



CHAPTER 4 Relationships to Plans and Policies

4.1 Introduction

This chapter describes plans, policies, and regulations that inform the Comprehensive Plan Periodic Update. These include the Growth Management Act (GMA), Puget Sound Regional Council's (PSRC) VISION 2050, and the King County Countywide Planning Policies (CPPs). These documents establish regulatory and policy frameworks with which comprehensive plans must be consistent. Bellevue's current Comprehensive Plan, Shoreline Master Program (SMP), and Capital Investment Plan (CIP) are also discussed to provide a basis for evaluating potential impacts associated with the alternatives.

This analysis considers the general direction of each alternative's proposed policy changes to Bellevue's Comprehensive Plan. The Final EIS will further evaluate any specific policy or regulatory proposals that emerge from the city's planning process.

4.2 Affected Environment

This section summarizes the key concepts in state, regional, and city growth management policies.

4.2.1 Washington State Growth Management Act

The Washington State GMA was adopted in 1990 to address concerns about the impacts of uncoordinated growth on Washington communities and the environment. The GMA includes 13 planning

goals to guide the development and adoption of comprehensive plans and development regulations. A 14th goal was added to the GMA to reference provisions of the Shoreline Management Act. These goals address the following topics:

1. Encourage growth in urban areas.
2. Reduce sprawl.
3. Encourage multimodal transportation systems.
4. Encourage a variety of housing types, including affordable housing.
5. Encourage economic development.
6. Recognize property rights.
7. Ensure timely and fair permitting processes.
8. Protect agricultural, forest, and mineral lands.
9. Retain and enhance open space and support recreation opportunities.
10. Protect the environment.
11. Encourage citizen involvement in planning processes.
12. Ensure adequate public facilities and services.
13. Encourage historic preservation.
14. Reference provisions of the Shoreline Management Act.

The GMA is the preeminent legislation for land use planning in Washington state and it requires that local governments prepare comprehensive plans to accommodate 20 years of expected growth. Required elements of a comprehensive plan include land use, housing, capital facilities, utilities, transportation, economic development, and parks and recreation. Local governments may include other elements if they wish.

Jurisdictions must be up to date with the requirements of the GMA, including the periodic update requirements, to be eligible for grants and loans from certain state infrastructure programs. Bellevue's most recent major periodic update to its Comprehensive Plan was in 2015. It is currently undergoing a periodic update to establish a new planning horizon in the year 2044.

The GMA also requires coordination and consistency between comprehensive plans of cities and counties with common borders or related regional issues. In 2020, multicounty planning policies (MPPs) were adopted in PSRC's VISION 2050 for the Central Puget Sound

region, and Countywide Planning Policies (CPPs) were adopted for all jurisdictions in King County in 2021. The MPPs in VISION 2050 and the King County CPPs provide frameworks for coordinated and consistent comprehensive planning across the region and within King County and are discussed in more detail below.

4.2.2 VISION 2050

PSRC develops policies and coordinates decisions about regional growth, transportation, and economic development planning within King, Pierce, Snohomish, and Kitsap counties. PSRC's VISION 2050 includes the GMA-required MPPs for the four-county region and a regional strategy to plan for growth through 2050. The 216 MPPs are organized by topic area to provide direction for more efficient use of public and private investments and inform updates to Countywide Planning Policies and local comprehensive plan updates.

VISION 2050 presents a Regional Growth Strategy to create healthy, equitable, vibrant communities well-served by infrastructure and services. It calls for focusing new housing and jobs within Regional Growth Centers and near high-capacity transit. Regional Growth Centers are intended to be focal points of vibrant city life and activity that provide a dense mix of housing, employment, commercial, and cultural amenities. Centers also serve as major transit hubs for the region. Downtown Bellevue is designated as a Metro Regional Growth Center under VISION 2050 and as such it receives priority for funding. Other topic areas within VISION 2050 include regional collaboration, environment, climate change, development patterns, housing, economy, transportation, and public services.

The Regional Growth Strategy defines roles for different types of places in accommodating the region's population and employment growth, which inform countywide growth targets, local plans, and regional plans. It classifies cities and unincorporated urban areas into a range of regional geographies based on their size, function, and access to high-capacity transit. Bellevue is classified as a Metropolitan City, which is defined as a civic, cultural, and economic hub, containing at least one Regional Growth Center. Bellevue is one of two Metropolitan Cities and is a major employment centers in King County (Seattle being the other). VISION 2050 directs a large share of the region's projected growth (36 percent of population and 44 percent of jobs) into Metropolitan Cities to improve jobs/housing balances throughout the region. Other regional geographies include Core Cities, High Capacity Transit Communities, Cities and Towns, and Urban Unincorporated Areas.

4.2.3 King County Countywide Planning Policies

King County's CPPs blend the direction in the GMA with regional values expressed in VISION 2050 and local priorities to guide cities in their development of comprehensive plans. Key topics covered by the CPPs include urban centers, housing, transportation, public facilities, and economic development. They encourage compact and coordinated land use patterns, with a focus on preserving open spaces and natural areas. They also promote the use of public transportation and encourage the development of walkable communities.

The CPPs aim to increase the availability of affordable housing for all residents, with a focus on providing housing for low- and moderate-income households. The policies encourage development of diverse housing options that are accessible to a range of household types, including single-family homes and apartments/condominiums, as well as middle housing such as townhouses, duplexes, and accessory dwelling units (ADUs). The CPPs' economic vision emphasizes providing opportunities for everyone, including BIPOC- (i.e., black, indigenous, people of color), immigrant-, and women-owned businesses.

The CPPs also establish housing and growth targets for the county and cities in alignment with VISION 2050's Regional Growth Strategy. Housing and job growth targets are set for each jurisdiction to plan for within the county for the planning period between 2019 and 2044. However, other policies related to expanding housing options and neighborhood choice can result in cities needing to increase their capacity for housing development further to encourage a greater variety of housing typologies. Bellevue's minimum growth targets as set in the CPPs are for 35,000 new housing units and 70,000 new jobs between 2019 and 2044.

The county's 2021 Urban Growth Capacity (UGC) Report, prepared in conjunction with the CPPs, compared estimated housing and employment growth from 2006 to 2018 relative to 2006–2035 growth targets and remaining capacity for each jurisdiction. Growth targets are based on actual growth projections prepared by the State of Washington Office of Financial Management, whereas development capacity is based on assumptions about how much land is redevelopable and the type of projects that could be developed under existing zoning. Current housing and job capacity used in this EIS analysis are higher than the capacity that was reported in the 2021 UGC Report. This is because:

- The city's calculation of capacity does not include the market factor used in the UGC Report that reduced total capacity by about 15 percent overall.
- Since publishing the UGC Report, the city has added capacity in East Main and on faith-owned properties.
- Permits have been issued for projects that are developing at a higher density than what was assumed in the UGC Report.
- Some properties that were not considered redevelopable in the UGC Report have since been redeveloped.
- The city's threshold for classifying a property as "redevelopable" is slightly more generous than what was used in the UGC Report to try to capture all potential development in the city.

Appendix 6 of King County's CPPs includes criteria for designating countywide growth centers (no countywide growth centers are designated currently in King County). Criteria include having an existing density of at least 18 activity units (residents or jobs) and a planned density of at least 30 activity units. Countywide growth centers are also expected to be between 160 and 500 acres in size; include frequent, all-day transit service; and be able to demonstrate the area's regional or countywide role and its future market potential to support the planned densities.

4.2.4 City of Bellevue Comprehensive Plan

The vision in the current Bellevue Comprehensive Plan is to create a city with a vibrant and growing Downtown and new business / residential centers in BelRed, Wilburton, and Eastgate, as well as to enhance the livability and connections between neighborhoods, and to deliver high-quality services in partnership with the community:

Bellevue embraces the future while respecting our past. In 2035 Bellevue is a vibrant international center for innovation and commerce with safe, attractive neighborhoods that feature some of America's finest schools. Most of Bellevue's jobs and many of its new housing opportunities are found Downtown with its thriving arts scene, and in new business/residential centers at BelRed, Wilburton, and Eastgate, which feature their own unique cultural amenities and urban landscapes. Our neighborhoods epitomize Bellevue's reputation as a "City in a Park" with visually breathtaking vistas, viewpoints, and recreation areas.

Despite the city's growth, neighborhoods remain connected to one another, offering diverse housing choices, gathering spaces, and local and regional commercial services. Bellevue's people—its ultimate strength—define both the city and their neighborhood.

Bellevue's current Comprehensive Plan includes the following citywide elements: Introduction and Vision; Citizen Engagement; Land Use; Neighborhoods; Housing; Capital Facilities; Utilities; Transportation; Economic Development; Environment; Human Services; Parks, Recreation, and Open Space; Urban Design and the Arts; and Shoreline Management.

Key policies in the Bellevue Comprehensive Plan guide the city's growth and emphasize quality of life and a sustainable natural environment. Growth will be focused in denser Mixed Use Centers served by a full range of transportation options, like Downtown, BelRed, and Eastgate, while maintaining and strengthening the vitality, quality, and character of Bellevue's distinctive neighborhoods. Mixed Use Centers are described as mixed use areas that *"are anticipated to accommodate a significant proportion of the city's projected growth."*

The current Comprehensive Plan includes 16 neighborhood areas planned for through 14 subarea plans.¹ Subarea plans are an opportunity to look at planning issues at a neighborhood scale and focus planning efforts in small areas of the city. The 16 neighborhood areas include changes to subarea boundaries to better reflect current neighborhood areas that align with community expectations and to facilitate long-range planning—these new boundaries are applied as neighborhood area plans are updated. The 14 subarea plans in Volume 2 of the current Comprehensive Plan include:

- BelRed
- Bridle Trails
- Crossroads
- Downtown
- Eastgate
- Factoria
- Newcastle
- Newport Hills
- Northeast Bellevue
- Northwest Bellevue
- Richards Valley
- Southeast Bellevue
- Southwest Bellevue
- Wilburton/NE 8th Street

The Wilburton study area analyzed in this EIS is located within the Wilburton/NE 8th Street Subarea.

¹ The Comprehensive Plan Periodic Update is focused on updated Volume 1 of the Comprehensive Plan, including the Comprehensive Plan Land Use Map.

4.2.5 Shoreline Master Program

Shoreline Master Programs (SMPs) are local land use policies and regulations that guide the public and private use of Washington shorelines. These policies and regulations provide for public access to public waters and shorelines, protect natural resources, and plan for water-dependent uses.

Shoreline Master Programs are subject to the Shoreline Management Act ([RCW 90.58](#)). The goals and policies of the Shoreline Master Program are included in comprehensive plans under the GMA ([RCW 36.70A](#)):

1. To prevent the inherent harm in uncoordinated and piecemeal development of the city's shorelines.
2. To protect, preserve, and enhance the ecology, environment, and amenities of the city's shorelines for use and enjoyment of present and future generations by limiting, insofar as practical, any resultant damage to the ecology and environment of the shoreline area.
3. To protect the public's opportunity to enjoy optimal access to the physical and aesthetic qualities of the shoreline consistent with the overall best interest of the city and the state.
4. To increase and encourage water-enjoyment recreation for the public on the city's shorelines when appropriate and consistent with the public interest.
5. To give preference to uses that are consistent with control of pollution and prevention of damage to the nature environment or are unique to or dependent upon use of the shoreline.
6. To give priority to single-family residences.
7. To give priority to non-single-family uses such as water-dependent recreational development, and other development that will provide an opportunity for substantial numbers of people to enjoy the shorelines of the state.
8. To discourage new or expanded commercial uses and activities on the city's shorelines except where those commercial uses or activities are associated with water-dependent uses.

Bellevue's shoreline jurisdiction is regulated through zoning and shoreline environment designations established in [Bellevue City Code \(BCC\) 20.25E](#). The Shoreline Jurisdiction includes Lake Washington, Lake Sammamish, Lower Kelsey Creek, Mercer Slough, and Phantom Lake, as well as associated wetlands and shorelands 200 feet from the ordinary high-water mark (including the floodway and 200 feet of any

adjacent floodplain) of each of the listed water bodies. **Table 4-1** summarizes the purpose of each designation.

TABLE 4-1 Shoreline Master Program Shoreline Environment Designations

Shoreline Designation	Purpose
Aquatic	Protect, manage, and restore the unique characteristics and resources of the areas waterward of the ordinary high-water mark.
Urban Conservancy—Open Space	Protect, retain, or restore those shoreline areas that are relatively free of urban development or that include intact or minimally degraded shoreline functions intolerant of urban development.
Urban Conservancy	Maintain shoreline ecological functions and foster opportunities to restore shoreline ecological functions while allowing compatible uses and development, such as public and private access to the shoreline.
Shoreline Residential—Canal	Maintain single-family residential development adjacent to artificially created canals in the Newport Shores community.
Shoreline Residential	Accommodate single- or multi-family residential development and appurtenant structures that are consistent with the Bellevue SMP.
Recreational Boating	Provide a variety of water-dependent and water-oriented uses, with primary focus on activities associated with recreation.

SOURCE: City of Bellevue 2023; BERK 2023

4.2.6 Capital Investment Program Plan

The Capital Investment Program (CIP) Plan is a schedule of major public facility improvements to be implemented over a seven-year period. The CIP Plan includes details on project design, land acquisition, construction costs, and financing sources. The City Council approved the most recent Bellevue CIP Plan in December 2020.

The CIP Plan organizes projects into topics including transportation, parks, general government, public safety, community development, economic development, neighborhood enhancement program, neighborhood investment strategy, water, sewer, and storm drainage.

The Capital Facilities Element of the Comprehensive Plan references the CIP Plan and provides broader policy guidance for capital facility planning.

4.3 Potential Impacts

4.3.1 Thresholds of Significance

The following thresholds of significance are considered in this chapter:

- **Consistency with Washington State Growth Management Act goals.** The action would result in an incompatibility with the Washington State Growth Management Act.
- **Consistency with VISION 2050 and the multicounty planning policies.** The action would result in an incompatibility with VISION 2050 and the multicounty planning policies.
- **Consistency with King County Countywide Planning Policies.** The action would result in incompatibility with the King County Countywide Planning Policies.

Under [WAC 365-196-210\(8\)](#), consistency occurs when *“no feature of a plan or regulation is incompatible with any other feature of a plan or regulation. Consistency is indicative of a capacity for orderly integration or operation with other elements in a system.”* For this analysis, consistency means that the alternative can occur and be implemented together with the selected goal or policy without contradiction. Inconsistencies or contradictions with state, regional, or county plans and policies are considered to have a significant adverse impact.

4.3.2 Consistency with Growth Management Act

The Bellevue Comprehensive Plan contains the elements required by GMA and was designed to meet provisions in the law as of 2015. The city has adopted development regulations to implement the goals and policies of the Comprehensive Plan.

This Draft EIS includes four growth alternatives for consideration in the 2024 periodic update. All alternatives would focus most future growth into the existing Mixed Use Centers, which is consistent with GMA policies that encourage a compact pattern of urban development to prevent sprawl (see Chapter 3, *Land Use Patterns and Urban Form*). The primary differences between the Action Alternatives described in this EIS are in the proposed distribution and intensity of growth in various parts of the city. Developable land with appropriate zoning is sufficient to accommodate population and

employment growth targets under all the alternatives.² However, Alternative 0 (No Action) assumes no substantial updates to the Comprehensive Plan strategy and would therefore not align with newer GMA requirements, such as provisions for housing across income bands and a range of housing types (see Chapter 7, *Housing*).

The alternatives are evaluated for compatibility with GMA goals in **Table 4-2**.

TABLE 4-2 Evaluation of Consistency with GMA Goals

GMA Goal	Discussion
(1) Encourage growth in urban areas	All alternatives focus growth in urban areas, with an emphasis on Mixed Use Centers. Alternative 3 would accommodate the most growth.
(2) Reduce sprawl	All alternatives support the goal to reduce sprawl by incorporating growth within the city limits and focusing growth in Mixed Use Centers. The Action Alternatives also include gentle density increases across the city in the form of low-density housing types. Alternatives 2 and 3 also focus growth near transit and in Neighborhood Centers. By focusing growth in Bellevue, sprawl is reduced and rural areas outside of the city are less likely to be impacted by regional growth.
(3) Encourage an efficient and multimodal transportation system	Alternatives 2 and 3 provide growth opportunities close to transit and invest in multimodal transportation improvements in high-density areas. Alternative 1 includes modest expansions of multimodal transportation. Alternative 0 (No Action) does not make changes to the current Comprehensive Plan, which includes some policy support for multimodal transportation.
(4) Plan for and accommodate housing that is affordable, at different densities, and preserve housing stock	Alternative 0 (No Action) , continues the current Comprehensive Plan policies forward, including some policies for affordable, diverse housing and preservation of housing stock. However, the No Action Alternative does not meet new requirements for affordable housing across income bands and a range of housing types. The Action Alternatives accomplish this by allowing gentle density increases across the city and adopting new affordable housing policies and incentives.
(5) Promote economic development	All alternatives include capacity for many new jobs. Alternative 3 would have the most capacity for jobs (200,000), and Alternative 0 (No Action) would have the least capacity (124,000).
(6) Recognize property rights	None of the alternatives would conflict with property rights.
(7) Ensure timely and fair permit procedures	Bellevue would continue to process permits consistent with its adopted code under all alternatives .

² Growth targets were adopted in 2019. Net capacity for growth under each of the alternatives is relative to 2019 housing and jobs. Housing and job capacity used in this EIS analysis is higher under the No Action Alternative than the capacity that was reported in King County's 2021 Urban Growth Capacity Report. See **Section 4.2.3** for a discussion of why these numbers are different.

GMA Goal	Discussion
(8) Protect agricultural, forest, and mineral lands	Since all alternatives provide capacity for growth within an incorporated urban area, they all contribute to the protection of resource lands by limiting sprawl on a regional level.
(9) Retain and enhance open space and support recreation opportunities	All alternatives would continue to invest in parks and open space consistent with adopted levels of service. Greater growth will increase the demand for recreation with Alternative 0 (No Action) the least and Alternative 3 the most.
(10) Protect the environment	All alternatives would continue to include Comprehensive Plan policies for protection of the environment. All alternatives would also limit regional sprawl by adding growth to an urban area, which has impacts on regional vehicle emissions, energy use, and land use. Alternatives 2 and 3 could best support this goal by allowing for the most density, for locating growth near transit, and for investing in multimodal transportation infrastructure.
(11) Foster citizen participation	All alternatives foster public participation and have been developed through a robust outreach process. This outreach will continue through the selection of a preferred alternative and development of a Final EIS.
(12) Ensure adequate public facilities and services	As growth increases under all alternatives , public facilities and services will experience greater demand. Service and capital planning will continue to support provision of adequate facilities and services consistent with the city's adopted levels of service.
(13) Encourage historic preservation	Future development under all alternatives will be required to comply with state and federal regulations for historic preservation.
(14) Shoreline management	Future development under all alternatives will be required to comply with federal, state, and local shoreline regulations.

SOURCE: [RCW 36.70A.020](#) and [36.70A.480](#); BERK 2023

4.3.3 Consistency with VISION 2050

VISION 2050 designates Bellevue as a Metropolitan City and Downtown Bellevue as a Metro Regional Growth Center. With population and employment growth focused in the Downtown and BelRed Mixed Use Centers, the growth strategy in Bellevue’s Comprehensive Plan is consistent with the intent of VISION 2050 to concentrate growth in centers. The Action Alternatives align with the Regional Growth Strategy, but vary in their patterns of growth distribution, requirements, or incentives for affordable housing, and in their allowance for a variety of housing types located near transit corridors or in existing low-density areas of the city. The alternatives are further evaluated for compatibility with specific VISION 2050 policies in **Table 4-3**.

TABLE 4-3 Evaluation of Consistency with VISION 2050

VISION 2050 Policy	Discussion
<p>MPP-DP-1 Develop high-quality, compact urban communities throughout the region’s urban growth area that impart a sense of place, preserve local character, provide for mixed uses and choices in housing types, and encourage walking, bicycling, and transit use.</p>	<p>All alternatives focus growth within the urban growth area, with most future growth focused in the existing Mixed Use Centers. A greater share of citywide housing and jobs would be shifted to the Mixed Use Centers under all alternatives (between 49%–52% and 82%–84%, respectively, depending on the alternative). The Action Alternatives provide the most opportunity for choice in housing types by allowing more variety in low-density areas and more development overall. While the Comprehensive Plan includes policies across alternatives to support multimodal transportation, Alternatives 2 and 3 support this best.</p>
<p>MPP-DP-2 Reduce disparities in access to opportunity for the region’s residents through inclusive community planning and targeted public and private investments that meet the needs of current and future residents and businesses.</p>	<p>All alternatives would focus most future growth into the existing Mixed Use Centers, which generally overlap transit-proximate areas of the city. Alternatives 2 and 3 emphasize growth near transit and the Neighborhood Centers. Adding growth near transit, jobs, and amenities can support access to opportunity. The Action Alternatives also support a wider range of housing types and affordable housing, which would provide more options for households to live in Bellevue and access local opportunities. Bellevue is conducting an ongoing and robust community outreach process for the Comprehensive Plan Periodic Update that will continue under all alternatives.</p>
<p>MPP-DP-3 Enhance existing neighborhoods to provide a high degree of connectivity in the street network to accommodate walking, bicycling, and transit use, and sufficient public spaces.</p>	<p>All alternatives include policies and regulations for multimodal connectivity. Alternatives 2 and 3 invest the most resources in supporting this policy. All alternatives focus most future growth capacity into the existing Mixed Use Centers, which generally overlap transit-proximate areas of the city. Alternatives 2 and 3 also emphasize additional growth near transit.</p>

VISION 2050 Policy	Discussion
<p>MPP-DP-9 Support urban design, historic preservation, and arts to enhance quality of life, support local culture, improve the natural and human-made environments, promote health and well-being, contribute to a prosperous economy, and increase the region’s resiliency in adapting to changes or adverse events.</p>	<p>All alternatives include policies and regulations to support urban design, historic preservation, and the arts.</p>
<p>MPP-DP-11 Identify and create opportunities to develop parks, civic places (including schools), and public spaces, especially in or adjacent to centers.</p>	<p>Under all alternatives, Bellevue would need to address park, trail, and school development to meet adopted levels of service.</p>
<p>MPP-RGS-8 Attract 65% of the region’s residential growth and 75% of the region’s employment growth to the regional growth centers and high-capacity transit station areas to realize the multiple public benefits of compact growth around high-capacity transit investments. As jurisdictions plan for growth targets, focus development near high-capacity transit to achieve the regional goal.</p>	<p>All alternatives would focus most future growth into the existing Mixed Use Centers, which generally overlap transit-proximate areas of the city. The Action Alternatives, and particularly Alternative 3, provide the most opportunity for growth in Bellevue. Alternatives 2 and 3 also emphasize additional growth near transit and in the Neighborhood Centers.</p> <p>In the Wilburton study area, all Action Alternatives support growth near the future light rail station, particularly Alternatives 2 and 3. However, under the No Action Alternative, housing in the Wilburton study area would account for less than 1% of citywide total housing capacity, and jobs would account for about 5% of citywide total job capacity.</p>
<p>MPP-RGS-9 Focus a significant share of population and employment growth in designated regional growth centers.</p>	<p>All alternatives would focus most future growth into the existing Mixed Use Centers. Between 23% and 46% of housing capacity and between 41% and 72% of job capacity would be focused in Downtown depending on the alternative. Overall, Downtown would continue to account for the greatest share of housing and job capacity within Bellevue’s Mixed Use Centers under any alternative, although a greater share of capacity would be shifted to other Mixed Use Centers under the Action Alternatives.</p>
<p>MPP-RGS-11 Encourage growth in designated countywide growth centers.</p>	<p>King County has designated 5 “Candidate” Countywide Centers in Bellevue. The county’s candidate designation letter included several recommendations, including planning for affordable housing and more housing options in these centers. All alternatives would focus most future growth into these Mixed Use Centers / Candidate Countywide Centers (see Table 4-5).</p>
<p>MPP-RGS-12 Avoid increasing development capacity inconsistent with the Regional Growth Strategy in regional geographies not served by high-capacity transit.</p>	<p>Alternatives 2 and 3 focus growth near transit, while this is less emphasized under Alternatives 0 and 1.</p>

SOURCE: PSRC 2020; BERK 2023

4.3.4 Consistency with King County Countywide Planning Policies

King County’s adopted CPPs set minimum growth targets of 35,000 housing units and 70,000 jobs in Bellevue by 2044. All of the alternatives contain enough capacity for growth to meet these targets. The three Action Alternatives are consistent with the goals set by the CPPs, including housing diversity and choice, connections to businesses and community gathering spaces, access to amenities, a variety of transportation options, and environmental sustainability and resilience.³ The alternatives are evaluated for compatibility with overarching CPP goals in **Table 4-4**.

TABLE 4-4 Evaluation of Consistency with CPPs Goals

CPP Goals	Discussion
<p>Environment Overarching Goal: The quality of the natural environment in King County is restored and protected for future generations.</p>	<p>Concentrating growth in Bellevue will prevent sprawl in other areas of the county, allowing more natural areas to be protected. Density, particularly near transit, is also associated with lower vehicle emissions, energy use, and land use per capita. All alternatives will continue to include policies to protect the environment.</p> <p>Alternatives 2 and 3 could best support this goal by allowing for the most density, for locating growth near transit, and for investing in multimodal transportation infrastructure.</p>
<p>Development Pattern Overarching Goal: Growth in King County occurs in a compact, centers-focused pattern that uses land and infrastructure efficiently and that protects Rural and Resource Lands.</p>	<p>All alternatives focus growth in the Mixed Use Centers. These Mixed Use Centers have been designated as Candidate Countywide Centers by King County. Alternatives 2 and 3 would also encourage additional growth near transit and in the Neighborhood Centers.</p>
<p>Urban Growth Area Goal Statement: The Urban Growth Area boundary is stable, and capacity within it shall increase over time to accommodate growth consistent with the Regional Growth Strategy and growth targets through land use patterns and practices that create vibrant, equitable, and sustainable communities</p>	<p>All alternatives continue to focus growth in the urban area with an emphasis on Mixed Use Centers. Alternatives 2 and 3 would also encourage additional growth near transit and in the Neighborhood Centers.</p>

³ Growth targets were adopted in 2019. Net capacity for growth under each of the alternatives is relative to 2019 housing and jobs. Housing and job capacity used in this EIS analysis is higher under the No Action Alternative than the capacity that was reported in King County’s 2021 Urban Growth Capacity Report. See **Section 4.2.3** for a discussion of why these numbers are different. While housing capacity is above the adopted target, the No Action Alternative does not meet other new planning requirements, including affordable housing across income bands and a range of housing types. See also Chapter 7, *Housing*.

CPP Goals	Discussion
<p>Centers Goal Statement: King County grows in a manner that reinforces and expands upon a system of existing and planned high-capacity transit in central places within which concentrated residential communities and economic activities can flourish.</p>	<p>All alternatives continue to focus growth in the Mixed Use Centers. Alternatives 2 and 3 would also encourage additional growth near transit and in the Neighborhood Centers. In the Wilburton study area, the Action Alternatives focus capacity near transit, particularly Alternatives 2 and 3.</p>
<p>Rural Area Goal Statement: The rural area geography is stable, and the level and pattern of growth within it provide for a variety of landscapes and open space lands, maintain diverse low-density communities, and support rural economic activities based on sustainable stewardship of the land.</p>	<p>Under all alternatives, reducing sprawl through increased growth and density in Bellevue would support the stability of rural areas. All the Action Alternatives also increase housing diversity in Bellevue. This provides greater opportunities for households to find housing that meets their needs within the city, creating less pressure on or near rural lands.</p>
<p>Resource Lands Goal Statement: Resources Lands are valuable long-term assets of King County and are renowned for their productivity and sustainable management.</p>	<p>Under all alternatives, reducing sprawl by concentrating growth in areas like Bellevue would also protect resource lands elsewhere in King County.</p>
<p>Housing Overarching Goal: Provide a full range of affordable, accessible, healthy, and safe housing choices to every resident in King County.</p>	<p>All alternatives provide policies in support of affordable, accessible, healthy, and safe housing. However, the No Action Alternative does not meet new requirements for affordable housing across income bands and a range of housing types. The Action Alternatives accomplish this by allowing gentle density increases across the city and adopting new affordable housing policies and incentives. Alternative 3 has capacity for the most housing units overall.</p>
<p>Economy Overarching Goal: All people throughout King County have opportunities to prosper and enjoy a high quality of life through economic growth and job creation.</p>	<p>All alternatives have capacity for job growth above the adopted target (70,000 new jobs by 2044). Alternative 3 has the greatest capacity at 200,000 new jobs.</p>
<p>Transportation Overarching Goal: The region is well served by an integrated, multimodal transportation system that supports the regional vision for growth, efficiently moves people and goods, and is environmentally and functionally sustainable over the long term.</p>	<p>All alternatives support a multimodal transportation system. Alternatives 2 and 3 best support this goal by encouraging additional growth near transit and by providing multimodal transportation investments in dense areas.</p>
<p>Public Facilities and Services Overarching Goal: County residents in both urban and rural areas have timely and equitable access to the public services needed to advance public health and safety, protect the environment, and carry out the Regional Growth Strategy.</p>	<p>Growth under all alternatives would increase demand for public facilities and services. Bellevue would continue to plan for facilities and services consistent with adopted levels of service.</p>

SOURCE: King County Countywide Planning Policies 2021; BERK 2023

The CPPs direct cities to concentrate growth in designated regional, countywide, and local centers. Downtown Bellevue is currently designated as a Metro Regional Growth Center under VISION 2050 and receives priority for investments in the four-county region accordingly. Downtown Bellevue is approximately 426 acres and currently has about 192 activity units per acre (jobs + population). Under the No Action Alternative, Downtown could reach up to 496 activity units, with other alternatives hovering around that same number (489–495).

The CPPs offer an additional county-level designation of centers to focus resources. Appendix 6 of the CPPs includes the criteria for designating countywide growth centers. To be designated as a countywide growth center, an area must have an existing density of at least 18 activity units and a planned density of at least 30 activity units. Countywide growth centers are also expected to be between 160 and 500 acres in size, include frequent, all-day transit service, and provide evidence of the center’s regional or countywide role and future market potential to support the planned densities. The city submitted five Mixed Use Centers to King County for consideration as Countywide Centers in August 2021 (all of the Mixed Use Centers except for Downtown, which is already a PSRC-designated Metro Regional Growth Center); these were reviewed by King County and given “candidate” status as of December 1, 2021.

Table 4-5 compares gross capacity in Bellevue’s Mixed Use Centers to the activity unit and geographic size requirements. All the Mixed Use Centers are within the size thresholds for countywide growth centers and meet the planned activity unit density criteria under all alternatives.

TABLE 4-5 Mixed Use Centers vs. Countywide Growth Center Designation Criteria

Center	Size (Acres)	Activity Units per Acre				
		Existing (2021)	No Action	Alternative 1	Alternative 2	Alternative 3
BelRed	426 ✓	48 ✓	104 ✓	141 ✓	153 ✓	190 ✓
Eastgate	173 ✓	48 ✓	46 ✓	50 ✓	53 ✓	53 ✓
Factoria	212 ✓	55 ✓	56 ✓	80 ✓	81 ✓	120 ✓
Wilburton-East Main	362 ✓	39 ✓	79 ✓	249 ✓	262 ✓	281 ✓
Crossroads	427 ✓	34 ✓	55 ✓	68 ✓	75 ✓	78 ✓

SOURCE: King County Countywide Planning Policies, Appendix 6, 2021; City of Bellevue 2023; BERK 2023

NOTES: Activity units is the sum of residential population and jobs. Existing activity units are listed as reported in the city’s 2021 Countywide Center application to King County. Estimated population is based on a citywide average household size of approximately 2.48 and vacancy rate of approximately 7%.

- ✓ Meets criteria.
- ✗ Does not meet criteria.

4.4 Avoidance, Minimization, and Mitigation Measures

4.4.1 Incorporated Plan Features

Many policies in the current Comprehensive Plan and provisions in the development code will continue to apply across all alternatives, including those that support GMA, regional, and county goals. This includes policies and regulations that support wider objectives relating to compact and transit-oriented development patterns, housing, multimodal transportation, economic development, environmental protection, parks and open space, public facilities and services, citizen participation, historic preservation, and urban design.

All alternatives provide enough capacity to meet growth targets and would focus most future growth into the existing Mixed Use Centers (which generally overlap transit-proximate areas of the city), consistent with the GMA, the VISION 2050 Regional Growth Strategy, and King County CPPs. The Action Alternatives also include policies to support affordable housing at various income levels and a wider range of housing typologies. Housing affordability and accessibility is a clear priority in the GMA, VISION 2050, and King County CPPs.

4.4.2 Regulations and Commitments

State and Regional Review. The GMA requires cities and counties to notify the Department of Commerce (at least 60 days in advance) of their intent to adopt comprehensive plans and development regulation amendments. State law also requires PSRC to review and certify local comprehensive plans.

Bellevue Comprehensive Plan. Bellevue adopted its Comprehensive Plan, complying with the GMA, in December 1993, and has amended the plan periodically since that time. The plan contains the elements required by the GMA and the city's adopted [Land Use Code](#) (Title 20) and environmental procedures ([BCC 22.02](#)) that implement the plan. All alternatives would maintain consistency with the broad objectives of the Comprehensive Plan by continuing and reinforcing the city's preferred growth strategy, while the Action Alternatives would support additional goals and policies related to housing opportunity and affordability.

4.4.3 Other Mitigation Measures

Mixed Use Centers are intended to accommodate most of the city's projected housing and employment growth. Minor changes in the Comprehensive Plan—such as the update of Figure LU-3 and revisions to reflect new targets for the 2019–2044 planning period—would be incorporated into the implementation of the Action Alternatives to ensure full consistency between the Comprehensive Plan and proposed policies and land use designations. The Comprehensive Plan may need to consider additional guidance for each of the Mixed Use Centers to support additional development in those areas under the Action Alternatives and within and around the Neighborhood Centers under Alternatives 2 and 3. 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 the Wilburton/NE 8th Street Subarea Plan for consistency.

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.

4.5 Significant Unavoidable Adverse Impacts

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. Such conflicts would be avoided by amending the Comprehensive Plan, as proposed under any of the three Action Alternatives.