



CHAPTER 12 Cumulative Impacts

12.1 Introduction

The State Environmental Policy Act (SEPA) directs lead agencies to consider the direct, indirect, and cumulative impacts of proposed actions. Direct and indirect impacts are described in the preceding chapters. Requirements for cumulative impact analysis are described below.

12.2 Regulatory Context

“Cumulative impact” is not defined in the SEPA Rules, but it is defined under federal rules implementing the National Environmental Policy Act (NEPA). “Cumulative impact” is defined in the Council on Environmental Quality (CEQ) Regulations as the *“impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions”* (40 CFR Part 1508). This chapter considers the effects of the Comprehensive Plan Periodic Update and Wilburton Vision Implementation when considered with other proposed actions or projects within the potentially affected area.

Washington courts have limited the requirement for cumulative impact analysis under SEPA, stating that an analysis of the cumulative impacts of a proposed project is not required under SEPA unless: (1) there is some evidence that the project will facilitate future action that will result in additional impacts, or (2) the project is dependent on subsequent proposed development. A project's cumulative

impacts that are merely speculative need not be considered (*Boehm v. City of Vancouver*, 111 Wn. App. 711(2002) – Cumulative impacts).

12.3 Cumulative Impact Evaluation

The City of Bellevue Comprehensive Plan Periodic Update and Wilburton Vision Implementation Environmental Impact Statement falls under the category of (1) there is some evidence that the project will facilitate future action that will result in additional impacts. As required by the Growth Management Act, it is anticipated that any changes to codes, standards, or regulations that follow in the wake of this non-project action will be consistent with the Grown Alternatives and policy changes evaluated in this Draft EIS. Potential future actions are speculative at this point. Therefore, cumulative impacts cannot be evaluated for this non-project action.

In addition, there are no current or existing projects that are functionally related or interconnected to this project (i.e., one could proceed without the other). Future projects would be required to conduct separate, project-specific environmental review, as appropriate. Mitigation measures for each project would also decrease the potential for cumulative impacts.

Finally, the environmental review contained in this Draft EIS takes a conservative approach by assuming growth to “build-out” capacity under the No Action Alternative and under each of the Action Alternatives. It is not expected that this level of growth would all occur by 2044, but the EIS nonetheless assumes this growth when evaluating potential environmental impacts associated with the Alternatives. In addition, the EIS also includes land use assumptions for the rest of the region, based on Puget Sound Regional Council (PSRC) growth targets, where applicable and reasonably foreseeable. Any cumulative impacts associated with additional regional growth, citywide growth, or growth anticipated by Wilburton Vision Implementation beyond that evaluated in this EIS is merely speculative and need not be considered as part of this programmatic environmental review.