

CHAPTER 1 Summary

1.1 Introduction

The City of Bellevue is updating its Comprehensive Plan in accordance with the requirements of the state Growth Management Act (GMA) and preparing the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation Environmental Impact Statement (EIS). The growth strategy established in the prior periodic update in 2015 focused on concentrating most new growth in the city in the Downtown neighborhood, designated a Regional Growth Center, and the BelRed neighborhood. Additional, although less, growth was planned for other mixed use areas of Eastgate and Factoria. This growth strategy supported investments in transportation with planning around new Sound Transit 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 2044. The EIS considers a range of approaches to distributing 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 non-project EIS includes the development of plan alternatives, environmental analysis of those alternatives, and identification of impacts and mitigation measures. The EIS includes a subarea-specific analysis for future land use and associated environmental impacts

for the Wilburton study area (which consists of portions of the Wilburton/NE 8th Street and BelRed Subareas).

A Draft Environmental Impact Statement (Draft EIS) was prepared for the Wilburton study area, which at the time was referred to as the Wilburton Commercial Area, in February 2018. The Draft EIS was followed by the Wilburton Commercial Area Study Citizen Advisory Committee report in July 2018. The study identified a “preferred alternative” for the future state of the Wilburton study area. Because of changed circumstances and the city’s desire to incorporate the Wilburton-specific environmental analysis within the citywide Comprehensive Plan Periodic Update analysis to ensure a cumulative evaluation of potential environmental impacts, the EIS for the Comprehensive Plan Periodic Update includes the updated environmental review for the Wilburton study area.

The city is also soliciting feedback from the public relating to Comprehensive Plan 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 Comprehensive Plan Periodic Update but changes in the land use designations that apply to individual properties will be considered in the context of the community’s vision for the Comprehensive Plan.

Bellevue’s Comprehensive Plan provides goals, policies, and strategies to ensure the city is a livable, welcoming, and vibrant place that maintains the high quality of life as the community grows over the next 20 years. The Comprehensive Plan looks ahead to the challenges Bellevue needs to address and the opportunities to ensure that all people can thrive.

The Comprehensive Plan provides a framework to ensure that people who live, work, learn, and play in Bellevue:

- Can find a variety of housing options.
- Have access to education, jobs, and economic opportunity.
- Enjoy parks and green space.
- Are able to get around using a range of transportation options.
- Have a resilient built and natural environment.
- Receive equitable and quality public services and capital facilities that support their daily needs.

The proposal evaluated in this EIS includes Bellevue’s Comprehensive Plan Periodic Update for the period 2024–2044, a land use plan and implementing regulations for the Wilburton study area, and other coordinated updates to development regulations to meet state and regional goals and requirements.

1.2 Project Purpose, Desired Outcomes, and Exclusions

This Draft EIS is a disclosure document that provides a qualitative and quantitative analysis of environmental impacts associated with the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation proposal and alternatives. The purpose of this EIS is to inform and assist the public and City of Bellevue decision-makers in considering future growth, multimodal transportation improvements, and policy/code proposals appropriate throughout the city and within the Wilburton study area.

The update to the city’s Comprehensive Plan will meet state and regional requirements, the City Council’s 2021 Vision, and other topics of importance to the community and City Council.

In particular, the update will include changes to Elements in Volume 1 of the Comprehensive Plan and Land Use Map Amendments. Volume 2 of the Comprehensive Plan (subarea plans) will only be updated as they relate to map amendments and policies that would conflict with either those map amendments or other updates to Volume 1 policies.

A Bellevue Housing Needs Assessment was completed in December 2022. The results have informed the housing analysis. Associated updates to the city’s 2017 Affordable Housing Strategy will work in tandem with this update but are outside of its direct scope.

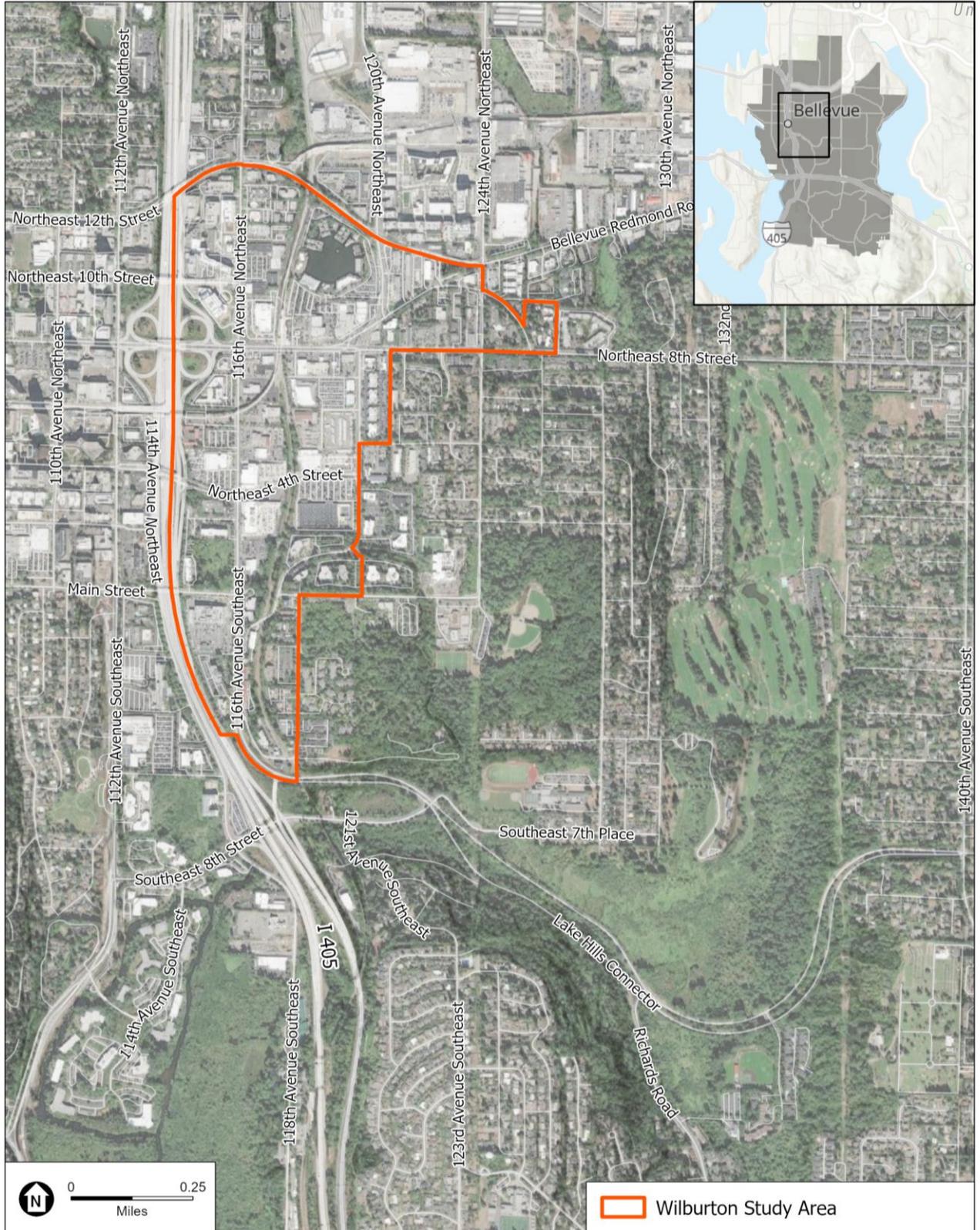
The following list identifies the primary requirements:

- Identify overarching growth target distribution approaches (housing + jobs).
- Evaluate impacts of growth distribution through an EIS.
- Recommend specific map amendments to achieve growth targets and other goals.
- Explore amending the land use classifications used in the Comprehensive Plan map to reference zones more broadly.

- Incorporate changes required within the Housing Element, particularly related to housing choices, affordability levels, and distribution.
- Consider incorporating a new Climate and Resiliency Element and required related additions.
- Address equity throughout all Elements of the Comprehensive Plan, including addressing historic inequities and evaluating the impacts of current trends and planned amendments.
- Update the Comprehensive Plan to set the stage for future functional plans. The update will strive to make the Comprehensive Plan as clear and concise as possible while serving as the guiding policy document for the city.

1.3 Study Area

The study area is the Bellevue planning area, the city limits (see **Figure 1-1**). Within the city, this EIS will inform potential policy changes affecting the Wilburton study area as an area of focus—the Wilburton study area refers to the area bounded by NE 12th Street in the north, the Lake Hills Connector in the south, Interstate 405 (I-405) in the west, and an eastern boundary that varies from 124th Avenue NE by the Spring District to 118th Avenue SE by the Bellevue Botanical Garden (see **Figure 1-2**).



SOURCE: City of Bellevue 2023; figure created by ESA 2023 and BERK 2023

FIGURE 1-2 Wilburton Study Area

1.4 SEPA Process and Public Involvement

1.4.1 Environmental Review Process

PROCESS

The State Environmental Policy Act (SEPA) is in the Revised Code of Washington ([RCW Chapter 43.21C](#)) and is a Washington State law that helps agency decision-makers, applicants, and the public understand how a proposal would affect the environment. The EIS process is a tool for identifying and analyzing probable adverse environmental impacts, reasonable alternatives, and potential mitigation. An EIS must inform decision-makers and the public of reasonable alternatives, as well as mitigation measures that would avoid or minimize adverse impacts or enhance environmental quality.

Preparation of an EIS is required for actions that have the potential for significant impacts. This document is a non-project EIS that analyzes the proposals and alternatives broadly across the study area (Washington Administrative Code [\[WAC\] 197-11-442](#)). The City of Bellevue has determined this periodic update to the Comprehensive Plan would likely have a significant adverse impact on the environment and is required under RCW Section 43.21C.030 to prepare an EIS. For this update, the EIS describes:

- Existing conditions in the city.
- Proposed alternatives (e.g., new policies and growth strategies).
- Potential significant, unavoidable, and adverse impacts.
- Mitigation measures to reduce or eliminate adverse impacts.

The EIS process involves the following steps: (1) initial research, issuing a determination of significance, and scoping the contents of the EIS with agencies, tribes, and the public; (2) preparing a Draft EIS with a comment period; (3) responding to comments and developing a Preferred Alternative; and (4) issuing the Final EIS to inform development of legislation. See **Figure 1-3** for the EIS process timeline.



SOURCE: City of Bellevue 2023

FIGURE 1-3 EIS Process

Community members have the opportunity to comment during two stages of the EIS process:

- Scoping Stage:** Scoping is the first step in the EIS process; scoping for this EIS was held in September and October 2022 and is described in more detail in Section 1.4.2. During scoping, members of the public learned more about the Comprehensive Plan Periodic Update and Wilburton Vision Implementation process and the draft growth alternatives. The scoping stage for this proposal is complete, and a scoping summary report is found in Appendix A to this Draft EIS.
- Draft Environmental Impact Statement (Draft EIS) Stage:** The EIS analyzes the particular environmental concerns that were identified during scoping. A separate analysis is prepared for each alternative. The purpose of the analysis is to estimate the nature, severity, and duration of impacts that might occur and to compare the impacts of the alternatives. The Draft EIS is available to the public for review and comment. Comments will be received on the analysis of the affected environment, the impact analysis for each of the alternatives included in the Draft EIS, and potential mitigation measures for each of the alternatives.

The city is due to complete the Final EIS in late summer 2023. Comprehensive Plan amendments for the Wilburton study area will be completed by the end of 2023, followed by Land Use Code

amendments in 2024. The Comprehensive Plan Periodic Update process will be completed in 2024. The timeline for the EIS process is provided in Figure 1-3.

NON-PROJECT EIS

This document is a non-project EIS that analyzes the proposals and alternatives broadly across the study area. See **Table 1-1** for features of a non-project EIS. SEPA identifies that a non-project EIS is more flexible and studies a range of alternatives comparatively to support the consideration of plans, policies, or programs ([WAC 197-11-442](#)). A non-project EIS does not provide site-specific detailed analysis. Additional environmental review will occur as other project or non-project actions are proposed in the city in the future. Future review could occur in the form of supplemental EISs, SEPA addenda, or determinations of non-significance.

TABLE 1-1 Comparison of Project and Non-Project Environmental Review

Feature	Project Environmental Review	Non-Project Environmental Review (WAC 197-11-442, -774)
Location	Site-specific	Areawide
Analysis Level of Detail	Detailed	Broad / order-of-magnitude
Alternatives	Specific construction proposals	Conceptual based on vision
Mitigation	Specific, alters project, project proponent responsibility	Broader; changes policies, plans, or code. City or future developer responsibility.
Future Environmental Review	No additional SEPA review	Subject to additional SEPA Review

SOURCE: [WAC 197-11-060](#), [197-11-440](#), [197-11-442](#), and [197-11-774](#), 2023; BERK 2023

PRIOR ENVIRONMENTAL REVIEW

Prior SEPA documents considered in this EIS and incorporated by reference are listed below:

- Wilburton Commercial Area Land Use and Transportation Project Draft EIS (February 2018), incorporation for background information and data.
- VISION 2050 Draft and Final Supplemental EIS (February 2019 and March 2020).

1.4.2 Scoping

The scoping process is intended to identify the range of potential significant impacts on the built and natural environment that should be considered and evaluated in an EIS. The city published a scoping notice and handout on September 29, 2022, with a 30-day public comment period that ran through October 31, 2022. The scoping notice was translated from English into seven other languages used in the city: traditional Chinese, simplified Chinese, Japanese, Korean, Russian, Spanish, and Vietnamese. Details of the scoping process for this EIS are available in the scoping summary report found in Appendix A.

One virtual and one in-person scoping meeting were held during the comment period from 6 to 8 p.m. on October 13, 2022, and from 6 to 8 p.m. on October 18, 2022, respectively. Each meeting had the same general format and content including an overview presentation, an opportunity to ask questions, and an opportunity to provide public comment. The virtual meeting was recorded, and a court reporter attended both the virtual and in-person meetings to transcribe comments. The in-person meeting included an informal open house at the beginning for community members to review display boards, ask clarifying questions, and sign up to provide written public comments.

The city accepted public comments through the following means: an online portal linked to the website; mailed through the postal service; emailed comments addressed to city staff or the city's Comprehensive Plan 2044 or Comprehensive Plan 2044 EIS email addresses; hand-delivered comments; comments submitted via laptop computer stations provided at the in-person public meeting; verbal comments in person at the public meeting; and via Zoom at the virtual public meeting (transcribed by a court reporter). Input received during the scoping period included:

- A total of 163 individual comments (excluding duplicates of the same comment from the same person submitted via different channels). In addition to individuals submitting comments on their own behalf, many submitted comments on behalf of organized groups.
- One virtual meeting with 12 attendees and one in-person meeting with 15 attendees. Four verbal comments were given during the virtual public meeting and seven were given at the in-person public meeting.

Land use was the theme with the most comments submitted during scoping. Topics included exploring expanding high-rise zoning areas and requests to consider potential displacement risks and the impacts of various zoning or density changes on existing neighborhoods. Other comments expressed a desire to increase density in areas with access to transit and jobs and maximize capacity in Mixed Use Centers, Neighborhood Centers, and light rail stations. Housing affordability was another common theme, with requests to explore “missing middle” options, consider mandates on affordable units for new development, and find ways to spread affordable units throughout the city (not just in the densest areas).

Transportation, especially transit and multimodal options, also emerged as a significant theme in the scoping comments. Commenters requested increased density at transit hubs to maximize ridership and reduce greenhouse gas (GHG) emissions and studying the impact of reduced parking ratios to encourage transit use. Other comments requested expanded multimodal transportation options and requested the alternatives evaluation assess options through a “15-minute city” lens. Excessive noise, especially related to traffic, was another common concern.

Several comments requested integration with ongoing climate planning efforts, such as the state’s Clean Energy Transformation Act (CETA), the King County-Cities Climate Collaboration, and the city’s implementation of transportation and building electrification. Comments spanned across several elements of the natural environment including impacts on air quality and GHG emissions, water quality, and plants and animals from increased density as well as single-family zoning.

Some commenters also requested analysis of development costs and incentives.

There were several comments that the city should reduce the scope of the analysis.

Based on the results of the comments received during the scoping process, the city made changes to the alternatives, and those changes are detailed in Chapter 2, Section 2.3.3.

The city is moving forward with the analysis of the following elements of the environment for the alternatives in the Draft EIS:

- Land use patterns and urban form
- Plans and policies

- Population and employment
- Aesthetics
- Housing
- Air quality and GHG emissions
- Noise
- Public services and utilities
- Transportation

1.5 Summary of Description of Alternatives

Alternatives are different ways of achieving a project's purpose and need and serve as the basis for environmental analysis relative to elements of the environment. They are described in greater detail in Chapter 2 of this Draft EIS.

Environmental analysis is the process of studying each alternative and forecasting impacts on different elements of the environment such as air quality, noise, or transportation.

Environmental Impact Statements must include an alternative that represents "no action" and one or more alternatives that includes changes to land use or policies, called the "Action Alternatives." Action Alternatives allow the city to understand the impacts of a range of growth scenarios and test ideas, implications, benefits, and impacts and compare them to the impacts of the No Action Alternative. The alternatives analyzed in this Draft EIS are based on the following:

- **City and regional policy guidance.** The King County Countywide Planning Policies (or CPPs) include growth targets for jobs and housing units across cities in King County, including Bellevue. The 2019–2044 Bellevue job target is **70,000 new jobs**. This anticipates business cycles that include patterns of layoffs and hiring in different industries over the 20-year planning period. The 2019–2044 Bellevue housing target is **35,000 new units**. Target setting occurred in coordination with other cities and the county using guidance from the Bellevue City Council Vision, VISION 2050, Bellevue's calculated capacity for new development, and the Puget Sound Regional Council (PSRC) and council vision and guidance.

- **Desire for flexibility in meeting the housing target.** The city is analyzing the impacts of development capacity that would occur beyond the 2044 growth targets (i.e., +70,000 additional jobs and +35,000 housing units). The Draft EIS analyzes an “informed build-out” scenario under each of the alternatives. In the alternatives studied in the Draft EIS, the city assumes that all developable or redevelopable parcels are built to a range of expected densities in each of the alternatives. It is very common for cities to have more capacity for development than their growth targets. The additional development capacity beyond the 2044 job and housing targets allows the city to meet its growth targets in different ways, letting potential developers respond to the market demands relating to the type of housing and commercial space and also provide flexibility for market demands. The analysis in the Draft EIS will help the Planning Commission, City Council, and full range of stakeholders understand the potential impacts of development and identify mitigation measures that can be implemented to respond to those impacts when and if the development occurs.
- **Additional housing capacity in the Wilburton study area.** Many changes within and surrounding the Wilburton study area make it challenging to pick up directly from the Wilburton Commercial Area Land Use and Transportation Project Draft EIS issued in 2018. This current Draft EIS considers additional housing capacity compared to what was analyzed in the 2018 Draft EIS. In addition, including the Wilburton study area in the Comprehensive Plan Periodic Update EIS enables the city to assess and communicate the impacts of the proposed Wilburton study area growth alternatives within the context of citywide growth.
- **Additional input from stakeholders on the Wilburton study area.** The Wilburton study area alternatives build off the vision and recommendations from the 2018 Wilburton Commercial Area Study while considering updates to housing policy, affordable housing, growth targets, sustainability, equitable access, multimodal transportation, Grand Connection and Eastrail integration and impacts, and universal design. Alternatives also incorporate the input of stakeholders and community members who were re-engaged as part of the Wilburton Vision Implementation launch, as well as stakeholders and community members who were not engaged previously in 2017–2018.

This EIS analyzes four alternatives, including a No Action Alternative and three Action Alternatives. The alternatives include ideas to be analyzed that would lead to development of a Preferred Alternative. The three Action Alternatives are measured against the baseline assumptions in the No Action Alternative.

For purposes of the No Action Alternative, it is assumed that development would occur within the City of Bellevue based on the current Comprehensive Plan land use, zoning, and development standards. The Action Alternatives are based on variations of components such as the amount and distribution of growth, and the implementation of new policies.

Analyzing different alternatives, and especially the differences between them, allows decision-makers and the public to compare the effects of different options and ultimately to select a Preferred Alternative.

1.6 Additional Analysis

The city conducted additional studies and analysis that will be helpful in their decision-making process during the Comprehensive Plan Periodic Update process. The following studies and reports are included as appendices to this Draft EIS document:

- **Appendix A: Scoping Summary.** This summary provides information on the comments received and does not indicate any position by the city regarding the stated information. Many of the comments address topics for the general Comprehensive Plan Periodic Update or the Wilburton Vision Implementation as opposed to comments on the environmental elements or alternatives.
- **Appendix B: Land Use Patterns and Urban Form Appendix.** This document is an appendix that relates to Chapter 3. It provides additional information on zoning designations and overlay districts. Current land uses and diverse use categories and sources are also provided. In addition, land use category maps are provided for each alternative at the end of Appendix B.
- **Appendix C: Traffic Data.** This appendix relates to Chapter 11, *Transportation*. It provides the source material used to analyze and model the data used in the impact and mitigation sections of Chapter 11 of the Draft EIS.

- **Appendix D: Historic Resources Survey.** As a part of the Comprehensive Plan Periodic Update, the city identified the need to meet the requirements of VISION 2050, including multicounty planning policy (MPP) Development Pattern-6: “preserve significant regional historic, visual, and cultural resources, including public views, landmarks, archaeological sites, historic and cultural landscapes, and areas of special character” (PSRC 2020:76). A best practice for historic preservation and alignment with VISION 2050 MPP DP-6 would be to establish a baseline historic preservation inventory and undertake a survey of the entire city that includes resources that are 50 years old or older. The survey provided here is a step toward providing an inventory to the entire city in the future. It includes 121 resources that were constructed in or prior to 1994 (50 years old or older as of 2044) in four select areas of the city: Eastgate, Lake Hills, Lake Heights, and Sherwood Forest.
- **Appendix E: Plants and Animals Memo.** The city requested a memo from subject matter experts to determine potentially significant adverse impacts that the Comprehensive Plan Periodic Update may have on plants and animals. The preliminary review determined that there would not likely be any significant adverse impacts on plants and animals. Because the Comprehensive Plan Periodic Update is a non-project action that does not include a physical project proposal, it is not expected to generate adverse impacts on vegetation and wildlife habitat, threatened and endangered species, and aquatic resources and wetlands. Thus, adoption of the Comprehensive Plan Periodic Update, regardless of the alternative selected, is not expected to have a significant adverse impact on plants and animals. Future site-specific development projects under the Comprehensive Plan Periodic Update could result in adverse impacts on vegetation and wildlife habitat, threatened and endangered species, and aquatic resources and wetlands. However, those projects will be subject to existing regulations that protect vegetation and wildlife habitat, threatened and endangered species, and aquatic resources and wetlands.
- **Appendix F: Water Resources Memo.** The city requested a memo from subject matter experts to determine potential significant adverse impacts that the Comprehensive Plan Periodic Update may have on water resources. The preliminary review determined that there would not likely be any significant adverse impacts on water resources. Because the Comprehensive Plan Periodic Update is a non-project action that does not include a

physical project proposal, it is not expected to generate adverse impacts on water including drainage basins, water quality, groundwater, and flooding. Thus, adoption of the Comprehensive Plan Periodic Update, regardless of the alternative selected, is not expected to have a significant adverse impact on water resources. Future site-specific development projects under the Comprehensive Plan Periodic Update could result in adverse impacts on water resources. However, those projects will be subject to existing regulations that protect drainage basins, water quality, groundwater, and flooding impacts.

- **Appendix G: Relationship of Climate Change Vulnerability to the Alternatives.** The city is conducting a Climate Vulnerability Assessment to determine the extent to which climate change is likely to affect residents, the built environment, and natural systems. Climate projections for the assessment were obtained from the University of Washington’s Climate Impacts Group. The Bellevue Climate Vulnerability Index (CVI) is being developed as part of the Bellevue Climate Vulnerability Assessment. The CVI includes 30+ indicators and combines them to form an index that supports a planning-level view of climate vulnerability in Bellevue to identify areas of the city that may be more or less vulnerable to the impacts of climate change. The indicators include metrics for climate stressors, demographics, community health, critical areas, and others relevant to the spatial variability of climate vulnerability.
- **Appendix H: Equity and Environmental Sustainability Performance Metrics.** This document includes performance metrics that allow current conditions and future alternatives to be screened for their environmental impacts and advancement of, or hurdles to, racial equity and displacement. Using the performance metrics described in the document, the consultant team considered how each alternative affects the elements of the environment and equitable outcomes across all EIS topics. This effort will provide a cohesive evaluation framework for equity while advancing EIS topics in the context of SEPA requirements.
- **Appendix J: Air Quality and Land Use Planning Report.** This report provides environmental health information for the city to consider, along with other factors, when making long-range planning decisions to increase development capacity. Specifically, this report focuses on air pollution that exists around high-volume roadways at concentrations that can be harmful, with analysis informed by studies that have shown that health impacts

associated with traffic-related air pollution (TRAP) can be minimized by reducing exposure to high pollutant concentrations.

1.6.1 Commenting on the Draft EIS

This Draft EIS identifies environmental conditions, potential impacts, and measures to reduce or mitigate any unavoidable adverse impacts that could result from the City of Bellevue 2024–2044 Comprehensive Plan Periodic Update and Wilburton Vision Implementation.

Public and agency comments are invited on this Draft EIS. Written and verbal comments are invited during the 45-day public comment period following issuance of this Draft EIS. The city will hold public engagement events during the 45-day comment period to help inform the identification of the Preferred Alternative. Public comments will be considered and addressed in the Final EIS. See the Fact Sheet at the beginning of this Draft EIS for the dates of the public comment period and public meetings. Meetings and comment periods regarding the proposals are described on the city's project webpage: <https://bellevuewa.gov/2044-environmental-review>.

1.6.2 Final EIS

A Final EIS will be issued in 2023 and will include responses to public comments received during the Draft EIS comment period. The Final EIS will study a Preferred Alternative that is within the range of the growth studied in the Draft EIS alternatives. Following the EIS process, the city will develop specific edits to the Comprehensive Plan Land Use Map and Comprehensive Plan that will be the subject of public meetings and public hearings by the Planning Commission and City Council.

1.7 Summary of Key Findings, Impacts, and Potential Mitigation Measures

One of the most important functions of an EIS is to identify potential impacts associated with a proposal and identify appropriate mitigation measures. The following sections describe how the EIS analyzed each element of the environment, what impacts have been identified, how the alternatives differ from one another, and what measures are proposed to mitigate impacts. The analysis contained

in the EIS will be used to guide city decision-makers in selecting the appropriate the Preferred Alternative.

Table 1-2 summarizes the results of the environmental evaluation of alternatives further detailed in Chapter 2, *Alternatives*, and Chapters 3 through 12. Where impacts are identified, mitigation is provided in the form of incorporated plan features (e.g., components of the alternatives that self-mitigate, such as design standards addressing height and bulk); regulations and commitments (e.g., critical areas regulations); and other potential mitigation measures that the city may consider applying through policies or other strategies to address potential impacts. The potential residual impacts, if any, following mitigation are also described. The reader is encouraged to review this summary section to find areas of interest, and to read the more-detailed analysis in the following chapters to have the full context of the affected environment, impact analysis, detailed mitigation measures, and overall findings.

TABLE 1-2 Summary of Impacts and Mitigation Measures

Element of the Environment	Alternative 0 (No Action): Continues the current Comprehensive Plan with growth focused in the Downtown, BelRed, and East Main Mixed Use Centers	Alternative 1: Providing options for families of all kinds	Alternative 2: Unlocking access for more residents	Alternative 3: Providing options throughout the city
	Capacity to add 41,000 housing units and 124,000 jobs	Capacity to add 59,000 housing units and 179,000 jobs	Capacity to add 77,000 housing units and 177,000 jobs	Capacity to add 95,000 housing units and 200,000 jobs
3. Land Use Patterns and Urban Form	<p style="text-align: center;">CITYWIDE IMPACTS</p> <p>Growth Targets: A moderately adverse impact related to other citywide housing growth requirements is expected under the No Action Alternative as it does not meet new planning requirements for affordable housing across income bands or a range of housing types.</p> <p>Land Use Compatibility: All alternatives include some amount of redevelopment with corresponding potential for land use compatibility impacts.</p> <p>Citywide, adverse land use compatibility impacts are expected under any of the alternatives but would be reduced to less-than-significant levels with the application of existing and proposed mitigation.</p> <p>Displacement: As future development occurs, some residents and businesses may be displaced through redevelopment or priced out as land prices and rents increase. Adverse residential and commercial displacement impacts are expected under all of the alternatives; potential displacement could occur under all alternatives but may be lower in the No Action Alternative as a result of its lower overall capacity for growth.</p>	<p style="text-align: center;">CITYWIDE IMPACTS</p> <p>Growth Targets: Citywide housing and job capacity are above the adopted target under all the alternatives. No adverse land use impacts are identified related to the growth targets under the Action Alternatives with the application of additional measures to improve housing affordability and choice. Therefore, impacts would be less-than-significant.</p> <p>Land Use Compatibility: Same as Alternative 0 (No Action).</p> <p>Displacement: Adverse residential and commercial displacement impacts are expected under all of the alternatives; potential displacement could occur under all alternatives. Affordability and choice throughout the city would be greater under the Action Alternatives than the No Action, thus reducing the risk of involuntary residential displacement. In addition, the Action Alternatives include policies to support more affordable</p>	<p style="text-align: center;">CITYWIDE IMPACTS</p> <p>Growth Targets: Same as Alternative 1.</p> <p>Land Use Compatibility: Same as Alternative 1.</p> <p>Displacement: Same as Alternative 1, but Alternative 2 also increases densities and opportunities for mixed use development that could support additional commercial space affordable to small business and entrepreneurs.</p>	<p style="text-align: center;">CITYWIDE IMPACTS</p> <p>Growth Targets: Same as Alternative 1.</p> <p>Land Use Compatibility: Citywide, adverse land use compatibility impacts are expected to be greatest under Alternative 3 but would be reduced to less-than-significant levels with proposed mitigation.</p> <p>Displacement: Same as Alternative 1, but Alternative 3 also increases densities and opportunities for mixed use development that could support additional commercial space affordable to small business and entrepreneurs (with the distribution of such spaces wider under Alternative 3 than Alternative 2). Housing affordability and choice throughout the city would have the widest variety of options under Alternative 3.</p>

Element of the Environment	Alternative 0 (No Action): Continues the current Comprehensive Plan with growth focused in the Downtown, BelRed, and East Main Mixed Use Centers	Alternative 1: Providing options for families of all kinds	Alternative 2: Unlocking access for more residents	Alternative 3: Providing options throughout the city
	<p>Access to Community Assets: All alternatives would focus most future growth into the existing Mixed Use Centers, which have the highest concentration of amenities, diverse uses, and community gathering spaces. No adverse impacts regarding access to community assets are expected.</p>	<p>housing, and higher density housing in various parts of the city would make it easier and more economically feasible for private developers to incorporate affordable housing as part of market-rate development projects.</p> <p>Access to Community Assets: Same as Alternative 0 (No Action).</p>	<p>Access to Community Assets: Same as Alternative 0 (No Action).</p>	<p>Access to Community Assets: Same as Alternative 0 (No Action).</p>
	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS
	<p>Future land use patterns under the No Action Alternative would not support the incoming light rail station or planned investments in Eastrail, the Grand Connection, or 116th Avenue NE, and so a moderately adverse land use compatibility impact in the Wilburton study area is expected under the No Action Alternative.</p> <p>Adverse residential and commercial displacement impacts in the Wilburton study area are expected under all alternatives.</p> <p>No adverse impacts regarding access to community assets are expected in the Wilburton study area.</p>	<p>The Action Alternatives add significant capacity in the Wilburton study area.</p> <p>The Action Alternatives would support these investments within the Wilburton study area, but potential adverse compatibility impacts to the east and southeast are expected.</p>	<p>Same as Alternative 1.</p>	<p>Within the study area, temporary land use conflicts are more likely under Alternative 3 than under the other alternatives. Like Alternatives 1 and 2, these impacts would be most pronounced in early redevelopment phases where new areas of greater height and intensity abut areas of existing development.</p> <p>Moderately adverse residential and adverse commercial displacement impacts in the Wilburton study area are expected under Alternative 3. Impacts would be similar to those described under Alternative 1 and Section 3.3.2, <i>Impacts Common to All Alternatives</i>.</p>
	MITIGATION MEASURES	MITIGATION MEASURES	MITIGATION MEASURES	MITIGATION MEASURES
	<p><u>Citywide and Wilburton Study Area</u></p> <p>1. The city could pursue the following types of actions for addressing possible future conditions, particularly related to commercial displacement impacts:</p> <ul style="list-style-type: none"> Consider amendments to zoning regulations in existing and future Mixed Use and Neighborhood Centers to address transitions more directly. See also Chapter 6, <i>Aesthetics</i>. Consider addressing transitions between Mixed Use and Neighborhood Centers and surrounding areas as part of ongoing neighborhood planning efforts. Consider selling or leasing city-owned property for projects that support affordable residential to reduce displacement impacts. Consider providing technical assistance to small businesses and entrepreneurs who are looking for affordable commercial space. This could include assistance with site selection, leasing negotiations, and financing. 	<p><u>Citywide</u></p> <p>1. Same as Alternative 0 (No Action).</p> <p><u>Wilburton Study Area</u></p> <p>2. Each Action Alternative would require the development of new or revised zoning and development regulations for the city and Wilburton study area. New regulations would need to address permitted uses, dimensional</p>	<p><u>Citywide and Wilburton Study Area</u></p> <p>Same as Alternative 1.</p>	<p><u>Citywide and Wilburton Study Area</u></p> <p>Same as Alternative 1.</p>

Element of the Environment	Alternative 0 (No Action): Continues the current Comprehensive Plan with growth focused in the Downtown, BelRed, and East Main Mixed Use Centers	Alternative 1: Providing options for families of all kinds	Alternative 2: Unlocking access for more residents	Alternative 3: Providing options throughout the city
	<ul style="list-style-type: none"> Consider incentives that encourage affordable commercial space for small businesses, especially in areas at high risk of displacement. For example, the city could reduce parking requirements in certain locations. Reducing parking standards for small businesses can also reduce the construction costs for new development. Also, consider setting average or maximum sizes for new ground floor spaces that result in space sizes that are more affordable for small businesses, which can facilitate small-business relocation and attraction. Ensure anti-displacement measures prior to designating new Neighborhood Centers in areas that currently lack access to essential services within a short distance that are also at high risk of displacement. Anti-displacement measures could include: <ul style="list-style-type: none"> Potential “right to return” policies that give preference to residential or small business uses that face displacement in redeveloping areas. Potential tenant relocation assistance: Demolition of existing housing to make way for new development may displace existing tenants who then incur moving costs. Local governments—authorized by WAC 365-196-835 and detailed in RCW 59.18.440—can pass an ordinance that requires developers, public funds, or a combination of the two to provide relocation funds for these displaced tenants. Tenants at or below 50 percent of the county median income, adjusted for family size, qualify for available funds. Resident relocation assistance as a result of public action is required, with details outlined in RCW 8.26. Potential community benefit agreements: Development agreements or community benefit agreements. These are voluntary, negotiated contracts between developers and municipalities or between developers and a community-based organization representing the interests of the community. They can support affordable housing, affordable commercial space, community gathering spaces, and other public amenities. Consider partnering with existing organizations or facilities to improve equitable availability of community gathering spaces across the Mixed Use and Neighborhood Centers and in transit-proximate areas outside of the centers. 	<p>requirements, a floor area ratio (FAR) amenity incentive system, the conversion of non-conforming uses and properties, parking and circulation, landscaping, and the development of streets and sidewalks.</p> <p>These regulations would need to be crafted with the intent of creating land use compatibility within and adjacent to the study area.</p>		
4. Plans and Policies	<p style="text-align: center;">CITYWIDE IMPACTS</p> <p>Alternative 0 (No Action) would not include changes to Comprehensive Plan policies or regulations, so inconsistencies with state and regional goals and requirements to support affordable housing and a wider range of housing typologies would occur would result in a significant adverse impact.</p> <p style="text-align: center;">WILBURTON STUDY AREA IMPACTS</p> <p>Same as above.</p>	<p style="text-align: center;">CITYWIDE IMPACTS</p> <p>Under Alternative 1, conflicts with plans and policies would be avoided by amending the Comprehensive Plan, as proposed under any of the three Action Alternatives.</p> <p>No significant adverse impact.</p> <p style="text-align: center;">WILBURTON STUDY AREA IMPACTS</p> <p>Same as above.</p>	<p style="text-align: center;">CITYWIDE IMPACTS</p> <p>Same as Alternative 1.</p> <p style="text-align: center;">WILBURTON STUDY AREA IMPACTS</p> <p>Same as Alternative 1</p>	<p style="text-align: center;">CITYWIDE IMPACTS</p> <p>Same as Alternative 1.</p> <p style="text-align: center;">WILBURTON STUDY AREA IMPACTS</p> <p>Same as Alternative 1</p>

Element of the Environment	Alternative 0 (No Action): Continues the current Comprehensive Plan with growth focused in the Downtown, BelRed, and East Main Mixed Use Centers	Alternative 1: Providing options for families of all kinds	Alternative 2: Unlocking access for more residents	Alternative 3: Providing options throughout the city
	MITIGATION MEASURES	MITIGATION MEASURES	MITIGATION MEASURES	MITIGATION MEASURES
	None proposed.	<p><u>Citywide and Wilburton Study Area</u></p> <p>No mitigation is required, however:</p> <ol style="list-style-type: none"> The Comprehensive Plan may need to consider additional guidance for each of the Mixed Use Centers to support additional development for additional development in those areas. Related system plans—such as the Land Use Code, Transit Master Plan, and the Storm and Surface Water System Plan—would need to be updated to ensure full consistency. The Action Alternatives would require the development of new or revised zoning and development regulations for the city and Wilburton study area. Revisions may be considered in a phased approach as infrastructure and other services become available, and new zoning and development standards in the Wilburton study area would likely be informed by development standards established for other subareas. The Action Alternatives also consider revisions to 	<p><u>Citywide and Wilburton Study Area</u></p> <p>Same as Alternative 1</p>	<p><u>Citywide and Wilburton Study Area</u></p> <p>Same as Alternative 1</p>

Element of the Environment	Alternative 0 (No Action): Continues the current Comprehensive Plan with growth focused in the Downtown, BelRed, and East Main Mixed Use Centers	Alternative 1: Providing options for families of all kinds	Alternative 2: Unlocking access for more residents	Alternative 3: Providing options throughout the city
		<p>the Wilburton study area for consistency.</p> <p>3. When the Preferred Alternative is selected for the Final EIS, it should be evaluated for alignment with the GMA, VISION 2050, and King County CPPs.</p>		
5. Population and Employment	CITYWIDE IMPACTS	CITYWIDE IMPACTS	CITYWIDE IMPACTS	CITYWIDE IMPACTS
	<p>Under all alternatives, additional population and job growth would occur citywide and in the Wilburton study area. All the alternatives align to some extent with the city's Economic Development Plan, and no unavoidable conflicts are expected. Significant unavoidable adverse impacts on population and employment are not expected under any alternative.</p>	<p>Same as Alternative 0 (No Action).</p>	<p>Same as Alternative 0 (No Action).</p>	<p>Same as Alternative 0 (No Action).</p>
	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS
	<p>Same as above.</p>	<p>Same as Alternative 0 (No Action).</p>	<p>Same as Alternative 0 (No Action).</p>	<p>Same as Alternative 0 (No Action).</p>
MITIGATION MEASURES	MITIGATION MEASURES	MITIGATION MEASURES	MITIGATION MEASURES	
<p><u>Citywide and Wilburton Study Area</u></p> <p>1. No mitigation is required. However, same as for Alternative 0 (No Action) under Element 3 (<i>Land Use Patterns and Urban Form</i>) and Element 8 (<i>Air Quality and Greenhouse Gas Emissions</i>), the city could consider the following:</p> <ul style="list-style-type: none"> • Mitigate displacement of existing small businesses. The city could explore creating a program to ensure that affordable office and retail spaces are available. The programs could consider financial incentives (such as tax abatements similar to an office/retail equivalent of the Multi-family Tax Exemption, technical assistance and outreach, or the integration of office/retail affordability with livability initiatives. • Reduce Exposure to Contaminated Sites and Traffic. implement mitigation strategies, including reducing vehicle miles traveled (VMT), retrofitting diesel vehicles, electrifying the city's fleet, transit-oriented development, land use buffers, improved urban design, roadside barriers, decking or lids over highways, and building design strategies. Land use buffers could include designating areas near high-impact areas as industrial or other nonresidential zones to ensure distance between these areas and residences. Bellevue could also limit residential uses within a certain distance of contaminated sites and freeways. 	<p><u>Citywide</u></p> <p>1. Same as Alternative 0 (No Action).</p> <p><u>Wilburton Study Area</u></p> <p>2. No mitigation is required. However, same as for Alternative 0 (No Action) under Element 3 (<i>Land Use Patterns and Urban Form</i>) and Element 8 (<i>Air Quality and Greenhouse Gas Emissions</i>), the city could consider the following:</p> <ul style="list-style-type: none"> • Wilburton Study Area: Zoning and Development Regulations. The Action Alternatives would require 	<p><u>Citywide and Wilburton Study Area</u></p> <p>Same as Alternative 1.</p>	<p><u>Citywide and Wilburton Study Area</u></p> <p>Same as Alternative 1.</p>	

Element of the Environment	Alternative 0 (No Action): Continues the current Comprehensive Plan with growth focused in the Downtown, BelRed, and East Main Mixed Use Centers	Alternative 1: Providing options for families of all kinds	Alternative 2: Unlocking access for more residents	Alternative 3: Providing options throughout the city
		changes in zoning and development regulations in the Wilburton study area. This would be an opportunity for Bellevue to specify allowed uses in the Wilburton study area to best align with the city's Economic Development Plan.		
6. Aesthetics	CITYWIDE IMPACTS	CITYWIDE IMPACTS	CITYWIDE IMPACTS	CITYWIDE IMPACTS
	In all alternatives, additional growth would result in impacts on the built form citywide, particularly in Mixed Use Centers, and, under the Action Alternatives, in Neighborhood Centers and near transit. This growth will, in turn, have significant adverse impacts from shadows, views, and light and glare. These impacts are to be expected as Bellevue continues to grow, especially in the context of regional transit investments and development interests. With the application of mitigation measures, no significant unavoidable adverse impacts on views or from shadows, light, and glare are expected.	In all alternatives, additional growth would result in impacts on the built form citywide , particularly in Mixed Use Centers and under the Action Alternatives.	Same as Alternative 1.	Same as Alternative 1.
	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS
	The character of the Wilburton study area, especially under the Action Alternatives, would change to a much denser area with much taller buildings. With the application of mitigation measures, no significant unavoidable adverse impacts on views or from shadows, light, and glare are expected.	Same as Alternative 0 (No Action).	Same as Alternative 0 (No Action).	Same as Alternative 0 (No Action).
	MITIGATION MEASURES	MITIGATION MEASURES	MITIGATION MEASURES	MITIGATION MEASURES
	<p><u>Citywide and Wilburton Study Area</u> Mitigation measures could include:</p> <ul style="list-style-type: none"> • Regulations around Public Spaces. Bellevue could add requirements for shadow studies, height limits, maximum floorplate size, separation of high-rise building massing, floorplate reductions, and modification of high-rise tower location and orientation for development adjacent to some key parks and public spaces. • Ground-Level and Upper-Story Setbacks. Bellevue could require all areas with higher heights to have ground-level or upper-story setbacks, which would preserve access to light, limit shading, and limit height and bulk. • Building Form Requirements. Bellevue could add requirements for roof articulation, modulation of façades, layering of materials and massing, and tower separation. • Streetscape Vegetation. The city could require vegetation on major streets to screen development and enhance the pedestrian experience. 	<p><u>Citywide and Wilburton Study Area:</u> Same as Alternative 0 (No Action) with the following additions:</p> <ul style="list-style-type: none"> • Low-Density Residential Development Regulations. The Action Alternatives would allow gentle density increases across the city. As new residential uses are added to the zoning code, Bellevue would 	<p><u>Citywide and Wilburton Study Area:</u> Same as Alternative 1.</p>	<p><u>Citywide and Wilburton Study Area:</u> Same as Alternative 1.</p>

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	<ul style="list-style-type: none"> • Viewshed Regulations. Bellevue could consider adding regulations to the development code to protect certain public views. • Transparent Façade Requirements. In areas with bulk and scale concerns that do not have existing requirements for transparent façades, the city could add such requirements to enhance the pedestrian environment. 	<p>have an opportunity to regulate scale and form.</p> <ul style="list-style-type: none"> • Wilburton Study Area: Zoning and Development Regulations. The Action Alternatives in the Wilburton study area would require changes to the zoning and development regulations. These regulations would address permitted uses, dimensional requirements, a FAR amenity incentive system, conversion of non-conforming uses and properties, pedestrian comfort, parking and circulation, landscaping, and the development of streets and sidewalks. • Wilburton Study Area: Design Guidelines The Action Alternatives would include design guidelines specific to the Wilburton study area. These would likely include standards related to building design, pedestrian experience and streetscapes, public spaces, and mixed use building features, in addition to other standards. These could include standards for towers, such as locating them farther from the street, making podiums shorter, or orienting towers to maximize solar access. 		

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7. Housing	CITYWIDE IMPACTS	CITYWIDE IMPACTS	CITYWIDE IMPACTS	CITYWIDE IMPACTS
	<p>The No Action Alternative continues existing regulations, incentives, and programs targeted at affordability. Recent development trends have shown decreases in affordability despite these existing tools. Without additional strategies for affordability, the No Action Alternative will likely have a significant adverse impact on housing affordability compared to Action Alternatives.</p> <p>Significant adverse impacts related to an increased risk for involuntary residential displacement are expected under the No Action Alternative.</p>	<p>The Action Alternatives integrate additional anti-displacement strategies like inclusionary housing to mitigate the impacts of displacement and supply more affordable housing overall. The city could also consider additional strategies to avoid or mitigate displacement including neighborhood stabilization efforts such as rental assistance programs, foreclosure assistance programs, as well as tenant protection policies. With the application of these mitigation measures, no significant adverse impacts are expected for the Action Alternatives.</p>	<p>Same as Alternative 1.</p>	<p>Same as Alternative 1.</p>
	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS
	<p>Same as above.</p>	<p>Same as above.</p>	<p>Same as Alternative 1.</p>	<p>Same as Alternative 1.</p>
MITIGATION MEASURES	MITIGATION MEASURES	MITIGATION MEASURES	MITIGATION MEASURES	
<p><u>Citywide and Wilburton Study Area</u></p> <p>1. No other mitigation measures are required, but the city could pursue the following actions to address affordability and displacement risk:</p> <p>ADU Reform: The city can remove barriers and encourage the construction of attached Accessory Dwelling Units (ADUs) in Bellevue and create a pathway for separate ownership of ADUs. Identified barriers to ADU construction, include:</p> <ul style="list-style-type: none"> • Owner-occupancy requirement. • Condominium prohibition. • Off-street parking requirement. • Design controls, such as the entry door location restriction. • Process requirements. <p>The city can also consider allowing detached ADUs, which are currently not allowed in Bellevue.</p>	<p><u>Citywide</u></p> <p>1. Same as Alternative 0 (No Action).</p> <p><u>Wilburton Study Area</u></p> <p>2. The Action Alternatives would also require the development of new or revised zoning and development regulations for the Wilburton study area. New zoning associated with these alternatives is expected to be similar to rules established for the</p>	<p><u>Citywide and Wilburton Study Area</u></p> <p>Same as Alternative 1.</p>	<p><u>Citywide and Wilburton Study Area</u></p> <p>Same as Alternative 1.</p>	

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	<p>Anti-Displacement Strategies:</p> <ul style="list-style-type: none"> • Neighborhood stabilization efforts such as rental assistance programs, foreclosure assistance programs, as well as tenant protection policies, especially in areas at high risk for displacement. • Selling or leasing city-owned property to support affordable residential projects. • Private or private-public partnerships for affordable housing. An example is the city's partnership with major employers such as Amazon, Microsoft, and Sound Transit in their efforts to create and preserve affordable housing. • Targeted homeownership assistance to residents of neighborhoods that are at high risk of displacement. Fair Housing Laws will need to be considered and complied with for such assistance programs. 	<p>BelRed area in part 20.25D of the Land Use Code. New regulations will need to address the provision of affordable housing and the potential for residential displacement. These regulations will need to be crafted with the intent of creating affordable housing and to avoid or mitigate residential displacement.</p>		
8. Air Quality	CITYWIDE IMPACTS	CITYWIDE IMPACTS	CITYWIDE IMPACTS	CITYWIDE IMPACTS
	<p>The impacts from construction with the No Action Alternative will result in a less-than-significant impact on air quality and GHGs.</p>	<p>The Action Alternatives would result in potentially significant unavoidable adverse impacts on air quality.</p>	<p>Same as Alternative 1.</p>	<p>Same as Alternative 1.</p>
	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS
	<p>Same as above.</p>	<p>Same as above.</p>	<p>Same as Alternative 1.</p>	<p>Same as Alternative 1.</p>
MITIGATION MEASURES	MITIGATION MEASURES	MITIGATION MEASURES	MITIGATION MEASURES	
<p><u>Citywide and Wilburton Study Area</u> Construction:</p> <ol style="list-style-type: none"> 1. For temporary impacts during construction, construction site owners and/or operators are required to take reasonable precautions to prevent fugitive dust from becoming airborne. Fugitive dust may become airborne during demolition, material transport, grading, driving of vehicles and machinery on and off the site, and from wind. <p>Controlling fugitive dust emissions may require some of the following actions:</p> <ul style="list-style-type: none"> • Spray exposed soil with water or other suppressant to reduce emissions and deposition of particulate matter. • Use phased development to keep disturbed areas to a minimum. • Use wind fencing to reduce disturbance to soils. • Minimize dust emissions during transport of fill material or soil by wetting down the load, covering the load, or by ensuring adequate freeboard (space from the top of the material to the top of the truck bed) on trucks. • Promptly clean up spills of transported material on public roads. 	<p><u>Citywide and Wilburton Study Area</u> Same as Alternative 0 (No Action).</p>	<p><u>Citywide and Wilburton Study Area</u> Same as Alternative 0 (No Action).</p>	<p><u>Citywide and Wilburton Study Area</u> Same as Alternative 0 (No Action).</p>	

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	<ul style="list-style-type: none"> • Schedule work to minimize disruption of the existing vehicle traffic on streets. • Restrict traffic on-site to reduce soil upheaval and the transport of material to roadways. • Locate construction equipment and truck staging areas away from sensitive receptors as practical and in consideration of potential impacts on other resources. • Provide wheel washers to remove particulate matter that would otherwise be carried off-site by vehicles to decrease deposition of particulate matter on area roadways. • Cover dirt, gravel, and debris piles to reduce dust and wind-blown debris. <p>2. Emissions of particulate matter, ozone precursors (e.g., volatile organic compounds and nitrogen oxides), sulfur oxides, and carbon monoxide would be minimized whenever reasonable and possible. Since these emissions primarily result from construction equipment, machinery engines would be kept in good mechanical condition to minimize exhaust emissions. Additionally, contractors would be encouraged to reduce idling time of equipment and vehicles and to use newer construction equipment or equipment with add-on emissions controls.</p> <p>Long-Term:</p> <p>1. A variety of air and GHG mitigation measures can be implemented to reduce the exposure of residents. The following measures could be applied to any of the alternatives to reduce air exposures:</p> <ul style="list-style-type: none"> • Land use buffers and project-specific mitigation measures to help limit exposures to emission sources such as high-capacity roadways. • Implement mitigation strategies, including reducing VMT, retrofitting diesel vehicles, electrifying the city's fleet, transit-oriented development, land use buffers, improved urban design, roadside barriers, decking or lids over highways, and building design strategies. Land use buffers could include designating areas near high-impact areas as industrial or other nonresidential zones to ensure distance between these areas and residences. Bellevue could also limit residential uses within a certain distance of freeways. • Promote the use of high-efficiency ventilation on residential facilities that are within 1,500 feet of major roadways. Limit sensitive uses in multi-story buildings for the floors that are at or near roadway level. • Enhance the air monitoring network in Bellevue to enable the community to characterize their exposures more accurately. Prioritize highly burdened regions such as the Wilburton study area. • Continue to prioritize low emissions transportation modes through the development of additional bike/walk pathways, rideshare programs, and other travel demand strategies. • Identify opportunities to use roadside barriers to reduce exposure to air pollution and to provide the related benefit of reduced noise. • Decking and lids over highways may also reduce exposures by consolidating emissions releases to certain locations or limiting releases in certain areas. • Produce air quality-specific policies that promote a uniform approach to reducing exposures in Bellevue's future developments. 			

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9. Noise	CITYWIDE IMPACTS	CITYWIDE IMPACTS	CITYWIDE IMPACTS	CITYWIDE IMPACTS
	Under all alternatives, noise would occur citywide and in the Wilburton study area. Transportation noise impacts would be less-than-significant and noise from stationary sources and loading docks associated with commercial uses would be less-than-significant with mitigation. Therefore, there would be no significant and unavoidable noise impacts.	Same as Alternative 0 (No Action). Also, under all Action Alternatives, development of new noise-sensitive uses in proximity to freeways could expose people to noise levels in excess of the 67 dBA residential NAC and be less-than-significant with mitigation.	Same as Alternative 1.	Same as Alternative 1.
	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS
	Same as above.	Same as above.	Same as Alternative 1.	Same as Alternative 1.
	MITIGATION MEASURES	MITIGATION MEASURES	MITIGATION MEASURES	MITIGATION MEASURES
	<p><u>Citywide and Wilburton Study Area</u> Stationary:</p> <p>1. Compliance with the Class B Commercial Maximum Permissible Noise Levels of Bellevue City Code (BCC) 9.18.030. Methods of achieving these standards include using low-noise-emitting heating, ventilation, and air conditioning (HVAC) equipment, locating HVAC and other mechanical equipment within a rooftop mechanical penthouse, and using shields and parapets to reduce noise levels to adjacent land uses. For commercial loading docks, specific design measures could be implemented that may include but are not limited to shielding from features integrated into site design, and/or restrictions on hours for commercial deliveries within commercial and mixed use areas.</p>	<p><u>Citywide and Wilburton Study Area</u></p> <p>1. Same as Alternative 0 (No Action). Siting Noise-Sensitive Uses:</p> <p>2. Construction of new noise-sensitive land uses should either provide a buffer distance commensurate with the distances provided in Table 9-4, or project plans should be reviewed by a qualified acoustical consultant to ensure that appropriate construction upgrades (typically higher-rated Sound Transmission Class values for windows) are specified to ensure compliance with the interior noise criterion of 45 dBA, Ldn.</p>	<p><u>Citywide and Wilburton Study Area</u></p> <p>Same as Alternative 1.</p>	<p><u>Citywide and Wilburton Study Area</u></p> <p>Same as Alternative 1.</p>

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10. Public Services and Utilities	CITYWIDE IMPACTS	CITYWIDE IMPACTS	CITYWIDE IMPACTS	CITYWIDE IMPACTS
	Under all alternatives, additional population and job growth would occur citywide and in the Wilburton study area. Effects on population growth on public services and utilities could be mitigated through the strategies in Section 10.4.1. Therefore, significant unavoidable adverse impacts on public services and utilities are not expected under any alternative. The growth planned for the area would be incremental. Through the capital facilities planning process, the City of Bellevue would continue to address changes in public services and utilities. The school districts would continue to address changes in student enrollment.	Same as Alternative 0 (No Action).	Same as Alternative 0 (No Action).	Same as Alternative 0 (No Action).
	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS	WILBURTON STUDY AREA IMPACTS
	Same as above.	Same as Alternative 0 (No Action).	Same as Alternative 0 (No Action).	Same as Alternative 0 (No Action).
	MITIGATION MEASURES	MITIGATION MEASURES	MITIGATION MEASURES	MITIGATION MEASURES
	<p><u>Citywide and Wilburton Study Area</u></p> <p>1. No other mitigation measures are required, but the city could:</p> <ul style="list-style-type: none"> • Look for opportunities to develop new parks, open space, and recreation facilities, especially in the northern portion of the study area, to address the 1/3-mile gap in access. • Concentrate on growth in areas with adequate water and sewer infrastructure. • Build in additional population density into upcoming plan or service updates such as the Bellevue Fire Department Standards of Response Coverage, Capital Investment Program, and Police Initiatives. • Investment to build new facilities for water, wastewater, and stormwater services. Non-city utility providers will also experience increased demand for services and will need to plan for new or improved facilities. • Extend water and wastewater utility service to unserved areas of the utility service area. • Require wastewater connections for all new development, including single-family plats, unless otherwise allowed by state or county regulations. • Encourage the use of low-impact development and stormwater best management practices to manage stormwater runoff, which may result in smaller facilities constructed on- and off-site for flow control, conveyance, and water quality. • Reduce vulnerability to surcharging during rainstorms by running the sewer model using forecast climate change rainfall amounts, expected to increase at highest percentages. The results will identify where retrofits may be required, but also where new development and redevelopment can mitigate for the future by installing pipes that carry a larger capacity. 	Same as Alternative 0 (No Action).	Same as Alternative 0 (No Action).	Same as Alternative 0 (No Action).

Element of the Environment	Alternative 0 (No Action): Continues the current Comprehensive Plan with growth focused in the Downtown, BelRed, and East Main Mixed Use Centers	Alternative 1: Providing options for families of all kinds	Alternative 2: Unlocking access for more residents	Alternative 3: Providing options throughout the city
	<ul style="list-style-type: none"> Update the Wastewater Management Plan to identify projects in the Capital Improvement Program or other studies that address known deficiencies for on-site disposal systems. Several areas have existing deficiencies that could be addressed as capital projects. Consider including the equity issues of provision of utilities in future updates to their Wastewater Management Plan to ensure all members of the community are provided safe means of handling wastewater. 			
11. Transportation	<p style="text-align: center;">CITYWIDE IMPACTS</p> <p>All alternatives are expected to have significant impacts on System Intersection volume-to-capacity (V/C), Primary Vehicle Corridor travel speed, and state facilities (with other potential impacts expected to be at a less-than-significant level). While incremental improvements in performance to some impacted facilities could be achieved, it is expected that some of the significant impacts on System Intersection V/C, Primary Vehicle Corridor travel speed, and state facilities would remain [and be significant and unavoidable]. Alternative 0 (No Action) impacts 13 of 134 System Intersections, 14 of 95 Primary Vehicle Corridors and 3 of 7 state facility study segments.</p> <p style="text-align: center;">WILBURTON STUDY AREA IMPACTS</p> <p>Alternative 0 impacts two System Intersections and one Primary Vehicle Corridor.</p> <p style="text-align: center;">MITIGATION MEASURES</p> <p>To successfully accommodate the planned growth included in each of the alternatives and mitigate transportation impacts, Bellevue, in partnership with developers and other agencies, will need to implement a broad spectrum of the improvements and strategies: <i>Mobility Implementation Plan; Transportation Demand Management, Smart Mobility, Agency Partnerships, Parking strategies; and Safety strategies.</i> Mitigation measures are informed by the context of Performance Management Areas (PMAs). Mitigation Measure M-TR-1: Performance target gaps to transit travel time ratios, System Intersection V/C ratios, Primary Vehicle Corridor speed, safety, and parking in Type 1 PMAs. Key mitigation measures Bellevue should consider in Type 1 PMAs include:</p> <ul style="list-style-type: none"> To address transit travel time performance target gaps, Bellevue should continue to partner with King County Metro and Sound Transit. Improvements could include transit only/high-occupant vehicle (HOV) lanes on city streets, transit signal priority, and strong coordination to plan for the Link light-rail 4 Line between South Kirkland and Issaquah, which will serve BelRed, Wilburton, Downtown, East Main, Factoria, and Eastgate. 	<p style="text-align: center;">CITYWIDE IMPACTS</p> <p>Same as Alternative 0 (No Action), but Alternative 1 impacts 18 of 134 System Intersections, 2 of 95 Primary Vehicle Corridors and 3 of 7 state facility study segments.</p> <p style="text-align: center;">WILBURTON STUDY AREA IMPACTS</p> <p>Alternative 1 impacts 5 System Intersections</p> <p style="text-align: center;">MITIGATION MEASURES</p> <p>Same as Alternative 0 (No Action).</p>	<p style="text-align: center;">CITYWIDE IMPACTS</p> <p>Same as Alternative 0 (No Action), but Alternative 2 impacts 26 of 134 System Intersections, 5 of 95 Primary Vehicle Corridors and 4 of 7 state facility study segments.</p> <p style="text-align: center;">WILBURTON STUDY AREA IMPACTS</p> <p>Alternative 2 impacts 7 System Intersections</p> <p style="text-align: center;">MITIGATION MEASURES</p> <p>Same as Alternative 0 (No Action).</p>	<p style="text-align: center;">CITYWIDE IMPACTS</p> <p>Same as Alternative 0 (No Action), but Alternative 3 impacts 33 of 134 System Intersections, 7 of 95 Primary Vehicle Corridors and 4 of 7 state facility study segments.</p> <p style="text-align: center;">WILBURTON STUDY AREA IMPACTS</p> <p>Alternative 3 impacts 7 System Intersections</p> <p style="text-align: center;">MITIGATION MEASURES</p> <p>Same as Alternative 0 (No Action).</p>

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	<ul style="list-style-type: none"> To address performance target gaps for System Intersection V/C ratios and Primary Vehicle Corridor speed, Bellevue should focus primarily on building out the pedestrian and bicycle network to ensure there are multiple mobility options for people to get to their destinations, “exceptional TDM” (transportation demand management) requirements beyond what is required by Bellevue City Code to further reduce single-occupant driver (SOV) driving demand, Smart Mobility solutions on arterials and state highways, and parking code reforms to eliminate parking minimums near Link light rail stations, and potentially add further maximum parking limits to shift driving from the default mode of travel to a mode of necessity. Roadway or intersection capacity expansion should be a mitigation measure of “last resort” in PMA 1 given the secondary impacts on pedestrian and bicyclist comfort and safety and the very limited available space to expand the roadway network. To address safety impacts, Bellevue should continue to implement countermeasures and strategies consistent with its Vision Zero Action Plan and Safe Systems approach with a particular focus on reducing risks to vulnerable pedestrians and bicyclists. Priority should be placed on improving the safety of people walking or bicycling along the road through closing sidewalk gaps, installing mid-block crossings, providing low-stress bicycle facilities, and reducing crossing distances and creating high-visibility crosswalks at intersections. As PMA 1 redevelops with greater intensity and mix of land uses, on-street parking demand may exceed supply during peak periods, which can be mitigated through Bellevue’s existing curbspace programs and with additional interventions identified in the Curb Management Plan. Review development projects in conjunction with the Mobility Implementation Plan (MIP) and use the MIP to inform the development and administration of the city’s codes, standards, regulations, the Multimodal Concurrency Code (Chapter 14.10 BCC), Transportation Design Manual requirements, the Transportation Facilities Plan (TFP), and Transportation Impact Fee Program (Chapter 22.16 BCC). Ensure that codes, standards, and regulations, as well as Transportation Plans and Programs adopted by the city, are administered, and adopted to address transportation system impacts and to accommodate actual and anticipated growth throughout the city, including but not limited to in PMA 1. <p>Mitigation Measure M-TR-2: Performance target gaps to transit travel time ratios, System Intersection V/C ratios, Primary Vehicle Corridor speed, safety, and parking in Type 2 PMAs. Key mitigation measures Bellevue should consider in Type 2 PMAs include:</p> <ul style="list-style-type: none"> To address transit travel time performance target gaps, Bellevue should continue to partner with King County Metro and Sound Transit. Improvements could include transit only/HOV lanes on city streets, transit signal priority, and strong coordination to plan for the Link light rail 4 Line between South Kirkland and Issaquah that will serve BelRed, Wilburton, Downtown, East Main, Factoria, and Eastgate. An innovative project like the Bellevue College Connector in Eastgate is a good example of this multi-agency collaboration. To address performance target gaps for System Intersection V/C ratios and Primary Vehicle Corridor speed, Bellevue should focus primarily on building out the pedestrian and bicycle network to ensure there are multiple mobility options for people to get to 			

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	<p>their destinations, and “exceptional TDM” requirements beyond what is required by Bellevue City Code to further reduce SOV driving demand. Smart Mobility solutions for city arterials are of key importance in Type 2 PMAs given busy arterials like Factoria Boulevard and 148th/150th Avenue. Further refinements in traffic signal timing could address Primary Vehicle Corridor performance target gaps even if there are still intersection V/C performance target gaps. Given the close proximity of the Factoria and Eastgate areas to major Washington State Department of Transportation facilities, Smart Mobility solutions on state routes are also important. Vehicle capacity expansions may be warranted in limited and strategic areas if the other project concepts or strategies do not adequately address vehicle performance target gaps. However, any capacity expansion should be weighed against safety and multimodal access impacts.</p> <ul style="list-style-type: none"> • To address safety impacts, Bellevue should continue to implement countermeasures and strategies consistent with its Vision Zero Action Plan and Safe Systems approach with a particular focus on reducing risks to vulnerable pedestrians and bicyclists. Managing vehicle speeds on arterials will be a key element of improving safety overall. • Type 2 PMAs, with less intensity and mix of land uses than in Type 1 PMAs, may experience parking impacts around its fringes and along smaller streets within the PMA. As noted earlier, Bellevue has robust parking and curbspace management programs that that can mitigate parking spillover impacts. • Review development projects in conjunction with the MIP and use the MIP to inform the development and administration of the city’s codes, standards, regulations, the Multimodal Concurrency Code, Transportation Design Manual requirements, the TFP, and Transportation Impact Fee Program. Ensure that codes, standards, and regulations, as well as Transportation Plans and Programs adopted by the city, are administered, and adopted to address transportation system impacts and to accommodate actual and anticipated growth throughout the city, including but not limited to in PMA 2. <p>Mitigation Measure M-TR-3: Performance target gaps to transit travel time ratios, System Intersection V/C ratios, Primary Vehicle Corridor speed, safety, and parking in Type 3 PMAs. Key mitigation measures Bellevue should consider in Type 3 PMAs include:</p> <ul style="list-style-type: none"> • Transit travel time performance target gaps affect frequent transit network routes that traverse Type 3 PMAs, but there are no major transit nodes in the PMA. However, Bellevue should continue to work with partner transit agencies to implement strategic transit speed and reliability improvements within the Type 3 PMA to benefit service within the area and to enhance the performance of the overall transit system. Transit riders from the Type 3 PMA can benefit from these improvements both on routes that they are able to access by walking or bicycling, and also from major park-and-ride and transit centers across the city. • To address performance target gaps for System Intersection V/C ratios and Primary Vehicle Corridor speed, Bellevue should continue to build out the pedestrian and bicycle network per the MIP within the Type 3 PMA as this large area of the city contains performance target gaps. Smart Mobility solutions for city arterials are of major importance for arterials like 148th Avenue and Coal Creek Parkway, for example. Further refinements in traffic signal timing could address primary vehicle corridor 			

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	<p>performance target gaps even if there are still intersection V/C performance target gaps. Vehicle capacity expansions may be warranted in strategic areas if the other project concepts and strategies do not adequately address vehicle performance target gaps.</p> <ul style="list-style-type: none"> To address safety impacts, Bellevue should continue to implement countermeasures and strategies consistent with its Vision Zero Action Plan and Safe Systems approach with a particular focus on reducing risks to vulnerable pedestrians and bicyclists. Managing vehicle speed on arterials will be a key element of improving safety overall. As the city redevelops with a greater intensity and mix of land uses, particularly in Type 1 and 2 PMAs, there could be parking impacts on city streets within the Type 3 PMA. The city has robust parking and curbspace programs in place that can mitigate parking impacts. Review development projects in conjunction with the MIP and use the MIP to inform the development and administration of the city's codes, standards, regulations, the Multimodal Concurrency Code, Transportation Design Manual requirements, the TFP, and Transportation Impact Fee Program. Ensure that codes, standards, and regulations, as well as Transportation Plans and Programs adopted by the city, are administered, and adopted to address transportation system impacts and to accommodate actual and anticipated growth throughout the city, including but not limited to in PMA 3. <p>Mitigation Measure M-TR-4: Impacts on state facility level of service (LOS). Key mitigation measures Bellevue should consider include:</p> <ul style="list-style-type: none"> To address impacts on state facility LOS, Bellevue should continue to coordinate and partner with WSDOT on state transportation investments to improve regional mobility. Specific examples could be continued collaboration on implementing elements of the I-405 Master Plan, including the South Downtown I-405 Access Study. Bellevue and WSDOT have a long history of implementing improvements to state routes through the city. Bellevue can also facilitate the implementation of Smart Mobility strategies on state facilities through sharing of travel data and using Bellevue's communications channels to convey information to travelers. Smart Mobility on state facilities is an important strategy to move more people and address regional travel needs. Consider "exceptional TDM" requirements beyond what is required by Bellevue City Code to further reduce SOV driving demand, which will reduce overall traffic demand on state facilities. Similarly, considering parking code reforms to eliminate parking minimums near Link light rail stations and potentially adding further maximum parking limits to shift driving from the default mode of travel to a mode of necessity would benefit state facilities. <p>As development occurs, Bellevue will determine the capital and programmatic improvements best suited to address the conditions that materialize. Capital projects will be identified in the Transportation Facilities Plan; the Transportation Facilities Plan is updated every two to three years.</p>			

1.8 Significant Unavoidable Adverse Impacts

Based on the full analysis presented in Chapters 3 through 11 of the Draft EIS, implementation of the alternatives would result in the following significant unavoidable adverse impacts for the following elements of the environment:

- **Housing:** The No Action Alternative continues existing regulations, incentives, and programs targeted at housing affordability. Recent development trends have shown decreases in affordability despite these existing tools. Without additional strategies for affordability, **the No Action Alternative will likely have a significant adverse impact on housing affordability** compared to the Action Alternatives.
- **Housing:** Economic displacement will be higher in the No Action Alternative. Given this, **significant adverse impacts** related to an increased risk for involuntary residential displacement are expected under the No Action Alternative.
- **Air Quality:** The Action Alternatives would result in **potentially significant unavoidable adverse impacts** on air quality.
- **Transportation:** While incremental improvements in performance to some impacted facilities could be achieved, it is expected that some of the impacts on V/C, Primary Vehicle Corridor travel speed, and state facilities would remain and be **significant and unavoidable adverse impacts**. This is true for the No Action Alternative and the Action Alternatives.
- **All Other Elements of the Environment:** With respect to the other elements of the environment analyzed in this Draft EIS, with the implementation of mitigation measures, **no other significant unavoidable adverse impacts are expected** with respect to future plan consistency under any of the alternatives.

1.9 Significant Areas of Controversy and Uncertainty, and Issues to Be Resolved

Key environmental issues and options facing decision-makers include:

- Alternative land use patterns in relation to growth estimates and community vision.

- Relationship of land use patterns to the natural environment and land use compatibility.
- Effect of growth on demand for public services, utilities, and parks and transportation capital improvements.

All alternatives would allow for population, housing, and employment growth and increased urbanization.

Prior to preparation of the Final EIS, the following issues are anticipated to be resolved:

- Selection and refinement of future land use studied in the range of alternatives.
- Refinement of goals, objectives, and policies.

Issues yet to be resolved include guidance related to the development regulations for specific zones to accommodate the changes proposed in the alternatives. The precise nature of these necessary amendments will be described in the Final EIS, after a Preferred Alternative has been identified.

1.10 Benefits and Disadvantages of Delaying the Proposed Action

If the proposed action is delayed, growth in Bellevue would be guided by the current Comprehensive Plan and zoning. It would allow for growth but not coordinate with regional growth strategies and targets or the investment to the same degree as the Action Alternatives. The investments in infrastructure would follow existing plans and not prepare the city for their expected share of growth. Retention of the No Action Alternative would also not provide a full range of housing types.

Retaining Alternative 0 (No Action) would result in inconsistencies with transportation metrics and disperse growth in a pattern that could result in more adverse impacts on water and natural resources. Delaying the Proposed Action would also not align with the Growth Management Act, VISION 2050, or Countywide Planning Policies. This could hinder the city's success in attaining state and federal grants and loans for infrastructure.