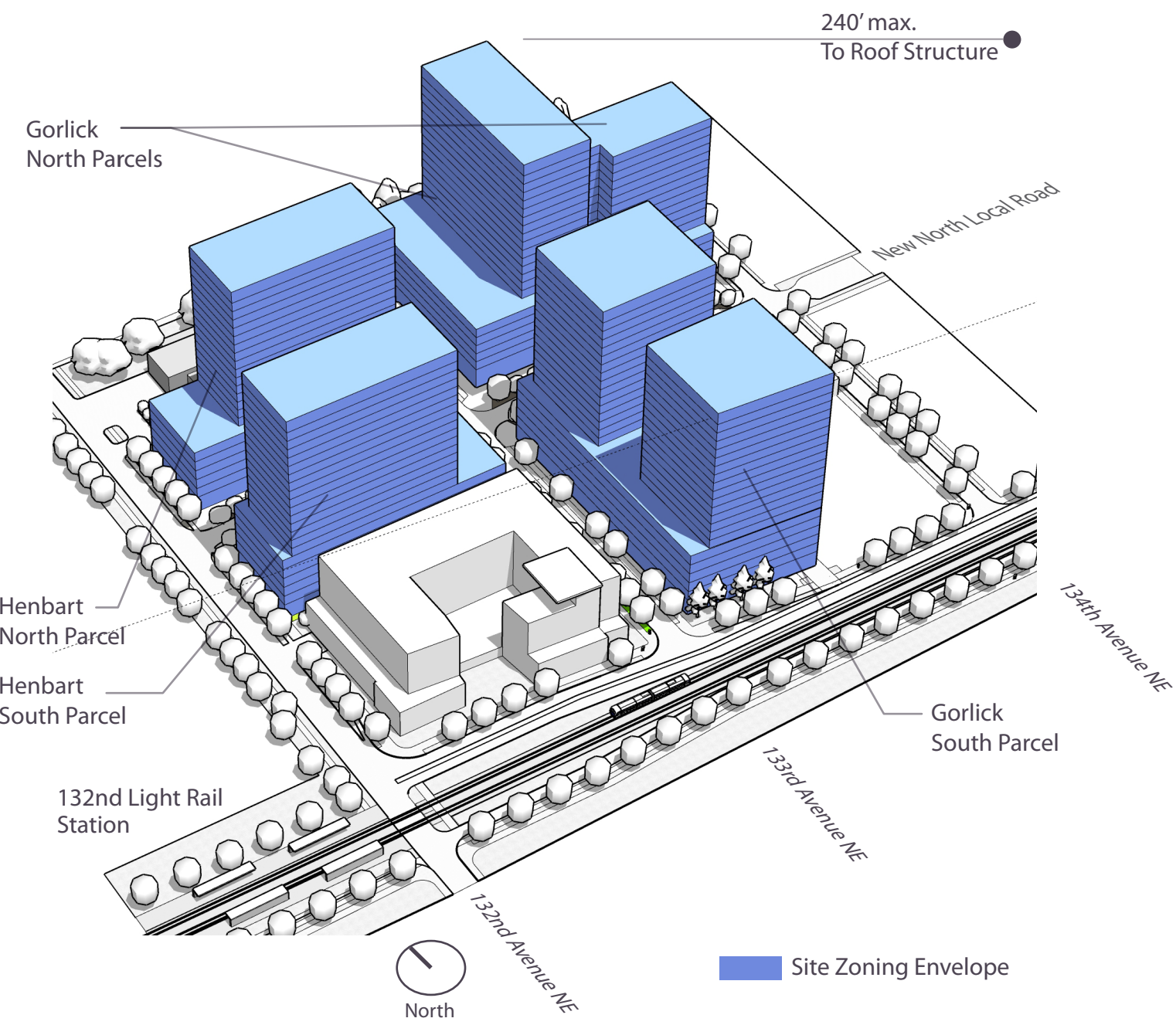
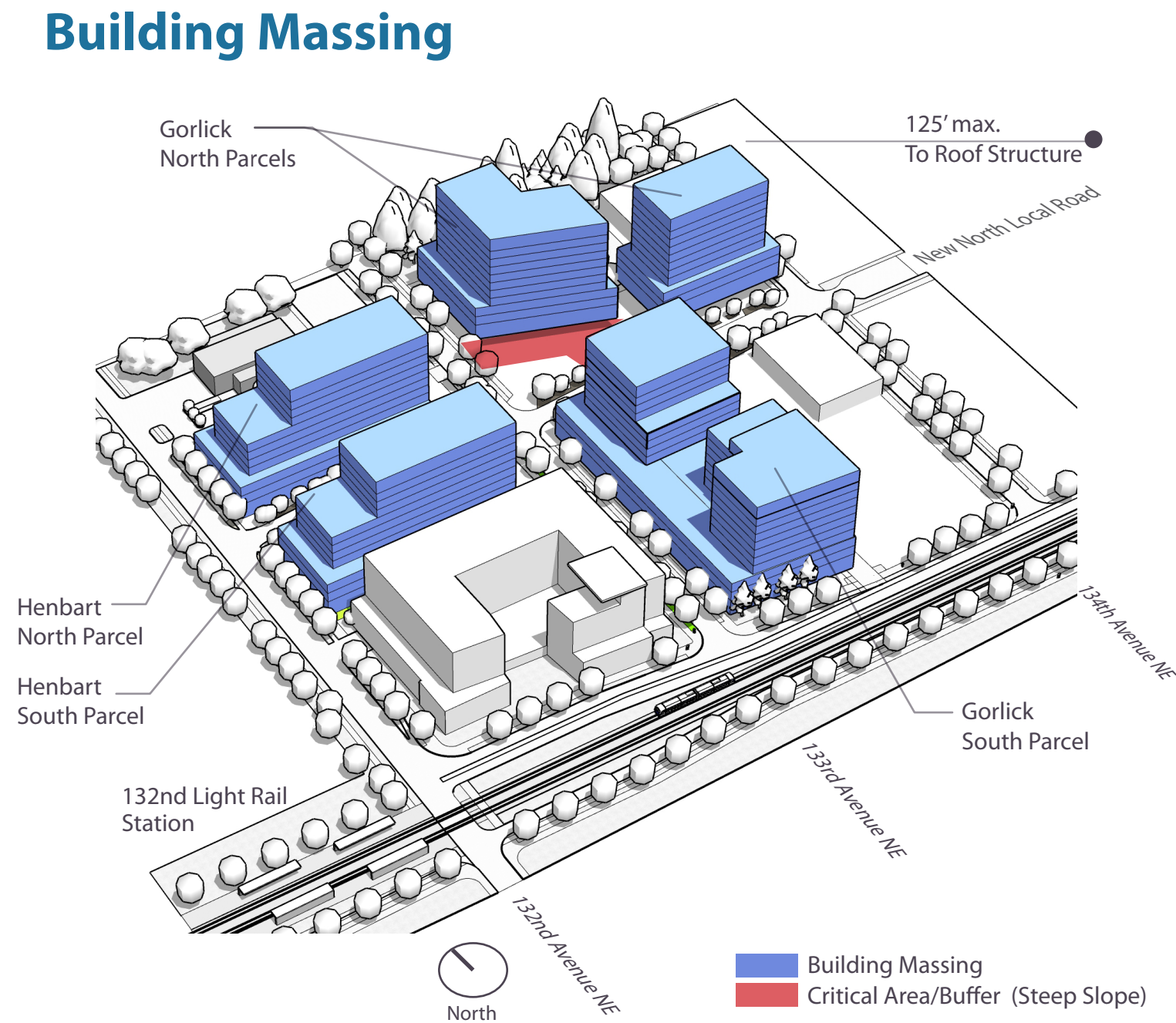
Buildable Area

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:	629,070 GSF
Approx. Total Residential Units:	744 units
(@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:	1,572,320 GSF
Approx. Total Residential Units:	1,935 units
(@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”.



ATTN: Thara Johnson
City of Bellevue
Development Services Department
450 110th Ave. NE
Bellevue, WA 98004

To Whom It May Concern,

My name is Cliff Cawthon and I am the Advocacy and Policy Manager for Habitat for Humanity Seattle-King & Kittitas Counties. I am writing today to provide feedback on the Environmental Impact Statement (EIS) Scope. As you likely know, we at Habitat for Humanity have been providing homeownership and home repair services to low-income people across the City of Seattle for over 36 years. We have had the privilege to work with the Planning commission, A Regional Coalition for Housing (ARCH), Eastside Affordable Housing Coalition (EAHC), and faith institutions; such as Holy Cross Lutheran Church which is hosting our new 25-unit multifamily development. Our work has been made possible by these relationships that are based on a common goal to provide affordable housing and homeownership opportunities for Bellevue and other communities in East King County. While we believe that this is a good start, from our experience and what we've heard from the community, we would like to suggest that the city of Bellevue consider going farther in the action alternatives under consideration.

Summary

The reality is that the current action alternatives are not ambitious enough to fully accommodate Bellevue's need for affordable housing and achieve the goals that the city of Bellevue has in terms of sustainability and equity. The current comprehensive plan is aiming for a growth target of 35,000 additional housing units and 70,000 jobs by the year 2044 and the goal is to meet hit those targets in an equitable, sustainable, and affordable way. We understand and appreciate that the city of Bellevue recognizes equity in terms of disrupting historical patterns of housing segregation, reversing disparities between groups based on race, ethnicity, class and national origin, and providing all residents with ample social and economic opportunities. We also recognize that sustainability in the context means protecting Bellevue trees, ecosystems and local fauna and incentivizing the use of public transit in order to reduce carbon emissions and environmentally friendly development practices. In order to achieve equitable and sustainable outcomes based on the city's growth targets, we propose an action alternative that builds on commonalities to all action alternatives, allows for all housing typologies throughout the city of Bellevue and includes a mandatory inclusionary zoning program throughout the city to ensure that there's both a mandate and incentives for the creation of affordable housing and homeownership opportunities.

Response to Existing Alternatives

We encourage the Planning Department to lean towards creating as much housing capacity as possible, with at least one alternative analyzing capacity for 80,000 or more homes, and we recognize that not all of the potential housing capacity will be developed within the relevant time period. The EIS should not conflate housing capacity with projected housing growth. Parcel-by-parcel redevelopment decisions are

up to the decision of individual land-owners, not all potential redevelopment sites will be and not all redevelopments will fully maximize capacity.

Alternative Two mostly confines additional residential capacity only in Mixed-use centers. Leveraging areas with existing capacity and infrastructure, such as, Factoria, Eastgate, Crossroads, Wilburton Bel-Red, Main and Downtown centers is important in order to ensure access to transit and good jobs but even with strong mandatory affordable housing policies it will produce a smaller number of affordable units to address Bellevue's affordability needs. More importantly, it does not utilize affordability tools throughout Bellevue's residential neighborhoods. In our experience, disrupting patterns of income segregation in housing enables increased social mobility among low-to-moderate income families. In the interest of increasing affordability and equity, we would encourage you to add mandatory inclusionary zoning as well as increased low-density zoning such as ADUs/DADUs/Duplexes/Triplexes/Quadplexes/Townhomes/Rowhouses/Cottage housing and more into this alternative.

Alternative Three adds more density in Neighborhood Centers and transit rich areas yet, it still segregates middle-scale housing options along frequent transit corridors and commercial areas within surrounding residential areas. As mentioned with the alternative above, concentrating affordable housing in mixed-use and commercial areas within residential neighborhoods will also reinforce economic and social segregation. Transit rich areas should be strongly considered as a site for increased density, however, concentrating housing exclusively in those areas may pose risks to residents in terms of air quality and reinforcing income segregation.

Alternative Three's proposal to study how low-density housing options in existing denser single-family areas can add capacity is also welcome. Using other housing typologies including, [Detached] Accessory Dwelling Units (DADU/ ADU's), six-plexes and mid-rise buildings should also be considered in single-family areas as well given that the majority of Bellevue's residential neighborhoods are single-family neighborhoods which, historically have not had many affordable housing options. We would encourage you to include a study of voluntary inclusionary affordability tools in mixed-use centers, neighborhood centers and around the city within this alternative. To ensure that the City of Bellevue achieves the "deeper affordability" it is looking for we urge the city to consider mandatory inclusionary affordability requirements. Mandatory inclusionary requirements among voluntary incentive tools would ensure that affordable units for both rental and homeownership uses are created across the city.

Alternative Four is the most ambitious, sustainable and equitable and while it combines many of the tools that we want to see, the biggest piece that the proposal lacks are a mandatory housing affordability program (MHA) and incentive zoning throughout the city. As I previously stated, a Mandatory affordability program, in addition to an and incentive zoning program will produce the deeper affordability the city is aiming to produce among other market-rate units. The production of an abundant quantity of market-rate and sufficient affordable units in mixed-use and neighborhood centers, both new and old, will alleviate pressure off of the market and gradually see prices decrease. While it isn't spelled out in the alternative, we are making the assumption that "low density" housing as stated in the alternative includes everything from ADUs and DADUs to cottage homes and everything in between. If that assumption is incorrect, I would encourage you to add that to this alternative for study.



New Alternative Five

Our proposed new alternative for Bellevue's SEPA-EIS study combines the most effective tools and approaches from Alternatives Two and Three. We propose that a fifth alternative closely analyzes how the city can build upon the capacity in mixed-use centers, residential areas with access to good transit and jobs and expand housing capacity in neighborhood centers. The middle housing range that Bellevue should study needs to allow a broad range of middle housing options, from ADUs and DADU's to fourplexes, townhouses, and cottage clusters, as well as everything in between, throughout the entirety of Bellevue.

In general, the alternative would see middle-scale housing types spread throughout the city equally in order to facilitate economic growth and equitable and sustainable development. This alternative would also include considerations for implementing mandatory inclusionary zoning in all of the growth alternatives. All of the alternatives should analyze transitioning existing multifamily zones from a density-based code to a Floor Area Ratio (FAR)-based code, to maximize development capacity in existing multifamily zones outside Downtown and BelRed.

In addition to middle-housing, Alternative Five would permit mid-rise, mixed-use apartments within a 15-minute walk of frequent transit service and neighborhood centers, given that mid-rise development is generally the lowest cost housing typology. In order to facilitate low-cost housing typologies, the alternative would study the development of a multimodal transportation network concurrently with the land use strategy, to expand the area of Bellevue covered by frequent transit service and facilitate the development of denser neighborhoods.

Because of your efforts the City of Bellevue will be able to grow in an equitable, sustainable and affordable way. Thank you for all of your time and effort on this project. The current economic growth has grown parallel to an increasing need for affordable housing and how we respond to this rising demand for affordable housing will define our region for generations to come. I am confident that we can work together to find solutions for all Bellevue residents, and I am eager to engage further with the City of Bellevue's staff to find those solutions to the housing crisis.

Thank you for your time and consideration.

Cliff Cawthon

Advocacy and Policy Manager, Habitat for Humanity of Seattle-King & Kittitas Counties.



ALEXANDRIA.

10/31/2022

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

Re: *Scoping Comments for Bellevue 2044 Comprehensive Plan EIS*

Dear Liz and Reilly,

Thank you for this opportunity to comment on the scope of the City of Bellevue's Environmental Impact Statement ("EIS") for the 2044 Comprehensive Plan update.

Alexandria Real Estate Equities is the leading owner, operator, and developer of collaborative campuses for life science, agtech, and technology companies in the nation's top innovation clusters with a portfolio representing nearly 74.5 million SF of operating assets, projects under construction, and in the development pipeline across the US. As a long-term life-science owner who has been active in Puget Sound for more than 25 years, we have approximately 5 million SF of operating assets, projects under construction and future development pipeline in clusters in South Lake Union, Eastlake, Bothell and now Bellevue, we are the first real estate company uniquely focused on the life science industry and the specific built environment to support this mission-critical work. The City has experienced significant growth over the past few years, but we continue to see an opportunity for Bellevue to diversify its economic base with the addition of life sciences uses that are currently concentrated in specific clusters elsewhere in this region like South Lake Union, Eastlake, and Bothell.

As you know, Alexandria acquired the majority of the Pine Forest Business Park site late last year. We plan to develop the site for life sciences use as a catalyst for a transformative life sciences innovation cluster in the Bel-Red Subarea. We believe this cluster will complement the City's healthcare industry concentrated in Wilburton and its innovation and technology companies throughout the City. The site presents a great opportunity for redevelopment positioned in the heart of Bel-Red just steps from The Spring District and a light rail stop. However, the site is not without its challenges, including grade changes, unique soil conditions and a high water table that trigger substantial engineering requirements and added cost to meet City parking ratios.

We have spent the last year studying the best approach to updating the existing Master Development Plan to support this vision, and through that work, we have also identified key zoning constraints that should be changed to ensure the ultimate site development reaches its full potential for the City and Alexandria. Development of the site will involve multiple new non-residential and residential buildings and will represent a hundred-year investment, so we want to get it right, given the size of Alexandria's investment. Although we plan to proceed with MDP updates in the near term ahead of the 2044 Comprehensive Plan adoption and associated zoning changes, because development of the scale and complexity we are considering takes time, there may be opportunities to incorporate the City's updated vision into the project if it makes sense, given what could very well be a phased approach to the commercial component and pioneering introduction of a new life science Bellevue cluster, which may take time to incubate.

In this vein, we offer the following comments on the City's Scoping Handout:

- **The Action Alternatives should clarify the anticipated zoning changes in Bel-Red and alternatives for growth based on such changes.** The Scoping Handout notes specific alternatives for growth in the Wilburton Subarea, but it does not do the same for Bel-Red aside from noting that growth would generally occur to varying degrees in "mixed-use centers" like Bel-Red. While we strongly support growth in the City's mixed-use centers compared to spreading growth into single-family and low-density zones, the City should be much more specific about the Bel-Red changes anticipated in each Action Alternative in the draft EIS so that the public can assess the feasibility of the City's growth assumptions and plan accordingly given the extended time it takes to bring new development to market.
- **All of the Action Alternatives should study additional height in Bel-Red zones to ensure development can maximize FAR and utilize new, innovative, and sustainable construction techniques.** The Action Alternatives propose accommodating 25,000 new jobs in Bellevue to meet growth targets. However, on larger sites like ours, it is not possible to achieve the existing FAR maximum and reach the City's existing zoned capacity for job growth because height limits are too low and site development limits like floorplate sizes, impervious surface and lot coverage standards, and transportation improvements reduce buildable area. As part of the Action Alternatives, the City should study increasing non-residential height limits on sites within nodes and less than 1/4 mile from light rail.

Additional height up to 220' or more would allow this site to get closer to maximizing FAR. It would also allow use of more innovative and sustainable construction techniques to reduce embedded carbon such as mass timber. A Type IV-B mass timber building may be constructed 180' above a Type I podium. The zoning code heights should be calibrated to maximize this sustainable development opportunity and account for the added floor to floor height required to successfully introduce life science lab space into this structural system given mechanical space constraints. Further, any new amenity incentives to achieve additional height for non-residential development should be focused on

sustainability measures. For our site in particular, we would support sustainable development practices as a trade-off for height. Interesting amenities options could include garage and sewer heat recovery systems or other renewable sources, energy efficiency measures, natural ventilation, embodied carbon analysis, electrification, high performance building sustainable operations, and water reduction and reuse, among others.

- **All of the Action Alternatives should study reduced or eliminated minimum parking ratios within 1/2 mile of light rail stations.** Light rail will imminently be open in Bellevue. The City should therefore be considering how it can continue to encourage transit-oriented development that maximizes this regional investment. The Action Alternatives should consider reducing or eliminating minimum parking ratios to support transit use.

Reduced or eliminated minimum parking ratios are also important on sites like ours with high water tables and inferior soil conditions, where below-grade parking is disproportionately expensive because of robust shoring systems and extensive dewatering necessary for construction. Although there are existing code mechanisms to reduce parking requirements, these are cumbersome and add additional development risk. Allowing projects to calibrate parking to meet the anticipated market-based demand, given proximity to transit, is the better approach and will ensure future projects are not over-parked.

Thank you again for this opportunity to comment. We look forward to continuing to partner with the City through the MDP and ADR processes for our site and in the next steps of this long-term planning effort. Please do not hesitate to contact me if you have any questions about these comments.

All the best,



Christian Gunter for Alexandria Real Estate Equities

cc: Thara Johnson, Comprehensive Planning Manager, tmjohnson@bellevuewa.gov
Emil King, Planning Director, eaking@bellevuewa.gov
Abigail DeWeese and Holly Golden, HCMP, abigail.deweese@hcmp.com / holly.golden@hcmp.com

From: Chris Reid <creid@lee-associates.com>
Sent: Monday, October 31, 2022 12:25 PM
To: CompPlan2044EIS
Subject: UPCOMING PROPOSED ZONNING FOR WILBURTON NEIGHBORHOOD

Hello Committee

My name is Chris Reid and I grew up in Bellevue and work in the Wilburton neighborhood. I want to encourage the city to choose Option 3 in the Wilburton EIS scoping exercise and to increase the housing units studied from 12,000 to 15,000. Wilburton's mix of transportation infrastructure is second to none in the region and increasing the housing density to 15,000 units would make a neighborhood that would be a great compliment to downtown and a draw to the rest of the region.

I also want to specifically encourage you to look at increased densities in the NE corner of Wilburton along 120th towards the Spring District. This area has the infrastructure to support the increased densities that Bellevue will need to meet its housing goals.

Sincerely,

Chris Reid
Senior Vice President
Lee & Associates | Pacific Northwest

D 425.818.2650
C 425.985.6593
O 425.454.4242
creid@lee-associates.com



170 120th Avenue NE | Suite 203
Bellevue, WA 98005



Confidentiality Notice: The information contained in this electronic e-mail and any accompanying attachment(s) is intended only for the use of the intended recipient and may be confidential. If any reader of this communication is not the intended recipient, unauthorized use, disclosure or copying is strictly prohibited, and may be unlawful. If you have received this communication in error, please immediately notify the sender by return e-mail, and delete the original message and all copies from your system.

From: Kevin Wallace <kwallace@wallaceproperties.com>
Sent: Monday, October 31, 2022 9:42 AM
To: CompPlan2044EIS
Cc: Miyake, Brad; Carlson, Diane; Michael D. Kattermann (mkattermann@bellevuewa.gov); King, Emil A.; Johnson, Thara; Jessica Clawson; Leshya Wig
Subject: Comp Plan Comments - Expansion of BR-MO-1 Zoning Area (1 of 2)
Attachments: 116th Ave Coalition Letter to Bellevue Regarding Comp Plan Change to BR-MO-1 103122 Executed (wout Exhibits).pdf; Exhibit A to 116th Ave Coalition Letter to Bellevue Regarding Comp Plan Change to BR-MO-1 103122.pdf

Email 1 of 2 – Exhibit B to follow.

Please find attached the comment letter from Blu Compass, Wallace Properties and Wig Properties, requesting:

- expansion of the BR-MO-1 zoning designation to include our parcels at the intersection of 116th Ave. NE and NE 12th Street;
- including this area in the analysis of the BR-MO-1 zone in the Wilburton Vision/Wilburton Subarea Plan update; and
- improving the zoning code for BR-MO-1 to incentivize the development of a medical and life sciences corridor in the area.

We hope you agree with our thorough analysis and will work with us to bring more medical and life sciences jobs in the city.

Kevin R. Wallace

Wallace Properties, Inc.
330 112th Ave. NE, #200
Bellevue, WA 98004
425-278-6363 (Direct Dial)
425-802-5701 (Mobile)

From: Kevin Wallace <kwallace@wallaceproperties.com>
Sent: Monday, October 31, 2022 9:43 AM
To: CompPlan2044EIS
Cc: Miyake, Brad; Carlson, Diane; Michael D. Kattermann (mkattermann@bellevuewa.gov); King, Emil A.; Johnson, Thara; Jessica Clawson; Leshya Wig
Subject: Comp Plan Comments - Expansion of BR-MO-1 Zoning Area (2 of 2)
Attachments: Exhibit B to 116th Ave Coalition Letter to Bellevue Regarding Comp Plan Change to BR-MO-1 103122.pdf

Email 2 of 2 – Attaching Exhibit B.

Please find attached the comment letter from Blu Compass, Wallace Properties and Wig Properties, requesting:

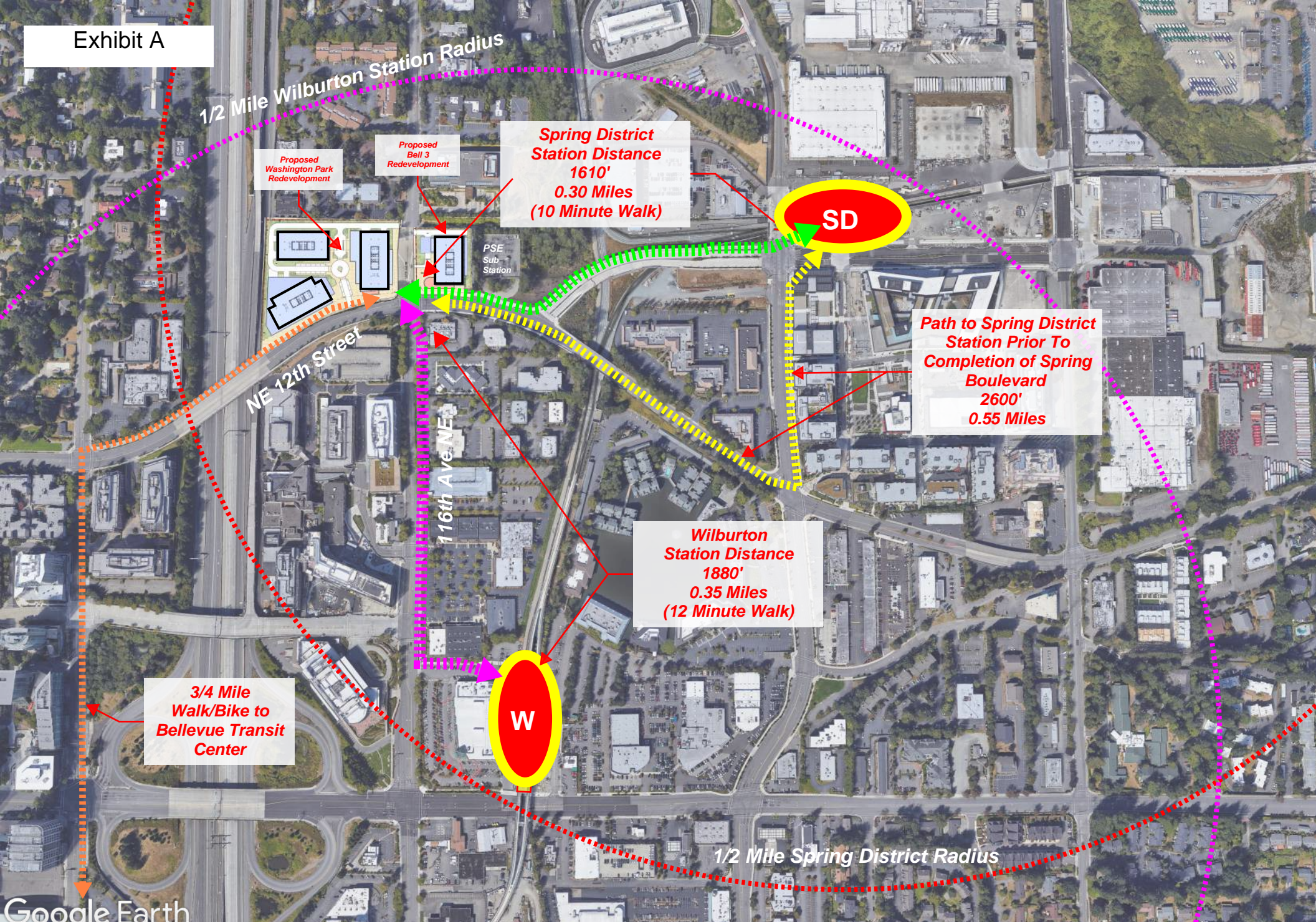
- expansion of the BR-MO-1 zoning designation to include our parcels at the intersection of 116th Ave. NE and NE 12th Street;
- including this area in the analysis of the BR-MO-1 zone in the Wilburton Vision/Wilburton Subarea Plan update; and
- improving the zoning code for BR-MO-1 to incentivize the development of a medical and life sciences corridor in the area.

We hope you agree with our thorough analysis and will work with us to bring more medical and life sciences jobs in the city.

Kevin R. Wallace

Wallace Properties, Inc.
330 112th Ave. NE, #200
Bellevue, WA 98004
425-278-6363 (Direct Dial)
425-802-5701 (Mobile)

Exhibit A



Light Rail Station Proximity

Exhibit A

**Metro #250 Frequent
Bus & Proposed
Rapid Ride K-Line**

Bike Path

**Eastrail & New
Ped-Bike Ramp
Connection To NE
12th Street**

**Proposed
Bell 3
Redevelopment**

**Proposed
Washington Park
Redevelopment**

**PSE
Sub-
Station**

**Off Street
Bike Path**

**Proposed
K-Line Rapid
Ride Bus Stops
(Existing #250 Bus
Stops)**

**3/4 Mile
Walk/Bike to
Bellevue Transit
Center**

SD

**East Link
Extension LRT Line**

**Spring
District LRT
Station**

**Metro #226
All Day Bus
Line**

W

**Wilburton
LRT
Station**

**Metro B-Line Rapid
Ride Bus**

Eastrail

Google Earth

Mobility Map

Exhibit A



Growth Areas, Employers & New Projects

Exhibit A

**Subject Properties
Within 10 a Minute
Walkshed From Spring
District Station
(Magenta Tone)**



Walkshed

10 Minutes From Spring District Station

Source: App.TravelTime.com

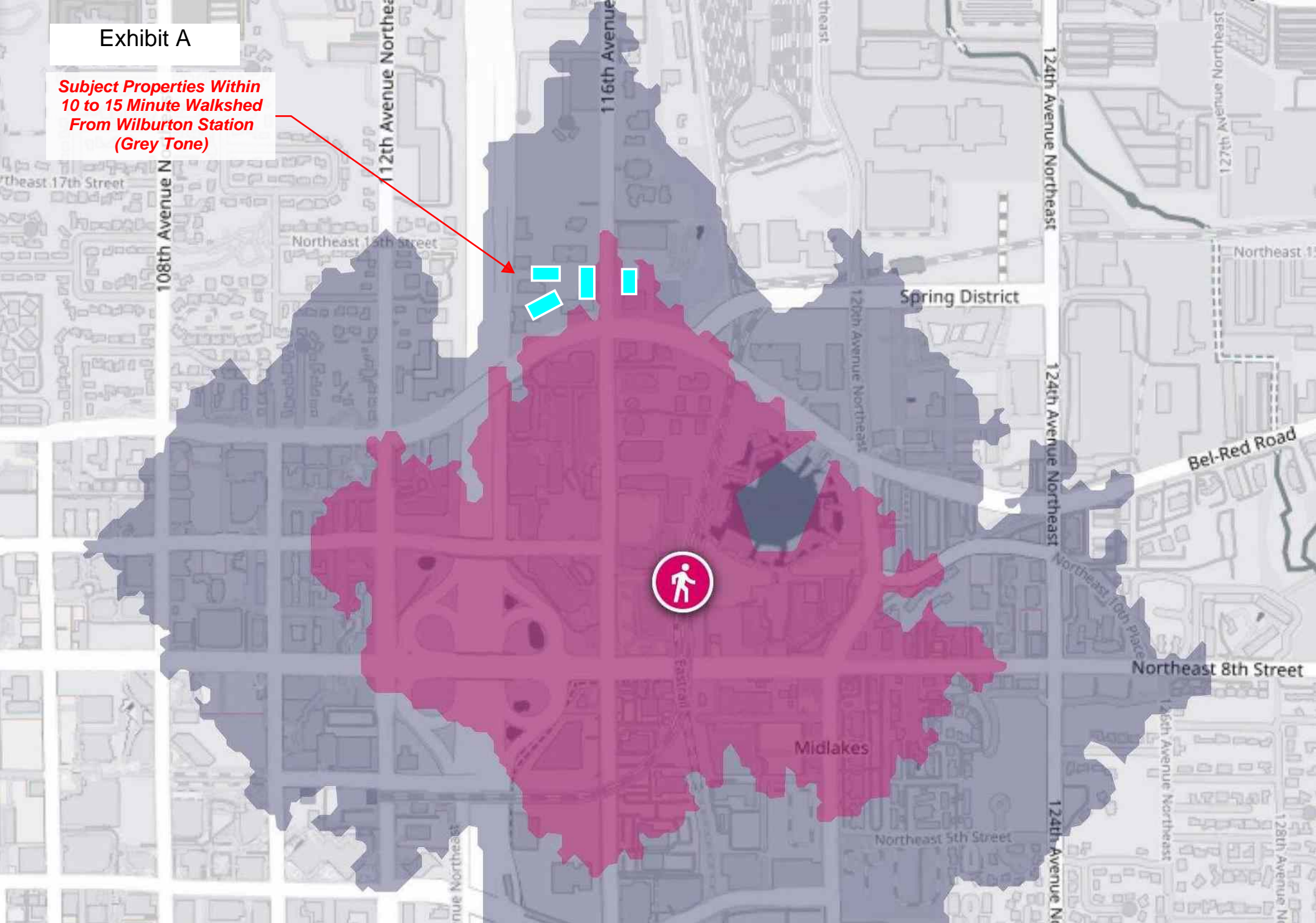
BelRed Rezone Study
116th Ave NE & NE 12th ST



Oct. 24, 2022

Exhibit A

**Subject Properties Within
10 to 15 Minute Walkshed
From Wilburton Station
(Grey Tone)**



Walkshed

15 Minutes From Wilburton Station

Source: App.TravelTime.com

BelRed Rezone Study
116th Ave NE & NE 12th ST

VIA
OCT. 24, 2022

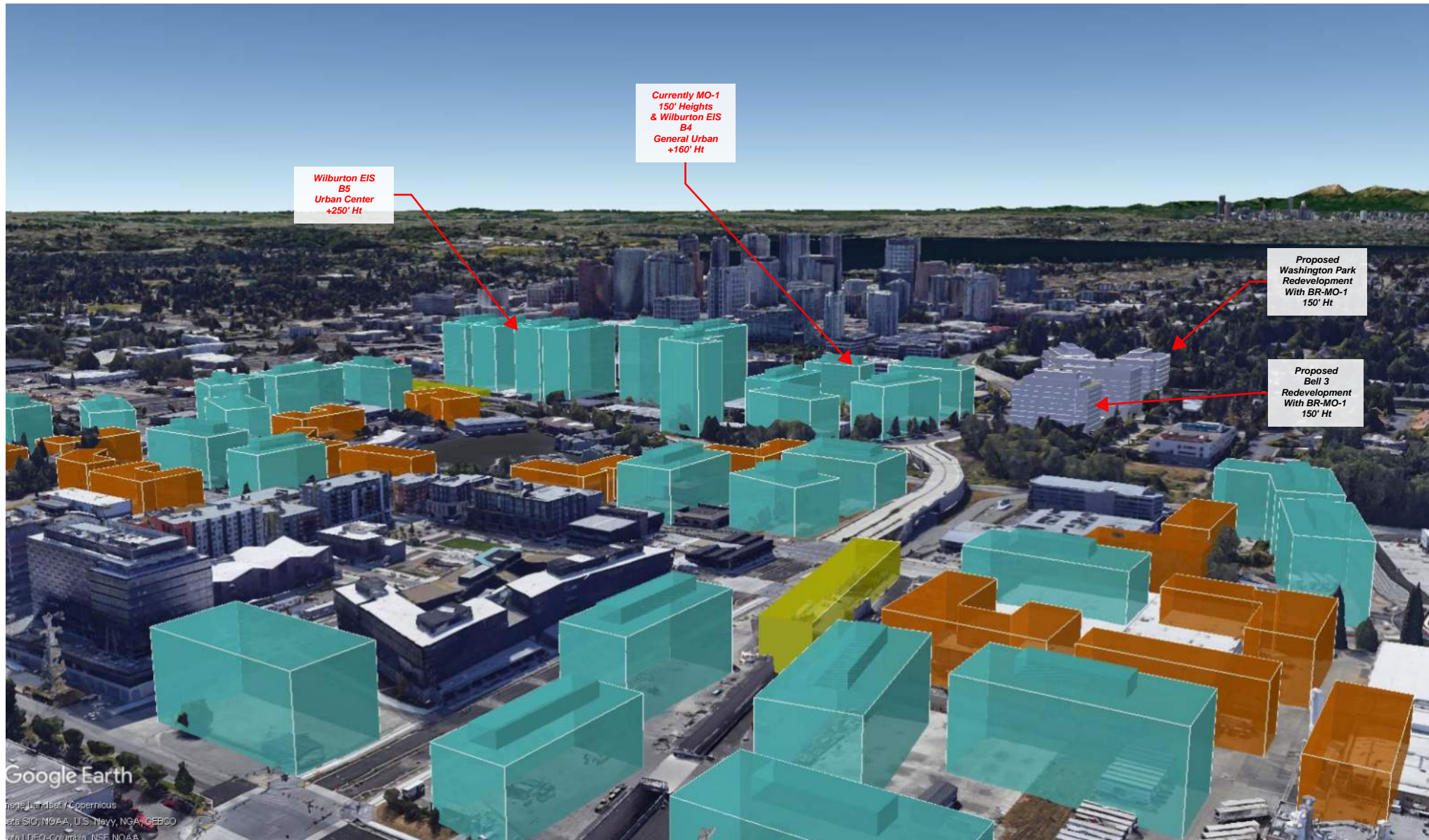


Future Development Propensity Views

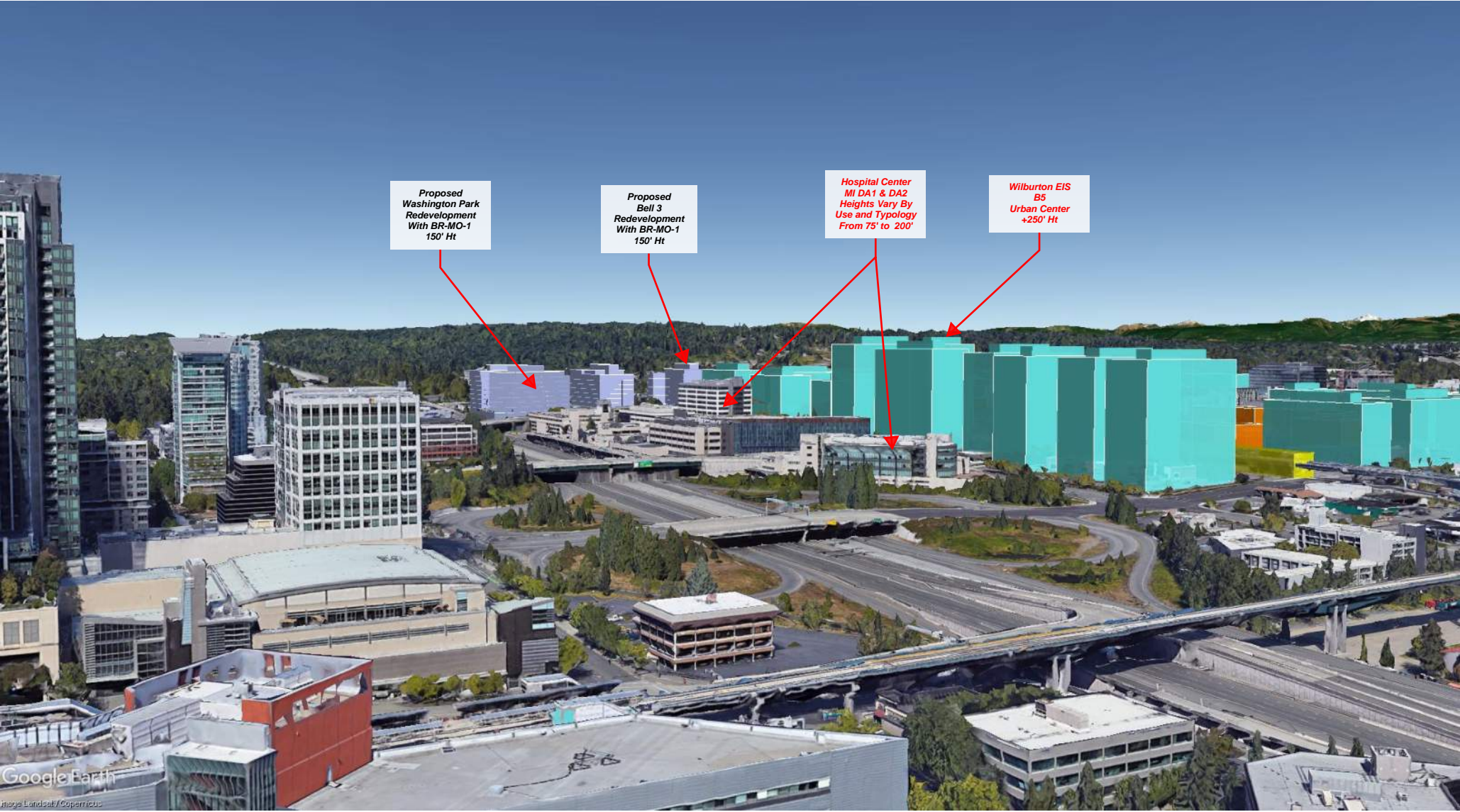


Future Development Propensity Views

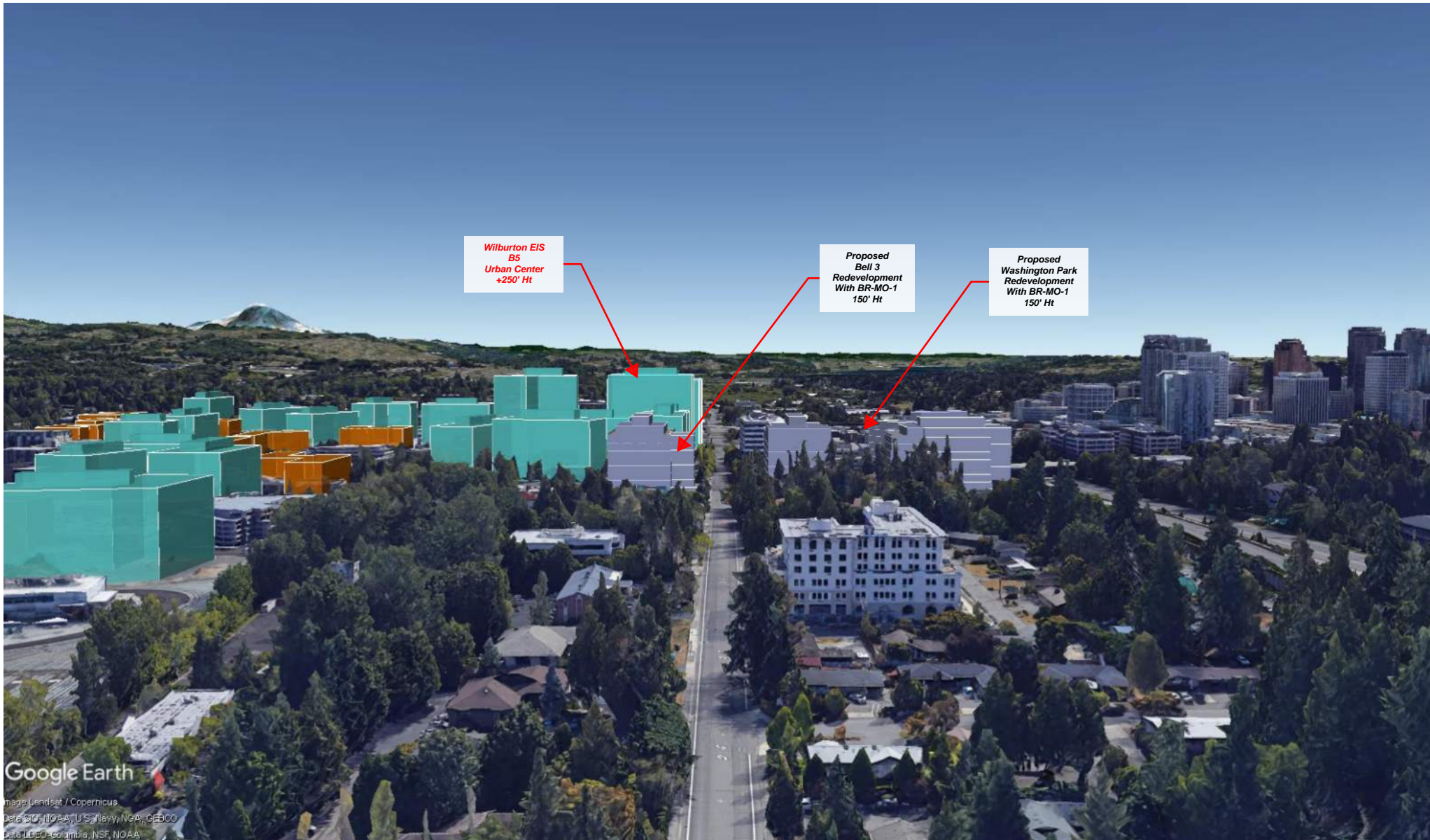
Exhibit A



Future Development Propensity Views



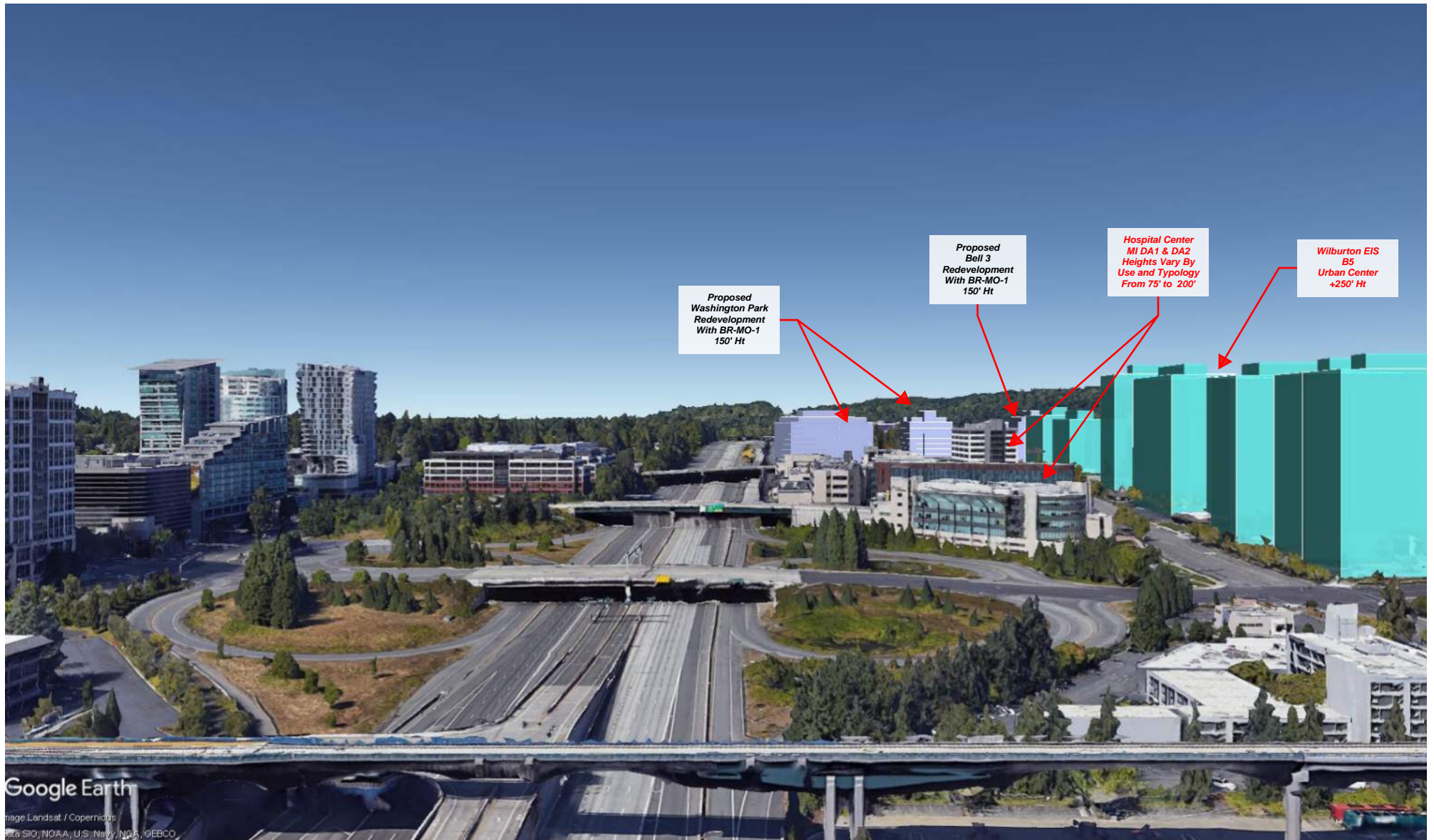
Future Development Propensity Views



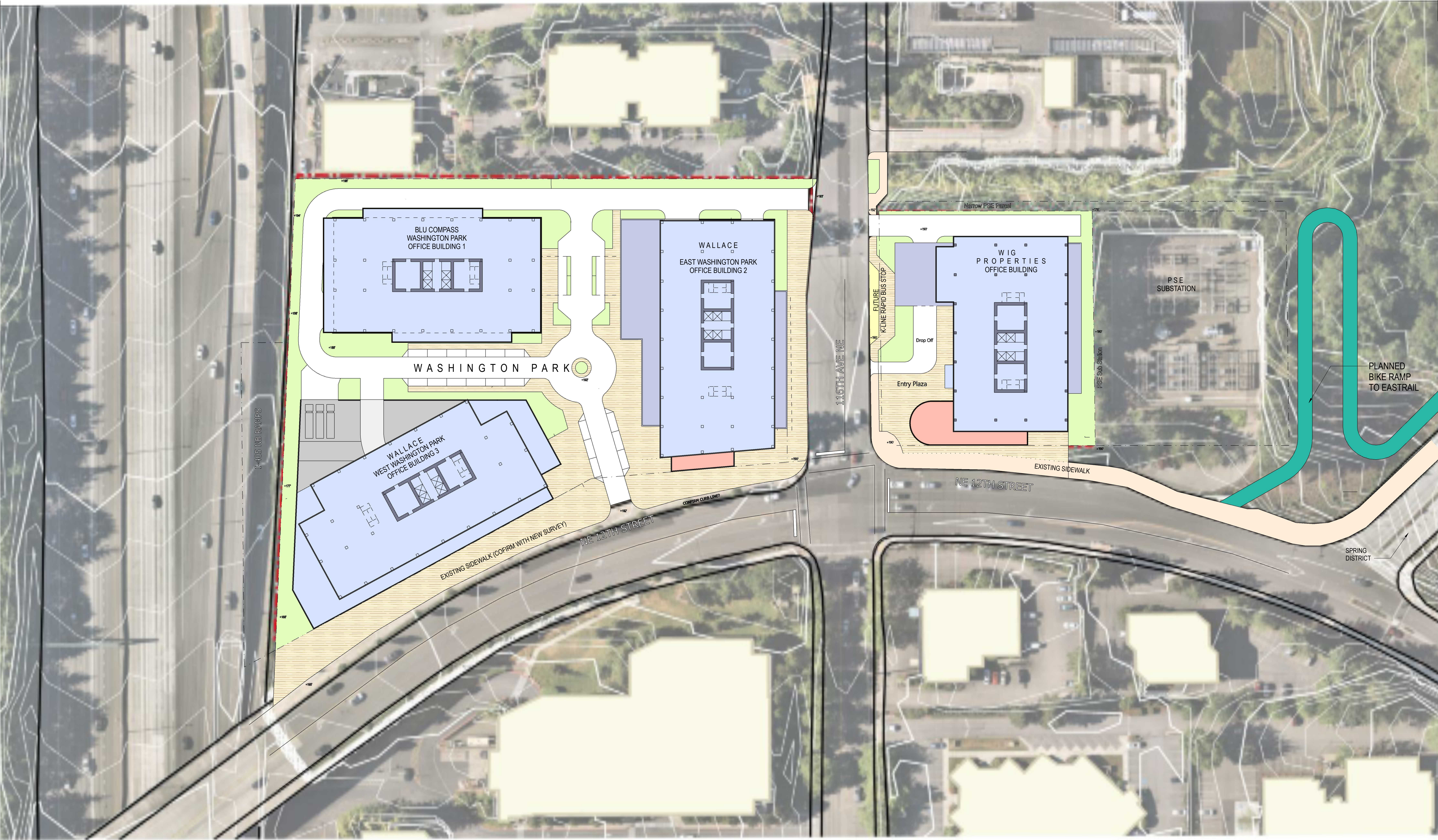
Future Development Propensity Views



Future Development Propensity Views



Future Development Propensity Views



PROJECT:

**Bel-Red
Re-Zoning
Study**

**WIG PROPERTIES
& WASHINGTON PARK
WALLACE / BLU COMPASS
PROPERTIES**
Bellevue, WA

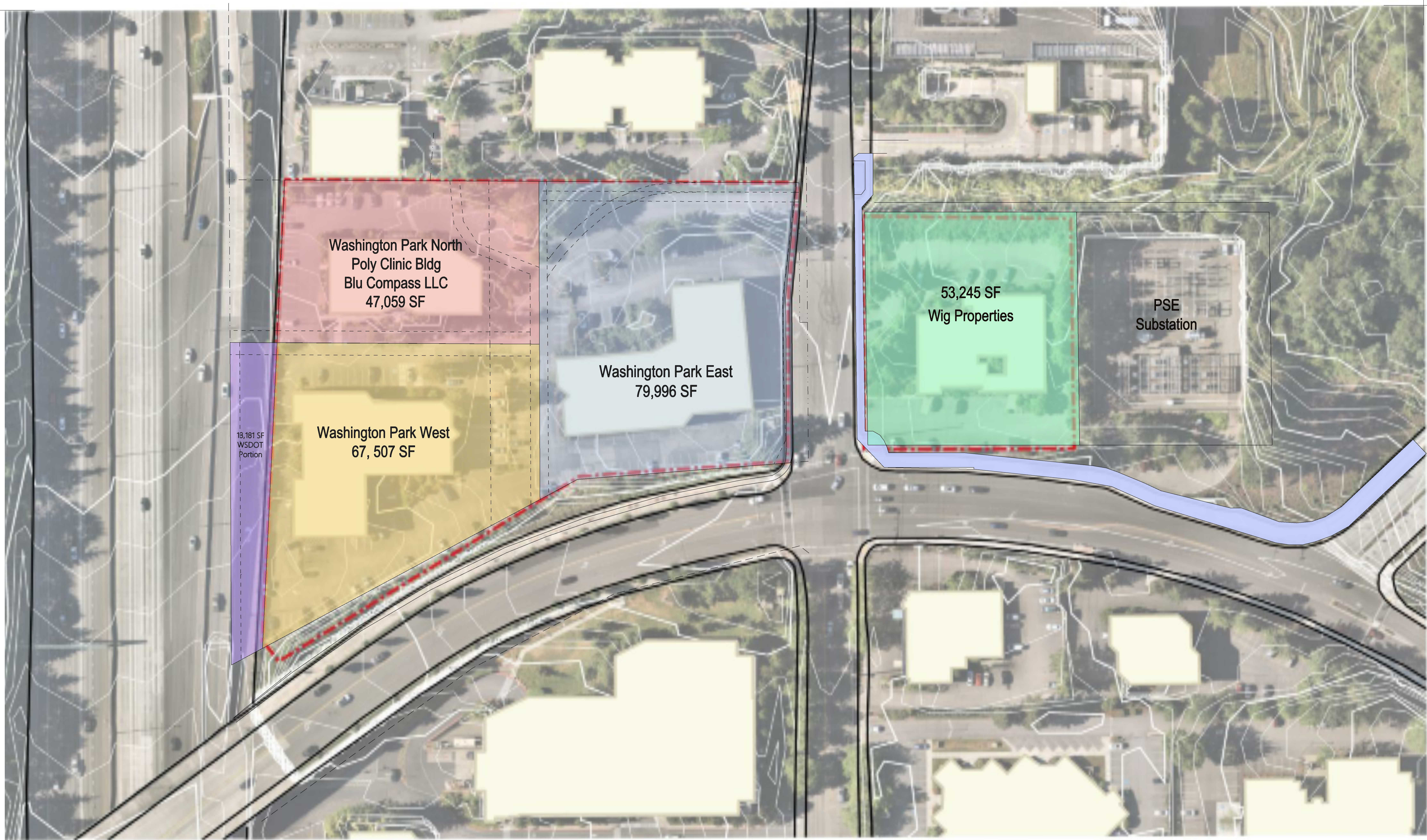
ISSUE:

Preliminary
Concept
Draft

October 27, 2022

CONTEXT - PROPOSED SITE PLAN - ON AERIAL GIS PHOTO





PROJECT:

**Bel-Red
Re-Zoning
Study**

WIG PROPERTIES
& WASHINGTON PARK
/ ALLACE / BLU COMPASS
PROPERTIES
Bellevue, WA

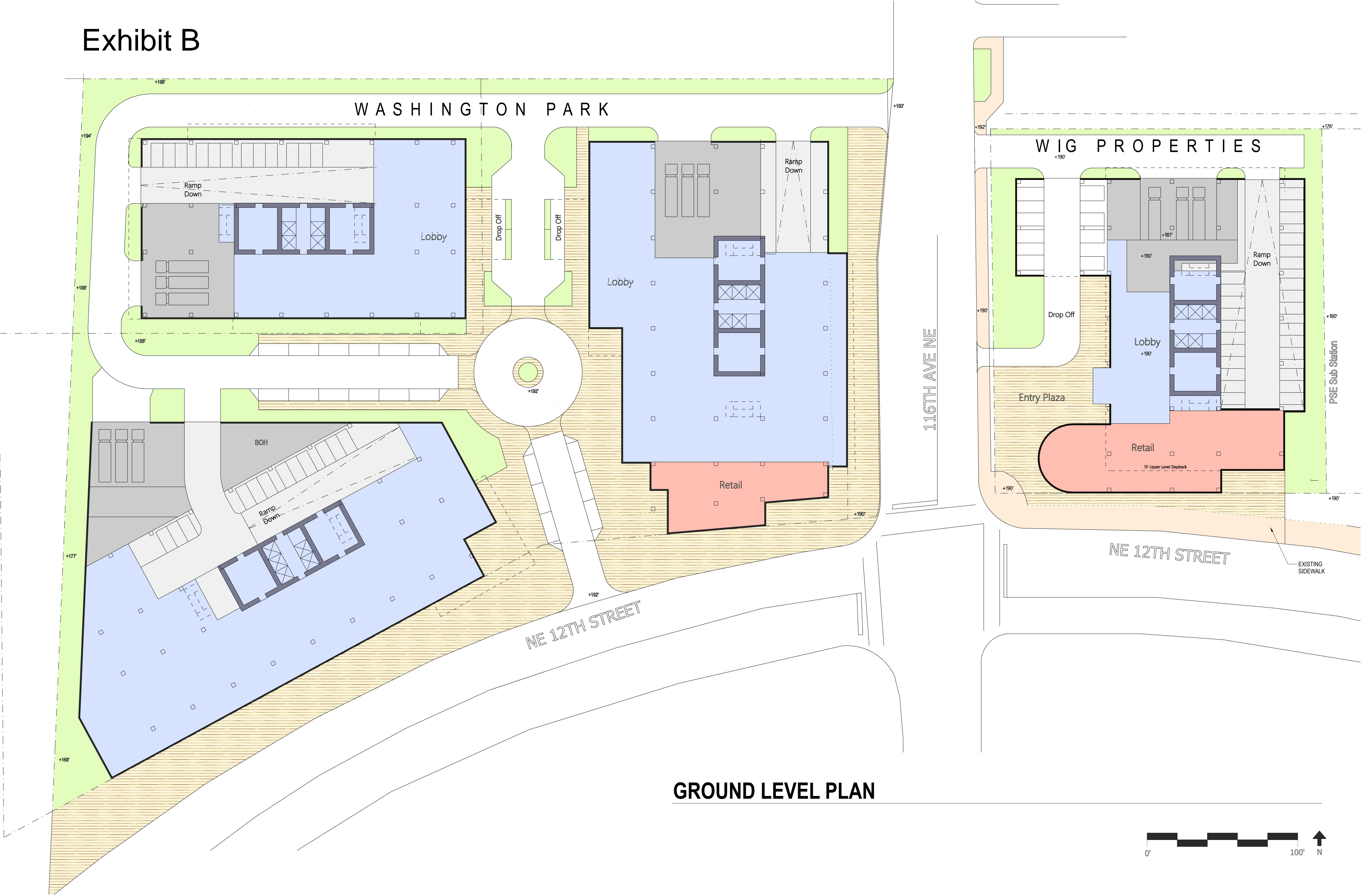
ISSUE:

Preliminary
Concept
Draft

October 27, 2022

EXISTING CONDITIONS - ON AERIAL GIS PHOTO

Exhibit B



GROUND LEVEL PLAN

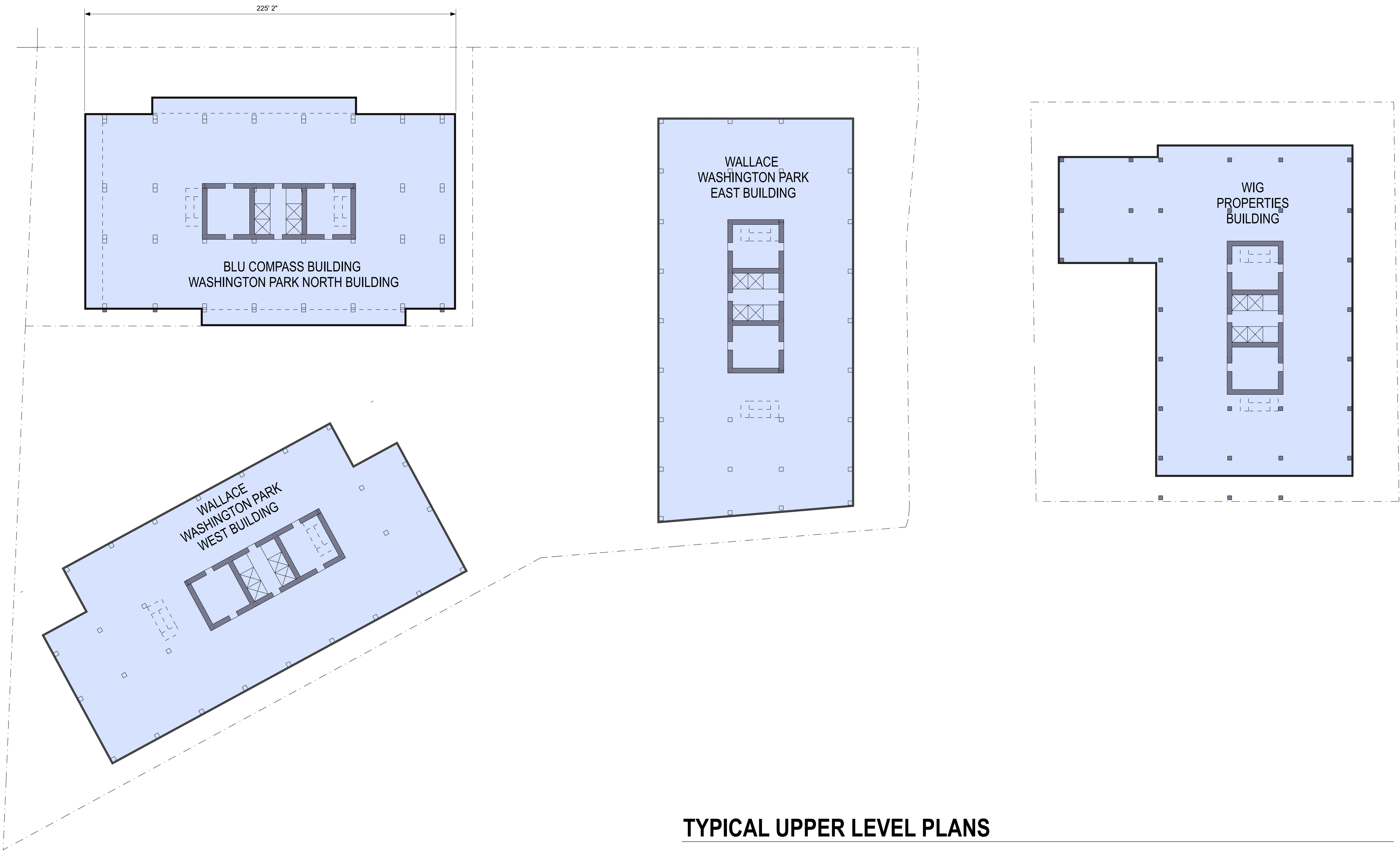
PROJECT:
**Bel-Red
Re-Zoning
Study**

WIG PROPERTIES
& WASHINGTON PARK
WALLACE / BLU COMPASS
PROPERTIES
Bellevue, WA

ISSUE:

Preliminary
Concept
Draft

October 27, 2022



PROJECT:

**Bel-Red
Re-Zoning
Study**

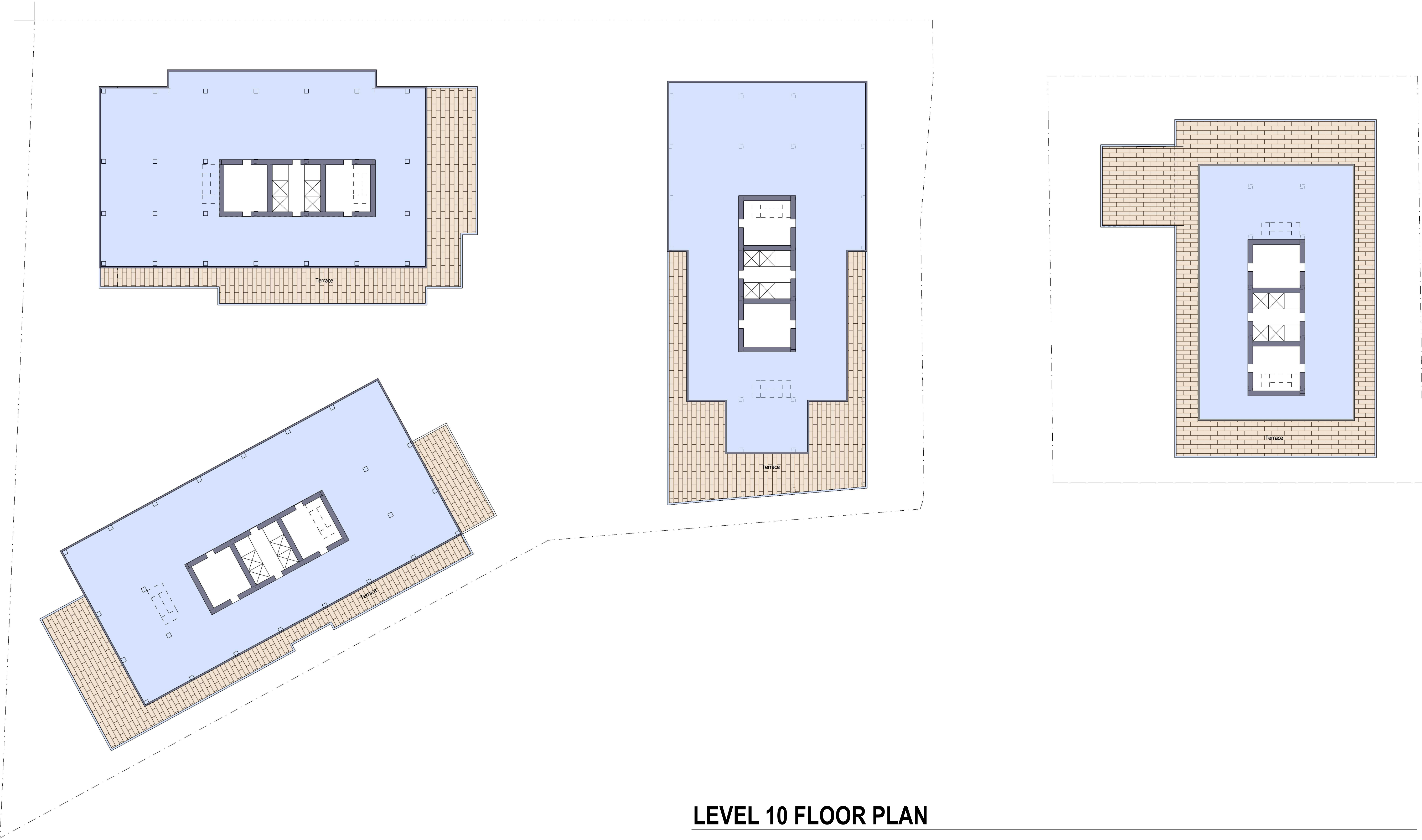
WIG PROPERTIES
& WASHINGTON PARK
WALLACE / BLU COMPASS
PROPERTIES
Bellevue, WA

ISSUE:

Preliminary
Concept
Draft

October 27, 2022





PROJECT:
**Bel-Red
Re-Zoning
Study**

WIG PROPERTIES
& WASHINGTON PARK
WALLACE / BLU COMPASS
PROPERTIES
Bellevue, WA

ISSUE:

Preliminary
Concept
Draft

October 27, 2022

PROJECT:

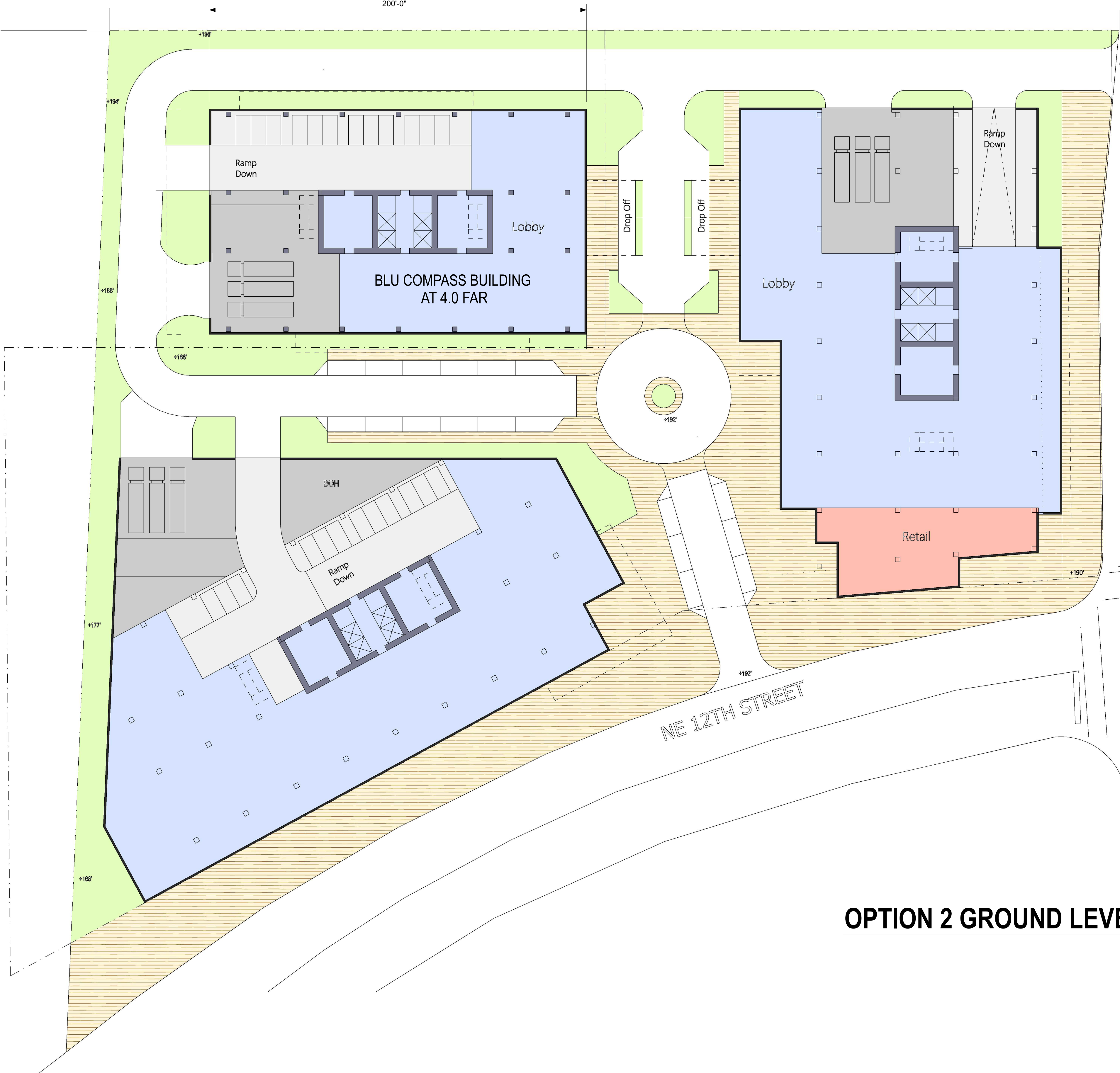
Bel-Red
Re-Zoning
Study

WIG PROPERTIES
& WASHINGTON PARK
WALLACE / BLU COMPASS
PROPERTIES
Bellevue, WA

ISSUE:

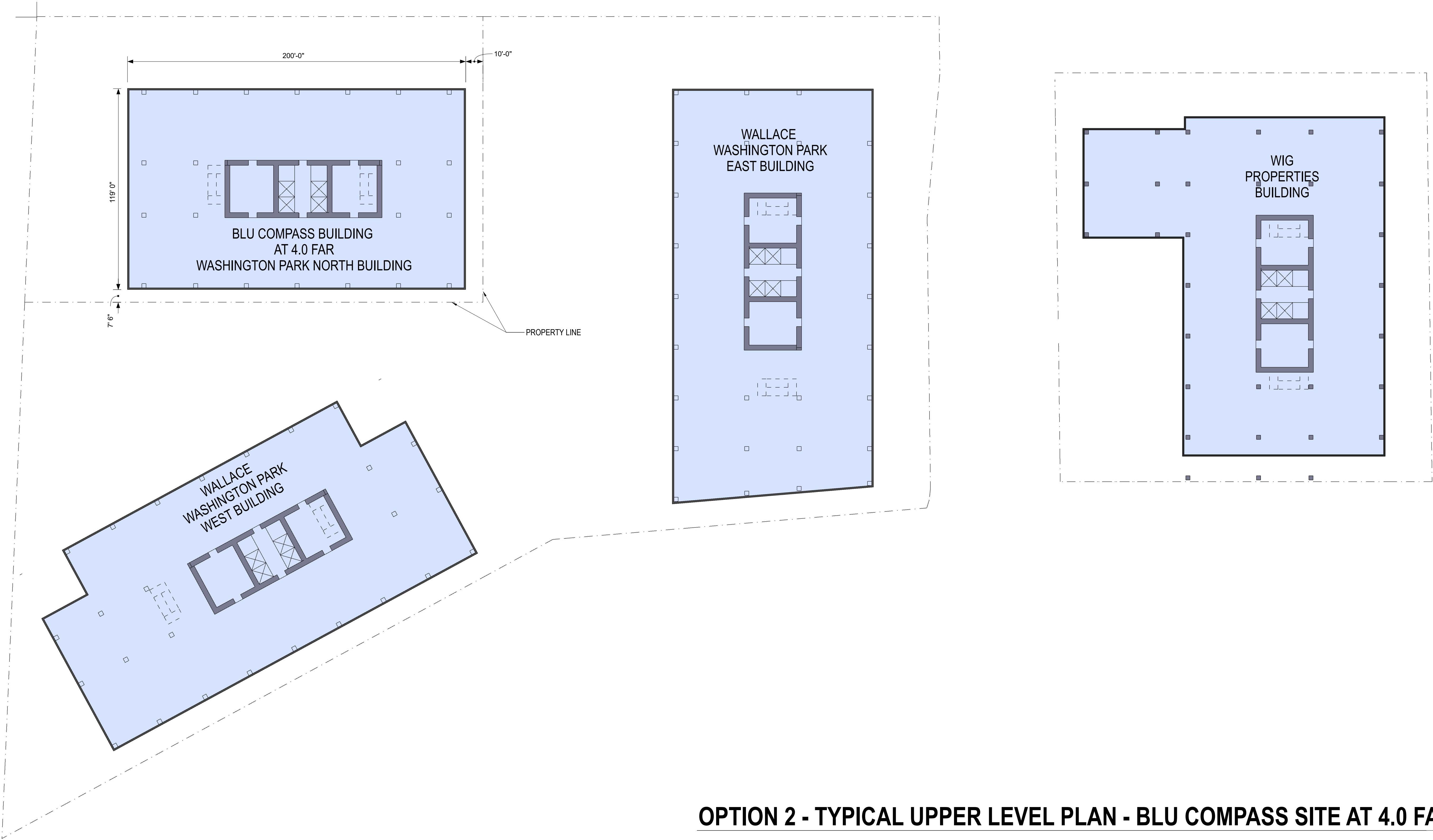
Preliminary
Concept
Draft

October 27, 2022



OPTION 2 GROUND LEVEL PLAN - BLU COMPASS SITE AT 4.0 FAR





PROJECT:
**Bel-Red
Re-Zoning
Study**

WIG PROPERTIES
& WASHINGTON PARK
WALLACE / BLU COMPASS
PROPERTIES
Bellevue, WA

ISSUE:

Preliminary
Concept
Draft

October 27, 2022

OPTION 2 - TYPICAL UPPER LEVEL PLAN - BLU COMPASS SITE AT 4.0 FAR





October 31, 2022

City of Bellevue Development Services Department

Attn: Reilly Pittman

450 110th Ave NE

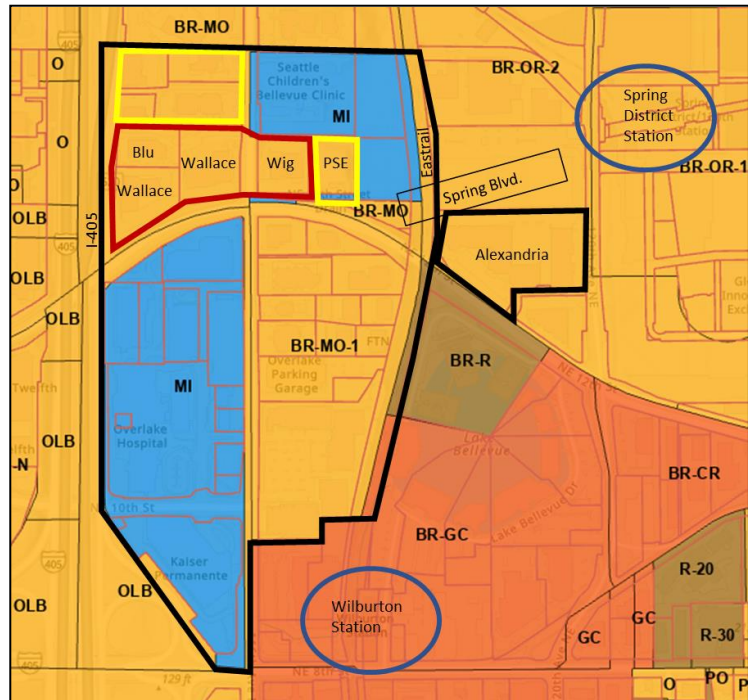
Bellevue, WA 98004

Via Email: compplan2044eis@bellevuewa.gov

Re: Comprehensive Plan EIS Scoping Comments
Request for Designation of NE 12th Street & 116th Ave. NE Properties as BR-MO-1

Dear DSD:

Thank you for this opportunity to comment on the scope of the Comprehensive Plan Major Update EIS (“Major Update”), which includes the Wilburton Vision Implementation. We are submitting comments on behalf of three property owners, representing all of the privately owned land adjacent to the north side of NE 12th 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”). We ask the City to extend the BR-MO-1 zone further north to include our Property as well as the four parcels to the north of us, which extend to the north boundary of the Children’s Hospital property. The siting and completion of the Wilburton and Spring District Light Rail Stations, the completion of Spring Boulevard and the completion of Children’s Hospital have all occurred since the last update to the Bel-Red Subarea Plan and, as discussed below, justify our request. In addition, we encourage the City to modify the Comprehensive Plan to incentivize a medical *and life sciences* corridor in the expanded BR-MO-1 area outlined in black in the map.



Address	Parcel	Owner
1407 116 th Ave. NE	292505-9023	Wallace Properties – Washington Park LLC
1414 116 th Ave. NE	282505-9105	Wig Properties LLC – Bell3
1417 116 th Ave. NE	292505-9307	Wallace Properties – Washington Park LLC
1427 116 th Ave. NE	292505-9329	Blu Compass LLC

October 31, 2022

Page 2 of 8

Specifically, we hereby make the following requests:

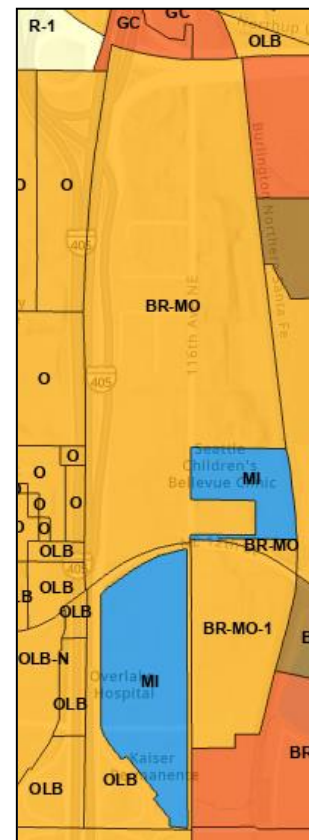
1. Through the Major Update process we request the City designate the Property as BR-MO-1 instead of the current zoning of BR-MO.
2. The land just south of the Property that is currently zoned BR-MO-1 is included in the Wilburton Study Area. We request that the City include the Property in the Wilburton EIS, or extend the same zoning criteria to the Property as is provided to the BR-MO-1 land on the south side of NE 12th Street.¹
3. Modify the BR-MO and BR-MO-1 land use code to incentivize the development of a medical and life sciences corridor in the area.

Bel-Red Medical Office (BR-MO) Zones. The existing BR-MO zone runs on either side of 116th Ave. NE from NE 12th Street to Northrup Way, and has a 70' height limit and 1.0 FAR limit. These limits effectively preclude redevelopment of the land. The BR-MO-1 designation was granted to the property south of NE 12th Street on the east side of 116th Ave. NE. BR-MO-1 has a 150' height limit and 4.0 FAR. These zones were both created in the Bel-Red Subregional Plan (hereafter, "BRSP"), which was originally adopted in 2009 and has not been modified since.² The use policies for the BR-MO and BR-MO-1 zones are identical: "Provide for office uses in this area, with an emphasis on medical office..."³ The rationale for treating the BR-MO-1 differently from BR-MO was that it was thought to be within the watershed of the hospital light rail station (now known as Wilburton Station), and the area north of NE 12th was not. As we discuss below, the Property is now within the watershed of two light rail stations, which means it is within a development node and should be afforded the BR-MO-1 designation and the additional height and density that comes with it.

The following significantly changed conditions⁴ have occurred since the 2009 adoption of the BRSP:

1. Completion of Spring Boulevard and the Spring District Station.
2. Siting and Completion of Wilburton Station.
3. Completion of Children's Hospital.

We address each of these conditions below.



¹ In the event this request cannot be granted, we request that the City study the Property as BR-MO-1 in the Bel-Red Look Forward CPA/LUCA, which is scheduled to commence in 2023.

² See Figure S-BR.1 Bel Red Land Use Plan and the current Comprehensive Land Use Plan map, dated 9/27/21.

³ See Policy S-BR-86 as to the BR-MO-1 zone and S-BR-90 as to BR-MO.

⁴ For approval of Comprehensive Plan amendments the City Code looks for significantly changed conditions since the last time the Comprehensive Plan map or text was amended. LUC 20.30I.140.E. Significantly Changed Conditions. Demonstrating evidence of change such as . . . changed conditions on the subject property or the surrounding area, or changes related to the pertinent plan map or text; where such change has implications of a magnitude that need to be addressed for the Comprehensive Plan to function as an integrated whole. LUC 20.50.046.

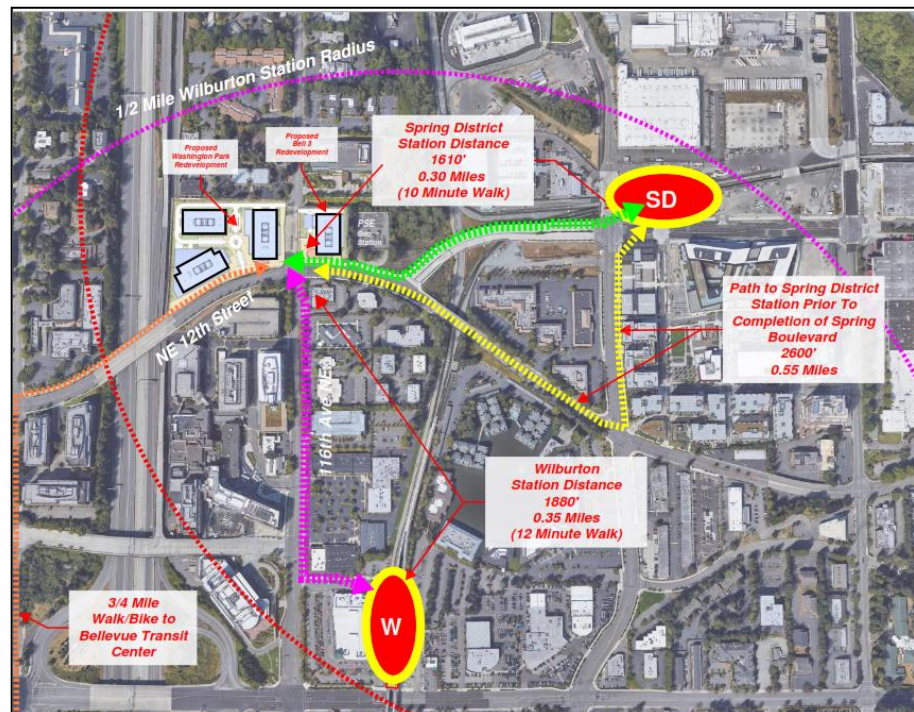
October 31, 2022

Page 3 of 8

Completion of Spring Boulevard and the Spring District Light Rail Station. A fundamental facet of the BRSP was the application of 4.0 FAR density to land, or “nodes” within the walkshed of a planned light rail station. The intro to the Neighborhoods/Districts section of the BRSP states:

“Development Nodes. The nodal development pattern concentrates development in the vicinity of potential future light rail stations, generally within a quarter-mile⁵ radius. Development nodes are located in the vicinity of Overlake Hospital, at 122nd Avenue NE, at 130th Avenue NE, and at 152nd Avenue NE (with a station in Redmond).... Land use intensities in these nodes can reach a maximum development intensity of 4.0 FAR...”⁶

Spring Boulevard opened to traffic in October, 2020 and by doing so brought the Property within the 10-minute walkshed of the Spring District Light Rail Station. The BRSP states, “The expansion of NE 16th Street [now known as Spring Boulevard] is a lynchpin project for Bel-Red. The extended corridor will be the key east-west arterial connection, tying together much of the new Bel-Red land use. It is also the City’s desired location for light rail and high capacity transit, and major new pedestrian and bicycle access across the Bel-Red area.”⁷



The transformative effect on the Property from the opening of the Spring Boulevard connection at NE 12th Street is hard to overstate. Not only does Spring Boulevard provide additional vehicular capacity to support an increase in density for the Property, it creates a level multimodal corridor that enables a leisurely, safe walk or bike connection directly to the Spring

⁵ The BRSP discusses a quarter-mile walkshed, but around 2013 with the adoption of the Growing Transit Communities Compact, the City and PSRC began analyzing a half-mile walkshed from light rail stations and other frequent transit stops. *E.g.*, Wilburton Vision Report, page 61, “A 10-minute or approximately 1/2 mile walkshed is generally accepted as the greatest distance people will walk to access transit.” In July, 2021 Bellevue amended the parking code to allow reduced parking minimums for projects “within one-half mile of a future light rail or bus rapid transit station scheduled to begin service within two years.” LUC 20.20.590.L.1.b.ii. *See also* the PSRC citation in footnote 9. The City approved the Vision 2050 plan.

⁶ BRSP, Page 41.

⁷ BRSP Policy S-BR-55.

October 31, 2022

Page 4 of 8

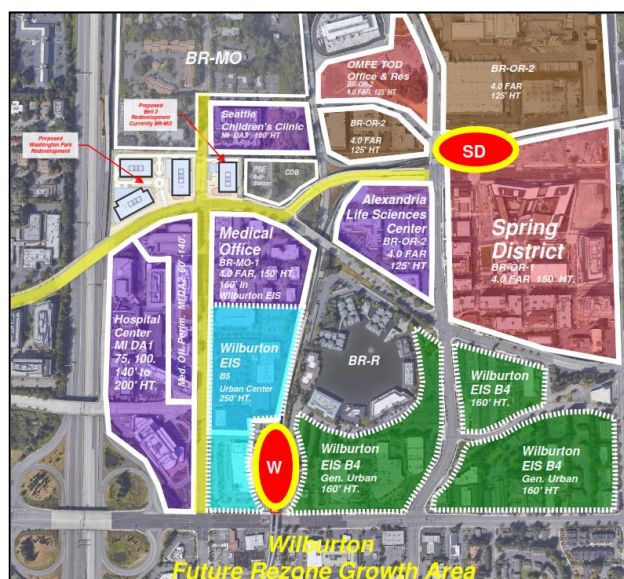
District light rail station. It also links the Property directly to the Spring District and the parks, jobs and housing therein. In *Exhibit A* we provide a walkshed analysis to show that not only is the Property within the one-half mile radius of the Spring District Station, but it is also within a 10-minute walk. This tremendous pedestrian connectivity between the Property and the Spring District was created solely by the opening of Spring Boulevard, and the additional infrastructure justifies the application of the “development node” BR-MO-1 zoning to the Property.

Siting and Completion of Wilburton Station. It appears from the text of the BRSP that even in 2009 the plan was to expand the higher density BR-MO-1 area to the area within the walkshed of the Wilburton Station once the location of the station was determined. BRSP Policy S-BR-86 states, “Initially higher intensities are limited to an area adjacent and to the east of Overlake Hospital, and heights may reach 150 feet. Sound Transit is contemplating an additional light rail station on either the northwest or southeast side of the [Overlake and Group Health] campus. When that station location is determined, an area of additional development intensity and height may be designated through a subsequent Comprehensive Plan amendment.”⁸ Not only has the Wilburton Station been sited, but construction of the station is complete, with the light rail line scheduled to open in 2024. The BRSP has not been modified since 2009 – this Major Update is the “subsequent Comprehensive Plan amendment” to which the BRSP is referring. As shown on the previous page, the Property is within a one-half mile radius of Wilburton Station. We have also provided a 15-minute walkshed map in *Exhibit A*. The Property is within the Wilburton Station walkshed,⁹ and therefore the higher density BR-MO-1 designation should be extended to the Property in the Major Update.

Completion of Children’s Hospital.

Children’s Hospital is located just north of the Property. The land was granted MI-DA3 zoning in July 2008, prior to the adoption of the BRSP in 2009. Despite being located further away from the Bel-Red development nodes than the Property, the Children’s site was granted a 100’ height limit, as compared to the BR-MO zone limit of 70’. The MI-DA3 zoning was developed contemporaneously with the City’s consideration and adoption of the BRSP. What constitutes the *change* is the completion of the hospital building in 2010, delivering:

- a much larger scale building to the north of the Property than existed previously;
- extension of higher intensity medical



⁸ Emphasis supplied.

⁹ Puget Sound Regional Council Vision 2050: A Plan for the Central Puget Sound Region, p. 132, Adopted October 29, 2020, states, “Walkshed, particularly in the context of light rail, is now typically defined as a one-half mile radius, a 10-minute walking distance, or a combination of the two. Used to measure the area in which walking or biking can serve as a viable way to access a transit facility.

October 31, 2022

Page 5 of 8

institutions further north up 116th Ave. NE from NE 12th to approximately NE 16th Street; and

- c. an anchor for future medical and life sciences demand in the surrounding area.

Compliance with Rezone Criteria. The redesignation of the Property to BR-MO-1 also meets the decision criteria in LUC 20.30A.140 for rezones:

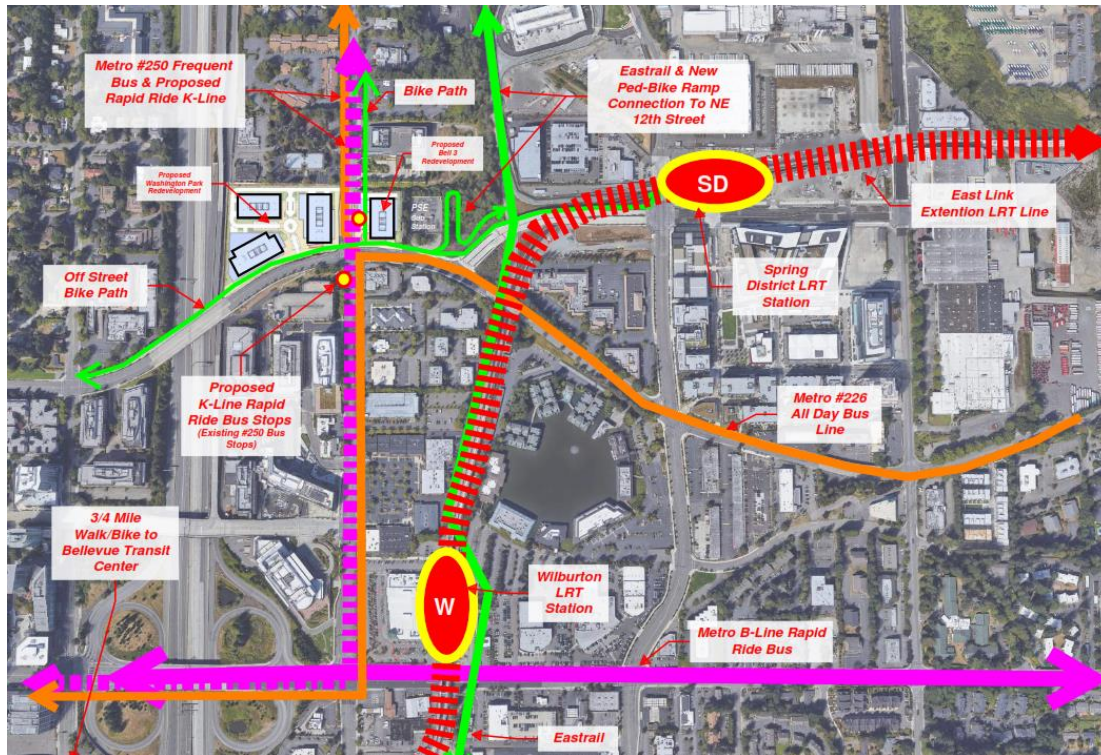
- The rezone bears a substantial relation to the public health, safety and welfare. The rezone will increase urban density and lead to the development of a medical office/life sciences hub in Bellevue that will drive Bellevue's economy, create good-paying jobs, and diversify the economy in partnership with technology uses.
- The rezone is needed because there is not currently enough BR-MO-1 zoned land to create a medical office/life sciences space hub. Medical centers and life sciences users prefer to be located in large clusters where they can utilize research and technology. Currently Bellevue lacks the zoning to be able to accommodate such a cluster.
- The rezone will not be materially detrimental to uses or property in the immediate vicinity of the property. The property is generally located next to I-405, and is surrounded by urban uses. Medical Institution zoning exists to the north and south of the Property, and it is bordered/buffered by I-405 and the Eastrail corridor to the west and east. The MI zoning permits larger scale buildings than BR-MO, with 140-200' tall buildings permitted on the Overlake Districts, and 100' tall buildings on Children's. The Development Propensity Map to the right assumes the building heights in Preferred Alternative of the Wilburton CAC recommendation are applied. The properties to the north are permitted to rise to 70' which means they are appropriate transition zones for the heights and density proposed.
- The rezone certainly has merit and value for the community as a whole. Again, support for this industry will drive and diversify Bellevue's economy and will create good paying jobs that will attract workers to Bellevue in a different area of the economy from simply tech office.



October 31, 2022

Page 6 of 8

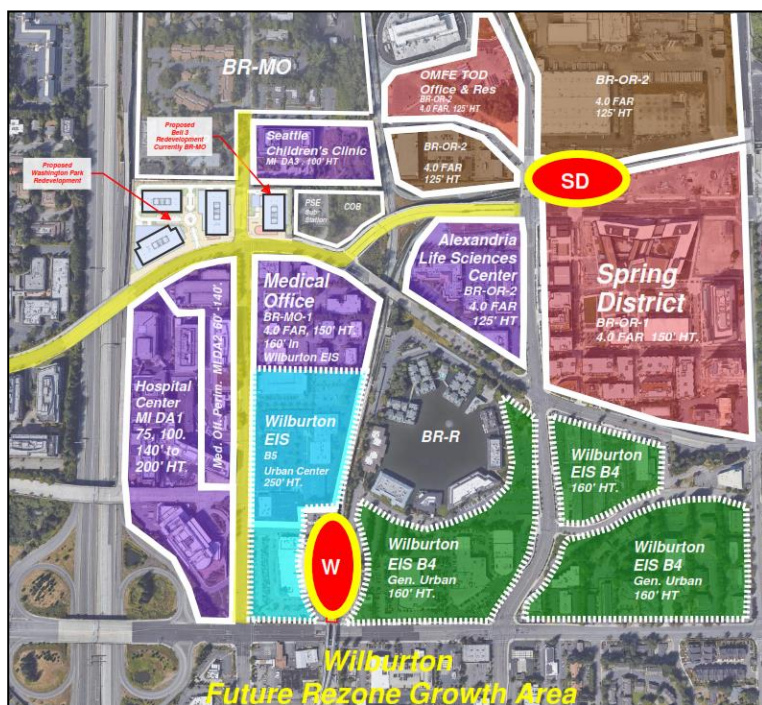
Multimodal Transportation Infrastructure. It's also worth noting the amazing collection of multi-modal transportation infrastructure that now connects near the intersection of 116th Ave. NE and NE 12th Street, where the Property is located. In addition to light rail, Metro 250 & 226 currently provide frequent transit service, Rapid Ride K is in planning and would have a stop right at the intersection, and the Property is mere feet away from a ped-bike connection to Eastrail. NE 12th Street also provides a convenient and safe ped-bike connection back into Downtown Bellevue.



Conceptual Project Design. To assist the City's consideration of our request we have prepared viable concept designs that show what could be achieved in medical and/or life sciences buildings on the Property under the rules of the current BR-MO-1 zone. Please see *Exhibit B*.

Change of Circumstances. The siting and construction of the Wilburton and Spring District Light Rail Stations, opening of Spring Boulevard and completion of Children's Hospital to the north of the Property provide sufficient changes in circumstances since the time of adoption of the BRSP in 2009 to warrant designation of the Property as BR-MO-1. It appears that the BRSP intended for this to happen in the Major Update, at least for properties within the walkshed of the light rail stations. Even if it did not, it is inconsistent with City and regional policy to zone property within the walkshed of a light rail station at 1.0 FAR. There is ample justification for our request to rezone the Property to BR-MO-1. In addition, the rezone of the Property to BR-MO-1 complies with the City's rezone criteria, and our conceptual designs and development propensity maps show that development of this scale on the site would complement the surrounding area.

Relevant to the idea of a medical *and life sciences* corridor is the parcel labeled “Alexandria Research Center”. The parcel was acquired by Alexandria Real Estate Equities in 2021, and they are currently leading the way in the design and construction of Bellevue’s first life sciences campus on the site, totaling 1.2 million square feet. The project highlights the opportunity the City has in zoning the 116th Ave. NE corridor and the NE 12th/Spring Boulevard corridors for medical and life sciences, and how the south and east extents of the area are served by the light rail stations.



To that end, we offer the following Major Update scoping comments with respect to both the Property and the existing BR-MO-1 area:

- Adjust the uses, building floorplates, setbacks, densities to create a medical center, biotech, and life sciences hub.
- Consider in the alternatives how the BR-MO-1 zoning could be modified to better support and foment the creation of a medical center/biotech hub, by considering the following changes:
 - Delete the lot coverage limitations; this is in an urban area
 - Delete the several upper level setback and setback limitations that reduce the ability for labs and medical uses to achieve large floor plates
 - Consider increasing floor plate limitations
 - Delete the Critical Areas Overlay District from application in Growth Centers (except for wetlands and creeks)


October 31, 2022

Page 8 of 8


- Delete the Critical Areas Development density/intensity the “Critical Areas Penalty” in all Growth Centers; consider whether there is any actual net environmental benefit achieved to the protected critical areas by reducing density in Growth Centers.
- Assuming the Bel-Red FAR Amenity Incentive system remains, increase the Base and Maximum FAR, allowing a base 3.0 and max 5.0 FAR, and allow non-residential buildings to achieve 50% of the Tier 1 FAR through payment of a fee-in-lieu for affordable housing and 50% for parks and streams.
- We ask the City to refrain from studying the conversion of the BR-MO-1 area to a “Mixed-Use Node”, as is proposed in Alternative 3. The Mixed-Use Node would emphasize housing and not medical. Whether looking at the current uses of BR-MO-1 or the future opportunities, disincentivizing medical is a poor idea. All of the Wilburton scoping alternatives include large amounts of land to be zoned with an emphasis on residential development. Preserving this small corridor will not hamper the City’s housing goals and it is important to preserve the medical cluster.
- At the same time, we are not opposed to the City adding housing as an option in the BR-MO-1 and BR-MO areas, so long as it does not interfere with the ability to develop medical office and life sciences buildings.
- None of the alternatives shown include the “no-man’s land” of the 116th Ave NE corridor north of NE 12th in either Growth Center or a specific Neighborhood Plan/Study Area. This corridor should be added to a Growth Center.

We encourage the City to embrace a vision of growth in this planning exercise, and to consider how the City can welcome and house cutting edge biotech/medical/life sciences companies that can truly change the world. We appreciate your consideration of these scoping comments. Please do not hesitate to reach out should you have any questions about these comments.


Sincerely,

DocuSigned by:

 002F142352F840E

Eric Hansen
 Manager,
 Blu Compass LLC

DocuSigned by:

 BE7216AA9DA547C...

Kevin Wallace
 Manager,
 Wallace Properties –
 Washington Park LLC

DocuSigned by:

 73EECEC27718478...

Leshya Wig
 Partner/Managing Director,
 Wig Properties LLC

Cc: Brad Miyake
 Diane Carlson
 Michael Katterman
 Emil King

Exhibit A: Light Rail Station Proximity; Mobility Map; Growth Areas, Employers & New Projects; Development Propensity Map; Wilburton Station Walkshed Map; Spring District Station Walkshed Map

Exhibit B: Conceptual Design of Blu Compass, Wallace, Wig Property with BR-MO-1 Zoning

City of Bellevue – Comprehensive plan 2044 EIS Scoping
October 30, 2022

Development Services Department
City of Bellevue
450 110th Avenue NE
Bellevue, WA 98004

RE: Bellevue 2044 EIS Scoping Comments – Wilburton District

To whom it may concern,

Compton Design Office is a professional Architecture practice with work representing many clients across the great metropolitan Bellevue area. We have worked extensively with the City of Bellevue over the years on single building pursuits and complex master development plans. Please find attached below our comments in response to the scoping notice for the Environmental Impact Statement (EIS) currently being for the 2044 update to the Bellevue Comprehensive plan.

1. Increase Porosity and Scale of Blocks

The block size of Wilburton is currently scaled for vehicles and not appropriate for pedestrians. Finding an appropriate block size is of critical importance to ensure balance between development lot sizes and pedestrian walkability could be maintained. We recommend referencing the Seattle block size of 300'x300' as a suitable reference point for the planning of Wilburton district.

2. Increase diversity of Residential Types

A successful urban environment requires a good balance of diverse residential types (high-rise, townhomes, single-family, rowhouses, etc.) to ensure needs and price points of a diverse mix of residents could be met.

3. Strategic and Equitable placement of mid-block connections

Based on experience of design projects that implement mid-block connections in downtown, we propose that the future location of mid-block connections should be strategic and considered with equitability of stakeholders in mind.

4. Maximize flexibility of Uses

Flexibility and variety of uses is key to ensuring the future resilience of a city. Not only does this allow a city to adapt and respond to changes in economic and market cycles, but it also allows a city to transform and adapt itself quickly to the needs in the future. The comprehensive plan should allow for maximized flexibility of different uses by allowing uses that are currently not accounted for in the LUC.

5. City of Bellevue - Growth Alternatives

Compton Design office supports the City of Bellevue's growth alternative #3. Increased housing capacity should be considered across the entire city to ensure equity. Providing a variety of housing options throughout the entire city will be the most equitable method and provide the best utilization of land, which is a limited and valuable resource.

6. Wilburton District - Growth Alternatives

Compton Design Office supports the City's – "Wilburton Study Area Alternative 3". Based on Wilburton's importance as an extension of Bellevue's downtown core, it's urban development pattern should allow for high-density development. Alternative 3 provides increased building heights that provide much needed additional housing capacity. The increase of mixed-use nodes will also provide maximized flexibility of uses for future development.

Sincerely,

Kay Compton
Compton Design Office | Founding Partner



City of Bellevue – Comprehensive plan 2044 EIS Scoping
October 30, 2022

Development Services Department
City of Bellevue
450 110th Avenue NE
Bellevue, WA 98004

RE: Bellevue 2044 EIS Scoping Comments – BelRed District

To whom it may concern,

Compton Design Office is a professional Architecture practice with work representing many clients across the great metropolitan Bellevue area. We have worked extensively with the City of Bellevue over the years on single building pursuits and complex master development plans. Please find attached below our comments in response to the scoping notice for the Environmental Impact Statement (EIS) currently being for the 2044 update to the Bellevue Comprehensive plan.

1. Balance allowable uses for Residential & Commercial Uses

The currently land use code in the Bel-Red district penalizes the development of commercial uses by providing a restrictive 0.5 FAR limitation in some zones. With the context of Bel-Red becoming a TOD area, the need for providing balance of uses are of utmost importance to maintain a sustainable program for an urban environment. We suggest providing additional incentives for residential uses without penalizing commercial uses in the base FAR condition.

2. Allow for 100% lot coverage

Many zones in BelRed are currently restricted from 100% lot coverage. We propose providing this allowance for flexibility of developments for BelRed to become a truly urban experience.

3. Allow greater residential floorplate sizes and height

To capture the development potential of providing optimized housing, the current restrictions for maximum residential floorplate sizes (9,000 SF) for buildings above 80FT tall should be removed or increased. An increase of the maximum height limits should also be considered. Current limitations in the LUC in floorplate sizes and height do not take advantage of the latest residential building structure and construction technologies that could optimize the City's goal of enhancing future supply of housing.

4. Allow for Flexibility to adjust COB Street Grid

The current Street grid proposed in the BelRed district had proven difficult to implement as some alignments had found to conflict with topography and environmental features.

Property ownership had also been difficult to coordinate when proposed roads span multiple parcels that affect multiple property owners. We propose the city to allow for more flexibility on the location and type of streets from those currently shown in the City's plan.

If pedestrian experience and block porosity is of true importance to the TOD nature of BelRed, then a variety of street types should be allowed (pedestrian only, laneways, alleys, e.t.c.) based on assessment of each development's urban design integration into to the entire district.

5. Reduce Minimum Parking Ratio

The current parking ratio of BelRed is much higher than downtown and most TOD districts. This is counter to the economics of development and the promotion of public transit. We propose a reduction of parking ratio to match other TOD urban environments.

6. Maximize flexibility of Uses

Flexibility and variety of uses is key to ensuring the future resilience of a city. Not only does this allow a city to adapt and respond to changes in economic and market cycles, but it also allows a city to transform and adapt itself quickly to the needs in the future. The comprehensive plan should allow for maximized flexibility of different uses by allowing uses that are currently not accounted for in the LUC.

7. Eliminate and/or reduce environmental Buffers

Current requirements for environmental buffers in the BelRed district are extremely prohibitive to future development. Many development sites are considered economically infeasible due to this specific requirement. We propose to eliminate or to reduce this requirement to ensure viability of project sites are maintained such that BelRed could be developed according to the long-term vision of the City.

8. City of Bellevue - Growth Alternatives

Compton Design office supports the City of Bellevue's growth alternative #3. Increased housing capacity should be considered across the entire city to ensure equity. Providing a variety of housing options throughout the entire city will be the most equitable method and provide the best utilization of land, which is a limited and valuable resource.

Sincerely,

Kay Compton
Compton Design Office | Founding Partner





October 31, 2022

Reilly Pittman, Senior Planner
City of Bellevue Development Services Department
450 110th Avenue N.E.
Bellevue, WA 98004

Re: City of Bellevue 2024-2044 Comprehensive Plan Periodic Update - Notice of Determination of Significance and proposed public scoping for the EIS

Dear Mr. Pittman:

This letter is in response to the City of Bellevue's request for comments pertaining to the Determination of Significance (DS) issued on September 29, 2022 for the periodic update to the Comprehensive Plan – Bellevue 2044, being conducted in accordance with the requirements of the Revised Code of Washington, specifically 36.70A and the 43.21C.

Puget Sound Energy (PSE) supports the City's declaration of a DS. In recognition this action will require an Environmental Impact Statement (EIS) for the periodic update to Comprehensive Plan – Bellevue 2024-2044, and in response to the City of Bellevue's scoping of possible focus areas in the programmatic EIS, listed below are issues that PSE believes should be considered within the update of the Comprehensive Plan and its accompanying EIS.

PSE encourages the City to integrate elements of the following documents:

- PSE Integrated Resource Plan (IRP) – 25 year Long-range Plan
- PSE Clean Energy Action Plan (CEAP) – 10 year Strategy Plan
- PSE Clean Energy Implementation Plan (CEIP) – The CEIP builds on the vision established within the Integrated Resource Plan and the Clean Energy Action Plan. The CEIP acts as a roadmap for implementing clean energy actions, programs and investments over the next 4 years.

How will the Comprehensive Plan and EIS address implementation of the State's Clean Energy Transformation Act (CETA)?

Letter Re: Bellevue Comp Plan 2024-2044 Update
DS and scoping of EIS
Page 2
October 31, 2022

How will the Comprehensive Plan and EIS integrate applicable information from PSE's EIS for the Energize Eastside Project? In addition, information from PSE's electric transmission projects such as the Lakeside-Phantom Lake transmission lines. These significant projects, and their respective permitting and construction, have occurred since the adoption of the City's 2015 Comprehensive Plan.

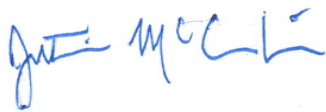
How will the Comprehensive Plan and EIS integrate applicable information from the ongoing King County-Cities Climate Collaboration, such as the Joint Letter of Commitment: Climate Change Actions in King County?

How will the Comprehensive Plan and EIS address the City's implementation of Transportation Electrification and Building Electrification? These energy strategies have potential impacts to both electric and natural gas transmission and distribution facilities. Such impacts should be identified and evaluated as part of the EIS and the subsequent amendment to the Comprehensive Plan – Bellevue 2044.

How will potential impacts identified in the EIS be integrated into the update of the Comprehensive Plan – Bellevue 2044, specifically within the Utilities Element and other elements identified in RCW 36.70A? This also includes the City's strategy for Subarea Plans.

PSE would like to thank the City for the opportunity to provide comments throughout the update process, including serving as a member on the City's Bellevue 2044 Strategy Team. 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.

Sincerely,



Justin McConachie
Senior Municipal Liaison Manager

Cc: Thara Johnson, City of Bellevue
Elizabeth Stead, City of Bellevue
Dave Anderson, WA Department of Commerce
Rich Doenges, WA Department of Ecology

From: Justin Altman <justin@altmanbiz.com>
Sent: Tuesday, November 1, 2022 10:03 AM
To: CompPlan2044EIS
Subject: Please Study Wilburton EIS Option 3 - We Need More Housing in Bellevue

Hi,

I represent a family that owns the I405 Corporate Center building. This is the old city hall building and is the building directly to the South of Lexus of Bellevue.

I have lived in the area for most of my life. The extent which Bellevue has grown has been breathtaking. However, Bellevue struggles to have enough housing and enough affordable housing. As parts of Bellevue are upzoned, only small areas within each zone are actually developed to the full extent possible. In the Spring district, we have seen many developments that have not maximized the new zoning benefits. Although these areas will continue to be developed over the next few decades, I am a strong believer that the city should allow for more density than needed and let the free market decide how much to build.

Wilburton has excellent public transportation access with easy access to the I405 and 520 freeways. We have three light rail stations within the walkshed of the neighborhood. We are very walkable and have four grocery stores that can easily be reached from any part of Wilburton. This infrastructure should be leveraged by adding as much housing density as feasible. Please study option 3 and increase the housing units to 15,000.

Justin Altman
206-371-2689
justin@altmanbiz.com

October 25, 2022

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

RE: Scoping Comments for Bellevue 2044 Comprehensive Plan EIS

Dear Liz and Reilly:

Thank you for this opportunity to comment on the scope of the City of Bellevue's Environmental Impact Statement ("EIS") for the 2044 Comprehensive Plan update.

Wright Runstad & Company and WR-SRI 120th LLC have partnered with the City on development of The Spring District as a catalyst development for the Bel-Red Subarea for more than fifteen years. In that time, we have had many successes together. The Spring District has grown from an ambitious idea to a vibrant mixed-use neighborhood that will be anchored by an East Link light rail stop. The 36-acre campus now features nine mixed-use residential buildings, UW's Global Innovation Exchange, hundreds of thousands of square feet of office space for Meta, vibrant parks, streets, and open spaces, and compelling retail spaces that include a Brew Pub. But this is just a portion of the vision for The Spring District articulated in the Master Development Plan that is only approximately two-thirds built.

Our commitment to realizing the full potential of The Spring District as a catalyst development is unwavering, but as the City considers where it should continue to grow in the next twenty years, we see opportunities for zoning improvements that would benefit the City and The Spring District. This perspective informs the following scoping comments for your consideration:

- **The City's Action Alternatives should provide a range of job growth and clarify where and how much additional growth is anticipated in Bel-Red.** The City's scoping handout notes that all of the City's Action Alternatives will involve additional capacity for 25,000 jobs. As a threshold matter, the City should include a range of additional job capacity in the Alternatives above this level so that decision-makers can meaningfully compare alternatives. Studying a range of 25,000-45,000 jobs capacity above the current capacity makes sense in the Action Alternatives.

Further, the scoping handout notes that additional capacity in the Action Alternatives would be focused in the City's "mixed-use centers" including Bel-Red, but it does not specify the level of additional capacity targeted in this Subarea. Bel-Red will be one of only four of the City's subareas that will be connected to our broader region by fast, efficient, and reliable light rail, so it should continue to be a focus for significant additional growth. All of the City's Action Alternatives in the draft EIS should clearly articulate the existing jobs and housing capacity in the Bel-Red Subarea, and the additional levels of targeted growth. This will allow the public and decision-makers to adequately assess impacts and make informed policy choices to best serve the City and our region.

- **The City's Action Alternatives should study additional heights in Bel-Red in excess of 240' for BR-OR-1 and BR-OR-2 zones.** In addition to clearly articulating the anticipated growth assumptions for Bel-Red, the draft EIS must identify how current capacity is calculated and how additional capacity will be created. One issue we have identified with the current zoning is that height limits are too low to achieve maximum density when other development standards like block lengths and street requirements, floorplate sizes, and lot coverage standards are applied. We have committed to achieving 2.5 FAR across The Spring District, but even that will be a challenge, and we will not come close to achieving the maximum FAR of 4.0 allowed unless the applicable development standards are changed.

The City should study additional heights in the Action Alternatives so it is more feasible for sites like ours to maximize development potential and meet the City's existing and anticipated growth assumptions. We think heights above 240' would make sense in BR-OR-1 and BR-OR-2 zones like The Spring District property that is at a light rail stop. When developed, buildings on these sites will likely survive for the next century, so it is imperative that they achieve the scales and density appropriate to match regional transit investments. Additional height is necessary to do that.

- **The City's Action Alternatives and transportation analysis should reconsider the function, utility, and approach to the Bel-Red local street grid.** One of the key zoning code features that is a barrier to development in the Bel-Red neighborhood is the local street grid. The original street grid was designed to provide small walkable blocks with proximity to transit. The divided land ownership in Bel-Red combined with a small block pre-determined street grid can, and has, limited the feasibility for dense commercial and multifamily developments. Many streets are overlain on multiple parcels, with disparate ownership, sizes, and grades. There may be other, better, ways to ensure pedestrian-scaled buildings like through-block pedestrian connections, pocket parks, and façade modulation.

The City's Action Alternatives and transportation analysis present a great opportunity to rethink the City's transportation networks and street grid. The Alternatives should consider how a local street grid should be designed and implemented within transportation networks, especially in close proximity to light rail stations. Removal or revaluation of some or all of the Bel-Red street grid should be clearly identified for study in at least one of the Action Alternatives.

Thank you again for this opportunity to comment. We look forward to continuing to work with the City on development of The Spring District and engaging with the City's important long-term planning efforts. Please do not hesitate to contact me if you have any questions about our comments.

Sincerely,



Gregory K. Johnson
Chief Executive Officer

cc: Cindy Edens, Wright Runstad & Company, cedens@wrightrunstad.com
Matt Neilson, Wright Runstad & Company, mneilson@wrightrunstad.com
Abigail DeWeese, HCMP, abigail.deweese@hcmp.com
Ryan Durkan, HCMP, ryan.durkan@hcmp.com
Emil King, City of Bellevue, Planning Director, eaking@bellevuewa.gov

From: Johnson Marshall <megolf365@gmail.com>
Sent: Monday, October 24, 2022 6:49 PM
To: CompPlan2044EIS
Subject: Re 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 submit that the city give all possible consideration for greatly expanded recreation facilities. My experience was that of the parent of a basketball player, a tennis player and a golfer. It is understandable that it is impossible to greatly augment facilities when it comes to golf. However, in the case of basketball, i think there is a fairly easy solution. I cannot recall an instance where we weren't struggling to have practice time and space and we were constantly being given last minute notification of venue changes as we shuttled from one middle school facility or private gym to another. When I look at Hidden Valley, I see a facility that could have been doubled or tripled in size simply by going up. I'm certain that doubling the capacity at all future builds would be absorbed by the need and I suspect tripling it would merely make venues available for all interested parties. Atop any future builds, lighted tennis courts should be placed. And on that note, all tennis venues should be lit and should have squeegees on hand to push the ever-present water away. We have countless times retired early from the tennis courts due to waning light or turned around altogether due to standing water...despite clear sunny skies. I'm confident that all these facilities would garner greater use if we made them more accessible, more usable and more reliable.

Respectfully,

Johnson Marshall
Business Owner: 11911 NE 1st St Suite B104, 98005
Resident: 10307 SE 25th St, 98004

Sent from my iPhone

From: jroskill@gmail.com
Sent: Wednesday, October 26, 2022 2:46 PM
To: CompPlan2044EIS
Subject: Support Option 3 for Wilburton EIS with 15,000 housing units

Hello. My name is Jon Roskill and I am a homeowner in Bellevue. I want to encourage the city to choose Option 3 in the Wilburton EIS scoping exercise and to increase the housing units studied from 12,000 to 15,000.

I also want to specifically encourage you to look at increased densities in the NE corner of Wilburton along 120th towards the Spring District. This area has the infrastructure to support the increased densities that Bellevue will need to meet it's housing goals.

Thanks, Jon

October 31, 2022

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 writing to provide comments in response to the Scoping Notice for the Environmental Impact Statement (EIS) being prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, Coast Hospitality LLC is the parent company of the ground lessee of Hotel 116, located on the east side of 116th Avenue NE, just south of NE 8th Street (the “Property”). The Property is in the heart of the Wilburton subarea. 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.

We recognize that the Comprehensive Plan is a planning document, not a set of development regulations. But major changes to the way the city approaches its Land Use Code will be required in the future implementation of this Comprehensive Plan update. Therefore, our comments below focus on the changes that are needed in the Land Use Code to ensure that Bellevue can meet its destiny as a regional urban center. The upcoming EIS should anticipate the need for these changes and its alternatives should assume a level of development that is achievable with the implementation of these Code changes.

As a general matter, we support Alternative 3 described in the EIS scoping notice, with the notation that this alternative should also be informed by the Code changes suggested below.

For these reasons, we suggest that the EIS should include analysis based on the following assumptions.

Comments Specific to Wilburton

- The area on both sides of 116th Avenue NE between I-405 and Eastrail line and NE 4th Street and NE 8th Street should be the location of the most intense development in Wilburton.
- NE 6th Street should terminate at 116th Avenue NE after crossing I-405. To extend NE 6th Street east to 120th Avenue NE would create little benefit to vehicle transportation and would destroy the opportunity to provide an iconic, regional connection between The

Grand Connection and Eastrail at that location. In addition to losing this critical multi-modal connection, an eastern extension of NE 6th Street would necessitate yet another at-grade crossing of Eastrail by a major arterial within only about a quarter mile.

General Comments

- Uses
 - 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.
 - 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.
 - Allow electric vertical take-off and landing (eVTOL) uses adjacent to transit stations, in order to maximize mass transit ridership and general mobility.
- Height & Density
 - 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.
 - 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 200 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 200 feet. Below 200 feet, high-rise development is difficult to underwrite in these urban centers.

- Floorplates & Tower Standards
 - Maintain appropriately sized residential floorplates above 85 feet, while permitting residential floorplates larger than 28,000 s.f. below 85 feet. The objective should be to maximize housing development opportunities, which means larger floorplates below 85 feet and smaller ones in towers above.
 - Allow larger floorplates for nonresidential uses, particularly tech, research & development and lab uses, above 40 feet and 85 feet. Such larger floorplates are especially attractive to this group of tenants, so the plan should accommodate these requirements.
 - 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 kinds of connections.
 - Tower spacing should be limited to 40 feet, as in the Downtown.
 - Structure setbacks should be eliminated, instead establishing a “build-to line” for new development.

- Parking
 - Minimum parking requirements should be significantly reduced in TOD areas, to 0.5 stalls/unit for multifamily and 1 stall/1000 s.f. for nonresidential.
 - Further parking reductions should be allowed based on project-specific parking studies, as in the Downtown.
 - Consider mass transit, grand Connection and Eastrail adjacency in setting low or zero parking stall/unit requirements.
 - Exempt below grade parking from FAR.
 - 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.
 - 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.

- Affordable Housing
 - Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options
 - Avoid mandatory inclusionary requirements
 - Extend MFTE authorization throughout all growth areas in the city.
 - Incentivize the creation of affordable housing by allowing private developers to create affordable housing “banks” in new or rehabilitated income-restricted projects. Those projects could be built in advance of new market-rate development in the City, and then in-lieu funds from the new projects could be used to acquire affordable housing credits from the income-restricted projects.
 - Bellevue should create and staff a new Housing Division within the Department of Community Development, to coordinate the City’s affordable housing initiatives and the use of fee-in-lieu collections

- Critical Areas
 - Exempt Wilburton and 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 development. Critical areas can be well-protected without meaningless 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.
- Tree Regulations
 - Urban center and TOD areas should be exempted tree preservation regulations, similar to Downtown.
- Impervious Surfaces
 - Urban center and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on LID/hard surface coverage regulations, similar to Downtown.
- Process
 - Allow broad use of development standard departures in all urban center and TOD areas. Encourage the use of such departures where they would result in superior design and use.
 - Allow broad use of development agreements in all urban centers and TOD areas for any land use regulation.
 - In urban centers and TOD areas, allow a three-year extension of ADR approvals, to preserve development opportunities across market cycles.

We appreciate the opportunity to provide these comments and we look forward to participating in the EIS and Comprehensive Plan update process ahead.

Sincerely,



Douglas Rigoni
President/CEO

Coast Hospitality LLC

600 Stewart Street, Suite 1920, Seattle, Wa, 98101
206 849 8664

www.coasthospitality.com

October 31, 2022

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 writing to provide comments in response to the Scoping Notice for the Environmental Impact Statement (EIS) being prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, Urban Renaissance Group and its partners own 16 acres in the Eastgate area known as “Cascade Yard” (the “Property”). Cascade Yard is the key TOD parcel in the 2017 rezone of the Eastgate Subarea and the site targeted for the most significant levels of residential and commercial development. 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.

Many concepts in Bellevue’s Land Use Code for areas outside Downtown date back to the late 1970’s and early 1980’s. This was an era in which Bellevue was primarily a suburban bedroom community, with the first high-rise buildings appearing in Downtown. Outside of Downtown, most development was low-density and suburban in character and elements of the Land Use Code continue to reflect this history. In the last 15 years, new zoning has been adopted for Bel-Red, Eastgate and East Main, but in each case the new zoning included relics of the City’s suburban past.

Bellevue is now a major regional center in the Puget Sound and the upcoming zoning for its mixed-use areas, TOD areas, growth centers and their surrounds, as well as other areas well-served by transit, should reflect this reality. New zoning for these areas should be based on the urban design principles that underlie the City’s Downtown zoning.

We recognize that the Comprehensive Plan is a planning document, not a set of development regulations. But major changes to the way the City approaches its Land Use Code will be required in the future implementation of this Comprehensive Plan update. Therefore, our comments below focus on the changes that are needed in the Land Use Code to ensure that Bellevue can meet its destiny as a regional urban center. The upcoming EIS should anticipate the need for these changes and its alternatives should assume a level of development that is achievable with the implementation of these Code changes.

As a general matter, we support Alternative 3 described in the EIS scoping notice, with the notation that this alternative should also be informed by the Code changes suggested below.

For these reasons, we suggest that the EIS should include analysis based on the following assumptions.

COMMENTS

Uses

- 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.
- 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.
- Allow electric vertical take-off and landing (eVTOL) uses adjacent to transit stations, in order to maximize mass transit ridership and general mobility.

Height & Density

- Maximize heights and densities within ½ mile of light rail stations and major transit hubs.
- 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.
- 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 200 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 200 feet. Below 200 feet, high-rise development is difficult to underwrite in these urban centers.

Floorplates & Tower Standards

- Maintain appropriately-sized residential floorplates above 85 feet, while permitting residential floorplates larger than 28,000 s.f. below 85 feet. The objective should be to maximize housing development opportunities, which means larger floorplates below 85 feet and smaller ones in towers above.
- Allow larger floorplates for nonresidential uses, particularly tech, research & development and lab uses, above 40 feet and 85 feet. Such larger floorplates are especially attractive to this group of tenants, so the plan should accommodate these requirements.
- 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 kinds of connections.

Parking

- Minimum parking requirements should be significantly reduced in TOD areas, to 0.5 stalls/unit for multifamily and 1 stall/1000 s.f. for nonresidential.
- Further parking reductions should be allowed based on project-specific parking studies, as in the Downtown.
- 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.
- 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.

Affordable Housing

- Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options
- Avoid mandatory inclusionary requirements
- Extend MFTE authorization throughout all growth areas in the City.
- Incentivize the creation of affordable housing by allowing private developers to create affordable housing “banks” in new or rehabilitated income-restricted projects. Those projects could be built in advance of new market-rate development in the City, and then in-lieu funds from the new projects could be used to acquire affordable housing credits from the income-restricted projects.

- Bellevue should create and staff a new Housing Division within the Department of Community Development, to coordinate the City's affordable housing initiatives and the use of fee-in-lieu collections

Critical Areas

- Exempt Wilburton and 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 development. Critical areas can be well-protected without meaningless reductions in on-site density.
 - Provide for an exemption from geologic hazard 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.

Tree Regulations

- Urban center and TOD areas should be exempted tree preservation regulations, similar to Downtown.

Impervious Surfaces

- Urban center and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on LID/hard surface coverage regulations, similar to Downtown.

Process

- Allow broad use of development standard departures in all urban center and TOD areas. Encourage the use of such departures where they would result in superior design and use.
- Allow broad use of development agreements in all urban centers and TOD areas for any land use regulation.
- Allow Master Development Plans to include optional alternatives for future development within distinct phases of the master-plan area.
- In urban centers and TOD areas, allow a two-year extension of ADR approvals, to preserve development opportunities across market cycles.

We appreciate the opportunity to provide these comments and we look forward to participating in the EIS and Comprehensive Plan update process ahead.

Sincerely,



Pat Callahan
Chief Executive Officer



Joe Polito
Managing Director, Development

October 31, 2022

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 writing to provide comments in response to the Scoping Notice for the Environmental Impact Statement (EIS) being prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan. For reference, Bridge Housing, Essex Property Trust and Touchstone/Urban Renaissance Group are currently working with Sound Transit on the development of Sound Transit's excess land located at 1797 120th Ave NE. The Comprehensive Plan update will be important to the future use and development of this property and the role it will play in Bellevue's growth as a regional center.

Many concepts in Bellevue's Land Use Code for areas outside Downtown date back to the late 1970's and early 1980's. This was an era in which Bellevue was primarily a suburban bedroom community, with the first high-rise buildings appearing in Downtown. Outside of Downtown, most development was low-density and suburban in character and elements of the Land Use Code continue to reflect this history. In the last 15 years, new zoning has been adopted for Bel-Red, Eastgate and East Main, but in each case the new zoning included relics of the City's suburban past.

Bellevue is now a major regional center in the Puget Sound and the upcoming zoning for its mixed-use areas, TOD areas, growth centers and their surrounds, as well as other areas well-served by transit, should reflect this reality. New zoning for these areas should be based on the urban design principles that underlie the City's Downtown zoning.

We recognize that the Comprehensive Plan is a planning document, not a set of development regulations. But major changes to the way the City approaches its Land Use Code will be required in the future implementation of this Comprehensive Plan update. Therefore, our comments below focus on the changes that are needed in the Land Use Code to ensure that Bellevue can meet its destiny as a regional urban center. The upcoming EIS should anticipate the need for these changes and its alternatives should assume a level of development that is achievable with the implementation of these Code changes.

As a general matter, we support Alternative 3 described in the EIS scoping notice, with the notation that this alternative should also be informed by the Code changes suggested below.

For these reasons, we suggest that the EIS should include analysis based on the following assumptions.

Uses

- 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.
- 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.

- Allow electric vertical take-off and landing (eVTOL) uses adjacent to transit stations, in order to maximize mass transit ridership and general mobility.

Height & Density

- 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.
- 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 200 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 200 feet. Below 200 feet, high-rise development is difficult to underwrite in these urban centers.

Floorplates & Tower Standards

- Maintain appropriately-sized residential floorplates above 85 feet, while permitting residential floorplates larger than 28,000 s.f. below 85 feet. The objective should be to maximize housing development opportunities, which means larger floorplates below 85 feet and smaller ones in towers above.
- Allow larger floorplates for nonresidential uses, particularly tech, research & development and lab uses, above 40 feet and 85 feet. Such larger floorplates are especially attractive to this group of tenants, so the plan should accommodate these requirements.
- 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.
- Structure setbacks should be eliminated, instead establishing a “build-to line” for new development.

Parking

- Minimum parking requirements should be significantly reduced in TOD areas, to 0.5 stalls/unit for multifamily and 1 stall/1000 s.f. for nonresidential.
- Further parking reductions should be allowed based on project-specific parking studies, as in the Downtown.
- 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.
- 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.

Affordable Housing

- Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options
- Extend MFTE authorization throughout all growth areas in the City.
- Incentivize the creation of affordable housing by allowing private developers to create affordable housing “banks” in new or rehabilitated income-restricted projects. Those projects could be built in advance of new market-rate development in the City, and then in-lieu funds from the new projects could be used to acquire affordable housing credits from the income-restricted projects.

- Avoid mandatory inclusionary requirements. To be successful, voluntary inclusionary zoning needs to be carefully calibrated to include financial and non-financial offsets. Property tax abatement (MFTE); System Development Charge (SDC) waivers; relaxed parking requirements; bonus density incentives; (bonus heights, density transfer & Floor Area Ratio increases) together with priority permit processing options should all be part of a robust voluntary inclusionary housing program. The goal should be to create permanently affordable housing integrated into high opportunity areas and to increase the inventory of permanently affordable, income-restricted homes in Bellevue.
- Bellevue should create and staff a new Housing Division within the Department of Community Development, to coordinate the City's affordable housing initiatives and the use of fee-in-lieu collections

Critical Areas

- Exempt Wilburton and 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 development. Critical areas can be well-protected without meaningless 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.

Tree Regulations

- Urban center and TOD areas should be exempted tree preservation regulations, similar to Downtown.

Impervious Surfaces

- Urban center and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on LID/hard surface coverage regulations, similar to Downtown.

Process

- Allow broad use of development standard departures in all urban center and TOD areas. Encourage the use of such departures where they would result in superior design and use.
- Allow broad use of development agreements in all urban centers and TOD areas for any land use regulation.
- In urban centers and TOD areas, allow a two-year extension of ADR approvals, to preserve development opportunities across market cycles.

We appreciate the opportunity to provide these comments and we look forward to participating in the EIS and Comprehensive Plan update process ahead.

Sincerely,



Joe Polito
Managing Director, Development
Touchstone, LLC



Deanna Chalfant
Vice President, Development
Essex Property Trust, Inc



Kurt Creager
Executive Vice President
BRIDGE Housing

McCULLOUGH HILL LEARY, PS

October 28, 2022

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 writing on behalf of Continental Properties to provide comments in response to the Scoping Notice for the Environmental Impact Statement (EIS) being prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

Continental Properties 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:

- Outside of mixed-use and urban centers, 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.
- Much of this product type from 40 years ago still exists in locations in Bellevue immediately adjacent to major urban centers, such as on the west side of 148th Avenue NE north of SR-520 and on Bellevue Way immediate north of and adjacent to Downtown.

- This 40-year-old zoning reflects a density that is 80% to 90% less than comparable 5-over-2 apartment development that predominates in the market today. Updating this zoning to current standards in these locations adjacent to major urban centers would add hundreds, if not thousands, of units to the City's housing inventory.
- Upgrading multifamily zoning in these key locations to expand the housing inventory can be accomplished while still providing usable open space and neighborhood buffers.
- The City cannot afford to forego this opportunity to update 40-year-old zoning in an effort to address the housing crisis in Bellevue. 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 for which Bellevue was noted two generations ago.

If the City is serious about addressing its housing crisis, the EIS should study greater residential density for The Park at Bellevue site and its neighbors, as well as similarly-situated areas with 40-year-old multifamily zoning in the City. Specifically, the EIS should review multifamily zoning at 75 feet in height for the Property. Height at the perimeter may be reduced to 55 feet and open space areas should be included in the new development. Ultimate density should be based on these prescribed development envelopes and site requirements, not a dated notion of units-per-acre. Accordingly, we ask that Alternative 3 in the EIS be refined to include this area immediately north of and adjacent to Downtown in the target zone for development of greater intensity.

We appreciate the opportunity to provide these comments and we look forward to participating in the upcoming EIS process.

Sincerely,



John C. McCullough



October 27, 2022

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

Re: *Scoping Comments for Bellevue 2044 Comprehensive Plan EIS – Bellevue Mission Healthcare*

Dear Liz and Reilly,

Thank you for this opportunity to comment on the scope of the City of Bellevue's Environmental Impact Statement for its 2044 Comprehensive Plan update. You are engaged in vital work for the City that will shape it for many years to come.

Careage health care and senior living communities provide a complete spectrum of quality care for older adults of all ages and abilities. Since 1996, we have been a part of the Bellevue community by providing services such as 24-hour nursing care, rehabilitation and occupational therapy, and degenerative chronic condition care to Bellevue's older citizens and others at our Mission Healthcare facility located at 2424 156th Ave NE. As we look toward the future, we hope to be able to utilize this location to provide additional residential density and services for active adults, senior citizens, and others. We believe the redevelopment of the property makes sense because of its immediate proximity to the Bel-Red subarea, frequent transit (including bus rapid transit and light rail), and Redmond's Overlake mixed-use neighborhood that is targeted for significant additional density by that jurisdiction. However, the City will need to make a Comprehensive Plan and zoning changes to support redevelopment.

We have studied the property and nearby zoning designations and believe it is a good candidate for the extension of the BR-RC-3 zoning that exists immediately to the west across 156th Avenue NE. With this zoning, the site could provide an estimated 325 residential units in addition to ground-level retail. We offer the following comments on the City's Scoping Handout based on our study:

- **All of the City's Action Alternatives should study the extension of the Bel-Red subarea and zoning designations to edge properties poised for redevelopment like ours.** The City's "Action Alternatives" for the 2044 Comprehensive plan (Alternatives 1-3) all contemplate additional housing unit capacity across the City, but none of them clearly focuses on additional housing unit capacity growth in Bel-Red or considers modest expansion of the Bel-Red Subarea boundaries. From the heat maps provided, some growth is expected within the current Bel-Red boundaries, but it is unclear whether this is under existing or future zoning changes.

At least one of the Action Alternatives should consider additional housing unit capacity in the Subarea and a modest boundary expansion. Sites like our property present great opportunities for midrise multifamily development if zoned appropriately. We are proximate to transit, located on arterials, and buffered from lower-density zones by other properties. We request you specifically consider extending BR-RC-3 zoning to our parcel in at least one of the Action Alternatives as a way to accomplish the additional housing unit capacity needed to meet the City's growth targets.



- **The City's Action Alternatives should consider modest increased heights and eliminate FAR restrictions in Bel-Red zones to maximize the development potential for midrise residential construction.** In addition to considering the extension of the BR-RC-3 zoning to our site, the City should consider a modest height increase for this zone from 70' to 85' in at least one of the Action Alternatives. This height increase would allow projects to maximize the number of residential stories allowed under Type III construction, which is the most cost-efficient to build. Further, the Action Alternatives should consider removing residential FAR limits in this zone that could artificially constrain development potential and rely instead on form-based standards. We understand the City is studying this concept as part of its "Next Right Work" on affordable housing, and we support it.
- **The City's Action Alternatives should study eliminating other development standards that reduce housing development potential.** In addition to appropriately calibrating heights and loosening density restrictions, the Action Alternatives should identify other development standards that could be modified or eliminated to increase the efficiency and likelihood of residential development. In particular, the rigid setback and step-back requirements in the Bel-Red zoning code create inefficient floorplates and result in lost units. The City's goal to have a beautiful built environment and be a "City in a Park" can still be effectively met through design guidelines that encourage articulation and modulation absent prescriptive standards. We think that is the better approach.
- **Affordable housing programs are important but should remain incentive-based.** Last, we would be remiss if we did not acknowledge the housing affordability crisis facing our region. The City's highest priority in tackling this challenge should be unlocking as much residential unit production potential as it can, and our suggestions above align with this. We also recognize that zoning programs can provide tools to create income-restricted housing units. These are important tools, but they must be calibrated correctly and responsive to market forces. We support the incentive-based programs identified in Alternatives 2 and 3, and believe the City should continue this approach as it creates less risk that an incorrectly calibrated program will stifle development. Further, as Bel-Red already has an incentive-based zoning structure, it would be simple to modify this program to encourage more affordable housing.

Thank you for this opportunity to comment. We look forward to further engagement with the City as it moves forward with the next steps in this important planning process.

Sincerely,

John Hogan

Careage and Mission Healthcare Investments LLC

cc: Thara Johnson, Comprehensive Planning Manager, tmjohnson@bellevuewa.gov
Emil King, Planning Director, eking@bellevuewa.gov
Abigail DeWeese, HCMP, abigail.deweese@hcmp.com

From: John Carlson <John.Carlson@kemperdc.com>
Sent: Monday, October 31, 2022 4:05 PM
To: CompPlan2044EIS
Cc: Kemper Freeman; jim.melby@kemperdlc.com; Mariya Frost
Subject: Bellevue 2044 Comp Plan Update

Below is our public comment on the scoping of the draft environmental impact statement that will include evaluation of the Wilburton Study Area.

The past 2018 Wilburton Draft Environmental Impact Statement (DEIS) included intersection-specific improvements that would increase the capacity of intersections and roadways in the study area and accommodate the trips that would be generated by the proposed alternatives. However, there appeared to be no willingness to implement them. The DEIS noted that “while this study proposes mitigation to return their operation to the No Action Alternative conditions, it is recommended that they be viewed more holistically as part of the Transportation Facilities Plan update to determine if the modifications are warranted given the envisioned urban, multimodal nature of the area.”

Mitigation is not only warranted – it should be mandatory. Increased traffic congestion reduces Bellevue’s and the region’s competitiveness, increases emissions, and costs drivers millions in lost time and money.

In its scoping, we encourage the City to conduct a *full evaluation of all alternative transportation grid patterns* and mitigation included in the DEIS. This includes the extension of NE 10th St., NE 6th St., NE 2nd St. and Main Street from 116th Ave. NE to 120th Ave. NE as well as additional north/south connections between 116th and 120th avenues. Also, there should be an evaluation of NE 2nd St. crossing I-405, now thought of as a city street with no connection to I-405 (although a set of ramps to I-405 has not been pre-empted yet). It is also critical that NE 8th be as unencumbered as possible, as it is a major artery for entering downtown.

City data for 2035 shows 76.5 % of all daily trips will be in cars. Again, this is city data. Even if there is a (slightly) lower proportion of trips taken by vehicles, there will still be a steady increase in vehicular traffic, since all modes of transportation will carry more passengers, assuming that transit trips eventually increase to their pre-Covid levels. It is critical that mitigation take place that accommodates projected demand and mode-split which is reflective of how people are expected to move about in Bellevue. Maintaining parking requirements to prevent developers from shaving costs at the expense of creating more congestion should likewise remain an important principle.

The Bellevue Chamber of Commerce put it well in their letter to the city of March 19th, 2018, when they said “We cannot endorse the implementation of any alternative which assumes a deliberate lowering of the level of service for commercial and emergency vehicles, as well as rubber-tired transit and private passenger vehicles within the Wilburton MMA.” It is not possible to divorce mobility in and around Bellevue from the desire to increase the supply of housing.

Thank you.

John Carlson

John Carlson
Vice President, Government Affairs

Kemper Development Company
The Bellevue Collection | Bellevue Square Lincoln Square Bellevue Place
Office: 425.460.5792
john.carlson@kemperdc.com
www.bellevuecollection.com



From: Joe Razore <joe@mrmcapitalllc.com>
Sent: Monday, October 24, 2022 12:09 PM
To: CompPlan2044EIS
Subject: FW: Final Week of Scoping for Comp Plan Environmental Review

To Whom this may concern,

My name is Joe Razore. Our company, MRM Capital, owns the Evergreen Center property in the Bel-Red corridor.

I'm writing to comment on the scope of the EIS the city is working on. It's critical for the future of Bellevue to be sure the EIS studies options that maximize housing and commercial density in the Bel-Red corridor. We've developed successful projects in neighboring cities, most recently the Boardwalk Apartments in Kirkland (www.kirklandboardwalk.com), and a big part of that success was due in part to city staff and elected officials. They listened to the needs of property owners and guided the visioning process to be sure what was studied was economically feasible and had adequate flexibility. They helped guide the process but ultimately let the market dictate what should be developed.

Our site currently faces many constraints which make development infeasible. The street grid, critical areas, density and floor plate size caps are just a few. If we as a city are serious in providing a range of housing affordability alternatives and desirable workplaces for our growing employment base, we need to re-look at all of these constraints. If we don't, sites like ours will remain underdeveloped.

Please be **sure the EIS is as broad as possible and looks at maximizing density for both commercial AND housing throughout the city.** Thank you.

Joe Razore
MRM Capital

From: City of Bellevue <bellevuewa@public.govdelivery.com>
Sent: Monday, October 24, 2022 11:37 AM
To: razore@broderickgroup.com
Subject: Final Week of Scoping for Comp Plan Environmental Review

From: Joe Dugoni <joedugoni@hotmail.com>
Sent: Saturday, October 29, 2022 4:46 PM
To: CompPlan2044EIS
Subject: Bellevue EIS 2044

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

I believe it is fair to share density throughout the entire city.

The 140th Ave NE Corridor in Northeast Bellevue is a strong location to increase density with the Spring District and Microsoft within blocks of that location. Also the Bellevue golf course is a natural place to put density around.

I believe it is also important so that we can add density up rather than horizontal which takes more land. If we are going to be stewards of the future and next generations, it is very important to maintain open space, trees and build up rather than allow sprawl. Thank you. Joe



PLUSH COMMITTEE

Planning, Land Use, Sustainability, & Housing

bellevuechamber.org

425-454-2464

staff@bellevuechamber.org



October 31, 2022

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

Re: Comprehensive Plan EIS Scoping Comments

Dear Development Services Department:

The Bellevue Chamber PLUSH Committee appreciates the opportunity to provide comments to the Bellevue 2044 Comprehensive Plan Periodic Update ("Comp Plan Update") and Wilburton Vision Implementation ("Wilburton Vision") Environmental Impact Statement, Fall 2022 Scoping Handout ("Scoping Handout"). As we write this letter at the end of 2022:

- Bellevue is seeing incredible growth in office building construction in Downtown and BelRed, with buildings slated to be occupied by some of the world's largest tech companies, including Amazon and Meta; the continuing post-COVID 'return to office' uncertainty requires considering EIS options broadly and flexibly.
- Light rail construction is nearly complete and scheduled to open in 2024, the state is continuing to advance the I-405 Master Plan improvements, and Bellevue has nearly completed its MI&I plan to create a network of arterials connecting Downtown Wilburton and BelRed.
- Significant growth in office buildings serving Bellevue's other economic clusters, such as FIRE, medical, and life sciences has not occurred, in large part due to under-zoned properties in areas like Wilburton and BelRed.
- Some multifamily residential development has occurred in Downtown and BelRed, but housing development has generally not kept pace with job growth, and affordable housing options are few and far between.

The Comp Plan Update provides Bellevue with a unique opportunity to prepare for the myriad of changes that are certain to occur in the years ahead; to take advantage of the strengths presented by the launch of light rail, highway and arterial expansion, and the ever-burgeoning tech sector, while simultaneously enabling the market both to capitalize on growth opportunities in other economic clusters and create new higher-density, transit-oriented housing options in addition to middle-density choices, all while maintaining the character of the city's vibrant single-family neighborhoods.

Before offering our comments, we note that the SEPA process and the EIS is intended as a tool to "inform decision makers and the public of reasonable alternatives" to assist in making these important decisions.¹

¹ WAC 197-11-400(2) and Scoping Handout, page 2.

As such, it is necessary to study a meaningful range of reasonable alternatives to provide the City Council and the public with potential impacts, both good and bad, of certain actions and inactions that we may ultimately pursue.

Comprehensive Plan Update comments. We request that you incorporate the following considerations into the Comp Plan Update:

- **Alternatives 1-3 provide an acceptable range of growth alternatives in housing units and jobs.** Even the low-end considered in Alternative 1 would result in aggressive growth in housing units in the city, and the consistent level of job growth across the alternatives ensures that sufficient planning for economic growth will occur. It will be important for the city to develop zoning alternatives where these targets can be rationally achieved. If so, the three Alternatives will analyze how much additional density should be provided to create more housing options, as opposed to how much job growth will need to be sacrificed. We believe this to be an appropriate paradigm.
- **Prioritize density in mixed use centers.** Bellevue should continue to concentrate density in the mixed use centers.² Placing growth at transportation nodes achieves a variety of goals, including reducing traffic and greenhouse gas emissions. The strategy is also consistent with state and regional planning goals and enables Bellevue to continue to grow in areas where there is infrastructure to support the growth, and where existing residents expect the growth to occur. Specifically, we suggest:
 - Minimum densities of 5.0 FAR be implemented on land within a mixed use center and within the half mile radius of light rail stations or frequent transit stops.
 - Additional density must be allocated to *all* mixed use centers, not just Downtown, BelRed, and Eastgate/Factoria. Left out of the current Comp Plan are East Main, Wilburton, and Crossroads, each of which provide greater opportunity for accommodating the targeted levels of housing units and jobs.
 - Appropriate building and site dimensions must be provided to enable the density to be achieved, to provide the flexibility to create high quality design, and to enable creation of more affordable housing options. Appropriate building dimensions for mixed use centers include:
 - Allowing building heights of 250'+ in high-rise areas.³
 - Eliminating the floorplate maximums for mid-rise residential.
 - Increasing floorplate maximums for non-residential to enable more nationally competitive tech, medical, and life sciences buildings.
 - Permitting maximum lot coverage and impervious surface at 100%.
 - Eliminating building setbacks, particularly for mid-rise residential.

² The existing Comp Plan identifies the mixed use centers as Downtown, BelRed, Eastgate/Factoria, Wilburton, and Crossroads, but only specifically allocated growth to the first three. Housing unit/jobs growth was allocated 50%/56% to Downtown, 38%/26% to BelRed, 6%/16% to Eastgate/Factoria, and 6%/2% to all other areas of the city. Combined, 94% of all housing units and 92% of job growth was allocated to these three areas.

³ For context, in much of Seattle's downtown-Ballard neighborhood, the maximum FAR is 5.75. Ballard does not have light rail stations.

- **Support density in neighborhood centers through zoning adjustments.** Within neighborhood centers, consider appropriate urban minimum densities and heights that promote redevelopment of a mix of uses and fit within surrounding communities. Neighborhood centers are scattered throughout the city and are zoned NB and CB. In some cases, land surrounding the centers also includes commercial zoning such as PO, O, or GC; or higher density residential, like R-10 or R-20, or even R-30. Most neighborhood centers also include transition areas, which significantly limit density within neighborhood centers. We request that the City evaluate each of these areas (the centers and surrounding land) and modify the code to enable redevelopment in a manner that fits well with the surrounding community, but at the same time provides additional residential housing and mixed use commercial opportunities.
- **Expand mixed use centers to capture transit areas and corridors.** To follow on the above bullet, mixed use centers are most viable when they are added or expanded where growth occurs organically—near transit. We suggest that all areas within frequent transit areas be included in mixed use centers. Areas for opportunity include many areas of Eastgate, the Bellevue Way Corridor (north of 12th and south of Main), and other transit-rich environments that to date have been excluded from mixed use centers.
- **Address the “missing middle” within viable residential areas.** Residential areas should be evaluated for locations that can viably support “missing middle” housing solutions. The existing Comp Plan calls for “providing, through land use regulation, the potential for a broad range of housing choices to meet the changing needs of the community”⁴ but this policy has not yet been met in Bellevue’s residential areas. This should be prioritized to meet current and future demand.
- **Re-evaluate the boundaries.** Throughout the city there are areas that are viable for higher density housing or nonresidential development but have not been included in an area-wide rezoning. The entire city should be explored for pockets of land that are appropriate targets for additional density. We see particular opportunity on the edges of BelRed near Redmond’s Overlake neighborhood where Redmond is planning for significant additional density and growth, in Eastgate, in Factoria, and within all of the city’s neighborhood centers.
- **Include BelRed as a continuing center for job growth and housing.** BelRed should be considered a blank slate for development with ample opportunity for growth; consequently, we request that a greater emphasis be placed on this subarea. It was an area slated for significant growth in the last Comprehensive Plan update, but it has not realized its potential because of zoning standards and a street grid that has been a barrier to feasible development. While Alternative Three includes a higher focus on BelRed than the other alternatives, we also suggest maximizing mixed use density for residential and commercial development within the half-mile radius surrounding all light rail stations, as stated above.
- **Eliminate barriers to housing and jobs production.** As stated, increasing FAR and minimizing zoning constraints are necessary mechanisms to fully realize development potential. As such, we ask that you consider identifying the specific regulations that have reduced development capacity, including upper level setbacks, floor plate limitations, open space/play area

⁴ Policy LU-15.

requirements, and lot coverage and impervious surface maximums. Eliminating these limitations in mixed use centers will allow for development to flourish in these areas and for growth tools, such as full use of FAR, not to be hampered in the process.

- **Streamline the ability to obtain contract rezones.** The existing process for obtaining contract rezones typically requires two separate City Council actions, which is incredibly challenging and hinders the ability to provide viable uses on land where the existing zoning is inadequate. We ask the City to adopt solutions that have worked well in Seattle, including the creation of general land use map designations within the Comprehensive Plan that can be zoned to a range of urban zoning designations⁵ and the adoption of standards that allow for greater density if a project can demonstrate compliance. General land use map and urban zone designations will streamline the process to allow for a one-step approval process that still has appropriate City Council oversight and public engagement.
- **Maximize development through incentive-based programs.** Alternatives Two and Three include voluntary incentive-based programs which provide industry with the necessary flexibility to develop widely in our community. We support incentive-based programs to support community priorities like affordable housing. With housing demand outpacing supply across the nation, the market has become more competitive in attracting quality development and high development exactions will jeopardize perceived development opportunity in capital markets. Incentive programs prove more durable and take into consideration the key financial components that are necessary to produce housing at all affordability levels. To that end, we encourage the city to do the following:
 - Maintain the 80% AMI incentive for affordable housing requirements. Bellevue's MFTE, Downtown FAR exemption, and BelRed, East Main, and Eastgate mandatory incentive zoning requirements are all predicated on the 80% AMI standard. This rent level can work for private sector development, depending on the percentage of units and the duration of the affordability requirement, and has been proven to work in some areas of the city, such as Downtown's MFTE and BelRed's mandatory incentive.
 - Create incentive zoning requirements consistent with state law (RCW 36.70A.540), in that they need to be voluntary and an incentive. To that end, the affordable housing requirements should be derived from a reasonable base FAR for the area, and the affordable housing percentages need to be set at a level that creates an incentive for the developer to provide the basic financial justification.
 - Adopt a reasonable fee-in-lieu for both residential and nonresidential developments that enables the flexibility to fund even greater levels of affordability while still being able to take advantage of the incentive zoning.
 - Maintain the Downtown and BelRed market rate FAR bonuses for on-site affordable units as a means of equalizing the on-site vs. fee-in-lieu structure.⁶
- **Increase the flexibility of the transportation/grid system.** The transportation "grid system" that was envisioned for BelRed was well-meaning but, in many cases, did not consider developability or property ownership. There is an emphasis on moving cars within the current grid system, however, within a transit-oriented area the movement of people should be prioritized. We

⁵ Examples of zoning designations like this would be the NC or SM zones in Seattle.

request that you consider allowing more flexibility in the grid system by allowing pedestrian paths in the place of auto-centered roads where appropriate. A grid system may not be appropriate in Wilburton where uses with larger block sizes (such as medical, biotech) may be needed.

- **Reduce or eliminate parking minimums in the TOD areas of mixed use centers.** Parking minimums have a range of negative consequences, including decreasing financial productivity and shifting finite resources from the creation of housing units. Increases in urbanization, transportation technology, and transit service all reduce the need for parking at buildings in these areas. Rather than requiring more parking than necessary, we ask the city to allow the market a greater degree of flexibility to make this determination. Additionally, we understand the state legislature may consider a bill related to this topic in the upcoming legislative session.
- **Eliminate the critical area penalty in all mixed use centers.** Critical areas are currently well-protected through the use of buffers and other regulatory mechanisms. Reducing density in urban areas will not better protect critical areas but can lead to nonfunctioning lots in key urban areas. We also suggest creating the ability to obtain a steep slope exemption from critical areas for manmade and isolated slopes. In addition, we request that a manmade retaining wall not be considered a “critical area.”
- **Exempt mixed use centers from tree protection ordinances.** In the places where growth is being incentivized (around transit), tree protection ordinances actively hamper industry’s ability to achieve the city’s collective development goals. An effective alternative would be to increase the city’s tree canopy replacement ratio for trees cut down to make way for urban development.
- **Increase speed of permitting and permitting flexibility.** To prepare for Bellevue’s coming growth, an administrative system that can support increased volumes of permit requests is necessary for both those seeking permits and those reviewing requests. To increase efficiency in permit review:
 - Consider a new online permitting/information system that makes it easier for applicants and the public to review information without having to call the City.
 - Hire more planners for review (we understand this is already underway) and ensure review consistency across staff tenures through employee training and preset interdepartmental communication processes.
 - Permit the wide use of departures and Development Agreements within mixed use centers to increase project flexibility and number of projects that provide additional public benefit.
 - Allow a 2-year ADR extension to consider current market conditions and maintain flexibility.
 - Increase SEPA thresholds to the maximum exemption levels allowed by state law.
 - Allow extensions for building permit applications, utility permit applications, and issued building permits to reduce staff burden and increase predictability.
- **Avoid policy pitfalls that hinder growth.** While we do not reject affordability policies out of hand, programs that add fees to development or require specific performance rather than incentives can be too rigid or poorly calibrated to our quickly changing economic conditions. We have seen many examples of well-intentioned housing policies leading to a complete shutdown of residential development in areas, exacerbating our already dire housing crisis. We encourage

flexible, market-based incentives that promote the profitability of creating the types of housing stock that address the city's greatest needs.

Wilburton Vision comments. We request you incorporate the following comments into the Wilburton Vision:

- **Increase residential heights in Wilburton.** Through increased height allowances, high-rise residential developments in Wilburton can be maximized to achieve desired high growth targets. Specifically, the City should increase the areas where it is considering the tallest buildings to encompass the entire area between NE 8th on the north, Eastrail on the east, and the boundary of the Wilburton subarea to the south. Failing to increase Wilburton's residential heights and rezone sufficient area to heights that support cost-intensive high-rise residential development will push growth to less appropriate areas that have fewer employment and transit opportunities.
- **Continue to maintain Wilburton as the natural extension of Downtown Bellevue.** Few downtown environments are supplied with acres upon acres of adjacent lower density development as Bellevue has in Wilburton. While the market currently is not prioritizing traditional office development, the Wilburton neighborhood should be utilized as the natural extension of the downtown office/jobs core. In addition, the larger block sizes in Wilburton could lend themselves to uses like medical office/biotech that need larger floor plate sizes. Encouraging these uses to locate near Overlake could create a mixed use/biotech hub, further diversifying the Bellevue economy.
- **Maintain the emphasis on medical uses along the 116th Ave. NE corridor.** Alternative 3 proposes to study the northwest corner of Wilburton as a Mixed-Use Node instead of Office-Residential. Given the large number of residential opportunities being proposed throughout Wilburton in all Alternatives, we believe the emphasis across the street from the hospitals should remain focused on medical. In addition, since a 1.2 million SF life sciences hub is being proposed on the west edge of BelRed, we believe the 116th corridor should encourage life sciences buildings as well. The BR-MO zoned land located north of NE 12th Street up to Northup Way should be included in the medical/life sciences discussion.

Thank you for the opportunity to provide our comments, which aim to promote sustainable, market-responsive growth. We truly appreciate your diligence in facilitating this feedback process and for navigating a range of highly complex policy issues. We look forward to our continued collaboration as we work in tandem to build a more viable Bellevue; one that will house its workers, empower its industries, and ensure its sustainability.

Sincerely,



Jodie Alberts
Vice President, Government Affairs



Jessica Clawson
PLUSH Committee Chair

From: Shull, Janet
Sent: Tuesday, October 25, 2022 7:45 AM
To: Walter Scott
Cc: CompPlan2044EIS
Subject: RE: Wilburton + Comprehensive Plan EIS scoping comment period reminder

Dear Mr Scott,

Thank you for sharing your EIS scoping comments with me.

Please be advised that your comments must be sent *by you* to the email address below no later than 4 PM on October 31 to be recognized as official comments.

CompPlan2044EIS@bellevuewa.gov

Please reach out with any questions.

Best regards,

-Janet Shull

Janet B. Shull, AICP CUD

State of Planning & Analysis

Community Development, City of Bellevue

jshull@bellevueaz.gov | 7580785086:4 | BellevueAZ.gov

From: Walter Scott <wscott@legacy-commercial.com>
Sent: Tuesday, October 25, 2022 1:16 AM
To: Shull, Janet <JShull@bellevuewa.gov>
Subject: RE: Wilburton + Comprehensive Plan EIS scoping comment period reminder

Hi Janet; we're the guys that operate the Bellevue Design Mkt across the freeway next to Whole Foods; Anyway, I thought I'd add some thoughts to this discourse, If the DEIS comments are not supposed to be sent to you, then please direct this letter to the appropriate party,

Wscott Comments to the DEIS

Height and Density: When people say they want to live in an interesting area: what they intend is "diversity"; diversity in the developments; this could be a variety of retail, green spaces, even building construction materials, and particularly building mass, heights. Think about the areas of certain metro regions that you like to be in or visit? What about Old Main [the area to the West of B V Way]; Is it a "retail " or "residential" area ? Well , people like to work

and office there, They like to recreate there as well. So, how do we recreate these places? If every development has the same rules, same density FAR / same height limit, then you get that "Bucharest": effect [all the buildings there are 8 levels [maximum height of their locally made piston elevators] all are made of the same brown stone [mined locally and affordable], If you want to encourage developers to think of things, and their uses ; then if their sites are large enough [ie minimum size of 3 acres or 5 contiguous acres] ; For example , suppose a developer wanted to build specific retail in single and/or 2 level buildings with grass in between , so there is open , air , light , and then , their next development on the same site could exceed the max height or FAR within some reasonable range to compensate them and encourage new concepts. Buildings made of different materials and architecture should earn developers more points; maybe they earn the right to avoid retail on the ground floor or are permitted to not be required to have the street sidewalks covered by the building canopy. Some sidewalks are covered ; some are not covered ; these are set back to create sun and air and light for the adjacent buildings. Diversity.

The sketches that the City has provided, resembles a continuation of the wedding cake phenomenon of downtown; This is an artificial ceiling for the only LRT Station in this Wilburton study area . The common shared theory about LRT is locating the densities within walking distances to the LRT Stations . This concept of increased densities in the LRT station nodes is obvious in any of the systems I've seen; the Vancouver BC / Lower Mainland, ["skytrain"]; the Long Island Railroad; the LRT in Boston; are some more well known examples. For example , what densities are planned for the Medical / research firms/ and support functions [residential for medical serviceworkers and / or hotels designed to provide close support for relatives and /or those requiring chronic care and medical travelers who are visiting from time to time, this needed infrastructure ; the land area is very limited particularly where it is near an actual LRT station. To put this in Land Manager's speak, this is known as Mixed-Use Node [allowing residential ,office , retail, hotel and medical offices] . The medical Center should be a node of its own ; so its contained to the point it can operate efficiently but never have to leave. And , what do the medical visitors crave ? A good meal, recreation, and all the other comfort of home like any other node except this land has a mission- to take care of the medical community in a manner that requires the difficult decisions City officials have to make.

Interconnections converting from LRT to other forms or conveyance cannot be broad brushed to achieve some success through design by a bicyclist [the ped / bike trail has to be "industrial" if it is large enough and doesn't change elevations much , and it is direct , then , it would have a meaningful impact on transportation; but if your bike trip has a number of pedestrians not segregated such that an approaching bicycle at a higher rate has to be concerned by all the leashes to the dogs running all over the path in n unpredictable manner; steeper grades up and down are not popular with bicyclists nor wheeled disabled or handicapped people; the less sticky the whole idea seems. Approximately 2 years ago, when the City Council of Bellevue voted to study the LID costs; their vote was unanimous : "go big or go home" so they authorized the City to assess the costs and benefits but they dd not escrow any money for this ; so , the "study " has only just started, and the "viable " bridge being studied is a bridge attached to the 6th Street extension to 116th Ave , where it is schedule to dead -end; I'm assuming that the Bike – ped path will continue up the hill to tie into the trails to rails path. There is another route that could level out at the route, the width could be the size of a bridge to minimize the cost but this other route leaves the LRT station at City hall at grade ; crosses the development there where the podium is either the same height close to it and due to the entrance and exit ramps to/from 4th st .there's one place it can go across I-405 whether it's a bridge or an entire LID; it would x I-405 with minor elevation changes to arrive at Lincoln [which the COB owns).There are some naysayers that may be accurate that the COB will never splurge for that pie in the sky costly LID but there has to be a bike and ped trail , maybe there's a compromised width. In any case , with this system crossing the 405 with a bike and ped trail under this revised relocation drops the bicycle riders on 4th st up the East side of NE4th street better that a dedicated connection right into the bike trail (or right by Home Depot and Best Buy;; other displaced retail could create something orderly yet open like the Washington DC Mall area between the Lincoln memorial and Congress only this "mall" would be for retail , light and air. Restaurants (like that "Old Main" feel] Personally , I think something closer to a lid does it better about making the entire place(s) [both sides of the LID] cool.

From: Shull, Janet <JShull@bellevuewa.gov>

Sent: Monday, October 24, 2022 1:29 PM

To: Walter Scott <wscott@legacy-commercial.com>

Subject: Wilburton + Comprehensive Plan EIS scoping comment period reminder

Dear Mr. Scott,

I am emailing you to remind you of the opportunity to comment on the scope of the Environmental Impact Statement (EIS) analysis. The EIS will analyze 3 possible changes to the Comprehensive Plan land use map including changes that will apply to the Wilburton study area. During the scoping comment period, the city is also inviting comments on potential changes to the land use map. Comments you may have regarding specific land use changes you feel should be included in the Wilburton study area alternatives will be valuable information. **The comment period for the scoping phase of the EIS ends at 4 PM on October 31, 2022.**

You can find more information out about the EIS and how to submit comments during the current comment period here: <https://bellevuewa.gov/2044-environmental-review> . Please reach out if you have questions about this scoping comment period, the EIS, or general questions related to the Wilburton Vision Implementation initiative.

Thank you,

Janet

Janet B. Shull, AICP CUD

State of Planning & Analysis

Community Development, City of Bellevue

jshull@bellevuewa.gov | 7580785086 | Bellevue@ajry

From: Walter Scott <wscott@legacy-commercial.com>
Sent: Monday, October 31, 2022 4:04 PM
To: CompPlan2044EIS; eaking@bellevuewa.gov
Cc: Shull, Janet; CompPlan2044EIS
Subject: DEIS comments from w Scott

On the behalf of our Company that operates our properties [in Bellevue , we have only 3 properties : the 5 acres across 112th Ave NE in Bellevue , Wa. And the 5 acres, now operating as the Bellevue Design ; I am submitting these comments concerning the Bellevue Design Market on 116th . Our address is 400 – 112th Ave NE; suite #230, Bellevue, 98004;

Janet: how do I confirm the EIS system receives this message ? I'm getting an error message all of sudden on the address that I cut and pasted from Janet's e mail

Height and Density: To leverage mass transportation Build density and height at the LRT Station modes.

When people say they want to live in an interesting area: what they intend is “diversity”; diversity in the developments; this could be a variety of retail, green spaces, even building construction materials, and particularly building mass, heights. Think about the areas of certain metro regions that you like to be in or visit? What about Old Main [the area to the West of B V Way]; Is it a “retail “ or “residential” area ? Well , people like to work and office there, They like to recreate there as well. So, how do we re-create these places? If every development has the same rules, same density FAR / same height limit, then you get that “Bucharest”: effect [all the buildings there are 8 levels [maximum height of their locally made piston elevators] all are made of the same brown stone [mined locally and affordable], If you want to encourage developers to think of things, and their uses ; then if their sites are large enough [ie minimum size of 3 acres or 5 contiguous acres] ; For example , suppose a developer wanted to build specific retail in single and/or 2 level buildings with grass in between , so there is open , air , light , and then , their next development on the same site could exceed the max height or FAR within some reasonable range to compensate them and encourage new concepts. Buildings made of different materials and architecture should earn developers more points; maybe they earn the right to avoid retail on the ground floor or are permitted to not have the street sidewalks covered by the building canopy. Some sidewalks are covered ; some are not covered ; these are set back to create sun and air and light for the adjacent buildings. Diversity.

Building heights and variety of uses: By all means; the City should prohibit illegal, lewd, noxious or loud or disruptive or other undesirable uses but it would be unwise to limit legitimate uses because there are so many legitimate uses in that kind of density.

The sketches that the City has provided, resembles a continuation of the wedding cake phenomenon of downtown; This is an artificial ceiling. The common shared theory about LRT is locating the densities within walking distances to the LRT Stations . This concept of increased densities in the LRT station nodes is obvious in any of the systems I've seen; the Vancouver BC / Lower Mainland, [“skytrain”]; the Long Island Railroad; the LRT in Boston; are some more well known examples. For example , what densities are planned for the Medical / research firms/ and support functions [residential for medical workers and / or hotels designed to provide close support for relatives and /or those requiring chronic care and medical travelers who are visiting from time to time, this needed infrastructure ; the land area is very limited particularly where it is near an actual LRT station. To put this in Land Manager's speak, this is known as Mixed-Use Node [allowing residential ,office , retail, hotel and medical offices] The medical Center should be a node of its own ; it's own city within a city meaning it can provide a food store and a few good restaurants; a daycare for children and adults; recreation, movie theatre, sports activities/ health club; Workplaces for researchers, labs, and physician offices, imaging and all the other subtrades that are needed to support the

mission then some including medical visitors getting beautification procedures all in one place And , what do the medical visitors crave ? A good meal, recreation, and all the other comforts of home like any other node except this land has a mission- to take care of the medical community in a manner that may require the difficult decisions City officials have to make in terms of uses not even considered at this point. Consider this: Such cities like Houston [heart and cancer leaders] , have locally based international co's that demand the best health care This factor is no different here ; if not , where ? Bellevue?

Interconnections converting from LRT to other forms or conveyance cannot be broad brushed to achieve some success through design by a bicyclist [the ped / bike trail has to be "industrial" if it is large enough and doesn't change elevations much , and it is direct , then , it would have a meaningful impact on transportation; but if your bike trip has a number of pedestrians not segregated such that an approaching bicycle at a higher rate has to be concerned by all the leashes to the dogs running all over the path in n unpredictable manner; also, steeper grades up and down are not popular with bicyclists nor wheeled disabled or handicapped people; the less sticky the whole idea seems. Approximately 2 years ago, when the City Council of Bellevue voted to study the LID costs; their vote was unanimous : "go big or go home" so they authorized the City to assess the costs and benefits but they did not escrow any money for this ; so , the "study " has only just started, and the "viable " bridge being studied is a bridge attached to the 6th Street extension to 116th Ave , where it is scheduled to dead -end; I'm assuming that where 6th st. ends, the Bike – ped path will continue up the hill to tie into the trails to rails path. There is another route that could level out at the ups and downs the width could be the size of a bridge to minimize the cost but this other route leaves the LRT station at City hall at grade ; crosses the development there where the podium is either the same height close to it and due to the entrance and exit ramps to/from 4th st .there's one place it can go across I-405 whether it's a bridge or an entire LID; it would x I- 405 with minor elevation changes to arrive at Lincoln [which the COB owns). There are some naysayers that may be accurate that the COB will never splurge for that pie in the sky costly LID but there has to be a bike and ped trail , maybe there's a compromised width. In any case , with this system crossing the 405 with a bike and ped trail under this revised relocation drops the bicycle riders on 4th st up the East side of NE4th street better that a dedicated connection right into the bike trail (or right by Home Depot and Best Buy;; other displaced retail could create something like a Mall like the Washington DC Mall area between the Lincoln memorial and Congress for retail , light and air. Restaurants (like that "Old Main" feel] Personally , I think something closer to a lid does it better about making the entire place(s) [both sides of the LID] cool. The LID[wide bridge] seems like the way other cities (Denver, Boston, Atlanta, Dallas etc.. the LIDs are proven to work ; moreover land in the vicinity of I 405 and NE 6th has been, earlier this year, selling for \$1000/ sft. By building a LID park and bike – ped path , the city could effectively be "making land :" for \$1,000 per sft.; The slopes and grades would be significant in getting the LID/ big wide bridge to match up with the rails to trails route.

From: Todd Woosley <todd@woosleyproperties.com>
Sent: Monday, October 31, 2022 4:48 PM
To: CompPlan2044EIS
Subject: Housing Affordability

Dear City of Bellevue,

Thank you for the opportunity to comment on the City's Comprehensive Plan Update. In particular, I would like to comment on the issue of housing affordability.

Foremost, it is essential to understand our housing market is a regional market. As such, any solutions to our housing supply and/or affordability issues will require the region to correct the mistakes that have led to our housing affordability crisis. These mistakes have severely limited the market's ability to create new housing, and dramatically increased the costs of building what little housing is allowed.

As a life-long real estate professional, whose focus is market analysis, land use and transportation policies, I have watched governmental actions for the last forty years lead to both a serious lack of housing supply, and massive increases in the cost of building housing.

Historically, the roots of our current housing supply and affordability crisis were planted in the 1980's, when the State Environmental Policy Act (SEPA) began to be used as a tool to limit, if not stop, development of new housing. Once local regulatory agencies and/or anti-growth interests began to impose the full force of SEPA on the homebuilding community, the effects were dramatic. Approval times to create buildable housing lots went from a 3-6 month process to a 3-12 year process. The cost of compliance drove lot prices through the roof.

On top of that, SEPA was used to shift the cost of paying for new infrastructure from the general public to homebuyers. While our governments used to build roads, utilities, parks and schools ahead of the need for them, and with general taxpayer funds, these costs were largely shifted onto new development. This, of course, significantly increased housing costs.

At the time, both the market and lenders required that lot costs be no more than 25% of a home's sales price. Therefore, the additional cost to develop lots for new homes had a quadrupling effect on home prices. For example, a lot's cost was increased \$25,000, the sales price of the home built on that lot was increased \$100,000.

About the same, King County imposed environmental restrictions on new development (the Sensitive Areas Ordinance). The SAO effectively made about 3/4s of the land in King County off limits to new development. This limitation to our region's buildable land drove housing prices even higher. Subsequently adopted Critical Areas Ordinances in incorporated jurisdiction had similar impacts on housing supply and affordability.

The next big restriction in the supply of buildable land came in the early 1990's, when the Countywide Planning Policies (CPPs) were adopted. While the State's Growth Management Act (GMA) required cities and counties accommodate their forecasted growth in jobs and population, this didn't happen.

In particular, the CPPs had both housing supply and affordability requirement (Appendix 2 & 3) which have yet to be met.

THE FUNDAMENTAL PROBLEM IS THE KING COUNTY COUNTY-WIDE PLANNING POLICIES USES A MARKET FACTOR TO DETERMINE IF THERE IS ENOUGH BUILDABLE LAND TO MEET OUR HOUSING NEEDS THAT IS FAR TOO LOW.

This resulted in an Urban Growth Boundary (UGB) so limiting that fails to provide the buildable land capacity needed to accommodate our housing supply and affordability targets. We now have some of the most expensive housing prices in the entire Country. Presciently, a State legislator who was serving in Olympia when the GMA was passed told me “the intent of the Legislature is the Urban Growth Boundary be somewhere east of North Bend”. It appears the UGB is too limiting.

During this period, and continuing to this day, the increase in costs of regulatory compliance for the housing that does get built has also skyrocketed. Whether it is inspections, fees, code compliance or something else, governmental imposed costs also bear a great deal of responsibility in driving up the cost of housing.

Therefore, if we are going to make significant improvements to our housing affordability crisis the City of Bellevue, along with the rest of the region, will need to take dramatic steps to 1. Increase the supply of buildable land capacity for housing, and 2. Reduce the costs associated with the development of housing.

Sincerely,

Todd

Todd R. Woosley
Hal Woosley Properties, Inc.
12001 N.E. 12th Street, Suite #44
Bellevue, WA 98005
(425) 455-5730 #3 office
(425) 454-7150 mobile

Oct. 31, 2022

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

Re: American Capital Group's 2044 Comprehensive Plan EIS Scoping Comments

Dear Liz and Reilly,

On behalf of American Capital group, a multi-generational West Coast Developer based in Bellevue, and our proposed 263 unit development in the S East Main/N Mercer Slough area. We are writing to provide comments on the City of Bellevue's 2044 Comprehensive Plan scoping process.

We fully appreciate and support the City's interest in reevaluating the zoning issues that cause Wilburton and the Bel-Red subareas to miss this last development cycle. ACG offers its full support to assist the City with this massive undertaking. Our 35 years in urban and suburban multifamily development along with Bellevue being our home uniquely positions us to comment on these proposed solutions.

It is from this experience, including our specific and immediate need for a solution that we offer these comments specific to our proposed development at 929 118th Ave Southeast, Bellevue, WA.

The City should increase and modify zoning benefitting housing throughout the City, outside of single family neighborhoods. The City has historically not met its housing targets. It is only on track to meet 79% of its prior goal based on the 2021 buildable lands report. Zoning and City capacity have been the primary barriers to increased development in this last cycle, as the demand for these homes has been at its strongest level in history and until recently capital has been available to build them.

Relying on Wilburton and Bel Red alone is unlikely to meet the housing needs of the City. Largely in part to the type of properties/property owners that make up the majority of both areas. Our proposed development at the North end of the Mercer Slough neighborhood offers a chance for additional market rate and affordable housing in an area that will have a lower traffic impact, and is close to downtown.

The City should include a pathway to propose and quickly expedite a rezone in all areas of the City. Single Family neighborhoods aside, all other areas that are suitable for development should have a clean, clear, and expedient pathway to change their zoning in support of the City's housing needs and vision. The faster a development can move passed this process and begin land use, the faster the City will benefit from additional housing, including affordable housing.

The City should eliminate the low density alternatives from its scope. As mentioned in another letter, while the prospect of encouraging SFR/Duplex housing appears to be more inclusive, it is not. The City needs to be realistic about the significant cost associated with development, especially in Bellevue. If a developer/builder were to construct a duplex in the City of Bellevue today, they would need to rent each side out for a minimum of \$4,500 just to break even. This approach will not make a dent in the

housing need and should be left out of the conversation unless the City can financially subsidize the cost. The best way the city can solve the housing and affordability issue is with additional density on a grand scale. Within reason, the higher percentage of market rate apartments the City permits, the higher number of affordable unit developers can afford/justify building.

There are numerous pathways for the development success of this City. We have an over supply of office space that is surely to expand over the next 12 months, so in the near term the focus of the City should be housing. Furthermore, if the City has qualified, well capitalized developers willing to take a chance on Bellevue now, in an increasingly risky capital market, the City should put everything you can behind it. Developers are willing to help as well. Other jurisdictions have found some success with third party reviewers, remote planners, and other means of more quickly permitting medium to large scale developments.

Please keep a solutions oriented mindset and recognize that we are all fully invested in the success and vitality of Bellevue's future.

Best regards,

A handwritten signature in black ink that reads "Sean Thorson". The signature is fluid and cursive, with the first name "Sean" and last name "Thorson" clearly distinguishable.

Sean Thorson
Acquisitions Manager
American Capital Group



October 28, 2022

Tharsis Law
Roger Pearce
206-226-1623
roger@tharsis.land

City of Bellevue Community Development
450 110th Ave NE
Bellevue WA 98004
Attn: Janet Shull and Thera Johnson

VIA EMAIL to CompPlan2044EIS@bellevuewa.gov
and to City project lead JShull@bellevuewa.gov and planning manager
tmjohnson@bellevuewa.gov

RE: Scoping Comments for Wilburton Vision Implementation EIS

Dear Ms. Finnell and Mr. Jette:

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 116th 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. Thank you for this opportunity to provide scoping comments on the City’s Draft Environmental Impact Statement for the Wilburton Visioning process and Comprehensive Plan update.

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 consider alternatives that take full advantage of these public investments, especially for housing within easy walking or biking distance from transit.

The City’s Comprehensive Plan generally recognizes Bellevue’s continued evolution as a metropolitan center. To continue this evolution, the Comprehensive Plan seeks to leverage transit investments and encourage growth through transit-oriented development (“TOD”). The Comprehensive Plan expressly identifies Wilburton as a mixed use center that encourages TOD

growth.¹ Recognizing Wilburton's relationship to future transit, Wilburton Policy S-WI-5 states: "Explore the potential for transit supportive land use designations for the area between I-405 and the BNSF corridor and NE 4th and NE 8th Streets." The City's ongoing Comprehensive Plan update will only strengthen these TOD planning principles. The Wilburton DEIS should provide alternatives to unlock the potential of these strategically located transit-oriented properties.

In particular, the Draft EIS should consider the following:

- **Provide a Real Transit-Oriented Development Alternative.** One purpose of the Wilburton Visioning process is to take advantage of the public investments in the Sound Transit stations, the Grand Connection (leading from the Downtown Station to the Wilburton area), and the Eastrail Multi-Use Corridor in order to encourage TOD. None of the three build alternatives in the City's Wilburton Visioning materials provide a robust TOD alternative. They are all alike – they simply step down development intensity from Downtown going to the east.

Specific Request: The EIS should examine a TOD alternative that clusters development in the areas of these public projects. This TOD alternative would include high-rise development between 116th Ave NE and the Eastrail Multi-Use Corridor and between NE 6th St and NE 8th St. High-rise development in this area would provide maximize the number of residents with easy walking or biking access to the Sound Transit stations. This area is also currently developed with low-intensity, commercial uses, so providing high-rise residential development would not displace any existing housing types. A true TOD option is consistent with and advances the City's existing and pending comprehensive planning documents.

- **Identify and Provide Realistic Development Alternatives.** The current draft alternatives indicate areas of undefined "mid-rise" development and "high-rise" development. Those development types need to be further refined to determine what development typologies are realistic with today's building code, development materials, and market conditions. General height, bulk and scale need to be identified. When asked at the scoping meeting, for example, City staff indicated that "mid-rise" development could be 8 to 12 stories. This projection is likely unrealistic because mid-rise development will almost certainly use conventional construction (not concrete/steel or mass timber which are much more expensive), and conventional construction tops out at 75 to 85 feet in height. Mid-rise development also needs to have sufficient floor area ratio ("FAR") allowances to make development economically feasible. FARs of at least 5.0 for 75/85 foot zoning should be specified, and any required affordable housing through MFTE or other incentive zoning programs should, at a minimum, be exempt from FAR requirements or provide a FAR bonus as in the current downtown code.

¹ Comprehensive Plan, p. 50 and Map LU-4.

Specific Request: For mid-rise development, FAR of at least 5.0 should be allowed with exemption for affordable housing programs or requirements.² For high-rise construction, heights of at least 240 feet for residential development should be considered. Rather than regulating high-rise residential by FAR, it is preferable to utilize design review, podium height limits, and tower floor-plate limits. This will provide an urban form that both allows sufficient development potential and preserves light and air for adjacent properties. These tools also avoid the need for draconian tower separation regulations that oftentimes lead to unnecessary “first to file” tower land use disputes as repeatedly seen in the City of Seattle. Design review and reasonable tower separations are far better than limits on the number of towers per block or per area.

- **Analyze Alternatives for East-West Streets.** All the draft alternatives show exactly the same proposed street grid without analyzing *any* transportation alternatives. This outdated street grid is taken from the previous Wilburton DEIS and its 2017 transportation analysis that relied on 2016 data. Thus, at the time of this EIS completion, the grid as currently presented will not take into account almost the last decade of growth in Bellevue. For example, the identified new intersection of NE 7th St/116th Ave NE is now unrealistic from a transportation perspective. This proposed intersection would be far too close to the NE 8th St/116th Ave NE intersection to be of use. Within the new study period time frame, traffic queues at NE 8th St/116th Ave NE would likely extend to this intersection. The outdated intersection at NE 7th St/116th Ave NE would also restrict development capacity at a strategic TOD redevelopment property considering the City’s regulations prohibit private improvements (*e.g.*, garages) below City rights-of-way.

We appreciate staff comments that other solutions could theoretically be proposed, such as private easement roads, for individual developments. As tempting as it is to kick the transportation can down the road, that approach may not give future development sufficient certainty and would work at cross-purposes with the City’s desired economic development and growth. For example, the City and the development community are acutely aware of the issues associated with co-locating new development and grid streets in Bel-Red.

Specific Request: The EIS Transportation Section should provide and analyze East-West street alternatives. Other alternatives for connections to 116th Ave NE should be included – such as a connection at NE 6th St/116th Ave NE, which would provide much better intersection spacing. When new connections are required, the City should expressly authorize private easement roads (that allow for underground improvements) in lieu of dedicated right-of-way.

- **Prioritize Residential Uses Near Transit.** If the City truly wants to prioritize TOD development, minimize the costs of required parking, and allow people to get out of their cars, the EIS should show alternatives that allow high-rise residential development within

² As the City proceeds to prepare implementing code language, it will be important to recall that the Comprehensive Plan calls for incentives, not exactions when new development provides infrastructure and amenities. Comprehensive Plan Policy LU 28.4 (“Consider a land use incentive system that offers additional floor area in exchange for infrastructure and amenities that contribute to the public good.”)

easy walking/biking distance from transit stations. Unless the housing is near the transit stations, people will still have to use their cars to get to transit. Having housing near transit stations also allows the City to eliminate or greatly reduce required parking. The City should recognize that required parking is a huge component of housing development costs, and minimizing that cost will make housing more affordable to build.

Specific Request: Provide an alternative that allows and plans for dense, high-rise residential development with easy walking/biking distance (1/4 mile is the most common metric) from the Sound Transit's Wilburton Station

Thank you for the opportunity to provide these scoping comments. We look forward to working with the City on realistic alternatives for TOD development in the Wilburton neighborhood that take advantage of the planned public transportation improvements in that area.

Very truly yours,

A handwritten signature in blue ink that reads "Roger Pearce". The signature is written in a cursive, flowing style.

Roger Pearce
Tharsis Law

Environmental Health Services Division

401 Fifth Avenue, Suite 1100
Seattle, WA 98104-1818

206-263-9566 Fax 206-296-0189

TTY Relay: 711

www.kingcounty.gov/health

Public Health 
Seattle & King County

Oct 31, 2022

TO: Reilly Pittman, City of Bellevue Development Services Department
CompPlan2044EIS@bellevuewa.gov

FM: Richard Gelb, Environmental Health Planner, Public Health – Seattle & King County
Richard.gelb@kingcounty.gov

RE: City of Bellevue Comprehensive Plan EIS scoping proposal

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 more sensitive occupants directly adjacent to very high-volume roadways.

Diesel exhaust is the main source of potential cancer risk from air pollution sources in King County.¹ Noise pollution from vehicle traffic contributes to high blood pressure, heart disease, sleep disturbances, and reduced school performance.^{2, 3} 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.⁴

Given the health consequences of potentially increasing the density of sensitive uses near high volume roadways, it will be illustrative to include in the scope of impacts how each alternative will vary in increasing the number of potentially-sensitive users in geographies that are highly proximal (within 500 feet) of high-volume corridors (over 100k AADT).

Thank you for considering including in the City of Bellevue Comprehensive Plan EIS scope (including for the Wilburton Commercial Area study) how growth alternatives will differ in placing potentially-sensitive building occupants in geographies with outsized exposure to noise and air pollution from high volume traffic corridors.

¹ Puget Sound Clean Air Agency, Chinatown-International District Air Toxics Study, 2016, <https://pscleanair.gov/DocumentCenter/View/3398>.

² HEI Panel on the Health Effects of Traffic-Related Air Pollution, "Traffic-related air pollution: a critical review of the literature on emissions, exposure, and health effects", HEI Special Report 17, Boston, MA: Health Effects Institute; 2010.

³ <https://iopscience.iop.org/article/10.1088/1748-9326/ac1bd8#erlac1bd8bib16>

⁴ [ARB's Air Quality and Landuse Handbook \(ca.gov\)](https://www.arb.ca.gov/airquality/landuse/Handbook.pdf)

WTM PROPERTY OWNER, LLC
511 Boren Avenue North, Suite 300
Seattle, WA 98109

October 28, 2022

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 writing to provide comments in response to the Scoping Notice for the Environmental Impact Statement (EIS) being prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, WTM Property Owner, LLC owns the Bellevue Tennis Academy at 13201 NE Spring Boulevard. 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.

Many concepts in Bellevue's Land Use Code for areas outside of Downtown date back to the late 1970's and early 1980's. Outside of Downtown, most development was low-density and suburban in character and elements of the Land Use Code continue to reflect this history. In the last 15 years, new zoning has been adopted for Bel-Red, Eastgate and East Main, but in each case the new zoning included relics of the City's suburban past.

Bellevue is now a major regional center in the Puget Sound and the upcoming zoning for its mixed-use areas, transportation-oriented development (TOD) areas, growth centers and other areas well-served by transit, should reflect this reality. New zoning for these areas should be based on the urban design principles that reflect the growth goals in the Comprehensive Plan update.

We recognize that the Comprehensive Plan is a planning document, not a set of development regulations. But major changes to the way the City approaches its Land Use Code will be required in the future implementation of this Comprehensive Plan update. Therefore, our comments below focus on the changes that are needed in the Land Use Code to ensure that Bellevue can meet its destiny as a regional urban center. The upcoming EIS should anticipate the need for these changes and its alternatives should assume a level of development that is achievable with the implementation of these Code changes.

As a general matter, we support Alternative 3 described in the EIS scoping notice, with the notation that this alternative should also be informed by the Code changes suggested below.

For these reasons, we suggest that the EIS should include analysis based on the following assumptions.

- Uses

- 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.
- Modernize and generalize uses in the Bel-Red district, thereby encouraging and incorporating types of uses desired by the BelRed Arts District (i.e. performance, venue, and flex space). This can be accomplished by including BelRed Arts District uses in the FAR Amenity System.
- Avoid being prescriptive about timing, sequencing and scale of different uses; allow the market to dictate development over time.
- 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.

- Height & Density

- Maximize heights and densities within ½ mile of light rail stations.
- The high-density zones around the 130th Street EastLink station should allow greater density for non-residential uses to promote more daytime activity and a mixed-use TOD station. Current zoning effectively limits this large area to residential development.
- 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, which will maximize positive urban development above-grade.
- Allow FAR to be freely allocated within a master-planned site, including across zoning lines and public right-of-ways.
- Maximum residential heights in TOD areas should not be less than 200 feet, in order to support viable high-rise development as well as mid-rise (5-8 story) development.

- Floorplates & Tower Standards

- Maintain appropriately-sized residential floorplates above 85 feet, while permitting residential floorplates larger than 28,000 square feet below 85 feet. The objective should be to maximize housing development opportunities.
- Allow larger floorplates for nonresidential uses, particularly tech, research & development and lab uses, above 40 feet and 85 feet. Larger floorplates are especially attractive to this group of tenants, so the Comprehensive Plan should accommodate these requirements.
- 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.
- Tower spacing should be limited to 40 feet, similar to Downtown.

- Structure setbacks should be eliminated, instead establishing a “build-to line” for new development.
- Parking
 - Minimum parking requirements should be significantly reduced in TOD areas, to 0.5 stalls/unit for multifamily and 1 stall/1,000 square feet for nonresidential.
 - Further parking reductions should be allowed based on project-specific parking studies, as in the Downtown.
 - Eliminate parking requirements for street-level active uses and active uses along pedestrian connections and open spaces. Code requirements for such uses are so excessive that they are an obstacle to the development of such uses.
 - 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.
- Affordable Housing
 - Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options.
 - Extend MFTE authorization throughout all growth areas in the City. The MFTE program is a proven tool that results in measurable additions to affordable housing and must continue to be supported.
 - Incentivize the creation of affordable housing by allowing private developers to create affordable housing “banks” in new or rehabilitated income-restricted projects.
 - Avoid mandatory inclusionary requirements in favor of programs that have been proven to produce affordable housing, such as MFTE.
 - Bellevue should create and staff a new Housing Division within the Department of Community Development, to coordinate the City’s affordable housing initiatives and the use of fee-in-lieu collections
- Critical Areas
 - Exempt Wilburton and Bel-Red from the Critical Areas Ordinance, similar to Downtown
 - Incentivize and encourage restoration of creeks and streams throughout Bel-Red. This will be most effectively accomplished through flexibility and innovation, honoring the connection between creeks and streams and the urban environment.
 - Encourage participation in programs that promote protection of water quality and aquatic habitat such as Salmon Safe.
 - Incentivize creative methods of stormwater infiltration systems and practices.
 - To accommodate restoration in the urban environment, consider reductions in critical area buffers similar to the “Urban Stream” defined by the City of Woodinville Municipal Code.
 - 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 development. Critical areas can be well-protected without meaningless 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. Preservation of isolated slope areas in a dense urban environment only creates orphaned, unusable land that could be put to better urban uses.
- Tree Regulations
 - Urban center and TOD areas, including Bel-Red, should be exempted from tree preservation regulations, similar to Downtown.
- Impervious Surfaces
 - Urban center and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on LID/hard surface coverage regulations, similar to Downtown.
 - Areas which fall within critical area buffers, as required by Code, should be counted in pervious surface calculations. Excluding critical area buffers is unnecessarily punitive and results in less density in the long term.
- Process
 - Allow broad use of development standard departures in all urban center and TOD areas. Encourage the use of such departures where they would result in superior design and use.
 - Allow broad use of development agreements in all urban centers and TOD areas for any land use regulation.
 - In urban centers and TOD areas, allow a two-year extension of ADR approvals, to preserve development opportunities across market cycles.
 - Transportation impact fee credits should be used in conjunction with other benefits and incentives to ensure that property owners are properly compensated for the construction of new infrastructure in Bel-Red.

We appreciate the opportunity to provide these comments and we look forward to participating in the EIS and Comprehensive Plan update process ahead.

Sincerely,

WTM PROPERTY OWNER, LLC



By:

Its:

BERG HOLDINGS
4315 Lake Washington Boulevard, Suite 7213
Kirkland, WA 98033

October 31, 2022

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 writing to provide comments in response to the Scoping Notice for the Environmental Impact Statement (EIS) being prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, Berg Holdings owns Yarrowood Highlands at 11330 NE 36th Place. 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.

Many concepts in Bellevue's Land Use Code for areas outside Downtown date back to the late 1970's and early 1980's. This was an era in which Bellevue was primarily a suburban bedroom community, with the first high-rise buildings appearing in Downtown. Outside of Downtown, most development was low-density and suburban in character and elements of the Land Use Code continue to reflect this history. In the last 15 years, new zoning has been adopted for Bel-Red, Eastgate and East Main, but in each case the new zoning included relics of the City's suburban past.

Bellevue is now a major regional center in the Puget Sound and the upcoming zoning for its mixed use areas, TOD areas, growth centers and their surrounds, as well as other areas well-served by transit, should reflect this reality. New zoning for these areas should be based on the urban design principles that underlie the City's Downtown zoning.

We recognize that the Comprehensive Plan is a planning document, not a set of development regulations. But major changes to the way the City approaches its Land Use Code will be required in the future implementation of this Comprehensive Plan update. Therefore, our comments below focus on the changes that are needed in the Land Use Code to ensure that Bellevue can meet its destiny as a regional urban center. The upcoming EIS should anticipate the need for these changes and its alternatives should assume a level of development that is achievable with the implementation of these Code changes.

As a general matter, we support Alternative 3 described in the EIS scoping notice, with the notation that this alternative should also be informed by the Code changes suggested below.

For these reasons, we suggest that the EIS should include analysis based on the following assumptions.

- Uses

- 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.
- 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.
- 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.

- Height & Density

- In areas already zoned for multifamily residential, the City should study additional density. For example, the Code provides that the R-20 and R-30 Districts are “intended to be convenient to centers of employment and have primary access to arterial streets”. Additional density in these areas makes sense and will help accomplish the production of housing necessary to meet Bellevue’s growth targets and incentivize redevelopment of existing properties as defined in the Comprehensive Plan update without being inconsistent with the existing Code.
- 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.
- 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 200 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 200 feet.

-
- Floorplates & Tower Standards
 - Maintain appropriately-sized residential floorplates above 85 feet, while permitting residential floorplates larger than 28,000 s.f. below 85 feet. The objective should be to maximize housing development opportunities, which means larger floorplates below 85 feet and smaller ones in towers above.
 - Allow larger floorplates for nonresidential uses, particularly tech, research & development and lab uses, above 40 feet and 85 feet. Such larger floorplates are especially attractive to this group of tenants, so the plan should accommodate these requirements.
 - 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.
 - Structure setbacks should be eliminated, instead establishing a “build-to line” for new development.
- Parking
 - Minimum parking requirements should be significantly reduced in TOD areas, to 0.5 stalls/unit for multifamily and 1 stall/1000 s.f. for nonresidential.
 - Further parking reductions should be allowed based on project-specific parking studies, as in the Downtown.
 - 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.
 - 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.
- Affordable Housing
 - Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options
 - Extend MFTE authorization throughout all growth areas in the City.
 - Incentivize the creation of affordable housing by allowing private developers to create affordable housing “banks” in new or rehabilitated income-restricted projects. Those projects could be built in advance of new market-rate development in the City, and then in-lieu funds from the new projects could be used to acquire affordable housing credits from the income-restricted projects.
 - Avoid mandatory inclusionary requirements
 - Bellevue should create and staff a new Housing Division within the Department of Community Development, to coordinate the City’s affordable housing initiatives and the use of fee-in-lieu collections

- Critical Areas
 - Exempt Wilburton and 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 development. Critical areas can be well-protected without meaningless 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.
- Tree Regulations
 - Urban center and TOD areas should be exempted from tree preservation regulations, similar to Downtown.
- Impervious Surfaces
 - Urban center and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on LID/hard surface coverage regulations, similar to Downtown.
- Process
 - Allow broad use of development standard departures in all urban center and TOD areas. Encourage the use of such departures where they would result in superior design and use.
 - Allow broad use of development agreements in all urban centers and TOD areas for any land use regulation.
 - In urban centers and TOD areas, allow a two-year extension of ADR approvals, to preserve development opportunities across market cycles.

We appreciate the opportunity to provide these comments and we look forward to participating in the EIS and Comprehensive Plan update process ahead.

Respectfully,

BERG HOLDINGS

Carlo Berg

From: Randy Dearth <rsdearth@comcast.net>
Sent: Monday, October 24, 2022 2:35 PM
To: CompPlan2044EIS
Subject: Comprehensive Plan 0 Housing

I have lived in Bellevue for 21 years. I support Bellevue 2044 Alternative 1 because it addresses the need for growth while maintaining the neighborhood-friendly aspect of our city. Duplexes, cottage housing, and other low-density typologies will continue to provide family-friendly areas while allowing growth to occur in major developmental areas; this aligns with the nature of today's younger generation who are marrying later and delaying their choice to have families. Bellevue can best match it's current high quality of lifestyle for all by providing areas that align with personal priorities. Family-friendly/focused area are critically important and should be maintained and protected as our city grows.

Alternative 2 would turn the city into a hodgepodge that would not be conducive to either the young professional or young family crowds.

R.S. Dearth

Randy Dearth
rsdearth@comcast.net
425-894-2795

From: phyllisjwhite@comcast.net
Sent: Monday, October 31, 2022 3:40 PM
To: CompPlan2044EIS
Cc: Lee, Conrad; Nieuwenhuis, Jared; Robertson, Jennifer S.
Subject: Bellevue Comprehensive Plan and Wilburton Vision Implementation

October 31, 2022

I submit the following on the Bellevue Comprehensive Plan Periodic Update and the Wilburton Growth Alternatives. Please include these comments in the comment record for both proposals:

Thank you for the opportunity for public comment during this Scoping Comment Period.

I support the goal to increase affordable housing in Bellevue; however, given the unstable economy, and over-the-top Federal deficit resulting in increased interest rates, lessening Federal funds, and higher costs of goods and services.

Wilburton Vision Implementation:

The goal of the Wilburton/N.E. 8th Street Subarea is to support the residential and non-residential uses in the subarea by protecting residential, recreation, and open space areas from the encroachment of commercial and other non-residential uses (except those generally permitted in residential areas). Non-residential development, such as retail activity, medical uses, and auto sales, should be concentrated in existing non-residential areas. This vision seeks to protect residential areas from commercial encroachment except in some cases. This vision also ensures the protection of our wildlife from encroachment and overdevelopment of commercial and residential uses in our existing single-family neighborhoods.

Support the following Wilburton/N.E. 8th Street Subarea Plan to meet the Wilburton/N.E. 8th Street Subarea goal:

To separate residential, recreational, and open space areas from commercial areas and to protect open 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, such as large retail and auto sales, that provide mixed-use opportunities and add convenient shopping for the adjacent neighborhoods.

Wilburton residents enjoy the qualities of our neighborhood listed below:

- A sense of community to the residential character of Wilburton.
- Protection of tree canopies and the beauty, quality, and trees bring to the Wilburton neighborhood.
- Ensure the planning and zoning for the safety and well-being of the neighborhood.
- Protect the neighborhood from overdevelopment, loss of tree canopies, and clean water in and open land spaces to preserve remaining wildlife and their resources for clean water running through the Kelsey Creek Basin through our Wilburton neighborhood.

Support the Wilburton/N.E. 8th Street Land Use Policies Subarea Plan Goals:

Land Use Policies:

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

Natural Determinants:

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

POLICY S-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek.

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

Residential Development:

POLICY S-WI-19. Enhance the cohesiveness of established single-family and multifamily residential areas.

POLICY S-WI-21. The impacts of traffic and the building scale of non-residential uses (such as churches and schools) located in residential areas should be considered during development review.

POLICY S-WI-22. Seek affordable and "work force" housing in new mixed-use developments through regulatory and incentive approaches.

Parks, Recreation, and Open Space:

POLICY S-WI-32. Retain the parks in the subarea and ensure they remain park facilities (including Wilburton Hill and Kelsey Creek Parks).

POLICY S-WI-33. Retain and develop open spaces for a variety of purposes.

POLICY S-WI-34. The City strongly encourages the continuation of the golf course use at the Glendale Golf Course.

POLICY S-WI-35. Prepare designs for proposed parks with the participation of the community affected and served.

POLICY S-WI-36. Support the continuation of the Lake-to-Lake Trail through Wilburton.

POLICY S-WI-37. The City should consider acquisition of surplus school district sites which might be appropriate for park and recreation uses.

POLICY S-WI-38. Encourage development of the Highland-Glendale site, located on the northeast corner of N.E. 8th Street and 134th Avenue N.E., as a park facility.

Please refer to the history of this property, Parcel [0672100095](#). A family donated the parcel to the City of Bellevue with the condition it be used for a park.

Bellevue is referred to as "A City in a Park". The sub-neighborhoods of Bellevue are as diverse as the residents that live here. Each differ in character, landscape, and density. Many of our differing neighborhood areas have older trees, some over 100 years old, growing on the properties. Trees are critical infrastructures, and neighborhood-by-neighborhood tree protections should be required. It takes years for them to grow. Trees provide a filter from air pollution, absorb stormwater runoff protect the water from contaminants, and provide shade and cooler air in residential properties. Trees offer tremendous wildlife habitats and provide animals shade, shelter, moisture, and food. Areas with fewer trees can become as hot as 10 degrees higher. Animals use trees for resting, nesting, and places to hunt and capturing prey. In my neighborhood area for example, between NE 8th and BelRed Road, trees provide the habitat for many types of animals, such as hawks, bald eagles, cardinals, robins, hummingbirds, crows, blue herons, owls, frogs, raccoons, deer, rabbits, beavers, squirrels, bats, coyotes, and many others. Cutting down the trees for housing density will destroy the essential habitat of these animals and will have a lasting impact on the residential environment that we love and enjoy.

Replacing single residential homes with apartments, townhouses, middle housing, and DADUs will affect the quality and character of the neighborhood if not done with careful consideration. Moreover, rentals should be required with established rental periods, owner residency requirements, and monitoring. Every neighborhood should have the ability to opt-in or opt-out of the inclusion of DADUs.

Off-street parking needs to be considered when planning for increasing density. Wilburton streets are narrow, with limited street parking. Also, the light rail, housing, office, and retail developments will contribute to worsening noise and air quality. There are about 22 new parcels in the Spring District and BelRed for development, adding 1,995 housing units and 6,000 parking spaces, with more on the way. Wilburton's traffic will increase with the Spring District, BelRed, The Wilburton Vision Implementation, and the light rail, and they will significantly impact Wilburton's noise and air quality.

Bellevue Comprehensive Plan Periodic Update:

Support "Alternative 0" promoting affordable housing given the reasons mentioned in this letter. The City should allow neighborhood-by-neighborhood tree protections focusing on growth where there is already density and not make the unnecessary sacrifice of forestry and tree canopies for more affordable housing without a definite matching anticipated job market. Support the housing density to meet the "**minimum requirements**" of the Growth Management Act and promote growth primarily in the downtown and commercial core areas, mixed-use centers (Downtown, East Main, BelRed,

Wilburton, Crossroads, Factoria, Eastgate), and consideration of other Bellevue neighborhoods, such as southeast of Enatai, and areas in the commercial Bridal Trails.

I also strongly encourage other options, including employment with incentives for affordability and equity, partnerships with universities and colleges for employment, and not only by increasing our property taxes for additional housing affordability. Residents face financial hardships, with our property taxes up 40% from last year. Raising property taxes will cause less affordability for housing for all.

1. Bellevue Comprehensive Plan Periodic Update and Wilburton Vision Implementation

1.1. Revise Alternatives 1, 2, and 3 to include only those changes needed to bring Alternative 0 into compliance with the housing unit growth target specified in 2021 King County Countywide Planning Policies. The current descriptions of these alternatives show that each would provide excessive housing and job growth.

2. Wilburton Vision Implementation

2.1. Support Alternative 0 with modifications and include other Bellevue areas.

2.2. Revise Alternatives 1, 2, and 3 to eliminate the NE 6th street extension.

2.3. Revise Alternatives 1, 2, and 3 to eliminate any provision for residential towers in any areas in the Wilburton subarea near neighborhood parks and single-family residential.

Thank you for your time and attention.

Sincerely,

Phyllis White



October 31, 2022

City of Bellevue Comprehensive Plan Periodic Update EIS Scoping Comments
c/o Thara Johnson, Comprehensive Planning Manager
City of Bellevue
450 110th Avenue NE
Bellevue, WA 98004

Via electronic mail: CompPlan2044EIS@bellevuewa.gov

Re: Amazon comments on the scope of City of Bellevue's Comprehensive Plan Periodic Update
Environmental Impact Statement

Dear Ms. Johnson,

The City of Bellevue's periodic update to the Comprehensive Plan presents an exciting opportunity to prepare for growth and development in Bellevue over the next twenty years. As a major employer that is growing in Bellevue, Amazon is grateful for this opportunity to take part in the city's public engagement process and submit comments regarding the scope of the Environmental Impact Statement (EIS). We want to express our appreciation for the extensive work city leadership and staff have done to date to chart a bold vision for Bellevue's future. 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 had roughly 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 2020, we announced plans to invest much more on the Eastside—bringing 25,000 jobs, and making Bellevue and the Eastside the primary location of our future growth in the Puget Sound region.

We have found the Eastside to be a great place to call home, but as with any change, we recognize our growth—and the growth around us as other companies also invest in the area—can create some challenges, including in critical areas like housing affordability.

We know that job growth and affordable housing stock need to grow at the same pace in order to create a vibrant and equitable community. In Bellevue, the combination of a rapidly growing population and limited housing supply have created affordable housing challenges dating back many years, disproportionately affecting low-income families. Solving this problem will require a strong partnership between the public and private sector—and we believe it is important to do our part.

In January 2021, we launched the Amazon Housing Equity Fund, a more than \$2 billion commitment to preserve and create over 20,000 affordable homes in our hometown communities. Along with the Fund, Amazon is also advocating for public policies that will provide new tools for affordable housing preservation and production, including an amendment to the Multifamily Tax Exemption (MFTE) program and a rezone of the East Main neighborhood to allow for taller buildings and more density. Since the Fund's creation, Amazon has invested \$374 million in loans and grants in the Puget Sound region to create and preserve 3,400 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. We are also committed to transit-oriented development as an approach to offer a double benefit to low- to moderate-income families by providing easy access to quality transit that connects residents to jobs and resources. Amazon partnered with Sound Transit and BRIDGE Housing on the development of 233 apartments homes affordable to families earning between 50% and 60% AMI just blocks from the future site of Sound Transit's 120th St. light rail station in the Spring District. Despite our efforts in this area, we know that one company or the private sector alone cannot address and solve the affordable housing challenges in Bellevue and many other communities, and we believe there is more that the private sector, nonprofits, and governments can do to partner together.

As the city considers specific elements to study as part of the EIS and proposed Bellevue 2044 alternatives, Amazon offers the following comments for consideration:

- **Study 80,000 additional housing unit capacity and 30,000 additional job capacity above No Action:** Since the Comprehensive Plan update will guide policy decisions on growth and development for the next twenty years, we believe it is important for the EIS to include analysis to more than double Bellevue's minimum 2019-2044 growth targets for housing (+35,000 housing units) for two reasons. First, we know that housing development takes time, and even when zoning conditions are favorable, not all sites will redevelop or maximize development capacity. We need to create much more capacity in order to reach the target housing units we need. Second, publicly available data from major employers show Bellevue will meet more than 39% of the 70,000 minimum 2019-2044 jobs growth target by 2025. All Action Alternatives (1-3) currently study a maximum of 25,000 new jobs capacity on top of the 120,000 jobs capacity in the No Action alternative. While 145,000 new jobs capacity is significant, in the spirit of ensuring we are scoping the EIS to study all possible scenarios, it would be prudent to have at least one alternative where we study even more job capacity. Job growth is directly tied to housing demand, therefore, the EIS should have at least one alternative that includes 30,000 additional job capacity and 80,000 additional housing unit capacity.
- **Prioritize density around frequent and reliable transit:** As proposed, Alternative 3 offers the most housing unit capacity, focusing growth in mixed-use centers, in areas of high opportunity, to add capacity in and around Neighborhood Centers across the city. Additionally, Alternative 3 includes housing typologies like townhomes, duplexes, and other low-density typologies. We would like to suggest a version of Alternative 3 that focuses growth mainly around transit centers, particularly more height and density around future light rail stations like Bel-Red/130th station, and less emphasis on adding density across the city. This includes increasing residential heights in Wilburton alternatives. Last year, City Council adopted Ordinance 6575 to establish lower minimum residential parking requirements for certain housing developments in areas with frequent transit service. We believe that action was a move in the right direction to help increase the supply of housing, and in particular, lower the costs to building affordable housing. We would like to see the city explore options to further reduce parking requirement within a half-mile to frequent and reliable transit as part of mitigation to reduce adverse impacts.
- **Study multimodal solutions as mitigation of growth and dense, mixed-use development:** In 2019, Amazon co-founded The Climate Pledge to work together with signatories around the globe to reach net-zero carbon emissions by 2040, a decade ahead of the Paris Climate Agreement. The City of



Bellevue's 2021-2025 Sustainable Bellevue Environmental Stewardship Plan has similar goals of reducing communitywide greenhouse gas emissions by 50% by 2030 and 80% by 2050. Urban infill and locating housing near transit and jobs is a proven way to reduce greenhouse gas emissions. In addition to increasing density and concentrating housing near transit, we encourage the city to study multimodal transportation infrastructure to enable more walking, biking, and rolling. The EIS should include an analysis that helps the city identify future investment needs for bus lanes, bike lanes, sidewalks, and multimodal trails. In the Wilburton Study Area, the city has a once-in-a-generation opportunity to envision a new neighborhood around two key multimodal infrastructure investments: the Eastrail and Grand Connection. In addition to identifying investments for multimodal infrastructure, we should concurrently consider ways to make multimodal transportation appealing and inviting. For example, the city should consider approaches such as form-based code that could allow projects more pedestrian friendly design at ground level in exchange for more flexibility elsewhere in the development. Specifically, along the Eastrail in Wilburton, we encourage the city to think creatively on ways to make trail-oriented development feasible so that development along Eastrail can become an extension of the multimodal trail and provide amenities facing the trail.

On behalf of Amazon, we thank the City of Bellevue for the consideration of these comments. Again, we deeply 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 Pearl Leung at phleung@amazon.com.

Sincerely,

A handwritten signature in black ink that reads "Guy Palumbo". The signature is fluid and cursive, with the first name "Guy" and last name "Palumbo" clearly distinguishable.

Guy Palumbo
Director, Public Policy
Amazon

CC:
Bellevue City Council
Brad Miyake, City Manager, City of Bellevue
Diane Carlson, Deputy City Manager, City of Bellevue
Mike Brennan, Interim Deputy City Manager, City of Bellevue
Genesee Adkins, Chief of External Affairs, 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

October 31, 2022

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 writing to provide comments in response to the Scoping Notice for the Environmental Impact Statement (EIS) being prepared for the Bellevue 2044 update to the Bellevue Comprehensive Plan.

For reference, N124 Holdings owns the properties located at 1940 124th Ave NE 98005, 2000 124th Ave NE 98005, 2020 124th Ave NE 98005 and 2100 124th Ave NE 98005. 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.

As a general matter, we support Alternative 3 described in the EIS scoping notice, with the notation that this alternative should also be informed by the Code changes suggested below. We suggest that the EIS should include analysis based on the following assumptions.

- Uses
 - 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. In particular, the zones in Bel-Red outside the Spring District should allow greater density for both residential and non-residential uses to promote more daytime activity and a mixed-use neighborhood. Current zoning tends to segregate residential and non-residential uses into different portions of Bel-Red, which makes it impossible to achieve a vibrant, mixed-use neighborhood across the subarea.
 - 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.
 - Allow electric vertical take-off and landing (eVTOL) uses adjacent to transit stations, in order to maximize mass transit ridership and general mobility.
- Height & Density
 - 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.
 - 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 200 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 200 feet. Below 200 feet, high-rise development is difficult to underwrite in these urban centers.
- Floorplates & Tower Standards
 - Maintain appropriately-sized residential floorplates above 85 feet, while permitting residential floorplates larger than 28,000 s.f. below 85 feet. The objective should be to maximize housing development opportunities, which means larger floorplates below 85 feet and smaller ones in towers above.
 - Allow larger floorplates for nonresidential uses, particularly tech, research & development and lab uses, up to 85 feet. Such larger floorplates are especially attractive to this group of tenants, so the plan should accommodate these requirements.
 - 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.
- Structure setbacks should be eliminated, instead establishing a “build-to line” for new development.

- Parking

- Minimum parking requirements should be significantly reduced in TOD areas, to 0.5 stalls/unit for multifamily and 1 stall/1000 s.f. for nonresidential.
- Further parking reductions should be allowed based on project-specific parking studies, as in the Downtown.
- 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.
- 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.

- Affordable Housing

- Emphasize affordable housing as an FAR amenity incentive and allow fee-in-lieu options
- Extend MFTE authorization throughout all growth areas in the City.
- Incentivize the creation of affordable housing by allowing private developers to create affordable housing “banks” in new or rehabilitated income-restricted projects. Those projects could be built in advance of new market-rate development in the City, and then in-lieu funds from the new projects could be used to acquire affordable housing credits from the income-restricted projects.
- Avoid mandatory inclusionary requirements
- Bellevue should create and staff a new Housing Division within the Department of Community Development, to coordinate the City’s affordable housing initiatives and the use of fee-in-lieu collections

- Critical Areas

- Exempt Wilburton and 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 development. Critical areas can be well-protected without meaningless 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.

- Tree Regulations
 - Urban center and TOD areas should be exempted tree preservation regulations, similar to Downtown.
- Impervious Surfaces
 - Urban center and TOD areas should allow 100% lot coverage. These areas should also be exempt from lot coverage limitations based on LID/hard surface coverage regulations, similar to Downtown.
- Process
 - Allow broad use of development standard departures in all urban center and TOD areas. Encourage the use of such departures where they would result in superior design and use.
 - Allow broad use of development agreements in all urban centers and TOD areas for any land use regulation.
 - In urban centers and TOD areas, allow a two-year extension of ADR approvals, to preserve development opportunities across market cycles.

We appreciate the opportunity to provide these comments and we look forward to participating in the EIS and Comprehensive Plan update process ahead.

Sincerely,

A handwritten signature in blue ink, consisting of two overlapping loops, positioned to the left of the printed name.

Pat Wiley
N124 Holdings, LLC

MOUNTVUE PLACE LLC
14510 NE 20TH STREET – SUITE 205
BELLEVUE, WA 98007

October 28, 2022

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@bellervuewa.gov

Re: Bellevue 2044 Comprehensive Plan EIS Scoping Comments

Dear Liz and Reilly,

Thank you for this opportunity to comment on the scope of the City of Bellevue's environmental review for the 2044 Comprehensive Plan and associated zoning changes in the BelRed Subarea. We submit these comments as the owner of the nearly 5 acre shopping center site Mountvue Place located at 14504 – 14510 NE 20th St. The site represents a significant opportunity for redevelopment meeting the City's long-term vision for a series of vibrant urban villages with abundant new green space, businesses and homes.

There are key site features that inform our comments. This site is situated in a prime location with immediate access to both the SR-520 & I-405 Freeways and less than 0.5 miles and 1.0 miles from two future light rail stops. The Bel-Red submarket's continued growth has been primarily driven by the expansion of tech companies, new large-scale office projects, the addition of light rail and unprecedented population growth. The site's proximity to amenities makes it an ideal location for future redevelopment. In addition, we see particular opportunity on the edges of Bel-Red near Redmond's Overlake neighborhood where Redmond is planning for significant additional density and growth. We have studied what development opportunity might be appropriate on the site. Based on that study, we think the site has the potential to deliver over 400 housing units. With additional density, many more housing units could be delivered. However, maximizing this opportunity for the City depends upon the future zoning and development standards.

With this context, we offer the following comments on the City's Scoping Handout that we hope you will consider as you move on to the draft EIS:

- **We support 85' heights in Bel-Red.** In order to maximize development ready sites and to spur development, we support and encourage the City's study of 85' heights in the Bel-Red Subarea that include the site.
- **Consider increasing housing unit capacity targeted in all Action Alternatives.** All of the City's Action Alternatives increase the housing unit capacity, however, we are concerned they do not go far enough. The City's last Comprehensive Plan had a housing growth target of 20,056 units and is only on pace to meet 79% of that target under current policies. Bold action is needed to make up for this gap and to achieve the 35,000 unit target for the new Plan. Because only a fraction of sites will develop in any real estate cycle, the City must have

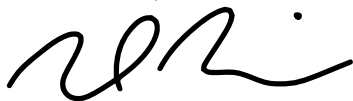
14510 NE 20TH STREET – SUITE 205 BELLEVUE, WA 98007
PHONE: 425-746-1500

sufficient zoned housing unit capacity to encourage redevelopment. The City should significantly increase or double the housing unit capacity assumed in all of the action Alternatives to ensure the EIS studies an adequate range of densities in Bel-Red to support the growth targets and to produce sufficient housing to address the current affordability crisis our region faces.

- **The draft EIS should study removing FAR-based density restrictions for residential use in all Action Alternatives.** We understand the City is considering removing FAR and dwelling unit per acre residential density restrictions as part of its “Next Right Work” on affordable housing. We support this policy. The built form of residential buildings can be effectively regulated by form-based development standards, and the City should not impose a density restriction on top of these standards in Bel-Red that will result in units “left on the table.” The City’s Action Alternatives should specifically acknowledge and study elimination of residential density restrictions in the future zoning code for the Bel-Red area.
- **The transportation analysis in the draft EIS should consider traffic impacts through the lens of permanent shifts in the way we work.** Traffic congestion in our area is significantly down since COVID. More people are working from home or on a hybrid basis, and all indications are that this trend will continue. Any assumptions around the number of trips associated with office development in the Alternatives should take into account that fewer people are coming into the physical office, and when they do, it’s typically not every day. If the City doesn’t account for the shifts in the way we work, the traffic analysis is likely to overstate impacts of future development, which should be avoided.

Thank you again for this opportunity to comment. We look forward to engaging with the City further as its Comprehensive Planning and rezoning process proceeds. Please do not hesitate to contact me if you have any questions about these comments.

All the best,



Neal Mulnick for Mountvue Place LLC

cc: Emil King, Planning Director
Janet Shull, Senior Planner
Thara Johnson, Planning Manager

D O G W A L K L L C
1 4 5 1 0 N E 2 0 ^{T H} S T R E E T – S U I T E 2 0 5
B E L L E V U E , W A 9 8 0 0 7

October 25, 2022

City of Bellevue Development Services Department
Attn: Liz Stead, Director and SEPA Responsible Official
Reilly Pittman, Environmental Planning Manger
450 110th Avenue NE
Bellevue, WA 98004

Via email CompPlan2044EIS@bellervuewa.gov

Re: Bellevue 2044 Comprehensive Plan EIS Scoping Comments

Dear Liz and Reilly,

Thank you for this opportunity to comment on the scope of the City of Bellevue's environmental review for the 2044 Comprehensive Plan and associated zoning changes in the Wilburton Subarea. We submit these comments as the owner of the nearly 4.5 acre Auto Nation Ford site located at 411 116th Avenue NE. The site represents a significant opportunity for redevelopment meeting the City's long-term vision for a dense, mixed-use Wilburton neighborhood that complements Downtown.

There are key site features that inform our comments. The site has excellent transportation connectivity for all modes because of its location adjacent to I-405 and NE 4th Street, within a quarter mile of both the Downtown and Wilburton light Rail stations, and just a block from the City's future Grand Connection bridge and Eastrail. The site's proximity to Downtown Bellevue immediately to the west means that redevelopment of the site high-rise heights will integrate well into the City's skyline and provide a natural height transition across I-405. Further, the large site size presents a unique opportunity that lends itself to ground-level pedestrian connections, open spaces, retail, and other amenities to activate the pedestrian realm. We have studied what development opportunity might be appropriate on the site, taking cues from Downtown Bellevue and other successful mixed-use high-rise neighborhoods like Seattle's Denny Triangle. Based on that study, we think the site has the potential to deliver 1,500 housing units and several hundred thousand square feet of commercial development in a highly sustainable development. However, realizing this opportunity for the City depends upon the future zoning and development standards.

With this context, we offer the following comments on the City's Scoping Handout that we hope you will consider as you move on to the draft EIS:

- **We support 450' heights defined in the Acton Alternatives.** All of the City's Action Alternatives (1-3) for Wilburton appear to recognize 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 heights. We support and encourage the City's study of 450' maximum heights in these areas that include the site.
- **Consider increasing housing unit capacity targeted in all Action Alternatives.** All of the City's Action Alternatives increase the housing unit capacity in Wilburton, however, we

14510 NE 20 ^{T H} S T R E E T – S U I T E 2 0 5 B E L L E V U E , W A 9 8 0 0 7
P H O N E : 4 2 5 - 7 4 6 - 1 5 0 0

are concerned they do not go far enough. The City's last Comprehensive Plan had a housing growth target of 20,056 units and is only on pace to meet 79% of that target under current policies. Bold action is needed to make up for this gap and to achieve the 35,000 unit target for the new Plan. Because only a fraction of sites will develop in any real estate cycle, the City must have sufficient zoned housing unit capacity to encourage redevelopment. The City should significantly increase or double the housing unit capacity assumed in all of the Wilburton action Alternatives to ensure the EIS studies an adequate range of densities in Wilburton to support the growth targets and to produce sufficient housing to address the current affordability crisis our region faces.

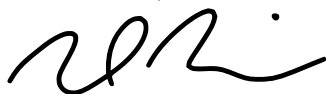
- **An expanded list of uses should be considered in the core area where the site is located.** The Scoping Handout indicates that there will only be a limited opportunity for housing in the office-residential area. We disagree residential use should be a secondary use in this area. On large sites like ours and at heights of 450' feet, high-rise residential use is well suited and complementary. The Action Alternatives should study allowing office and residential uses on equal footing in these areas.
- **The draft EIS should study removing FAR-based density restrictions for residential use in all Action Alternatives.** We understand the City is considering removing FAR and dwelling unit per acre residential density restrictions as part of its "Next Right Work" on affordable housing. We support this policy. The built form of residential buildings can be effectively regulated by form-based development standards, and the City should not impose a density restriction on top of these standards in Wilburton that will result in units "left on the table." The City's Action Alternatives for Wilburton should specifically acknowledge and study elimination of residential density restrictions in the future zoning code for this area.
- **The City should study alternatives to motorized through-block connections.** From the maps provided in the Scoping Handout, it does not appear that any non-motorized or motorized through-block connections are targeted for our site. However, there is a motorized connection identified north of our site on property owned by the City and others. We question the utility of this connection as it will dead-end at I-405 and Sturtevant Creek. The draft EIS should study alternatives to this connection and others. Achieving a functional vehicular circulation system in Wilburton is of highest priority, but dead-end connections don't make sense. Further, because any new streets across private property carry the risk of significantly impacting development feasibility, the City should study alternatives to implementing such vehicular-focused connections like eliminating minimum parking requirements, requiring Transportation Management Programs, and construction of multi-modal infrastructure.
- **The transportation analysis in the draft EIS should consider traffic impacts through the lens of permanent shifts in the way we work.** Traffic congestion in our area is significantly down since COVID. More people are working from home or on a hybrid basis, and all indications are that this trend will continue. Any assumptions around the number of trips associated with office development in the Alternatives should take into account that

fewer people are coming into the physical office, and when they do, it's typically not every day. If the City doesn't account for the shifts in the way we work, the traffic analysis is likely to overstate impacts of future development, which should be avoided.

- **The draft EIS should provide information on key development standards to be considered in a future Wilburton zoning code under all Action Alternatives.** In order to understand and assess whether the assumed housing unit capacity in the City's Alternatives can actually be achieved, the City should identify in the draft EIS the key development standards it anticipates will be a part of the future Wilburton zoning code. In crafting such development standards, the City should draw on the lessons learned from other areas, and provide maximum flexibility and incentives to achieve interesting building forms. Key standards are market-based floorplate sizes, avoiding prescriptive tower setbacks and step backs, and providing opportunities for multiple towers in creative configurations. The City should also identify changes or alternatives to existing standards that hinder full housing unit production like noise reduction standards adjacent to I-405 and critical areas buffers and associated density reductions. Finally, an incentive-based system should be used to meet the City's goals for affordable housing, open space, and other community amenities as such a system will be the most durable in the face of market pressures.
- **The City should complete a Planned Action Ordinance for Wilburton.** Last, the City should seize the opportunity presented by this full EIS process to complete detailed environmental analysis supporting a "Planned Action Ordinance" for the Wilburton Subarea. A future PAO should be identified as an action or approval by the City Council in the draft EIS. Adoption of a PAO would allow future developments compliant with the zoning code and mitigation measures identified in the Ordinance the opportunity to speed up the entitlement and development process. A PAO would also provide certainty in the mitigation measures necessary to achieve the density assumed on sites, which will help accurately calibrate land prices in the market. This would be a valuable tool for landowners, developers, and the City. We preliminarily discussed with staff the opportunity to use our site as a "test case" for a PAO, and we would be happy to help in that process in any way we can.

Thank you again for this opportunity to comment. We look forward to engaging with the City further as its Comprehensive Planning and rezoning process proceeds. Please do not hesitate to contact me if you have any questions about these comments.

All the best,



Neal Mulnick for Dog Walk, LLC

cc: Emil King, Planning Director
Janet Shull, Senior Planner
Thara Johnson, Planning Manager
Abigail P. DeWeese and Josh Friedmann, HCMP

DOG WALK LLC
14510 NE 20TH STREET – SUITE 205 BELLEVUE, WA 98007
PHONE: 425-746-1500



COMMERCIAL REAL ESTATE
DEVELOPMENT ASSOCIATION

WASHINGTON STATE CHAPTER

October 31, 2022

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

Re: *NAIOP Bellevue 2044 Comprehensive Plan EIS Scoping Comments*

Dear Liz and Reilly,

On behalf of NAIOP Washington State (NAIOPWA), the Commercial Real Estate Development Association for Washington State and our more than 1,000 members, we are writing to provide comments on the City of Bellevue's 2044 Comprehensive Plan scoping process.

The City has set out incredibly ambitious goals and priorities for this Comprehensive Plan update – it is expected to guide growth and zoning changes in Wilburton, Bel-Red, and across the City. We applaud your foresight in identifying the large amount of work to be done to ensure Bellevue's zoning code correctly guides growth for the next decade plus, and we would be happy to aid the City in any way we can. Our members are comprised of for-profit and not-for-profit developers, general contractors architects, engineers, civil consultants, land use attorneys, and other participants in the real estate development industry who would jump at the chance to apply their expertise to your efforts.

NAIOPWA and its members are strong supporters of focused urban, residential, retail and office development, as well as transit-oriented development and industrial uses that reflect a 21st century view of the industry and its future.

In this vein, we offer the following comments for the City to consider during this scoping process:

- **The City should increase the zoned residential housing unit capacity assumed in all of the Action Alternatives, and it should meaningfully differentiate between the Action Alternatives for jobs density.** The City has historically not met its housing targets. It is only on track to meet 79% of its prior goal based on the 2021 buildable lands report. To ensure that the City keeps pace with its 35,000 housing target for this next Comprehensive Plan it should study much higher *zoned capacity* for residential unit growth in its alternatives. This is especially necessary because of the GMPC's feedback that *most* of the housing target must be achieved in units below 80% AMI. In order for the City to come close to both its housing production target and the affordable housing need, significant growth opportunity is realistically needed. It is currently unclear what zoned capacity is assumed for the Alternatives, but we believe the City should

zone for *at least double* the assumed housing unit production totals in all of the Action Alternatives. This would mean zoning for: 30,000-40,000 additional unit capacity above no action for Alternative 1, 50,000-60,000 additional unit capacity above no action for Alternative 2, and 70,000-80,000 additional unit capacity for Alternative 3.

Further, the Action Alternatives must study different levels of additional jobs *growth* to provide a meaningful study of impacts from additional growth. We would suggest the following capacity increases: 25,000 additional jobs above no action for Alternative 1, 35,000 additional jobs above no action for Alternative 2, and 45,000 additional jobs above no action for Alternative 3.

- **The focus of growth should be in mixed-use, commercial and neighborhood centers, with only modest density increases elsewhere in the City.** The City's Action Alternatives all identify growth in zoned capacity in the City's mixed-use centers (including Downtown, Bel-Red, Wilburton, Crossroads, Factoria, and Eastgate) with secondary focus on growth and capacity in neighborhood centers and commercial areas with good transit access. We support this general approach. Additional density makes sense in areas with infrastructure to support it.
- **The City should consider modest expansion of mixed-use and neighborhood centers where it makes sense based on frequent transit proximity existing uses and land use patterns.** The City's scoping handout does not acknowledge any expansion of mixed-use or neighborhood centers. The City's Alternatives should not be constrained by existing subarea boundaries. The City should analyze all existing zones and uses and propose expansions to existing subarea boundaries for property within 1/2 mile of frequent transit (including future light rail stations), and in areas where there is existing zoning or uses that could accommodate more density.
- **The focus of high-rise growth should be in Wilburton, but Bel-Red should see additional height and density increases too.** The City's scoping handout provides specific alternatives for additional density in Wilburton, but it does not do the same for other areas of the City. The draft EIS should clarify the assumed height and density increases for other areas. In Bel-Red in particular, the City should consider additional height for commercial uses in nodes up to 250' and should consider setting a baseline height datum of 85-90' for residential uses throughout the district to maximize midrise multifamily housing opportunities. The Lake Bellevue parking lot, which was denied a comprehensive plan amendment last year and asked to wait for this process, should also be included in the Wilburton alternatives. It is right next to the future light rail station.
- **The EIS should provide a clear explanation of the methodology for density assumptions in the Alternatives that is based on existing development standards and anticipated, identified, development standard changes.** It is not clear from the scoping handout how the City has calculated the existing housing unit and jobs capacity and how it will calculate future zoned capacity. Accounting for specific development standards must be an important part of this study. FAR alone cannot be used as a proxy for capacity as there are many site-specific and development standard barriers to maximizing FAR. The City should study modifying or eliminating many of these development standards as part of the Action Alternatives. Specific

development standards of concern that should be modified are: prescriptive setback and stepback requirements, lot coverage limits, suburban multifamily play area requirements, and height limits that do not match building construction code limits. The City should also eliminate the density reduction for critical areas, and should fix the man-made steep slope issue that is already a consistency issue with its Comprehensive Plan.

- **The City should identify in the EIS a Planned Action Ordinance for Wilburton as a future action.** A Planned Action Ordinance is a key tool allowed by Washington’s State Environmental Policy Act that can extend the value of the City’s EIS investment to provide certainty to developers and the City in future environmental review processes and mitigation measures. The City should complete a Planned Action Ordinance for future development in Wilburton as it is the neighborhood most key to meeting the City’s jobs and housing targets. This would speed up the permit process, and provide more certainty in mitigation measures for landowners and developers, which will stabilize land prices.
- **The City should identify in all Action Alternatives a strategy change in how it structures its “Future Land Use Map” and zoning designations to allow additional flexibility for rezones.** The City’s current Comprehensive Plan Future Land Use Map structure references specific zoning designations. This creates an inefficient two-step process for rezones that requires a Comprehensive Plan Amendment, then a zoning code change where properties require zoning updates. This is an oddity in Bellevue’s Future Land Use Map. Most jurisdictions are less specific in their Map so that Comprehensive Plan Amendments aren’t often required for rezones. The City should take a less specific and more efficient approach to its map designations. To pair with this approach, the City should consider creating more generally applicable “mixed-use” zones that could be applied to broader areas of the City, rather than relying heavily on Subarea-specific zoning. Similar to the Eastgate areawide upzone, the City should evaluate and rescind stale concomitant zoning agreements city-wide that are inconsistent with the future zoning designations.
- **All Action Alternatives should identify voluntary, incentive-based affordable housing programs rather than mandatory programs.** Alternative 1 identified on the scoping handout discusses a mandatory inclusionary affordability program. Although we agree that affordable housing is an important topic to consider in this process, we do not support mandatory approaches for affordable housing programs, as they are less durable in the market and carry more risk of stifling housing development compared to voluntary and incentive-based programs. This is especially true since Bellevue’s code does not prioritize multifamily housing over office development. Efforts need to be made to provide more incentives for projects that include large components of housing at the 80% AMI level.
- **All Action Alternatives should identify elimination of residential density limits and parking minimums in mixed-use areas.** We understand the City is considering changes to density limits and parking minimums as part of its “Next Right Work” on affordable housing. We support these efforts. On the residential density side, it makes sense to regulate residential development with form-based standards rather than overlay prescriptive density limits that can lead to units “left

on the table.” Similarly, minimum parking requirements add cost to projects and don’t react to changing market forces for parking demand. It should be left to the market to deliver parking, especially in frequent transit areas. The market trend is a decreasing percentage of households relying on auto transportation and this trend has and will move faster than legislative changes. The cost reductions achieved through reduced parking reduces the cost of housing for the most price-sensitive segments of the population.

Thank you again for this opportunity to comment. We look forward to continuing to monitor this process and engage with you as the comprehensive planning and rezone process proceeds. We share the goal of ensuring the process provides the greatest likelihood of success for the City’s vision for a bold, growth-supportive future.

Sincerely,

Danielle Duvall

Interim Executive Director, NAIOP Washington State

From: Michael Niemann <mike@mobilizedigital.com>
Sent: Wednesday, October 26, 2022 10:39 AM
To: CompPlan2044EIS
Subject: Bellevue 2044 EIS Bridle Trails/116th Changes

Hello. I am writing to submit my feedback and ask for your help related to the current EIS project during the public comment period. My family and many of our neighbors (Bridle Trails off the 116th AVE corridor) have two main issues: Zoning and Road Noise.

Zoning: Realizing there is a focus to increase housing availability and accommodate growth in Bellevue, the Bridle Trails area is a clear choice to help achieve your goals. If the zoning changed to R4 instead of the current R1 for example, **the number of possible houses would increase 4x** and the lots would still be ~10k sq ft on average. On our street alone, the number of possible homes would increase from 16 to 64 which would increase population capacity by ~200 or more people just on one street. We are one of the closest neighborhoods and within walking distance to the new Spring District/120th Station. Is rezoning likely for us?

Road Noise: With the focus on environmental factors impacting quality of life, we need to raise the issue of Road Noise from 405. It's bad all along 116th and unacceptable by Bellevue's own standards where we live. I can't imagine any residential area in Bellevue where the noise is worse. The noise wall is woefully short and is not effective. It's also crumbling down in places. The Bellevue City Municipal Code indicates the **maximum environmental noise level is 55 decibels. It is consistently over 70 decibels at our house with spikes in excess of 100 decibels.** The noise spikes come from Jake Brakes and cars racing. Can you prohibit the use of Jake Brakes on 405 right here as I've seen signs to indicate in other areas? Attached is a screenshot from the Sound Meter app I took the other day from my yard. The app is available on the App Store and shows a normal middle of the day (around 2:00 p.m.) average of 72 decibels. This is every day and negatively impacts sleep and just general enjoyment of life. It's honestly not enjoyable to be in the back yard due to the noise and at night it constantly keeps us up. The wall is so short, you can actually see the tops of vehicles on 405 from our yard. This is really a problem for my 7-year-old son despite our attempts to mitigate with white noise.

I invite someone from the city to please come to our house and measure and experience the noise personally. We have seen some newer, impressive walls going up in other parts of the city and request a modernized wall to help get the noise to acceptable levels based on the city code (link below).

Here is the code. Bellevue is not close to meeting its own standard here. <https://bellevue.municipal.codes/BCC/9.18.030>

Thank you for your consideration. Please let me know if you would like to visit or have a conversation. We welcome any opportunity to participate.

Thanks,

Mike Niemann
11600 NE 30th PL
Bellevue, WA 98005

Sound Meter



INFO

RESET

72 dB



MIN

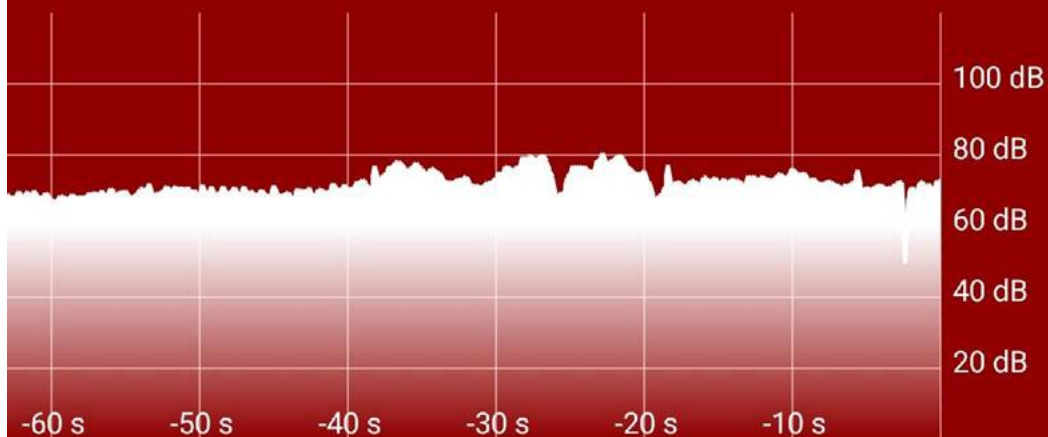
AVG

MAX

47 dB

70 dB

95 dB



MEMO

To: City of Bellevue Development Services Department
From: BDA Land Use & Livability Committee
Date: October 31, 2022
Re: Bellevue 2044 Environmental Review Scope- Wilburton

About:

The BDA Land Use & Livability Committee wishes to share the following comments about the draft Environmental Impact Statement (EIS) scope for the Wilburton Implementation Vision. The input outlined in this memo was sourced from two committee meeting discussions and a survey. Feedback has been categorized and framed as study topics to include in the EIS analysis. We urge the City to have an expansive EIS scope to ensure the final report delivers strong information to support the process to update the Comprehensive Plan and Code Amendment associated with Wilburton.

Housing:

1. Examine the benefits and downsides to increasing the housing goals.
2. What neighborhood characteristics would be necessary to increase the jobs-to-housing ratio to 2:1?
3. What are the benefits and downsides to making the ratio 1:1?
4. What housing typologies would best serve the area?

Block sizes and configurations:

1. Check the feasibility of the CAC's recommended block system against changes that have occurred since the report was produced.
2. What are the benefits and tradeoffs to building out the block network as a first step to help frame future development?
3. What are the best methods for encouraging property owners to invest in a united vision so build out avoid scenarios where projects are disconnected to the network system.
4. Are there recent examples of how block networks were established to frame buildout for an urban neighborhood?
5. Examine all the options for how to buildout the block network; examples identified but not limited to include: development incentives, public funding, public-private partnerships.
6. What are the benefits and tradeoffs of having a mix of vehicular streets and pedestrian corridors to frame the blocks.
7. If the City is going to study reducing block size in Wilburton, it needs to study development feasibility inputs, which can vary by site.
8. Study the benefits and tradeoffs of a market-lead approach to building system connectivity.

Subareas:

1. Explore the benefits and tradeoffs with establishing subareas to help frame buildout of the 300-acre study area?
2. Can zoning subareas and/or district overlays help establish and support buildout expectations like Downtown which is 400 acres?
3. Where would the boundaries for districts and overlays be drawn based on existing conditions?

NE 6th St Extension:

1. Compare the benefits and downsides for extending NE 6th Street to either 116th Ave NE and 120th Ave NE.
2. What are the capacity benefits of each option compared to impacts?
3. How would the extension options interact with the street network, walkability, Eastrail, the Grand Connection, and Eastlink?

Lincoln Center Site:

1. Examine the benefits, tradeoffs, feasibility of the different use concepts proposed to date. Ideas include mixed-used affordable housing, civic center / town square, large park, and aquatics center.
2. Examine how the project designs for the Grand Connection I-405 lid park would impact the Lincoln Center use cases. What are benefits and tradeoffs to taking a modular approach to building the park by building a bridge to Eastrail first?

Wilburton Growth Alternatives:

1. Re: Alternative 3 - Explore increase Housing Unit scoping number from 12,000 to 15,000.
2. Re: Alternative 3 - Study the benefits and tradeoffs of creating a life sciences corridor/hub in the hospital district area. Note the impacts to land use potential, especially around housing potential.
3. Examine traffic mitigation strategies. Explore the benefits and tradeoffs of the mode-split options to support access to and within Wilburton.
4. Examine the benefits and tradeoffs for a market-lead development approach for development buildout. Examine the benefits and tradeoffs for planned development approach for buildout.
5. Show the development benefits and walkability improvement from design work that incorporates Eastrail.
6. Study the benefits and tradeoffs to reducing or eliminating parking minimums. Explore whether this approach will lead to more affordable housing and a less car-dependent outcome.
7. Explore whether increasing heights and density for residential developments will help Bellevue meet its growth targets. Examine different areas of Wilburton to create examples for future reference.
8. Explore how to leverage the multimodal infrastructure that would support a pedestrian-connected TOD neighborhood.
9. Conduct a full and comprehensive evaluation of all alternative transportation grid patterns.
10. Study the benefits and tradeoffs for mandatory housing and fee in lieu programs.
11. Study how Wilburton can generate the "missing middle" housing types.
12. Study the benefits and tradeoffs of increasing density around all light rail stations.

From: Lyn Adams <lyn_adams@msn.com>
Sent: Monday, October 24, 2022 3:11 PM
To: CompPlan2044EIS
Subject: Housing Affordability

I live in Clyde Hill but what Bellevue does directly affects us in our residential city.
More housing will bring much more traffic, crowded schools, more need for police and fire, more stress on our water/power/sewer supply. Its too much density in small areas. Stop.

Marilyn Adams
Clyde Hill Resident

October 30, 2022

VIA EMAIL

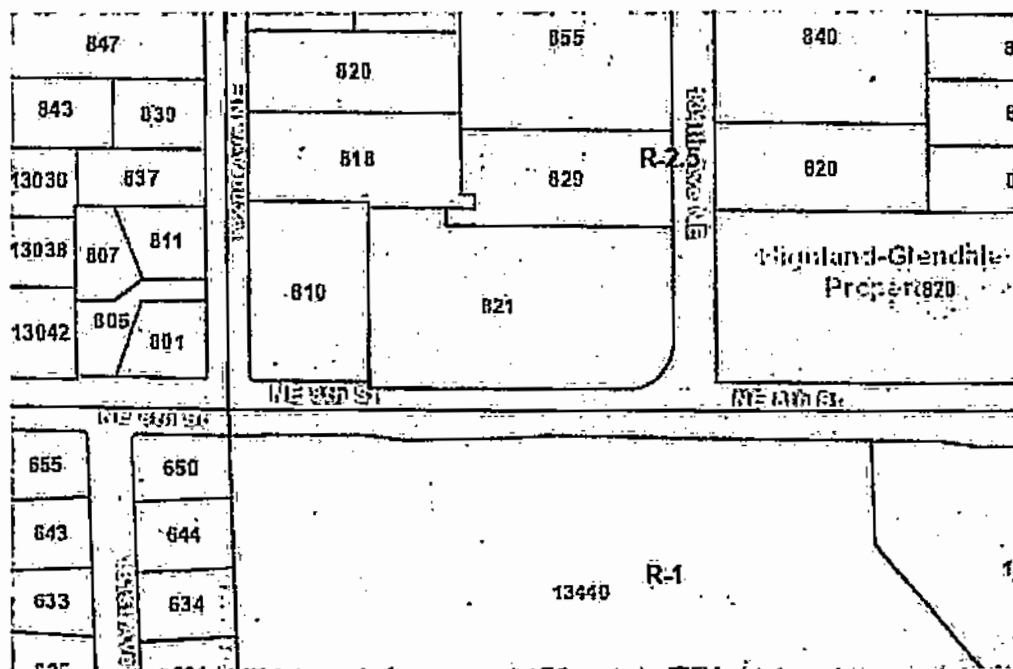
Development Services Department
City of Bellevue
Attn: Emil King and Reilly Pittman
450 110th Avenue NE
Bellevue, WA 98004
Email: CompPlan2044EIS@bellevuewa.gov

RE: Scoping Comment to encourage study of high-density multifamily opportunities along NE 8th Street and support for Alternative 3

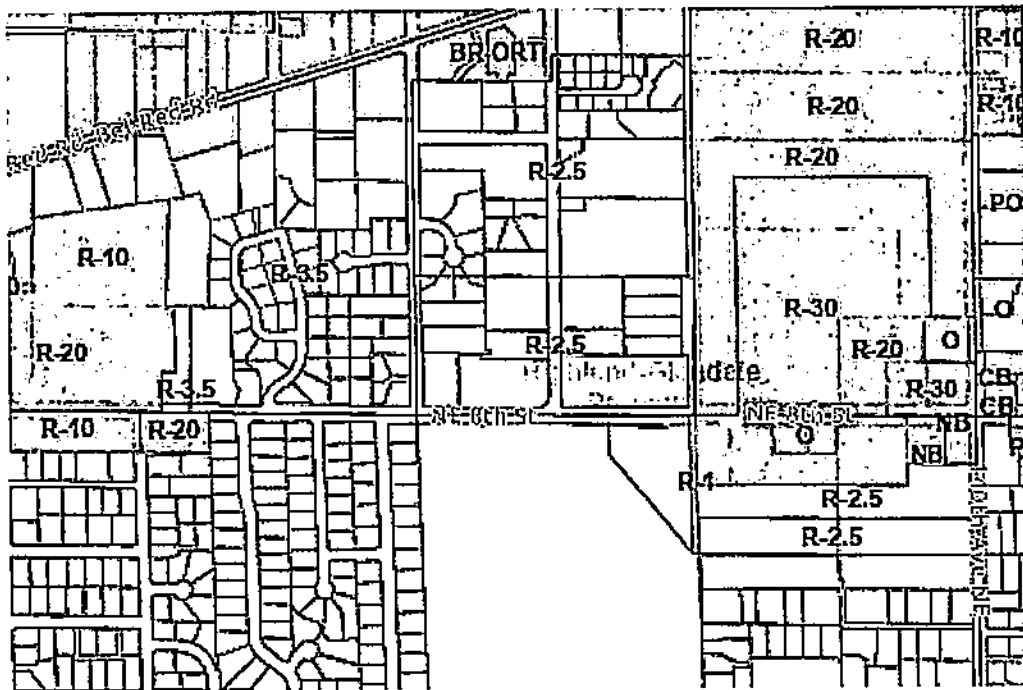
Dear Mr. King and Mr. Pittman:

The Edson family owns property located at 821 134th Avenue NE, Bellevue, parcel 067210-0081 ("Property"). Our family has lived in the City of Bellevue ("City") since 1962. We agree with planning staff's recommendation that Alternative 3 will most adequately address the City's ambitious planning goals. We are writing to encourage you to study the opportunity for dense multifamily development on the Property as part of your efforts to accommodate growth and address housing affordability in the 2044 Comprehensive Plan Update.

The Property is within the Wilburton-NE 8th Subarea and is currently zoned R-2.5. It is adjacent to NE 8th Street between 132nd Avenue NE and 134th Avenue NE, across from Glendale Country Club. The Property is identified in the image below with address "821" on the City's GIS zoning map.

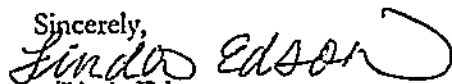


Though the Property is approximately 101,771 s.f. in size (2.34 acres), it is currently underserving Bellevue's housing needs, developed with only one single-family home. We encourage staff to study upzoning the Property for middle-scale multifamily development. Since the City's last comprehensive update, NE 8th 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 8th Street for multifamily. The Property is located in a "gap" of low-density zoning along the corridor, as shown below. The Environmental Impact Study ("EIS") should study additional opportunities for multifamily density along NE 8th Street in this area, such as the Property.



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. Of the three Alternatives outlined in the City's scoping notice, we support Alternative 3 with multiple strategies to accommodate the greatest amount of new housing units. Since the Property is adjacent to NE 8th Street near frequent transit, the EIS should study expanding housing capacity in this location.

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 more residential development. Please do not hesitate to contact me with any questions you may have about the Property.

Sincerely,

 s/Linda Edson
 Email: allegrofabrics@yahoo.com

From: Linda Sferra <lindasferra@earthlink.net>
Sent: Friday, October 28, 2022 3:02 PM
To: CompPlan2044EIS
Subject: Bellevue CPA -- Overlake Farm 40 acres

Dear City of Bellevue,

The Overlake Farm property, in Northeast Bellevue, contains a parcel of 40 acres on the west side of 140th Avenue NE and immediately south of the Bellevue-Redmond border. We have reviewed the Alternatives proposed in the Scoping Notice for the Draft EIS that will be prepared for the 2044 Comprehensive Plan update.

Our comments are:

Bellevue has grown to be the commercial/business hub for the greater Eastside. Redmond and Kirkland, have some important business areas, but Downtown Bellevue and the Spring District combine to form one of the most significant employment centers. This creates the need for more housing in Bellevue to accommodate demand and maintain and/or create more affordable housing, well beyond the directed additional 35,000 housing units and 70,000 jobs by 2044.

In the Bellevue 2044 EIS Scoping Handout, Alternatives 2 and 3 are the only ones that make sense, and Alternative 3 is really the only one that will have a chance of providing a spectrum of affordable housing and a variety of housing types. In order to create that type of density, the entire City must be considered. While concentrated housing in Downtown and the Spring District will occur this is expensive housing to build due to land values, primarily; does not create sufficient affordable housing units, and only apartments/condominiums will be provided. Townhomes and cottages make little economic sense in these areas where the cost of land is so high.

The eastern 40 acres of the Overlake Farm is a prime location for higher density housing, especially the missing middle. It is across the street from the Bellevue Municipal Golf Course with excellent access to jobs in the Overlake neighborhood, the Spring District, and Downtown Bellevue, as well as the nearby Microsoft West campus. There is also excellent access to transit with the Overlake Village and Redmond Technology light rail stations nearby. **Additionally, a wide, paved pedestrian/bicycle path already connects the property to commercial areas nearby.** The property can accommodate multi-story multifamily development as well as townhomes and cottages, which would also be in keeping with the adjacent neighborhoods.

This 40-acre parcel should be designated for multifamily development and a density of 10-15 dwelling units per acre and a height limit of 60 feet in order to optimize the provision of housing and the preservation of open space. Such a designation would reduce carbon footprint and environmental impact of the expected new residents projected for the City of Bellevue.

Sincerely,

Linda Sferra

From: Laura Bachman <bachmanconsulting@gmail.com>
Sent: Friday, October 28, 2022 9:16 AM
To: CompPlan2044EIS
Subject: EIS Zoning Alternative 3 - SUPPORT!

I would like to submit **support for the Comp Plan Amendment zoning Alternative 3**, as outlined in the recently released EIS document.

The City of Bellevue and the entire Puget Sound Region is suffering from a lack of housing, particularly a greater variety of housing types affordable at the 80-120% AMI level. Growth in population is going to occur, like it or not. And if Bellevue wishes to continue to attract new employers and residents, more housing **MUST** be built. However many areas in Bellevue have been locked into low density zones which essentially bar reasonable growth and expansion.

In the Bellevue 2044 EIS Scoping Handout, Alternatives 2 and 3 are the only ones that make sense, and Alternative 3 is really the only one that will have a chance of providing a spectrum of affordable housing and a variety of housing types. In order to create that type of density, the entire City must be considered. While concentrated housing in Downtown and the Spring District will occur this is expensive housing to build due to land values, primarily; does not create sufficient affordable housing units, and only apartments/condominiums will be provided. Townhomes and cottages make little economic sense in these areas where the cost of land is so high.

The eastern 40 acres of the Overlake Farm is a prime location for higher density housing, especially the missing middle. It is across the street from the Bellevue Municipal Golf Course with excellent access to jobs in the Overlake neighborhood, the Spring District, and Downtown Bellevue, as well as less than a block from Microsoft West campus. There is also excellent access to transit with the Overlake Village and Redmond Technology light rail stations nearby. The property can accommodate multi-story multifamily development as well as townhomes and cottages.

This 40-acre parcel should be designated for multifamily development and a density of 10-15 dwelling units per acre and a height limit of 60 feet in order to optimize the provision of housing and the preservation of open space.

Thank you -

Laura Bachman

October 31, 2022

VIA EMAIL

City of Bellevue Development Services Department

Attn: Reilly Pittman

450 110th Avenue NE

Bellevue, WA 98004

Email: CompPlan2044EIS@bellevuewa.gov

Re: Bellevue 2044 Comprehensive Plan Update – Scoping Comment

Dear Mr. Pittman:

We represent Roger White (“Mr. White”), owner of two properties consisting of Parcel Nos. 282505-9103, 282505-9290, and 262505-9217. The City has set out ambitious goals and priorities for its 2044 Comprehensive Plan update. We commend the City’s efforts in identifying key areas within the City that will support and guide future growth for the next several decades. On behalf of Mr. White, we write to provide the following comments regarding the City of Bellevue’s 2044 Comprehensive Plan scoping process

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 (“BelRed Road Property”). Both of these zoning classifications are limiting and present development challenges with respect to density, range of uses, and parking requirements. Mr. White’s BelRed Road Property is located just outside of the Bel-Red zone and both the BelRed Road Property and BelRed Medical Property are located near future East Link Light Rail stations. With this in mind, Mr. White’s goal is to create vibrant, livable, and sustainable housing.

We appreciate that the City is strategizing and focusing on the future of housing, and concentrating on three alternatives to support growth for the next 20 years. As the zoning currently stands, Mr. White is unable to play a part in this strategy. We believe the strategy for the 2044 Comprehensive Plan should be refined to allow greater development potential and flexibility for Mr. White’s properties and the surrounding areas because they are well-positioned to assist in transit oriented development and coordinated growth.

Historically, the City of Bellevue has not met its housing targets. Based on the 2021 buildable lands report, the City is only on track to meet 79% of its prior goal. To ensure that the City stays on

track for its next housing target under the 2044 Comprehensive Plan, alternatives with much higher residential unit growth should be studied. We believe this is necessary to increase the residential housing unit supply without risking long-term shortfalls in units delivered. In order to maximize the likelihood of meeting the housing supply target, the City should double the assumed housing unit production target.

In the event that new alternatives are not explored, and based on the information available to date, it appears the best alternative currently under review is Alternative 3. As the option that maximizes housing, we most support Alternative 3 because it will assist with the City's crucial goal to provide high-density housing throughout several neighborhoods. With respect to Mr. White's properties, we recommend high-density zoning and allowing for a broader range of uses on the site. For the BelRed Medical Property, we propose changes that would allow for the highest density possible. For the BelRed Road Property, we propose revisions that would allow for a rezone to BR-RC-2. Ultimately, the City should remove barriers with respect to zoning and allow property owners to help meet the City's long-term housing goals.

We applaud your foresight in recognizing the need for an increase in housing units in Bellevue and ensuring that the zoning code correctly guides growth for the next several decades. We are happy to aid the City in any way we can. Thank you for your time and consideration.

Very truly yours,



Nicole De Leon

October 26, 2022

VIA EMAIL

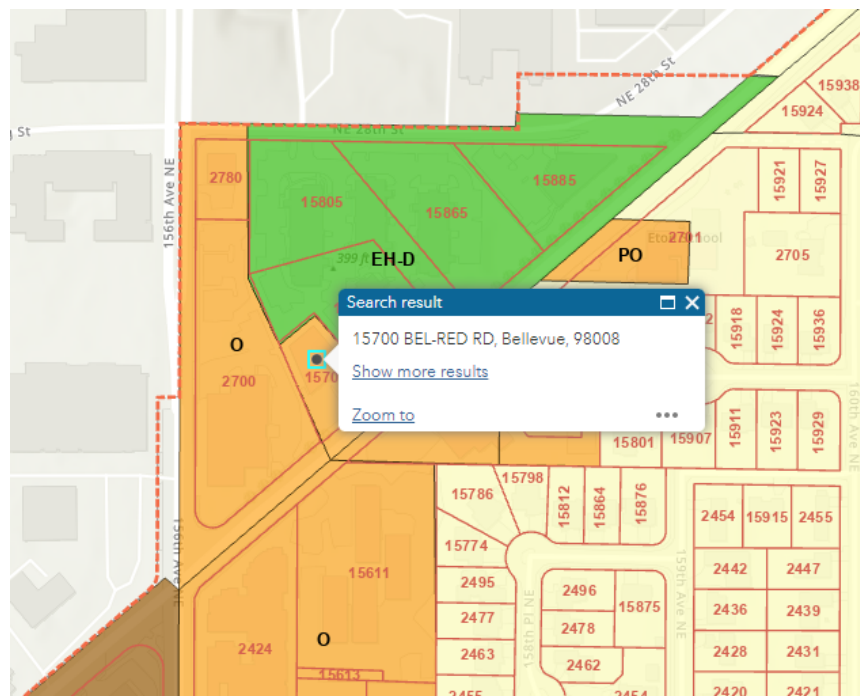
Development Services Department
City of Bellevue
Attn: Emil King and Reilly Pittman
450 110th Avenue NE
Bellevue, WA 98004
Email: CompPlan2044EIS@bellevuewa.gov

RE: Scoping Comment to encourage study of high-density multifamily opportunities and support of Alternative 3

Dear Mr. King and Mr. Pittman:

Parkay Investments, LLC (“Parkay”) 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 would like to congratulate you on your efforts to date on the City’s 2024 Comprehensive Plan Update. The City faces daunting planning challenges, but we believe they can be met with ambitious solutions. We are writing to encourage you to study the opportunity for dense multifamily development on the Property as part of your efforts to accommodate growth and address housing affordability in the 2024 Comprehensive Plan Update.

The Property is within the Northeast Bellevue Subarea and is currently zoned Office, shown below.



It is currently developed with a 1977, 6,291 s.f. woodframe building and extensive surface parking. The current zoning allows only for limited multifamily development, not to exceed 50 percent of the gross floor area. LUC 20.10.440, Note 1. This is due in part to the current Comprehensive Plan subarea policy prohibiting new multifamily uses in this location. Northeast Bellevue Subarea Policy S-NE-7. The continuation of this outdated policy during the 2024 Comprehensive Plan Update would be a missed opportunity for the City. The Property is a 24,477 s.f. parcel adjacent to Bel-Red Road and frequent transit service. It is an ideal location for climate-smart transit-oriented housing development in a location where few opportunities for multifamily housing currently exist.

As you and City Council have identified, the City faces a pressing housing affordability crisis. We lack “missing middle” housing for our teachers, police officers, firefighters, young families, and others who constitute a critical part of our community. Of the three Alternatives outlined in the City’s scoping notice, we support Alternative 3 which would pursue multiple strategies to accommodate the greatest amount of new housing units. Since the Property is adjacent to Bel-Red Road near frequent transit and commercial uses, the Environmental Impact Statement (“EIS”) should study including it within the “Mixed Use” and “Neighborhood Centers” concepts articulated in the Alternatives, where housing capacity should be expanded.

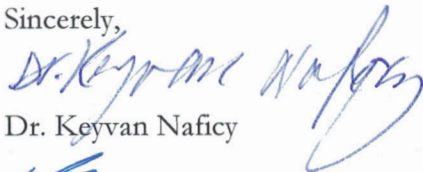
We appreciate that the Alternatives summarized in the scoping notice are clearly all focused on expanding housing options. However, we note that the summary of Alternatives only mentions “low-density housing options” and “middle-scale housing.” We understand the scoping notice represents an initial and broad concept, but it is unclear to what extent high-density housing options will be studied in new locations based on the Draft Concept Maps.

The City cannot afford from an equity nor climate perspective to forgo high-density housing opportunities in strategic locations in its next 20-year plan. We encourage that the EIS evaluate options for high-density housing within its “Mixed Use Centers” and “Neighborhood Centers” concepts in Alternatives 2 and 3, especially for the Property. Podium-style, high-density housing should also be studied along high-capacity corridors, particularly in Bel-Red and Wilburton where housing can most readily materialize and be located near jobs. Specifically, we suggest that the EIS study heights up to 85 feet in this location to accommodate midrise and podium construction, wood-frame housing solutions. The Property is ideally sized and appropriately located for dense multifamily; it is not appropriate for redevelopment as office and will not further the City’s ambitious planning goals as a one-story building. The Property’s best use for the City’s goals to address housing affordability, equity, and climate should be studied in the EIS.

In general, we believe Alternative 3 is pointed in the right direction as the City begins to study Alternatives. But the need to diversify housing opportunities and allow for increased housing production in Bellevue should be addressed through high-impact solutions. Transit-oriented development sites appropriate for dense residential development is a powerful tool to address affordability, equity, and sustainability goals identified by the City Council. We also encourage the City to evaluate how the Comprehensive Plan’s overall goals and policies for more residential opportunities near transit infrastructure may be frustrated or impeded by inconsistent policies in subarea plans, such as Northeast Bellevue Subarea Policy S-NE-7. The EIS should evaluate the impacts of such subarea plan policies on the overall housing capacity and, where appropriate, include revisions to the Comprehensive Plan and zoning regulations to support additional housing.

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 more residential development. In the meantime, please do not hesitate to contact me with any questions you may have about the Property.

Sincerely,



Dr. Keyvan Naficy



Kianoush Naficy



Joseph Curran

Managers, Parkay Investments, LLC



October 31, 2022

Reilly Pittman, Senior Planner
City of Bellevue Development Services Department
450 110th Avenue N.E.
Bellevue, WA 98004

Re: City of Bellevue 2024-2044 Comprehensive Plan Periodic Update - Notice of Determination of Significance and proposed public scoping for the EIS

Dear Mr. Pittman:

This letter is in response to the City of Bellevue's request for comments pertaining to the Determination of Significance (DS) issued on September 29, 2022 for the periodic update to the Comprehensive Plan – Bellevue 2044, being conducted in accordance with the requirements of the Revised Code of Washington, specifically 36.70A and the 43.21C.

Puget Sound Energy (PSE) supports the City's declaration of a DS. In recognition this action will require an Environmental Impact Statement (EIS) for the periodic update to Comprehensive Plan – Bellevue 2024-2044, and in response to the City of Bellevue's scoping of possible focus areas in the programmatic EIS, listed below are issues that PSE believes should be considered within the update of the Comprehensive Plan and its accompanying EIS.

PSE encourages the City to integrate elements of the following documents:

- PSE Integrated Resource Plan (IRP) – 25 year Long-range Plan
- PSE Clean Energy Action Plan (CEAP) – 10 year Strategy Plan
- PSE Clean Energy Implementation Plan (CEIP) – The CEIP builds on the vision established within the Integrated Resource Plan and the Clean Energy Action Plan. The CEIP acts as a roadmap for implementing clean energy actions, programs and investments over the next 4 years.

How will the Comprehensive Plan and EIS address implementation of the State's Clean Energy Transformation Act (CETA)?

Letter Re: Bellevue Comp Plan 2024-2044 Update
DS and scoping of EIS
Page 2
October 31, 2022

How will the Comprehensive Plan and EIS integrate applicable information from PSE's EIS for the Energize Eastside Project? In addition, information from PSE's electric transmission projects such as the Lakeside-Phantom Lake transmission lines. These significant projects, and their respective permitting and construction, have occurred since the adoption of the City's 2015 Comprehensive Plan.

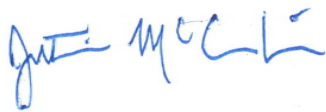
How will the Comprehensive Plan and EIS integrate applicable information from the ongoing King County-Cities Climate Collaboration, such as the Joint Letter of Commitment: Climate Change Actions in King County?

How will the Comprehensive Plan and EIS address the City's implementation of Transportation Electrification and Building Electrification? These energy strategies have potential impacts to both electric and natural gas transmission and distribution facilities. Such impacts should be identified and evaluated as part of the EIS and the subsequent amendment to the Comprehensive Plan – Bellevue 2044.

How will potential impacts identified in the EIS be integrated into the update of the Comprehensive Plan – Bellevue 2044, specifically within the Utilities Element and other elements identified in RCW 36.70A? This also includes the City's strategy for Subarea Plans.

PSE would like to thank the City for the opportunity to provide comments throughout the update process, including serving as a member on the City's Bellevue 2044 Strategy Team. 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.

Sincerely,



Justin McConachie
Senior Municipal Liaison Manager

Cc: Thara Johnson, City of Bellevue
Elizabeth Stead, City of Bellevue
Dave Anderson, WA Department of Commerce
Rich Doenges, WA Department of Ecology

October 28, 2022

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

RE: Bellevue Comprehensive Plan – Wilburton Vision Implementation

Dear Reilly:

We are writing to comment on the Comprehensive Plan 2044, specifically the Wilburton Vision Implementation.

Our concern is with the Wilburton Study Area **Alternative 3** which would change the zoning along 116th from an emphasis on medical office to “Mixed-Use Node” with limited opportunity for medical uses.

Overlake Medical Center has made a tremendous investment in our campus and the Bellevue community, including most recently our world-class Project FutureCare campus renewal. We have longer term growth plans, and changing the zoning from medical to mixed use residential would likely preclude our ability to continue to grow within Bellevue.

We applaud the City of Bellevue for its proactive planning requirements targeting housing availability and affordability, and feel that the Wilburton Alternative 1 & 2 provide the area with hundreds of acres of land zoned for residential and multifamily developments. It is critical to the future growth of Overlake Medical Center to preserve the existing focus on medical use for our campus and the immediately adjacent property we control. The Alternative 3 rezone would jeopardize this growth and our ability to continue to provide world-class medical care to Bellevue and Eastside communities.

Sincerely,



J. Michael Marsh
President & CEO
Overlake Medical Center & Clinics

Public Scoping Comments to the City of Bellevue's 2024-2044 Comprehensive Plan

Somewhere, somehow in the scoping document, there needs to be a discussion on the impacts of the Covid-19 virus pandemic effects and impacts to the economic and population growth projections of the 2024-2044 Comprehensive Plan. What patterns or trends have emerged from the 2020-2021 pandemic time-period?

Lessons learned so far include:

- (1) office work (especially high-tech) environments changed
This factor raises a number of questions. First how many office jobs were done from remote locations (3 time frames 2018-2019, 2020-2021, 2022-2023)? Second, what is the ratio of high tech jobs to non-high tech jobs (pre-pandemic vs post-pandemic)? How will Bellevue based office jobs done from remote locations be tabulated as city based jobs? Given these questions and other similar and related questions, are the projected growth figures for the planning period (2024-2044) of 70,000 jobs and 35,000 housing units realistic and achievable? And over this 20-year time period, what are the projected growth dynamics (based on previously growth dynamics from current comprehensive plan)?
- (2) diseases such as the Covid-19 virus and all its variants will persist. The new norm now and well into the future will be the health care challenges to manage the annual outbreak of Covid-19 sub variant various virus, the flu virus and the respiratory syncytial virus (RSV). The spread and transmission of these virus (globally, nationally, regionally, and locally) adds to this challenge. Another challenge is the fact that population group immunity may not exist due to the number of non-vaccinated or minimum vaccinated people in a given population. The fall and winter seasons are the major time frames of concern. How will the City of Bellevue deal with this public health care challenge over the comprehensive planning timeframe?
- (3) office and living accommodations will need to leverage technology to provide safe, secure and productive environments. The traditional open-plan space that maximized the potential for collaboration and communication between workers is probably now outdated given the post-pandemic operational guidelines. Now and probably into the future, offices will have to practice social distancing and have state-of-the-art air filtration and ventilation systems. How will the city of Bellevue address these public health issues and concerns?

The Covid-19 Pandemic was a major societal event. It affected global, national, regional, and local public health, economic, social/cultural, and transportation systems. This major event dynamics needs to be discussed in the City of Bellevue's 2024-2044 Comprehensive Planning process.

James Doyle
3703 169 Ave NE, Bellevue, WA 98008

ATTACHMENT 3. WILBURTON VISION IMPLEMENTATION RELATED COMMENT SUMMARY

ID #	First	Last	Comment
I-11	Phyllis	White	We have deer, coyotes, bald eagles, hawks, blue herons, beavers, opossums, and other wildlife living in our Wilburton neighborhood between Bel-Red and NE 8th. There are numerous trees over 100 years of age and the Kelsey Creek stream runs through the neighborhood. With the Bel-Red and Wilburton West Edge commercial development, and the Spring District, traffic will be increased. Limit the density and growth areas to Bel-Red and commercial Wilburton.
I-16	Barbara	Braun	2030 decarbonization goals should be added to the EIS standards. Given the vision for this area, the question should be how much is it IMPROVING things against the EIS standards and our decarbonization goals. If EIS is negative vs positive to any extent, the plan should be revised. This is the opportunity, and the stated goal, to go from a blighted area to a model of environmental redemption and sustainability. This project should break free of the coal/gas and highway/car shackles of the past. It's time to move on. The development so far in Wilburton (PCC, REI, etc.) and the Spring District don't reflect the vision although PCC is a green building.
I-17	Hanna	Floss	For the Wilburton study area, I favor Alternative 2. I feel strongly that the Eastrail should be backing up to apartments so residents can take advantage of this accessway to light rail, downtown and beyond
I-20	John	Wu	I'm afraid this "crazy" plan will turn our beautiful Wilburton neighborhood into an overcrowded, traffic-jammed, uninhabitable, crime-ridden inner-city dungeon. Then there will be various homeless shelters. Ironically, outsiders make decisions for our community. If our city can't handle this much housing, we don't need our city to handle it alone. There are other cities that could help build more housing. The study option also has the following problems: 1. Are based on a pre-Covid commuting situation where people daily went to their workplace. Just drive through the Spring District or downtown and you'll see numerous empty offices. Space-available signs are everywhere. Take a spin through the South Bellevue Park & Ride lot midday on a weekday and the once-crammed facility has just a couple dozen cars. 2. Encourage large increases in the number of teeny apartments. Today, if you drive past those cramped quarters, you'll see many are empty – people who are no longer chained to a physical workplace have fled. 3. Do not address the effect of traffic on 128th – the north-south street on the east side of Wilburton Hill Park. That road – and intersection with the Lake Hills Connector at SE 8th – already backs up southbound when 116th/8th traffic mires. Nor does the study address volume increases on 124th/Main and the effect on park visitors and our neighborhood elementary school. 4. Do not describe how our views of our landscape will change. The city touts being committed to green space, but the study allows for visitors to the Botanical Garden to be greeted with a western wall of high-rise towers vs. its current beautiful vista. (In expectation of zoning changes, an adjacent office park was recently sold.) See https://www.bizjournals.com/seattle/news/2022/10/20/pine-forest-acquires-bellevue-office-buildings.html 5. Do not address King County's expectations that the opening of the Wilburton Trestle as a trail will attract a lot of visitors. (At an open house, fewer than 5 parking spots were allotted by Bellevue for the north access and not one for the south access.) See https://kingcounty.gov/elected/executive/constantine/news/release/2021/September/20-eastrail-amazon.aspx

I-21	Linda	Ulrich	Dear Committee Members, As a long time Bellevue resident (64 years) I have a deep vested interest in and concern with the plans being discussed for the Wilburton Vision Implementation plan. During the years of residency along the Bel-Red Corridor, on 134th Ave NE, we have seen a devastating loss of, and displacement of, our wild life, old growth trees and native vegetation. Driving west on 520 or 8Th Ave I have counted a minimum of 8 cranes. I was shocked therefore to read of the plans for even greater density than that which is currently under construction. Sadly, Bellevue no longer seems to reflect it's name - Beautiful View - one can only "view" block after block of 3-4 story apartment buildings and minimal landscaping. The sun is even blocked in many areas due to the density of the apartments. This alone creates a problem of run-off from the roofs, parking areas, and sidewalks all running into the diminished streams we give lip service to protecting. I agree with affordable housing but please reevaluate what that means. Many if not most of these high density projects result in monthly rents that are as much as a mortgage payment. I understand that provides greater revenue for the City via taxes but at what cost to the City itself? I understand there are other areas that have not been "tagged" such as Bridle Trails, areas north of Bel-Red, east of 156th to suggest a few. I strongly hope you will consider leaving the Wilburton area the wild life sanctuary that it is and look to other areas to accommodate your need for more affordable housing plans. Thank you for your consideration.
I-23	T.J.	Woosley	The Wilburton area is going to play a very large part in Bellevue's ability to accommodate the upcoming employment, residential and commercial growth into the future. For the Scoping of the EIS I would strongly encourage that the largest growth alternative (#3) be assumed and that the proposed residential population # be increased from 12,000 to 15,000. Transportation/Mobility infrastructure (for all modes, including cars) needs to be adequately planned and built concurrent with the needed commercial and residential development. Thank you, T.J. Woosley
I-27	Cheryl	Wang	This comment is in regards to the increased housing that the city is planning. I am asking that you put a hold on that. Wilburton should stay as is - the park and single family homes is the right balance. Economy is not well. We don't know how the job market will be. Thank you.
I-29	Lisa	Olsen	All the options for the Wilburton proposed growth plans show sweeping changes to the southern suburban areas in Bellevue, but what about the northern suburban areas?? Overall, these areas seem to be left out of the growth.
I-34	Gloria	Olsen	Alternative #3 of the maps for the Wilburton Vision makes the most sense to me!

I-48	Phyllis	White	<p>The goal of the Wilburton/N.E. 8th Street Subarea is to support the residential and non-residential uses in the subarea by protecting residential, recreation, and open space areas from the encroachment of commercial and other non-residential uses (except those normally permitted in residential areas). Non-residential development, such as retail activity, medical uses, and auto sales, should be concentrated in existing non-residential areas. This vision seeks to protect residential areas from commercial encroachment except in some cases. This vision also ensures the protection of our wildlife from encroachment and overdevelopment of commercial and residential uses in our existing single-family neighborhoods. Our neighborhood supports the following Wilburton/N.E. 8th Street Subarea Plan to meet the Wilburton/N.E. 8th Street Subarea goal: To separate residential, recreational, and open space areas from commercial areas and to protect open 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, such as large retail and auto sales, that provide mixed-use opportunities and add convenient shopping for the adjacent neighborhoods. Wilburton residents enjoy the qualities of our neighborhood listed below:</p> <ul style="list-style-type: none"> • A sense of community to the residential character of Wilburton. • Protection of tree canopies and the beauty, quality, and trees bring to the Wilburton neighborhood. • Ensure the planning and zoning for the safety and well-being of the neighborhood. • Protect the neighborhood from overdevelopment, loss of tree canopies, and clean water in and open land spaces to preserve remaining wildlife and their resources for clean water running through the Kelsey Creek Basin through our Wilburton neighborhood. <p>I support the land use policies below to retain and support the Wilburton/N.E. 8th Street Subarea Plan Goals:</p> <p>Land Use Policies: POLICY S-WI-1. Protect residential areas from impacts of other uses by maintaining the current boundaries between residential and non-residential areas. Natural Determinants: POLICY S-WI-16. Protect and enhance streams, drainage ways, and wetlands in the Kelsey Creek Basin. POLICY S-WI-17. Prevent development from intruding into the floodplain of Kelsey Creek. POLICY-S-WI-18. Development should not interfere with Lake Bellevue as a drainage storage area identified in the City's Storm Drainage Plan. Residential Development: POLICY S-WI-19. Enhance the cohesiveness of established single-family and multifamily residential areas.</p>
------	---------	-------	--

I-48 contd.	Phyllis	White	<p>POLICY S-WI-21. The impacts of traffic and the building scale of non-residential uses (such as churches and schools) located in residential areas should be considered during development review. POLICY S-WI-22. Seek affordable and “work force” housing in new mixed-use developments through regulatory and incentive approaches. Parks, Recreation, and Open Space: POLICY S-WI-32. Retain the parks in the subarea and ensure they remain park facilities (including Wilburton Hill and Kelsey Creek Parks). POLICY S-WI-33. Retain and develop open spaces for a variety of purposes. POLICY S-WI-34. The City strongly encourages the continuation of the golf course use at the Glendale Golf Course. POLICY S-WI-35. Prepare designs for proposed parks with the participation of the community affected and served. POLICY S-WI-36. Support the continuation of the Lake-to-Lake Trail through Wilburton. POLICY S-WI-37. The City should consider acquisition of surplus school district sites which might be appropriate for park and recreation uses. POLICY S-WI-38. Encourage development of the Highland-Glendale site, located on the northeast corner of N.E. 8th Street and 134th Avenue N.E., as a park facility. Please refer to the history of this property, Parcel 0672100095. A family donated the parcel to the City of Bellevue with the condition it is used as a park. Bellevue is referred to as “A City in a Park”. Our sub-neighborhoods of Bellevue are as diverse as the residents that live here. Each differs in character, landscape, and density. Many of our differing neighborhood areas have older trees, some over 100 years old, growing on the properties. Trees are critical infrastructures, and neighborhood-by-neighborhood tree protections should be required. It takes years for them to grow. Trees provide a filter from air pollution, absorb stormwater runoff protect the water from contaminants, and provide shade and cooler air in residential properties. Trees offer tremendous wildlife habitats and provide animals shade, shelter, moisture, and food. Areas with fewer trees can become as hot as 10 degrees higher. Animals use trees for resting, nesting, and places to hunt and capturing prey. In my neighborhood area for example, between NE 8th and BelRed Road, trees provide the habitat for many types of animals, such as hawks, bald eagles, cardinals, robins, hummingbirds, crows, blue herons, owls, frogs, raccoons, deer, rabbits, beavers, squirrels, bats, coyotes, and many others. Cutting down the trees for housing density will destroy the essential habitat of these animals and will have a lasting impact on the residential environment we love and enjoy.</p>
-------------	---------	-------	--

I-48 contd.	Phyllis	White	Replacing single residential homes with apartments, townhouses, middle housing, and DADUs will affect the quality and character of the neighborhood if not done with careful consideration. Moreover, rentals should be required with established rental periods, owner residency requirements, and monitoring. Every neighborhood should have the ability to opt in or inopt out of the inclusion of DADUs. Off-street parking needs to be considered when planning for increasing density. Wilburton streets are narrow, with limited street parking. Also, the light rail, housing, office, and retail developments will contribute to worsening noise and air quality. There are about 22 new parcels in the Spring District and BelRed for development, adding 1,995 housing units and 6,000 parking spaces, with more on the way. Wilburton's traffic will increase with the Spring District, BelRed, The Wilburton Vision Implementation, and the light rail. Our air and noise quality will be significantly impacted. Bellevue Comprehensive Plan Periodic Update: Support "Alternative 0" promoting affordable housing given the reasons mentioned in this letter. The City should allow neighborhood-by-neighborhood tree protections focusing on growth where there is already density and not make the unnecessary sacrifice of forestry and tree canopies for more affordable housing without a definite matching anticipated job market. Support the housing density to meet the "minimum requirements" of the Growth Management Act and promote growth primarily in the downtown and commercial core areas, mixed-use centers (Downtown, East Main, BelRed, Wilburton, Crossroads, Factoria, Eastgate), and consideration of other Bellevue neighborhoods, such as southeast of Enatai, and areas in the commercial Bridal Trails. I also strongly encourage other options including employment with incentives for affordability and equity, partnerships with universities and colleges for employment, and not only by increasing our property taxes for additional housing affordability. Residents are facing financial hardships with our property taxes up 40% from last year. Increasing property taxes will cause less affordability for housing for all. 1. Bellevue Comprehensive Plan Periodic Update and Wilburton Vision Implementation 1.1. Revise Alternatives 1, 2, and 3 to include only those changes needed to bring Alternative 0 into compliance with the housing unit growth target specified in 2021 King County Countywide Planning Policies. The current descriptions of these alternatives shows that each of them would provide excessive amounts of housing and job growth.
I-48 contd.	Phyllis	White	2. Wilburton Vision Implementation 2.1. Revise Alternatives 1, 2, and 3 to eliminate the NE 6th street extension. 2.2. Revise Alternatives 1, 2, and 3 to eliminate any provision for residential towers in any areas in the Wilburton subarea near neighborhood parks and single-family residential. Thank you for your time and attention. Sincerely, Phyllis White
I-49	Todd	Woosley	See PDF
I-50	Heidi	Dean	1. The CoB acknowledges that things have changed in the city since the original Wilburton study was done, thereby requiring a fresh look. The city has also acknowledged that a large # of the 70K+ jobs that are targeted for growth will have their home base here but will be worked elsewhere due to the advent of remote work. That means the jobs and housing targets should be decreased as they are not an accurate reflection of what's coming. 2. Spread density & affordability equitably across all neighborhoods in the city to avoid socio-economic redlining.
I-54	Joseph	Pew	There is significant investment being made in Wilburton for parks and trails and a high density neighborhood should be created to take advantage of the presence of the Eastrail and future Grand Connection. Please select option 3 in the scoping alternatives and increase the housing studied to 15,000 new units.
I-55	Betsi	Hummer	See PDF

I-60	Bill	Finkbeiner	<p>See PDF</p> <p>I think about Wilburton a lot and have a lot to say about it, but the gist of this email is that this is a neighborhood that has all the infrastructure in place to compliment downtown with significant densities. Given this, and the market demand for housing, Bellevue should absolutely choose the option three in the for EIS scoping and should up the housing numbers to at least 15,000. More detailed thoughts are below. Over the last 22 years I have probably spent about half of my life in the Wilburton neighborhood. Depending on the traffic and what I have planned for the day I either drive or bike into work. When I drive I sometimes take the 124th exit off 520 or the NE 8th exit off of 405, there are several other onramps and offramps into the neighborhood that facilitate easy access.</p>
I-60 contd.	Bill	Finkbeiner	<p>When I bike I take the Eastrail until it ends near 10th and then it is easy to get into the North end of the Wilburton neighborhood without leaving a bike lane. There is a rapid ride bus that comes every 10 minutes less than a block away and I am looking forward to the two light rail stations opening within a quarter mile of where I work. For lunch I can walk to any of a dozen restaurants but usually end up going to Whole Foods or Uwajimaya which are both within quarter mile walk, amazingly there is also a PCC and Trader Joes within a half mile. Last week I stopped into the drugstore across the street to get my flu shot. Sometimes to clear my head in the afternoons I go for a walk or bike to the Bellevue Botanical Garden, which abuts the Wilburton neighborhood and is less than a mile away, on my way I pass by the new Wilburton Elementary. I am always amazed at how amazing this neighborhood is and how few people live and work here. At the same time Bellevue is falling so far behind the market's demand for housing that it is unaffordable to most families and individuals. Pretty much all the land available for single family housing in the region has already been built out and to increase supply we would have to expand the growth management area and build further into rural areas, increasing commute times, increasing traffic and increasing environmental and societal costs. Or we could put more people where this incredible infrastructure exists by allowing for significantly more densities. I understand that changes like increased densities also bring some costs, and some people don't like change, but the benefits so far outweigh the costs that this is a no brainer, especially in an area as well served by infrastructure and services as Wilburton. The primary benefit is the increased housing stock which will put downward pressure on housing costs, but there are a ton of secondary benefits. These include the general societal benefits that come from dense neighborhoods like the increase in diverse businesses, especially those that increase the quality of life for all residents like restaurants, gyms, day cares, etc. There is also a benefit to the region by putting densities in a walkable neighborhood so well served by the massive investments we have made into transit alternatives. For all these reasons Bellevue needs to think big when it comes to Wilburton and in your scoping efforts you should maximize the densities reviewed to bring the most long term benefit to the city.</p>
I-63	Chris	Reid	<p>See PDF</p> <p>My name is Chris Reid and I grew up in Bellevue and work in the Wilburton neighborhood. I want to encourage the city to choose Option 3 in the Wilburton EIS scoping exercise and to increase the housing units studied from 12,000 to 15,000. Wilburton's mix of transportation infrastructure is second to none in the region and increasing the housing density to 15,000 units would make a neighborhood that would be a great compliment to downtown and a draw to the rest of the region. I also want to specifically encourage you to look at increased densities in the NE corner of Wilburton along 120th towards the Spring District. This area has the infrastructure to support the increased densities that Bellevue will need to meet its housing goals.</p>

I-64	David	Plummer	See PDF 2.1. Revise Alternatives 1, 2, and 3 to reduce the maximum building heights in all areas to the dimensional equivalent of 3 stories. 2.2. Revise Alternatives 1, 2, and 3 to eliminate the NE 6th street extension. 2.3. Revise Alternatives 1, 2, and 3 to eliminate any provision for residential towers in any areas of the Wilburton subarea.
I-72	Justin	Altman	See PDF Wilburton has excellent public transportation access with easy access to the 1405 and 520 freeways. We have three light rail stations within the walkshed of the neighborhood. We are very walkable and have four grocery stores that can easily be reached from any part of Wilburton. This infrastructure should be leveraged by adding as much housing density as feasible.
I-78	Linda	Edson	See PDF
O-04	Pine Forest Properties		Our firm, Pine Forest Properties, is the owner of the Belle View office park in the Wilburton area. We are in full support of the Wilburton Vision, and specifically zoning that would support maximum housing density.
O-07	Jenifer	Thornton	Re: Please Support at least 15,000 Additional Housing Units, Common Sense Density and Option 3 Under the Bellevue 2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Our family, through our family company, RCJ Properties, LLC, has owned the property located at 888 116th Avenue NE in the Wilburton neighborhood of Bellevue for over 50 years. Currently, we ground lease the property to Whole Foods. We have seen the remarkable evolution of Wilburton over the last five decades, most significantly the construction of Sound Transit's rail and station nearly adjacent to our property. We are well aware of the housing shortage and transportation challenges our region and City face. Fortunately, room for redevelopment exists in Wilburton, and the development environment is very favorable: Sound Transit's construction is nearly complete, Wilburton is located directly adjacent to I-405, and the City continues to invest heavily in public parks and trails here. Thus, the twin problems of low housing stock and transporting Bellevue's growing population will be tangibly addressed with a common-sensical up-zone of Wilburton. That up-zone, and in particular, adoption of the at least the values disclosed in Option 3 under the Wilburton EIS, will provide housing for the growing workforce across all income levels, while minimizing increased vehicle trips and the impacts of those trips on the City. The Wilburton neighborhood has an abundance of transportation options including easy freeway access to I-405 and SR 520 and three light rail stations within the walkshed of the neighborhood. These transportation investments must be leveraged by creating a high-density neighborhood with at least 15,000 new housing units. This is especially true because the Spring District and the light rail maintenance facility were built significantly below their allowed zoning. With appropriate zoning that properly leverages Wilburton's significantly improved infrastructure and its four existing major supermarkets, our neighborhood could become the most walkable neighborhood in Bellevue. For all these reasons, Option 3 is the lowest of the future growth alternatives that should be evaluated and then adopted by the City. It is the only way for the City and region to get an appropriate return on both the City's and the regional investments in Wilburton and the only way the City can possibly achieve its goals of creating necessary housing stock and a truly walkable City. Thank you for your consideration. RCJ PROPERTIES, LLC Jenifer Thornton, Manager Sydney Ostrem, Manager

O-08	KG Investment Properties		<p>See PDF (Andrew Coates)</p> <p>Comments Specific to Wilburton: The area between 116th Avenue NE and Eastrail and NE 4th Street and NE 8th Street should be the location of the most intense development in Wilburton. NE 6th Street should terminate at 116th Avenue NE after crossing I-405. To extend NE 6th Street east to 120th Avenue NE would create little benefit to vehicle transportation and would destroy the opportunity to provide an iconic, regional connection between The Grand Connection and Eastrail at that location. In addition to losing this critical multi-modal connection, an eastern extension of NE 6th Street would be extraordinarily expensive (in terms of both property acquisition and construction costs) and would necessitate yet another at-grade crossing of Eastrail by a major arterial within only about a quarter mile. As a result, such a NE 6th extension would destroy the key hub for Eastrail and undermine the hundreds of millions of dollars of investment in this regional multi-modal facility. No requirement of a "street grid" should be imposed on the properties. 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 properties impair the use and activation of any such grid streets and those streets would not connect to any larger network. Any future development of the properties can and should accommodate east-west pedestrian connections. The properties along both sides of the Eastrail between NE 4th and NE 8th should receive increased heights and densities for trail-oriented development.</p>
O-09	Doug	Rigoni	See PDF
O-21	Eastridge Pa	LLC	<p>See PDF (Eastridge Partners)</p> <p>We have reviewed the Wilburton Study Area Alternatives provided in the Notice of Scoping. Alternative 3 which seeks to locate the highest number of housing units and jobs in Wilburton is most appropriate given Bellevue's unprecedented growth. However, the City needs to add 70,000 new dwelling units to address housing affordability. We encourage that Alternative 3 should study adding 15,000 units to the Wilburton area. While the Alternatives appear to divide Wilburton into different use categories, we continue to believe that mixed-use designation with flexibility to develop residential and office will best facilitate development to meet Bellevue's planning goals in the area.</p>

O-23	Jennifer	Thomton	<p>Our family, through our family company, RCJ Properties, LLC, has owned the property located at 888 116th Avenue NE in the Wilburton neighborhood of Bellevue for over 50 years. Currently, we ground lease the property to Whole Foods. We have seen the remarkable evolution of Wilburton over the last five decades, most significantly the construction of Sound Transit's rail and station nearly adjacent to our property. We are well aware of the housing shortage and transportation challenges our region and City face. Fortunately, room for redevelopment exists in Wilburton, and the development environment is very favorable: Sound Transit's construction is nearly complete, Wilburton is located directly adjacent to 1-405, and the City continues to invest heavily in public parks and trails here. Thus, the twin problems of low housing stock and transporting Bellevue's growing population will be tangibly addressed with a common-sensical up-zone of Wilburton. That up-zone, and in particular, adoption of the at least the values disclosed in Option 3 under the Wilburton EIS, will provide housing for the growing workforce across all income levels, while minimizing increased vehicle trips and the impacts of those trips on the City. The Wilburton neighborhood has an abundance of transportation options including easy freeway access to 1-405 and SR 520 and three light rail stations within the walkshed of the neighborhood. These transportation investments must be leveraged by creating a high-density neighborhood with at least 15,000 new housing units. This is especially true because the Spring District and the light rail maintenance facility were built significantly below their allowed zoning. With appropriate zoning that properly leverages Wilburton's significantly improved infrastructure and its four existing major supermarkets, our neighborhood could become the most walkable neighborhood in Bellevue.</p>
O-30	Jodie	Alberts	<p>Increase residential heights in Wilburton. Through increased height allowances, high-rise residential developments in Wilburton can be maximized to achieve desired high growth targets. Specifically, the City should increase the areas where it is considering the tallest buildings to encompass the entire area between NE 8th on the north, Eastrail on the east, and the boundary of the Wilburton subarea to the south. Failing to increase Wilburton's residential heights and rezone sufficient area to heights that support cost-intensive high-rise residential development will push growth to less appropriate areas that have fewer employment and transit opportunities. Continue to maintain Wilburton as the natural extension of Downtown Bellevue. Few downtown environments are supplied with acres upon acres of adjacent lower density development as Bellevue has in Wilburton. While the market currently is not prioritizing traditional office development, the Wilburton neighborhood should be utilized as the natural extension of the downtown office/jobs core. In addition, the larger block sizes in Wilburton could lend themselves to uses like medical office/biotech that need larger floor plate sizes. Encouraging these uses to locate near Overlake could create a mixed use/biotech hub, further diversifying the Bellevue economy. Maintain the emphasis on medical uses along the 116th Ave. NE corridor. Alternative 3 proposes to study the northwest corner of Wilburton as a Mixed-Use Node instead of Office-Residential. Given the large number of residential opportunities being proposed throughout Wilburton in all Alternatives, we believe the emphasis across the street from the hospitals should remain focused on medical. In addition, since a 1.2 million SF life sciences hub is being proposed on the west edge of BelRed, we believe the 116th corridor should encourage life sciences buildings as well. The BR-MO zoned land located north of NE 12th Street up to Northup Way should be included in the medical/life sciences discussion.</p>
O-33	Neil	Mulnick	See PDF (Dog Walk LLC/Mountvue Place LLC)

O-37	Matt	Jack	<p>Wilburton Growth Alternatives. 1. Re: Alternative 3- Explore increase Housing Unit scoping number from 12,000 to 15,000. 2. Re: Alternative 30 Study the benefits and tradeoffs of creating a life sciences corridor/hub in the hospital district area. Note the impacts to land use potential, especially around housing potential. 3. Examine traffic mitigation strategies. Explore the benefits and tradeoffs of the mode-split options to support access to and within Wilburton. 4. Examine the benefits and tradeoffs for a market-lead development approach for development buildout. Examine the benefits and tradeoffs for planned development approach for buildout. 5. Show the development benefits and walkability improvement from design work that incorporates Eastrail. 6. Study the benefits and walkability improvement from design work that incorporates Eastrail. 6. Study the benefits and tradeoffs to reducing or eliminating parking minimums. Explore whether this approach will lead to more affordable housing and a less car-dependent outcome. 7. Explore whether increasing heights and density for residential developments will help Bellevue meet its growth targets. Examine different areas of Wilburton to create examples for future reference. 8. Explore how to leverage the multimodal infrastructure that would support a pedestrian-connected TOD neighborhood. 9. Conduct a full and comprehensive evaluation of all alternative transportation grid patterns. 10. Study the benefits and tradeoffs for mandatory housing and fee in lieu programs. 11. Study how Wilburton can generate the "missing middle" housing types. 12. Study the benefits and tradeoffs of increasing density around all light rail stations.</p>
O-40	Natalie	Quick	<p>Zoned residential housing unit capacity, focus on growth in urban centers, Wilburton and Bel-Red, methodology for density assumptions, planned action ordinance for Wilburton as a future action, flexibility for rezones, incentive based affordable housing, eliminate parking minimums.</p>
O-41	Roger	Pearce	<p>Provide a Real Transit-Oriented Development Alternative. One purpose of the Wilburton Visioning process is to take advantage of the public investments in the Sound Transit stations, the Grand Connection (leading from the Downtown Station to the Wilburton area), and the Eastrail Multi-Use Corridor in order to encourage TOD. None of the three build alternatives in the City's Wilburton Visioning materials provide a robust TOD alternative. They are all alike - they simply step down development intensity from Downtown going to the east. • Specific Request: The EIS should examine a TOD alternative that clusters development in the areas of these public projects. This TOD alternative would include high-rise development between 116th Ave NE and the Eastrail Multi-Use Corridor and between NE 6th St and NE 8th St. High-rise development in this area would provide maximize the number of residents with easy walking or biking access to the Sound Transit stations. This area is also currently developed with low-intensity, commercial uses, so providing high-rise residential development would not displace any existing housing types. A true TOD option is consistent with and advances the City's existing and pending comprehensive planning documents. Identify and Provide Realistic Development Alternatives. The current draft alternatives indicate areas of undefined "mid-rise" development and "high-rise" development. Those development types need to be further refined to determine what development typologies are realistic with today's building code, development materials, and market conditions. General height, bulk and scale need to be identified. When asked at the scoping meeting, for example, City staff indicated that "mid-rise" development could be 8 to 12 stories. This projection is likely unrealistic because mid-rise development will almost certainly use conventional construction (not concrete/steel or mass timber which are much more expensive), and conventional construction tops out at 75 to 85 feet in height. Mid-rise development also needs to have sufficient floor area ratio ("FAR") allowances to make development economically feasible. FARs of at least 5.0 for 75/85 foot zoning should be specified, and any required affordable housing through MFTE or other incentive zoning programs should, at a minimum, be exempt from FAR requirements or provide a FAR bonus as in the current downtown code.</p>

O-8	KG Investment Properties		<p>Comments Specific to Wilburton</p> <ul style="list-style-type: none"> ● The future connection between The Grand Connection and Eastrail is the centerpoint of the Wilburton subarea, and this location should be afforded the greatest heights and densities. Overall, the area between 116th Avenue NE and Eastrail and NE 4th Street and NE 8th Street should be the location of the most intense development in Wilburton. As noted above, all alternatives in the EIS should focus the maximum height and density within Wilburton should occur at the Property, which is the catalyst hub for Wilburton. NE 6th Street should terminate at 116th Avenue NE after crossing I-405. To extend NE 6th Street east to 120th Avenue NE would create little benefit to vehicle transportation and would destroy the opportunity to provide an iconic, regional connection between The Grand Connection and Eastrail at that location. In addition to losing this critical multi-modal connection, an eastern extension of NE 6th Street would be extraordinarily expensive (in terms of both property acquisition and construction costs) and would necessitate yet another at-grade crossing of Eastrail by a major arterial within only about a quarter mile. As a result, such a NE 6th extension would destroy the key hub for Eastrail and undermine the hundreds of millions of dollars of investment in this regional multi-modal facility.
O-8	KG Investment Properties		Submitted attachment of 2018 comments to the Wilburton/ Grand Connection Draft EIS noting many of the comments are still relevant to this EIS.
V-1	Chris	Randels	with Wilburton specifically, I've heard with the Spring District that there is a great need for existing retail to have a lot of housing around it in order to support those retail uses, so I would want to make sure that to support the small scale level mom-and-pop shops that we need in Wilburton that we right size the housing appropriately, i.e. go for more housing where needed.